

# **U.S. Department of the Interior Office of Inspector General**

## **EVALUATION REPORT**

YEAR 2000 READINESS OF AUTOMATED INFORMATION SYSTEMS AT THE U.S. GEOLOGICAL SURVEY

> REPORT NO. 99-I-l 66 JANUARY 1999



### United States Department of the Interior

OFFICE OF INSPECTOR GENERAL Washington. DC. 20240

**JAN - 8 1999** 

#### **EVALUATION REPORT**

Memorandum

To: Director, U.S. Geological Survey

Robert J. Williams Wobert & Williams
Assistant Inspector General for Audits From:

Subject: Evaluation Report on Year 2000 Readiness of Automated Information Systems at

the U.S. Geological Survey (No. 99-I-166)

#### INTRODUCTION

This report presents the results of our evaluation of the year 2000 (Y2K) readiness of automated information systems at the U.S. Geological Survey and the Geological Sun-ey's Washington Administrative Service Center.' The objective of our review was to determine whether the Geological Survey inventoried its automated information systems and identified those systems that were mission critical and were not Y2K compliant and whether the Geological Survey and the Service Center (1) developed auditable cost estimates for renovating systems to be Y2K compliant; (2) identified, by name, individuals responsible for ensuring that the Geological Survey is Y2K compliant; (3) ensured that responsible individuals' annual personnel performance evaluation plans included critical elements related to identifying and remedying Y2K problems; (4) developed a credible plan that included milestones and a critical path to ensure that the Geological Survey is Y2K compliant: and (5) developed a contingency plan that would address the failure of any part of the systems not being Y2K ready. This review was conducted at the request of the Department of the Interior's Chief Information Officer to assist the Information Officer in monitoring the progress of Departmental agencies in ensuring Y2K readiness, implementing Y2K compliant systems, and validating the accuracy of the information reported by the Departmental agencies to the Chief Information Officer.

Effective October 1, 1998, the Washington Administrative Service Center was transferred from the Geological Survey to the Department's Office of the Secretary.

#### **BACKGROUND**

The "Y2K problem" is the term used to describe the potential failure of information technology systems, applications, and hardware related to the change to the year 2000. Many computer systems that use two digits to keep track of the date will, on January 1, 2000, recognize "double zero" not as 2000 but as 1900. This could cause computer systems to stop running or to start generating erroneous data. The problem has been recognized as nationally significant by the President in Executive Order 13073, issued in February 1998. The Secretary of the Interior, in a December 1997 memorandum, stated that the Y2K problem was critical to the Department in meeting its mission and that resolution of the problem was one of his highest priorities. Further, Office of Management and Budget Memorandum 98-02, "Progress Reports on Fixing Year 2000 Difficulties," issued on January 20, 1998, requires all Federal executive branch agencies to ensure that Federal Government systems do not fail because of the change to the year 2000 and to have all systems, applications, and hardware renovated by September 1998, validated by January 1999, and implemented (that is, "fixes to all systems--both mission critical and non-mission critical") by March 1999. The Office of Management and Budget, in Memorandum 98-02, states that it is to provide "information to the Congress and the public as part of its [Office of Management and Budget's quarterly summary reports on agency progress ... [and] to report on the status of agency validation and contingency planning efforts and on progress in fixing. equipment that is date sensitive."

The Department has developed the "Department of the Interior Year 2000 Management Plan," which focuses on the resolution of the Y2K problem and provides an overall strategy for managing Departmental mission-critical systems and infrastructure. The Department has a multitiered approach to managing the Y2K problem that includes a top tier, which comprises the Secretary of the Interior; the Information Technology Steering Committee, which consists of the Chief of Staff and Assistant Secretaries; and the Chief Information Officer, who is responsible for the Department's Y2K issues. This tier, which represents senior-level Departmental managers, provides the Y2K project's direction and resources and ensures accurate reporting to external organizations, such as the Office of Management and Budget and the Congress. A DepartmentwideY2K project team, which reports to the Chief Information Officer and comprises representatives from each agency and the Office of the Secretary, was tasked with developing the Department's "Year 2000 Management Plan," refining inventory data on the Department's mission-critical and information technology portfolio systems,\* and monitoring and reporting the progress of each conversion. In addition, a Y2K Embedded Microchip<sup>3</sup> Coordinators Team has been established to inventory and monitor embedded microchip technology Y2K problems. The team is led by the Office

<sup>&</sup>lt;sup>2</sup>The portfolio is an inventory listing of 13 crosscutting or sensitive systems that are receiving attention at the Secretarial level.

<sup>&#</sup>x27;Embedded microchips are "integrated circuits (miniature circuit boards)" that control "electrical devices" which include "elevators; heating, ventilation, and air conditioning (HVAC) systems; water and gas flow controllers; aircraft navigational systems: .. medical equipment"; and office devices such as telephones, facsimile machines, pagers, and cellular telephones. (Department of the Interior's Office of Managing Risk and Public Safety "Year 2000 Embedded Microchip Hazards" [Web site])

of Managing Risk and Public Safety and comprises representatives of the eight Departmental agencies, the Denver Administrative Service Center. and various Departmental offices.

The Department's August 1998 "Progress Report," which was submitted to the Office of Management and Budget, reported that the Department had 91 mission-critical systems, of which the U.S. Geological Survey had 13 systems (see the Appendix). In addition, the Federal Financial System (FFS) and the Interior Department Electronic Acquisition System (IDEAS), which were maintained by the Service Center, are 2 of the Office of the Secretary's mission-critical systems and are 2 of the Department's 13 information technology portfolio systems. To address the Y2K problems, the Geological Survey established the USGS (U.S. Geological Survey) Millennium Task Force. The structure included an executive Y2K manager who is the Associate Director for Operations; a Y2K program coordinator; Y2K coordinators at Geological Survey division offices; and Y2K contacts for telecommunication infrastructure, embedded technology, and administrative systems. The Service Center also established a Y2K project management structure that included representatives on the Task Force.

#### **SCOPE OF EVALUATION**

To accomplish our objective, we reviewed the documentation available that supported the Geological Survey's information submitted to the Department's Chief Information Officer for the June, July, and August "Progress Reports" and the available documentation that supported the information submitted by the Service Center to the Office of the Secretary for FFS and IDEAS. We performed our evaluation from June through August 1998 at the Geological Survey's National Center located in Reston, Virginia. We interviewed personnel responsible for project coordination to identify the Geological Survey's and the Service Center's Y2K plans and progress. We also interviewed personnel involved in various aspects of the Y2K project, including coordination, compliance identification, software remediation, and project management.

The evaluation was conducted in accordance with the "Quality Standards for Inspections," issued by the President's Council on Integrity and Efficiency, and included such tests and inspection procedures considered necessary to accomplish the objective. Our conclusions on the status of the progress made by the Geological Survey in addressing and remediating Y2K problems were based on reviews of documentation maintained by the Geological Survey and with individuals performing remediation or replacement of noncompliant applications or hardware. Also, our conclusions on the status of the progress made by the Washington Administrative Service Center were based on reviews of documentation and discussions with Y2K project management and with individuals performing testing, remediation, or replacement of noncompliant applications or hardware. As specifically agreed to in our discussions with the Department's Chief Information Officer, we did not validate or certify that the Geological Survey's or the Service Center's systems wereY2K compliant.

#### **RESULTS OF EVALUATION**

Regarding the six areas that the Chief Information Officer requested us to evaluate, we found that the Geological Survey had completed action for one area but had not completed all actions for the five remaining areas. Specifically, the Geological Survey had designated responsible officials but had not completed an inventory of its automated information systems, developed auditable cost estimates forall of its mission-critical systems, included critical elements related to identifying and remedying Y2K problems in all responsible individuals' annual personnel performance evaluation plans, developed credible plans that included milestones and critical paths to ensureY2K compliance, and developed contingency plans that would address any part of the systems not being Y2K ready. As a result, we believe that there is an increased risk that the Geological Survey may not meet the Office of Management and Budget's target date of March 1999 for having compliarY2K systems implemented.

Additionally, of the five areas that the Chief Information Officer had requested us to review, we concluded that the Washington Administrative Service Center had completed the requirements for four areas and that one area was not applicable. Specifically, Service Center Y2K project management had developed auditable cost estimates and a credible plan, including milestones where applicable; had completed actions on the designation of responsible individuals; and had included critical elements related to identifying and remedying Y2K problems in all responsible individuals' annual personnel performance evaluation plans. However, according to Service Center Y2K project management, the development of a contingency plan for FFS and IDEAS was not needed. As a result of the progress made by Service Center Y2K project management, we believe that the Service Center may meet the Office of Management and Budget's target date of March 1999 for having compliant Y2K systems implemented provided that the Y2K project proceeds as scheduled.

The specific actions taken by the Geological Survey and the Service Center related to each area and other issues affecting the Geological Survey's and the Service Center's Y2K progress are discussed in the paragraphs that follow.

#### **Automated Information Systems Inventory**

The Geological Survey had not performed an inventory of all of its automated information systems (mission and nonmission critical). According to the Department's milestone dates, agencies were required to have mission-critical systems inventoried and systems that were not Y2K compliant identified by June 1997. Although the Geological Survey reported 13 mission-critical systems, these systems were not identified through a systematic inventory but had been identified previously by the Geological Survey as mission critical. As a result of not performing an inventory of all mission- and nonmission-critical systems, the Geological Survey may have other systems that are mission critical and should have been reported to the Department's Chief Information Officer and to the Office of Management and Budget. Therefore, we determined that the Geological Survey had not completed this

requirement. During meetings with Y2K project management after our fieldwork was completed, Y2K project management stated that it was continuing its efforts to complete an inventory of automated information systems.

The Department's Chief Information Officer requested that we determine the progress of the Geological Survey in addressing Y2K problems related to telecommunications equipment and embedded microchips in information systems and facilities. We found that the Geological Survey, at the time of our review, had begun to inventory and test telecommunications equipment and to inventory embedded microchips in information systems, scientific equipment, and facilities. Although Geological Survey Y2K project management had begun to inventory and test telecommunications equipment, they had not prepared a comprehensive overview, neither graphic nor in narrative form, of the Geological Survey's communications systems. Without a comprehensive overview of the communications systems, the risk is increased that a complete inventory may not be accomplished. We also found that telecommunications equipment for the Department of the Interior Network (DOINET') had been tested. According to the "DOINET Compliance Verification Test Results," the impact on Y2K compliance was "minimal," and the portions of the DOINET network tested were found to be Y2K compliant, although some anomalies had occurred.

#### **Auditable Cost Estimates**

We found that only 1 of the 13 cost estimates that the Geological Survey had reported to the Department's Chief Information Officer in the August 1998 "Progress Report" was auditable. The revised cost of \$74,588 for the Seismic Event Data Analysis System (SEDAS) was supported by estimates established for each phase of the project using a project management tool and a supportable basis for the estimate. Although this same project management tool and estimate basis were used to develop revised cost estimates for the Mineral Resource Data System (MRDS), the Global Seismograph Network (GSN), and the U.S. National Seismograph Network (USNSN) systems, these revised auditable cost estimates were not reported to the Department's Chief Information Officer in the August 1998 "Progress Report." The documentation to support the reported incurred costs of \$14,446 for the National Coal Resources Data System (NCRDS) was not provided. The documentation used to support the Geological Survey's cost estimates for correcting the Y2K problems in each of the Geological Survey's remaining eight mission-critical systems was not maintained; therefore, these cost estimates were not auditable. Subsequent to our fieldwork. the Geological Survey provided us with documentation pertaining to Y2K funding requirements for fiscal year 1999. The documentation identified, by object code, estimated costs for 2 of the 13 mission-critical systems reported, the GSN and the National Water Information

<sup>&</sup>lt;sup>4</sup>DOINET is a communications network backbone used to communicate between Departmental agencies. A backbone is the part of the network that handles the major traffic. The backbone employs the highest-speed transmission paths in the network and may also run the longest distance, generally spanning a large geographic area. (Department of the Interior's "Year 2000 Management Plan, " dated February 1998. and the <u>Computer Desktop Encyclopedia</u>, Version 9.4, 4th quarter, 1996)

System (NWIS). However, this documentation did not agree with the amounts reported in the August 1998 "Progress Report" and did not specifically identify the basis for these estimates. Consequently, the Geological Survey had not completed this requirement.

We found that the cost estimates developed by the vendor for the Y2K effort related to FFS were auditable and supported. Service Center Y2K project management said that since IDEAS was Y2K compliant by design, specific Y2K costs were not applicable. Therefore, the Service Center had completed this requirement.

#### **Designation of Responsible Individuals**

Geological Survey documentation identified 15individuals, excluding representatives from the Washington Administrative Service Center, as responsible for Y2K compliance. Specifically, we found that the Geological Survey had designated, by name, the Y2K executive; the Geological Survey Y2K program coordinator; Y2K coordinators in each of the Geological Survey's division offices; coordinators for its administrative systems, telecommunication infrastructure, and embedded technology; and technical managers and other responsible individuals. Therefore, the Geological Survey had completed this requirement.

We also found that the Service Center specifically named individuals responsible for FFS and IDEAS Y2K compliance and had named representatives on the Geological Survey's USGS Millennium Task Force. Therefore, the Service Center had completed this requirement.

#### **Annual Personnel Performance Evaluation Plans**

The Secretary of the Interior's December 1997 memorandum required that "a critical performance element for identifying and remedying" the Y2K problem be included as part of each responsible official's annual personnel performance evaluation plan. Responsible officials are defined in the memorandum as agency directors, agency Y2K executives, agency information resources management coordinators, safety officials, and all others as determined by the Y2K executives. We found that the Geological Survey's Y2K executive, the Geological Survey's Information Resources Management Coordinator, the Y2K program coordinator, and 8 of the remaining 12 individuals assigned Y2K coordination duties had elements addressing Y2K objectives in their annual personnel performance evaluation plans. Subsequent to our fieldwork, Geological Survey Y2K project management provided documentation indicating that three of the remaining four individuals assigned to the Y2K project had an element addressing Y2K in their annual personnel performance evaluation plans. According to Y2K project management, the remaining individual did not have a Y2K objective in the annual personnel performance evaluation plan because the individual had no direct Y2K involvement. However, documentation provided during our fieldwork indicated that this individual was part of the Y2K project management team and was specifically required by the Associate Director of Operations to have a Y2K objective included in the

annual personnel performance evaluation plan. Therefore, the Geological Survey had not completed this requirement.

We found that the four individuals assigned responsibility for the Y2K project at the Service Center had elements addressing Y2K objectives in their annual personnel performance evaluation plans. Therefore, the Service Center had completed this requirement.

#### **Plan for Milestones**

We found that the Geological Survey had developed credible plans which included milestones with critical paths for 5 of the 13 mission-critical systems reported as part of the Geological Survey's Y2K project. In July 1998, the Geological Survey developed plans to correct the Y2K problems in five systems: NCRDS, MRDS, USNSN, GSN, and SEDAS. Although a draft plan, dated July 1998, for the Map Catalog (MapCat) System was developed, the plan did not address the independent validation and verification phase. There were final plans, developed in July 1998, for the Distributed Ordering Research Reporting and Accounting Network (DORRAN), the Assignment Management System (AMS), and the Operational Database (ODB) system, along with a draft plan for the Geographic Names Information System (GNIS). However, milestones for each of the steps to be performed were not identified in the plans for these four systems. In addition, we found that plans had not been formally developed for the Distributed Information System-II (DIS-II), the Administrative Information System (AIS), and the National Water Information System (NWIS). Therefore, the Geological Survey had not completed this requirement at the time of our review. In our November 1998 meeting with Geological Survey officials, Y2K project management stated that 10 of the 13 systems had been renovated and documentation had been submitted to the Department for certification. The documentation provided to us indicated that independent verification and validation had been completed for 5 of the 10 systems. Therefore, because these five systems had undergone independent verification and validation, we believe that project management plans for these five systems (MapCat, DORRAN, AMS, ODB, and GNIS) would not be necessary. However, the Geological Survey had not provided us documentation for the remaining eight systems to support that the plan would not be necessary.

We found that the Service Center had a credible plan with a critical path to address Y2K compliance for FFS. The contractor, which was responsible for remediating FFS, had provided the Service Center with credible plans and milestones for delivery of the Y2K compliant version of FFS. In addition, the Department of the Interior's Software Advisory Board, which comprises representatives from all Departmental agencies that use and are responsible for testing and maintaining FFS, had developed target testing and production installation dates for the Y2K compliant version of FFS. Because Service Center officials stated that IDEAS was Y2K compliant by design and that the certification of Y2K compliance had been submitted to the Department, a plan was not required. Therefore, the Service Center had completed this requirement.

#### **Contingency Plans**

We found that the Geological Survey had contingency plans for 4, including 1 in draft, of the reported 13 mission-critical systems. However, the contingency plans for the four systems were not specifically related to Y2K but addressed general information technology disaster recovery. Therefore, we believe that the plans for the four systems did not address the failure of the system not being Y2K ready. In addition, the Geological Survey did not develop a contingency plan for NCRDS because, according to Geologic Division Y2K project management, this system was compliant and awaiting certification. The Geologic Division's Y2K project management also stated that the Geological Survey did not develop a contingency plan for GSN because a contingency plan would be cost prohibitive and thus not feasible. Instead, the Geologic Division's master plan for renovation of the GSN included revised dates based on an accelerated schedule, which required additional resources of \$199,580 to be allocated to the effort. The Department's August 1998 "Progress Report" to the Office of Management and Budget stated that the "allocation of additional resources to accelerate the compliance schedule is being determined." Since implementation of a contingency plan is not feasible, we believe that it is critical for the Geological Survey to address the resource requirement to meet the accelerated schedule to ensure full implementation of a mission-critical system that is Y2K compliant by March 1999.

According to Water Resources Division Y2K project management, the Geological Suney had not developed contingency plans for NWIS because the system was planned to be Y2K compliant and to be fully implemented by September 1998. However, Water Resources DivisionY2K project management said that they needed an upgrade to the required graphics software to meet Y2K compliance. The Y2K project management further stated that the Geological Survey needed a new software program to support the Web interface with the NWIS but that the software was not expected to be released until December 1998. In our October 6, 1998, meeting, Y2K project management stated that the upgrade to the graphics software had been ordered and that reprogramming of the Web interface had been completed. In our November 4, 1998, meeting, the Water Resources Division Y2K project management stated that NWIS had been implemented. Therefore, we believe that a contingency plan would not be necessary for NWIS. The Geological Survey said that it had not developed formal contingency plans for the remaining six mission-critical systems because the systems were to be compliant prior to March 1999. Therefore, the Geological Survey had not completed this requirement.

The Washington Administrative Service Center had not developed contingency plans related to Y2K for Office of the Secretary systems, which operated on the Geological Survey's mainframe. This occurred, according to Service CenterY2K project management, because contingency planning for FFS was the responsibility of the Department's Office of Financial Management, which is the system owner. Office of the Secretary officials stated that a contingency plan for FFS was being developed. Further, Service Center Y2K project management said that contingency planning was not applicable for IDEAS because IDEAS was Y2K compliant by design. Consequently, the requirement for contingency planning on the part of the Service Center for Y2K did not apply.

#### Other Issues

We noted other issues that affected the Geological Survey's and the Service Center's Y2K readiness efforts as follows:

**-Data Exchange.** The Department of the Interior and the Office of Management and Budget required that an inventory of all data exchanges with outside parties be completed by Februaryl, 1998, and that coordination with these parties to determine a transition plan occur by March 1, 1998. We found that the Geological Survey had not completed an inventory of all of its data exchange partners. For example, the Water Resources Division Y2K coordinator said that there are more than 1,000 cooperating Federal, state, and local agencies for the Water Resources Division but that a complete inventory of these exchange partners was not available. However, of the data exchange partners that were inventoried, we found documentation to support that those partners were contacted by Division Y2K coordinators.

The Service Center had identified two interfaces with systems external to the Service Center, both of which were with other Federal Government entities. The Service CenterY2K project management had contacted the U.S. Treasury, which was one of the interfaces. and determined that FFS data could be interfaced. The Department's Federal Personnel Payroll System, at the Bureau of Reclamation's Denver Administrative Service Center, was the other interface that had been addressed. Thus, the inventory of data exchange partners was complete.

- independent Verification and Validation. According to the Geological Suney's Y2K project management, independent verification and validation testing of renovated mission-critical systems was to be performed internally by Geological Survey staff because of the expertise needed to test the systems. Y2K project management stated that independent verification and validation testing had begun for all but three of the mission-critical systems.

Service Center Y2K project management said that the Service Center was relying on acceptance testing of the new FFS software release performed internally and on each of the Departmental agencies to meet the independent verification and validation testing requirements. However, we believe that by relying on acceptance testing and not performing any type of integrated testing, the Service Center will not be assured that all FFS modules will function in the year 2000 as designed. Further, we found that although the Sen-ice Center had submitted a request to the Department's Chief Information Officer to certify IDEAS Y2K compliance, the software had not been independently verified. Specifically, the Service Center's Procurement Systems Branch, which participated in the procurement of the software, tested the IDEAS-Procurement Desktop and the Procurement Desktop Web Application. and the developer of IDEAS tested the IDEAS Business Opportunities, which interfaces with IDEAS. The Department's independent verification and validation guidelines dated August 1998 require that mission-critical systems be independently reviewed, verified, and validated by individuals who have no part in the development or renovation of the software. We believe that the independent verification and validation performed by the

Service Center did not meet the Department's guidelines. However, Departmental Y2K project management stated that the testing performed on FFS and IDEAS met the Department's independent verification and validation requirement.

- Mainframe Computer Operating System. The Geological Survey's mainframe computer, which is the computer where FFS acceptance testing is to be performed, has the same operating system as the Denver Administrative Service Center's mainframe computer (which is not Y2K compliant and will not be compliant unless more than 100 program temporary fixes are implemented or the system is upgraded to a newer version of the operating system). According to Geological SurveyY2K project management, the operating system was upgraded and implemented in September 1998, and application level testing for FFS and IDEAS was scheduled for September 25 through December 31, 1998. However, if delays are encountered in testing the applications, the Geological Survey should develop a contingency plan to ensure that the operating system does not adversely affect the compliant FFS and IDEA systems or other client applications.

During an October 6, 1998, exit conference to discuss a preliminary draft of this report and a subsequent meeting on November 4, 1998, Geological Survey project management generally agreed with our evaluation. Based on the actions taken by project management to address the incomplete areas and on the additional information provided, we made changes to the report as appropriate and have not made any recommendations.

Since this report does not contain any recommendations, a response is not required.

The legislation, as amended, creating the Office of Inspector General requires semiannual reporting to the Congress on all audit reports issued, the monetary impact of audit findings, actions taken to implement audit recommendations, and identification of each significant recommendation on which corrective action has not been taken.

We appreciate the assistance of personnel at the U.S. Geological Survey's National Center, including the Washington Administrative Service Center, in the conduct of our review.

## U.S. GEOLOGICAL SURVEY MISSION-CRITICAL SYSTEMS INVENTORY

System Name or Acronym	Description	Estimated Cost for Compliance
Distributed Ordering Research Reporting & Accounting Network (DORRAN)	This system tracks orders for U.S. Geological Survey products by the general public. It interfaces with the Federal Financial System.	\$452,500
National Coal Resources Data System (NCRDS)	This system analyzes, distributes, and stores data relevant to coal quantity and quality via the Internet.	10,000
Mineral Resource Data System (MRDS)	This system contains a relational database of mineral deposits throughout the United States.	5,000
Seismic Event Data Analysis System (SEDAS)	This alert system allows rapid response to potentially hazardous earthquakes.	74,588
Global Seismograph Network (GSN)	This system collects and provides data from the Global Digital Seismic Network to research institutions.	192,000
U.S. National Seismograph Network (USNSN)	This system provides national seismic coverage for earthquake monitoring, research, and engineering purposes.	10,000
Administrative Information System (AIS)	This system contains the financial and personnel information database for the Water Resources Division.	20,000
National Water Information System (NWIS)	This system is a hydrologic database containing all water information collected by the Geological Survey.	140,000
Distributed Information System-II (DIS-II)	Data General Unix systems process the financial and personnel information and data from the hydrologic database (NWIS).	80,000

<sup>\*</sup>Information is from the Geological Survey's Y2K project management as of August 1998.

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System Name or Acronym	Description	Estimated cost for Compliance
Geographic Names Information System (GNIS)	This system maintains official feature names to support the U.S. Board on Geographic Names. Any date-related functions use ORACLE constructs and are Y2K compliant.	95,000
Assignment Management System (AMS)	This system manages and tracks work assignments to the organizational elements within the National Mapping Division.	124,650
Map Catalog (MAPCAT) System	This system contains a catalog of all maps distributed by the National Mapping Division. Any date-related functions use Oracle constructs and are Y2K compliant.	95,000
Operational Database (ODB)	This database consists of production status and presents the availability of National Mapping Division products.	95,000
Total		\$1.393.738

**APPENDIX** 

### ILLEGAL OR WASTEFUL ACTIVITIES SHOULD BE REPORTED TO THE OFFICE OF INSPECTOR GENERAL

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