




**OFFICE OF
INSPECTOR GENERAL**
U.S. DEPARTMENT OF THE INTERIOR

September 17, 2014

Memorandum

To: Douglas Glenn
Director, Office of Financial Management

Attention: Eric Eisenstein
Division Chief, Internal Control and Audit Follow-up, Office of Financial
Management

From: Charles Haman 
Central Region Manager for Audits, Inspections, and Evaluations

Subject: Verification of Recommendations for the Report, "National Park Service:
Climate Friendly Parks Initiative" (Report No. HI-EV-NPS-0001-2010)
Report No. C-VS-NPS-0040-2014

The Office of Inspector General (OIG) has completed a verification review of the recommendations presented in the subject report. Our objective was to determine whether the National Park Service (NPS) implemented our recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget (PMB). PFM reported to us that NPS has met the intent of the recommendations and considers the recommendations closed. We concur that the recommendations have been resolved and implemented.

Background

An OIG evaluation report dated August 12, 2011, titled "National Park Service: Climate Friendly Parks Initiative" sought to determine if NPS' parks benefitted from the Climate Friendly Parks (CFP) program and whether additional benefits could be realized with program enhancements. The report found that progress made in this voluntary program might not easily transfer to the newly mandated reporting requirements because of deficiencies in accountability, data quality and assurance, and program sustainability. The report made four recommendations pertaining to these deficiencies.

In a July 13, 2011 response to the evaluation report, NPS concurred with all four recommendations. On September 13, 2011, we referred the recommendations to PMB for tracking of implementation. The referral stated that we consider each recommendation resolved but not implemented. On September 27, 2011, PFM sent a memorandum to us stating that NPS had completed the actions required to close Recommendation 2 of the evaluation report. On May 7, 2013, PFM sent a memorandum to us stating that NPS had completed the actions required to close Recommendations 1, 3, and 4.

Scope and Methodology

The scope of this review is limited to documenting NPS' implementation of our four recommendations regarding its CFP initiative. We reviewed NPS' response in the report and requested, and subsequently reviewed, additional documentation from the bureau supporting the steps taken to close the recommendations.

We did not perform site visits or conduct fieldwork to determine whether NPS corrected the underlying deficiencies that we initially identified. As a result, this review was not conducted in accordance with the Generally Accepted Government Auditing Standards, or the Quality Standards for Inspection and Evaluation as put forth by the Council of the Inspectors General on Integrity and Efficiency.

Results of Review

We concluded that NPS implemented the recommendations as indicated by PFM's closure notification.

NPS Recommendations and Actions Taken:

Recommendation 1: Systematically monitor and report CFP-related results, including actions taken and outcomes achieved.

Action Taken: NPS has implemented a method of monitoring the CFP-related information by surveying member parks annually to obtain data that includes actions taken and outcomes achieved. This information is then reported in the Green Parks Plan annual report and website.

In addition, NPS has increased the accountability required of the parks concerning its CFP program. Parks are now required to complete "comprehensive" Environmental Management System (EMS) reports to become members. These EMS reports specify actions that parks should accomplish and identify persons responsible for implementing each action. They also help the parks monitor CFP program action items by determining priority projects and requiring EMS reports to be updated annually.

Recommendation 2: Establish clear data quality standards and protocols, to include a secondary verification at the park unit level, and implement a systematic process to ensure adherence.

Action Taken: NPS established procedures to ensure clear data quality standards and protocols. These procedures include—

- greenhouse gas (GHG) inventory data being reviewed at the park level to ensure that the park accounts for all emission sources occurring within its boundary,

- park inventory being checked by a park employee other than the employee who originally completed the Climate Leadership in Parks (CLIP) tool for that specific park
- GHG emissions inventory being reviewed by comparing each park's overall energy use intensity to a frequency distribution of all NPS parks' energy use intensity, and
- reviewers sweeping the CLIP tool data to determine entry of correct data and information.

In addition, NPS evaluates the quality of the GHG emissions inventory based on relevance, consistency, completeness, transparency, and accuracy. NPS outlined these standards and protocols in the Climate Friendly Parks Program Guidance Handbook, and to ensure adherence, it made them a requirement for CFP membership.

Recommendation 3: Update the Climate Leadership in Parks (CLIP) tool's capabilities to ensure that agency aggregate level data is compiled automatically to be less prone to errors and meets current greenhouse accounting and reporting requirements.

Action Taken: NPS has updated the CLIP tool's capabilities by implementing the CLIP data warehouse and business intelligence framework. This framework will ensure data is less prone to errors and it will help to meet GHG accounting and reporting requirements.

Recommendation 4: Develop a long-term plan for the CFP initiative that takes into consideration the initiative's integration potential with other environmental programs, as well as its outreach potential.

Action Taken: In the CFP Program Guidance Handbook, NPS has identified a strategy/long-term plan for the CFP initiative. The CFP Program Guidance Handbook also identifies the CFP program's initiative to integrate itself with other environmental programs, and it identifies its use as a tool in meeting other environmental program goals. In addition, NPS has identified in multiple documents the importance of communicating CFP program results to the public and the opportunities it has to do so.

Conclusion

We informed NPS officials of the results of this review at an exit conference on August 21, 2014. The officials agreed with the results.

cc: Nancy Thomas, Audit Liaison Officer, Office of Financial Management
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