



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

# **BUREAU OF LAND MANAGEMENT AND BUREAU OF INDIAN AFFAIRS BRIDGE SAFETY PROGRAMS**



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

**APR 12 2012**

Memorandum

To: Marcilynn Burke, Assistant Secretary, Land and Minerals Management  
Larry Echo Hawk, Assistant Secretary – Indian Affairs

From: Mary L. Kendall *Mary L. Kendall*  
Acting Inspector General

Subject: Final Evaluation Report – Bureau of Land Management and Bureau of Indian  
Affairs Bridge Safety Programs  
Report No. ER-EV-MOA-0002-2011

This memorandum transmits our final evaluation report on the Bureau of Land Management (BLM) and the Bureau of Indian Affairs (BIA) bridge safety programs. During this evaluation, we found that BLM and BIA did not comply with National Bridge Safety Inspection Standards (Standards). The Standards mandate minimum safety requirements for the inspection of highway bridges located on all U.S. public roads.

Specifically, we found that BLM had never submitted its full bridge inspection data to the National Bridge Inventory, a database designed to capture data for bridges inspected to the Standards. We found inventory management errors at BIA, causing bridge inspection timetables to be missed and bridges belonging to BIA to go unidentified and uninspected. In addition, we uncovered contracting issues at BIA that could diminish the ability of the bureau to meet future bridge inspection requirements.

Our report includes six recommendations designed to improve oversight of the BLM and BIA bridge safety programs. Based on management's response to the draft report (see Appendix 2 and Appendix 3) we consider recommendation 1, 3, and 4 to be resolved and implemented, and recommendations 2, 5, and 6 to be resolved but not implemented (see Appendix 4). Accordingly, no further response to the Office of Inspector General (OIG) on this report is necessary.

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit reports issued, actions taken to implement our recommendations, and recommendations that have not been implemented.

We appreciated the cooperation and assistance of the BLM and BIA staff. If you have any questions about this report, please do not hesitate to contact me at 202-208-5745.

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## Results in Brief

The National Bridge Safety Inspection Standards (Standards) establish criteria against which the thoroughness of bridge safety inspections is measured. As the bridge inspection industry standards, they require inspection data to be submitted at the request of the Federal Highway Administration (FHWA) for inclusion in the National Bridge Inventory (NBI). NBI provides a retrievable record of actions taken to ensure the safety of bridges.

We found that the Bureau of Land Management (BLM) and the Bureau of Indian Affairs (BIA) did not comply with the Standards. Prior to our review, BLM never submitted its bridge inspection data for inclusion in NBI. We also found that BLM did not know the exact number of bridges in its inventory. Consequently, some inspection reports did not contain pertinent information such as bridge load capacity and data pertaining to erosion and water damage. Such data is critical when assessing the structural integrity of bridges and determining their safety for public use.

We also found that while BIA required its bridge inspectors to follow the Standards, the completeness and accuracy of data maintained in the Bureau's bridge inventory could not be validated in every instance. We also identified contracting issues that need to be resolved for the Bureau to comply with Federal requirements and to ensure the validity of its bridge inspections.

Compliance with the requirements of the Standards provides the greatest assurance that Bureau bridges are as safe as possible for public use.

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# Introduction

## Objective

The objective of this evaluation was to determine whether accurate data was submitted to the Federal Highway Administration (FHWA) for the National Bridge Inventory (NBI).

## Background

The Bureau of Land Management (BLM) and the Bureau of Indian Affairs (BIA) currently are collectively responsible for approximately 1,432 public bridges (BLM estimates 500 and BIA 932).

Bridges that are publicly accessible and greater than 20 feet long must meet the National Bridge Safety Inspection Standards (Standards) found in 23 C.F.R. Part 650. The law requires that all state, county, local, and Federal bridges meeting this criteria follow the Standards, which describe inspection procedures, inspection frequency, inspector qualifications, and inventory requirements. The Standards require bridges to be inspected once every 2 years and the collected data to be submitted at the request of Federal Highway Administration (FHWA) for the National Bridge Inventory (NBI). FHWA is responsible for maintaining this database and has historically requested that agencies provide inspection data on an annual basis.

Compliance with the requirements of the Standards provides the greatest assurance that bridges are as safe as possible for public use.

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## Findings

The Standards contain specific guidelines to detect deterioration, identify critical findings from inspections, and help ensure that appropriate corrective action is taken by bridge owners to maintain bridges used by the public. Federal bureaus responsible for the safety of American bridges are expected to follow the Standards and report information to FHWA for inclusion in NBI.

Historically, BLM has not submitted data for inclusion in NBI, a database that houses inspection information on public bridges. BLM also has significant data gaps for bridges in its property inventory and has demonstrated inconsistencies in conducting inspections to the Standards.

We found that a combination of internal issues regarding the accuracy of BIA's bridge data and its ability to conduct timely bridge inspections places the bureau at risk of not fully complying with the Standards.

### Public Safety Requirements

To ensure bridge safety, agencies are required to inspect their bridges to specific criteria detailed in the Standards. Data from these inspections are then submitted to FHWA for inclusion in NBI. According to FHWA, BLM has approximately 500 bridges that should be reported. In spite of repeated requests from FHWA, however, BLM never submitted information relative to the safety of its bridges until this OIG evaluation.

Historically, BLM disputed that its bridges fall under the requirements of the Standards. The Bureau argued that its bridges only serve administrative purposes, are considered non-public, and, therefore, are not required to be inspected in accordance with the Standards. BLM's interpretation conflicts with FHWA's definition of a public bridge—any bridge accessible by the public at any point during a year. For a bridge to be defined as non-public by FHWA, it must be behind a locked gate or other obstruction 365 days a year. Bridges that do not meet these criteria must be inspected to ensure compliance with the Standards and the results submitted at the request of FHWA for inclusion in NBI.

At the time of our evaluation, BLM does not know the number of publicly accessible bridges in its inventory, the number of bridges that are behind locked gates, or the level of vehicular traffic that crosses BLM bridges at any given time. Without such knowledge, BLM has no assurance that all bridges are included in its inventory and that all bridges have been inspected to ensure bridge safety.

We inspected BLM-owned bridges in Oregon to determine the validity of BLM's administrative use claim in comparison to FHWA's definition of a public bridge. Seventy-eight percent of the bridges we visited in Oregon proved to be accessible by public vehicular traffic (18 of 23 bridges). We found no locked gates or any



other barrier to prevent the public from accessing these 18 bridges. Based on our observations we concluded that, at a minimum, the bridges we visited are publicly accessible and should be added to NBI.



Figure 1. Photo of site adjacent to publicly accessible bridge that BLM considers administrative.

During our review, we issued BLM a Notice of Potential Finding and Recommendation (NPFR) to encourage the Bureau to develop policies designed to classify publicly accessible bridges as “public” in accordance with 23 CFR Part 650 and to take immediate corrective action by submitting data on NBI-eligible bridges to FHWA. In response to our NPFR, BLM began taking such action and initiated data submission to FHWA for NBI. BLM indicated their intention of submitting 69 of its bridges that have already been inspected to Standards for inclusion in the NBI.

BLM does have complete data available to submit on approximately half of its NBI eligible bridges. This is because it contracts with FHWA to have those bridges inspected to the Standards. Its remaining bridges are inspected by BLM personnel, using criteria established by the Bureau that does not completely mirror the same information required by NBI. Consequently, certain inspection data have been omitted from these Bureau-inspected bridges. Critical information missing from reports include load data, which is necessary to determine the maximum vehicle weight the bridge can safely handle, or scour data, which is used to assess the degree of erosion and water damage to piers and abutments for structures spanning rivers or streams. The absence of such data critical to determining the safety of these bridges offers no assurance that BLM inspections

are conducted at a level consistent with what would be required to ensure adequate bridge safety.

## **Database Management**

BLM's bridge database management has multiple issues, many of them resulting from an absence of policy guidance. Currently data collection occurs chiefly through paper reports. Although BLM has electronic management capability through its Facility and Asset Management System (FAMS) to record bridge inspection information, use across field offices and among regions is inconsistent. While inspectors can add bridge inspection data to FAMS, no bureau requirement compels them to do this. Because data is entered inconsistently, BLM has no assurance that the data in FAMS is reliable or accurate.

Even if BLM inspectors digitized inspection results into FAMS, its current configuration does not contain the fields required for NBI. Estimates by BLM personnel suggest that paper reports contain approximately 80 percent of NBI-required data, but that only 10 percent of this data has been transcribed into FAMS. The data gap between the data available in FAMS and the remaining data contained in paper reports calls into question BLM's ability to accurately manage critical information needed to determine a bridge's safety rating. By BLM's own admission, it has not collected pertinent NBI-required data such as load ratings for bridges, which are inconsistently documented on paper reports. Where such data has been absent in the paper reports, unvalidated figures have been inserted into the database to prevent the missing data being flagged by an automated NBI file error checking process. In addition, BLM personnel indicated that scour analysis calculations for bridges across the bureau were similarly incomplete. Consequently the bureau could not adequately ascertain the extent of bridge pylon erosion due to water damage.

BLM has no policies requiring field-level personnel to collect NBI- required data, no mechanism to ensure the accuracy of inspection data, and FAMS does not capture the required data. In response to these issues, BLM is: (a) drafting guidelines for data collection and (b) populating a spreadsheet with data currently stored in FAMS or retrieved from paper inspection reports.

FHWA personnel are working with BLM to identify additional data gaps. FHWA also has asked BLM to submit all available data, even if incomplete.



## Recommendations

The Director, Bureau of Land Management should:

1. Develop policies and timelines to identify and classify bridges that are defined as “public” in accordance with 23 C.F.R. Part 650.
2. Submit remaining data for its qualifying public bridges to FHWA for inclusion in the National Bridge Inventory.
3. Develop and implement plans and procedures to verify the Bureau’s bridge inventories and ensure that all public bridges are inspected in accordance with the Standards.
4. Develop and implement a process to collect, maintain, and report required data to meet the Standards.

## Bridge Inventory Discrepancies

BIA complied with requirements to submit their data to FHWA for inclusion in NBI. The Bureau, however, demonstrated issues with the completeness and accuracy of submitted data. Record-keeping errors in BIA’s current database caused structures not to be scheduled for inspection and thus not to meet FHWA’s 2-year inspection requirement. These issues included the following:

- bridges unintentionally left off the bureau’s inventory list;
- bridges designated for inventory removal at tribal request that still remain on the list;
- bridges that have been replaced but not given new bridge designation numbers;
- bridges that have been replaced and have new designation numbers, but still have the old designation numbers in the inventory, resulting in duplication of structures;
- bridges closed to vehicular traffic but not removed from the inventory list; and
- a bridge not actually owned by BIA but listed on the inventory.

Additionally, at the time of our evaluation, BIA had not physically accounted for all of the NBI-eligible bridges in its inventory. In a site visit to the greater Phoenix area, we identified bridges belonging to BIA that were not included in its bridge inventory. One bridge crossed the 1930s-era Coolidge Dam on the San Carlos Apache reservation. Ownership of a smaller bridge downriver from Coolidge Dam also could not be immediately determined. At the time of our site

visit, BIA could not identify who owned either bridge. BIA personnel initially believed that USBR owned the Coolidge Dam and overlaying bridge.

When USBR informed us that it did not own or maintain either the dam or the bridge, BIA investigated further. Officials later acknowledged that BIA in fact owned both of these bridges. By the end of our fieldwork, these structures still had not been identified in BIA's inventory and, therefore, were not on their inspection schedule.



Figure 2. Coolidge Dam structure.

Such discrepancies raise concern about BIA's ability to ensure complete accuracy of its database; ensure the timeliness of its bridge inspections; and ensure the safety of the bridges the Bureau manages. Although the Bureau is working aggressively to correct these deficiencies by the 2012 NBI reporting cycle, BIA program personnel have expressed concerns about the Bureau's ability to meet the required inspection deadlines. They cite the Bureau's failure to meet previous deadlines because staff could not award an inspection contract quickly enough to meet reporting requirements.

This developed because, historically, BIA has used a centrally managed Indefinite Delivery, Indefinite Quantity (IDIQ) contract for bridge inspections that require task orders to be issued against this contract. A communication failure between BIA bridge program personnel and BIA procurement staff led program personnel to believe that task orders could no longer be issued against the centrally managed IDIQ contract but rather that each inspection needed to be competed as an individual contract.

## Recommendations

The Director, Bureau of Indian Affairs, should:

5. Develop and implement plans and procedures to verify the accuracy of the Bureau's bridge inventories.
6. Develop and implement a plan to ensure that the Bureau's bridge inventory is accurate and that inspections are performed consistently and on time to meet NBI requirements.

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# Conclusion and Recommendations

## Conclusion

BLM and BIA need to improve management oversight and documentation of the bridges in their inventories. We found that BLM never submitted bridge data for NBI inclusion prior to our evaluation. Subsequently, even though BLM has submitted data, the agency still is not in full compliance with the Standards. In addition, its data management gaps have the potential to result in safety issues of significant concern to the bureau and the public.

BIA also has data management issues that have led to an inability to identify bridges in their inventory and, thus, ensure timely inspection schedules. The Bureau has contracting issues that need to be addressed both to meet Federal requirements and to ensure that inspections are conducted in keeping with the Standards.

We believe both bureaus could not only increase the reliability and effectiveness of their bridge inspection practices, but also improve bridge safety by following the recommendations presented in this report.

## Summary of Recommendations

The Director, Bureau of Land Management should:

1. Develop policies and timelines to identify and classify bridges that are defined as “public” in accordance with 23 C.F.R. Part 650.

**BLM Response:** BLM concurred with the recommendation. BLM has issued an Instruction Memorandum (IM) 2011-198, entitled Compliance with the National Bridge Inspection Standards, dated September 28, 2011. The IM directs state offices to complete and submit National Bridge Inventory (NBI) data. BLM has identified and submitted data to FHWA on 438 bridges deemed “public” in accordance with 23 C.F.R. Part 650 and submitted for inclusion in the 2012 NBI.

**OIG Analysis of BLM Response:** Based on BLM’s response, we consider this recommendation resolved and implemented.

2. Submit remaining data for its qualifying bridges to FHWA for inclusion in the National Bridge Inventory.

**BLM Response:** BLM concurred with the recommendation. BLM has submitted data to FHWA for its NBI-qualified bridges but indicates that approximately 20 percent of these bridges lack load rating data. BLM indicates that the rating determinations for these bridges will be submitted

to FHWA during fiscal year 2013. BLM has established a target date of July 15, 2013.

**OIG Analysis of BLM Response:** Based on BLM's response, we consider this recommendation resolved but not implemented.

3. Develop and implement plans and procedures to verify the Bureau's bridge inventories and ensure that all bridges are inspected in accordance with the Standards.

**BLM Response:** BLM concurred with the recommendation. BLM has issued an Instruction Memorandum (IM) 2011-198, entitled Compliance with the National Bridge Inspection Standards, dated September 28, 2011. BLM's guidance includes procedures for verifying the inventory and ensuring regular inspections in compliance with NBIS. According to BLM, state offices have verified and submitted their inventories to BLM headquarters, which, in turn, forwarded the data to the FHWA in December of 2011. BLM also indicates that future submissions and updates will be completed annually per FHWA requirements.

**OIG Analysis of BLM Response:** Based on BLM's response, we consider this recommendation resolved and implemented.

4. Develop and implement a process to collect, maintain, and report required data to meet the Standards.

**BLM Response:** BLM concurred with the recommendation. According to BLM, their Instruction Memorandum (IM) 2011-198 supplements existing policies and includes guidance on standardization of processes for the collecting, maintaining, and reporting of required data to meet NBI Standards. BLM indicates that state offices submitted their data to BLM headquarters, which, in turn, has been forwarded to FHWA in December 2011. BLM has indicated that future submissions and updates will be completed annually per FHWA requirements.

**OIG Analysis of BLM Response:** Based on BLM's response, we consider this recommendation resolved and implemented.

The Director, Bureau of Indian Affairs, should:

5. Develop and implement plans and procedures to verify the accuracy of the Bureau's bridge inventories.

**BIA Response:** BIA concurred with the recommendation. The BIA indicated that they will continue to use their bridge management software application to verify the accuracy of the BIA bridge inventory. In addition,

BIA indicated they are in the process of developing a Bridge Safety and Inspection Manual designed to address procedures for submitting, verifying, and reviewing data for inclusion in the NBI. The anticipated completion date for the manual is August 30, 2012.

**OIG Analysis of BIA Response:** Based on BIA's response, we consider this recommendation resolved but not implemented.

6. Develop and implement a plan to ensure that the Bureau's bridge inventory is accurate and that inspections are performed consistently and on time to meet NBI requirements.

**BIA Response:** BIA concurred with the recommendation. BIA has indicated that task orders have been issued (as of August 16, 2011) for the inspection of all BIA bridges. BIA indicated that a new process has been developed whereby all bridges will be inspected on the same interval or cycle and that the new schedule allows for more time between awards for contract negotiation. BIA believes that this will alleviate past problems that led to delays in awarding of contracts and missed submission dates of NBI required data to FHWA.

**OIG Analysis of BIA Response:** Based on BIA's response, we consider this recommendation resolved but not implemented.



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# Appendix I: Scope and Methodology

## Scope

We performed our evaluation in accordance with the “Quality Standards for Inspections” issued by the Council of Inspectors General on Integrity and Efficiency. The evaluation focused on determining if accurate data was submitted for BLM and BIA owned bridges. In order to determine this, we evaluated the bureaus’ compliance with national standards.

## Methodology

As part of our evaluation, we:

- obtained a general understanding of bridge programs managed by BIA, BLM, FWS, NPS, and USBR;
- conducted site visits and interviewed officials from the various bureaus;
- interviewed FWHA officials;
- reviewed documentation and reports internal to the respective bureaus and the sites we visited;
- reviewed laws and regulations that prescribe the bridge programs on Federal lands;
- visited BLM sites in the state of Oregon to determine the accessibility of bridges classified as “administrative;” and
- visited BIA sites in the state of Arizona.

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## **Appendix 2: BLM Response**

The Bureau of Land Management's response to the draft report follows on page 14.



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Washington, D.C. 20240  
<http://www.blm.gov>



MAR - 1 2012

In Reply Refer To:  
1245/9112 (830/854)

Memorandum

To: Kimberly Elmore  
Assistant Inspector General for Audits, Inspections, and Evaluations

Through: Marcilynn A. Burke *Marcilynn A. Burke*  
Acting Assistant Secretary – Land and Minerals Management

From: *[Signature]* Robert V. Abbey  
Director

Subject: Office of the Inspector General Evaluation Draft Report, Bureau of Land Management and Bureau of Indian Affairs Bridge Safety Programs (ER-EV-MOA-0002-2011)

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG) draft Evaluation Report: "Bureau of Land Management and Bureau of Indian Affairs Bridge Safety Programs" (ER-EV-MOA-0002-2011). The Bureau of Land Management (BLM) appreciates the work of the OIG, and the OIG's recognition that the BLM has taken significant steps to improve its Bridge Safety Program. The purpose of the OIG's evaluation was to determine whether the BLM and BIA submit accurate bridge safety inspection data to the Federal Highway Administration (FHWA) as required under the National Bridge Inspection Standards (NBIS). The NBIS establish national standards for conducting bridge safety inspections for all state, county, local, and Federal bridges that are publicly accessible and greater than 20 feet long, and requires submission of the bridge inspection data on an annual basis to the FHWA for inclusion in the National Bridge Inventory (NBI).

The OIG evaluation found that the BLM and BIA do not comply with the NBIS, including the requirement to submit inspection data to the FHWA. The OIG's report issued a total of six recommendations to increase the reliability and effectiveness of bridge inspection practices and the overall safety of the Federal bridges administered by the BLM and the Bureau of Indian Affairs (BIA). Recommendations 1-4 are directed to the BLM, and recommendations 5 and 6 are directed to the BIA. This response addresses the BLM-specific recommendations. The BIA will respond to recommendations 5 and 6 under separate cover.

The BLM concurs with the recommendations specific to the BLM. Historically, although the BLM consistently referenced the NBIS in conducting bridge safety inspections, the BLM did not consider the bridges it administered to be "public" as defined by the NBIS and as a result did not

believe it was required to comply with the NBIS reporting requirements. Based on the OIG's evaluation, the BLM reconsidered its interpretation and determined that certain bridges are "public" and therefore fall under the NBIS Standards. The attachment provides the actions taken to date which demonstrate the BLM's efforts to comply with the NBIS, as well as additional steps underway in response to the four recommendations.

When the OIG began its review, it issued a notice of preliminary findings and recommendations in April 2011 related to the BLM's submission of bridge inspection data to the FHWA's NBI. At that time, the OIG determined that the BLM's policies and practices did not adequately address the requirement for submitting BLM data to the NBI. In September 2011, the BLM issued new policies requiring submission and verification of bridge inspection data. The BLM also has completed additional bridge inspections, received updated and verified data from BLM field organizations, and submitted its inventory of 438 bridges to the FHWA NBI. At present, the BLM believes it is in compliance with the NBI requirement and has taken significant steps to address the OIG recommendations.

If you have any questions, please contact Luis V. Coppa, Chief, Branch of Engineering and Asset Management Policy, at 202- 912-7050, or LaVanna Stevenson, BLM Audit Liaison Officer, at 202-912-7077.

Attachment



**Response to the Office of the Inspector General Evaluation Draft Report, Bureau of Land  
Management and Bureau of Indian Affairs Bridge Safety Programs  
(ER-EV-MOA-0002-2011)**

**Recommendation 1:** Develop policies and timelines to identify and classify bridges that are defined as “public” in accordance with 23 C.F.R. Part 650.

**Response:** The BLM issued Instruction Memorandum (IM) 2011-198, entitled, Compliance with the National Bridge Inspection Standards (NBIS), on September 28, 2011, which directs the BLM state offices to complete and submit National Bridge Inventory (NBI) data. Through the process established in the IM, the BLM identified 438 bridges as “public” in accordance with 23 C.F.R. Part 650 and submitted the data to the NBI. By April 2012, the Federal Highway Administration (FHWA) according to its schedule should have incorporated the BLM’s NBI data. Future submissions and updates will be completed annually per FHWA requirements.

**Target Date:** April 30, 2012.

**Responsible Official:** Janine Velasco, Assistant Director, Business and Fiscal Resources

**Recommendation 2:** Submit remaining data for its qualifying bridges to FHWA for inclusion in the National Bridge Inventory.

**Response:** While the BLM has submitted data for its NBI-qualifying bridges, there is a small percentage of the NBI-qualifying bridges (approximately 20%) that lack load rating data. Load rating determinations will be submitted for this remaining set of NBI-qualifying bridges during fiscal year 2013.

**Target Date:** July 15, 2013.

**Responsible Official:** Janine Velasco, Assistant Director, Business and Fiscal Resources

**Recommendation 3:** Develop and implement plans and procedures to verify the Bureau’s bridge inventories and ensure that all public bridges are inspected in accordance with the Standards.

**Response:** The BLM 2011-198 IM on compliance with the NBIS directed the BLM State Offices to complete inspections and submit their NBI data. The policy guidance included procedures for verifying the inventory and ensuring regular inspections in compliance with the NBIS. BLM state offices verified and submitted their inventories to BLM Headquarters, where they were compiled and submitted, adhering to BLM policies, to FHWA in December 2011. The FHWA according to its schedule should have incorporated the BLM’s NBI data by April 2012. Future submissions and updates will be completed annually per FHWA requirements.

**Target Date:** April 30, 2012.

**Responsible Official:** Janine Velasco, Assistant Director, Business and Fiscal Resources

**Recommendation 4:** Develop and implement a process to collect, maintain, and report required data to meet the Standards.

**Response:** The BLM existing policy which was supplemented by the 2011-198 IM on compliance with the NBIS further directed BLM state offices to complete inspections and submit their NBI data. These guidelines include a standardized process for collecting, maintaining, and reporting required data annually to meet the Standards. BLM state offices submitted their data to BLM Headquarters, where they were compiled and submitted, adhering to BLM policies, to FHWA in December 2011. By April 2012, the FHWA according to its schedule should have incorporated the BLM's NBI data. Future submissions and updates will be completed annually per FHWA requirements.

**Target Date:** April 30, 2012.

**Responsible Official:** Janine Velasco, Assistant Director, Business and Fiscal Resources



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## **Appendix 3: BIA Response**

The Bureau of Indian Affairs' response to the draft report follows on page 19.



# United States Department of the Interior


OFFICE OF THE SECRETARY

Washington, DC 20240

**MAR 14 2012**

## Memorandum

To: Kimberly Elmore  
Assistant Inspector General for Audits, Inspections, and Evaluations

From: *For* Larry Echo Hawk   
Assistant Secretary – Indian Affairs

Subject: Draft Evaluation Report- Bureau of Land Management and Bureau of Indian Affairs Bridge Safety Programs Report No. ER-EV-MOA-0002-2011

The Office of Inspector General Draft Evaluation Report- Bureau of Land Management and Bureau of Indian Affairs Bridge Safety Programs Report No. ER-EV-MOA-0002-2011, provided two recommendations from the subject report to Indian Affairs (IA) for a written response and implementation of the recommendations. Specifically the report stated that the BIA did not comply with the National Bridge Inspection Standards (NBIS) in submitting bridge inventory data to the National Bridge Inventory (NBI).

The following provides the Agency acknowledgement, corrective actions with dates, and responsible officials for the implementation of Recommendations 5 and 6. Recommendations 1-4 are being addressed by the BLM separate from this response.

The recommendations as a result of the OIG evaluation are as follows:

The BIA should:

5. Develop and implement plans and procedures to verify the accuracy of the Bureau's bridge inventories.

Recommendation 5. Indian Affairs concurs with this recommendation. The BIA will continue to use the bridge management software application developed and maintained by the Office of Chief Information Officer known as the Bridge Management System (BMS) to verify the accuracy of the BIA bridges. This software prepares the data in the required format for inclusion in the Federal Highway Administration NBI database, which is a key part of complying with the NBIS. This recommendation is also being addressed through the development of a BIA Bridge Safety and Inspection Manual, which is in draft. It is anticipated that the manual will be finalized by August 30, 2012, by the designated responsible official, Mr. LeRoy Gishi, Chief, Transportation. Upon review by senior program managers, this manual among other things will address the procedures for submitting, verifying, and reviewing data for inclusion into the NBI.

6. Develop and implement a plan to ensure that the Bureau's bridge inventory is accurate and that inspections are performed consistently and on time to meet NBI requirements.

Recommendation 6. Indian Affairs concurs with the recommendation and, as of August 16, 2011, seven task orders have been issued for the inspection of all BIA bridges. The general inspection schedule was to inspect one-half of the bridges each year. With the new process, all bridges will be inspected on the same interval or cycle. The new schedule allows more time between contract awards for our contracting office-consultant negotiations, which was part of the delay when the Indefinite Delivery - Indefinite Quantity (IDIQ) contracts were under negotiations per the Brooks Act. The data for inclusion in the NBI will be made on April 1, 2012, by designed responsible official, Mr. LeRoy Gishi.

BIA comments to the report:

The delay in the FY 2010 inspections was a result of partial funding availability due to the numerous extensions of the highway act, resulting in only a portion of the funding being available from U.S. Department of Transportation. Nevertheless the inspections were completed, but the reporting to the FHWA bridge office, which maintains the NBI, did not receive the BIA reports on time. Although the reports were not received on time, the safety inspections were completed and reports to the respective BIA regions for actions were not delayed.

Specific to the finding of the bridges associated with the Coolidge Dam located on the San Carlos Apache Indian Reservation, the following is provided:

1. The BIA does acknowledge the ownership of the bridges over the spillways on either side of the dam. The bridges will be inspected under a special inspection and coordinated with the BIA Safety of Dams Office in March 2012.
2. The draft BIA bridge inspection manual provides guidance to all programs and offices within the BIA and the Bureau of Indian Education on the inspection of all public bridges owned by Indian Affairs. These bridges, if eligible, will be included in a special inspection cycle and reported as part of the BIA bridge inventory in the NBI.
3. The smaller bridge located downstream from the dam is a BIA owned bridge. It has been identified as an administrative bridge and not open to the public. It is strictly used for maintenance of the dam. Although not required to be included in the NBI, the BIA is including this bridge in the special inspection of the two bridges located over the spillways of the dam in order to provide a sufficiency rating and deficiency status.

The BIA has determined that steps taken to date, and that are planned, will address the data management issues leading to the inability to identify bridges in its inventory and ensure timely inspection schedules. If additional information is needed, please contact Mr. LeRoy Gishi at (202) 513-7711.

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## Appendix 4: Status of Recommendations

Recommendations	Status	Action Required
1	Resolved and implemented	No further response to OIG is required
2	Resolved and not implemented	No further response to OIG is required. The recommendation will be referred to the Assistant Secretary for PMB for tracking and implementation.
3	Resolved and implemented	No further response to OIG is required
4	Resolved and implemented	No further response to OIG is required.
5	Resolved and not implemented	No further response to OIG is required. The recommendation will be referred to the Assistant Secretary for PMB for tracking and implementation.
6	Resolved and not implemented	No further response to OIG is required. The recommendation will be referred to the Assistant Secretary for PMB for tracking and implementation.

# **Report Fraud, Waste, and Mismanagement**



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