




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

September 19, 2012

Memorandum

To: Marcia McNutt
Director, U.S. Geological Survey

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

From: Hannibal M. Ware 
Regional Manager, Eastern Region

Subject: Verification Review of Recommendations for the Evaluation Report, "Interior Lacks a Scientific Integrity Policy (WR-EV-MOA-0014-2009)"
Report No. ER-VS-MOA-0004-2012

The Office of Inspector General (OIG) has completed a verification review of the two recommendations presented in the subject evaluation report. The objective of the verification review was to determine whether the U.S. Department of the Interior implemented our recommendations. We concluded that both recommendations have been resolved and implemented.

Background

Our April 2010 evaluation report, "Interior Lacks a Scientific Integrity Policy," contained two recommendations concerning the absence of a Department-wide policy on scientific integrity and the lack of a requirement to track allegations of scientific misconduct. Recommendation 1 was for the Secretary to develop such a policy, and recommendation 2 was to designate a responsible official to guide that policy's development and implementation.

In a memorandum dated July 2, 2010, the Department concurred with both recommendations, and resolved recommendation 2 by assigning Dr. McNutt to guide the development and implementation of a scientific integrity policy. On July 7, 2010, OIG considered recommendation 2 resolved and implemented, and referred the remaining recommendation to the Department's Office of Policy, Management and Budget (PMB) for tracking. In a memorandum dated December 3, 2010, PMB reported that recommendation 1 had also been implemented.

Scope and Methodology

The scope of this review was limited to determining whether the Department implemented the two recommendations. To accomplish our objective, we reviewed documentation of communication in the audit file as well as applicable Secretarial Orders and the Departmental Manual (DM).

We did not visit sites or conduct fieldwork to determine whether the underlying deficiencies that were initially identified have actually been corrected. As a result, this review was not conducted in accordance with generally accepted Government auditing standards issued by the Comptroller General of the United States, or with the quality standards for inspections of the Council of the Inspectors General on Integrity and Efficiency.

Results of Review

The Department has implemented both of our recommendations as indicated by their closure:

Recommendation 1: Develop and implement an Interior-wide comprehensive scientific integrity policy that addresses required elements of the OSTP [White House Office of Science and Technology Policy] scientific misconduct policy, to include provisions for both internal and external scientific research, applicable to all agents, appointees, employees and contractors involved in researching and publishing scientific results of any kind, include a misconduct allegation reporting requirement, and a range of disciplinary actions.

Action Taken: We considered recommendation 1 resolved and implemented based on a memorandum dated December 3, 2010, stating that the Secretary had issued a Secretarial Order that addressed the required elements of the OSTP policy, including those specifically named in the recommendation. Deputy Secretary David J. Hayes was named as the official in charge of implementing the Order, including the execution of a chapter in the DM.

We confirmed the full implementation of this recommendation by reviewing Secretarial Order number 3305, which was issued September 29, 2010, and remained in effect until the new DM chapter, 305 DM 3, was enacted on January 28, 2011. After reviewing 305 DM 3, titled "Integrity of Scientific and Scholarly Activities," we determined that it covers all provisions enumerated in recommendation 1.

Recommendation 2: Designate a responsible official to guide the development and implementation of an Interior-wide scientific integrity policy and to oversee the bureaus implementation and application of the policy.

Action Taken: We considered recommendation 2 resolved and implemented based on a memorandum dated July 2, 2010. In it, the Department concurred with our recommendation and designated Dr. McNutt as the official charged with guiding the

development and implementation of an Interior-wide scientific integrity policy and overseeing the bureaus' implementation and application of the policy.

We confirmed the full implementation of this recommendation by verifying the Department's list of bureau scientific integrity officers on its Web site, including the overall Departmental scientific integrity officer, who is picked by the Secretary. This officer oversees the ongoing application of the scientific integrity policy, which satisfies all conditions mentioned in the recommendation.

Conclusion

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 informed Department officials of the results of this review at an exit conference on September 12, 2012. The officials agreed with our results.

cc: Rebecca Bageant, Audit Liaison Officer, U.S. Geological Survey
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