



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

AUG 22 2014

Memorandum

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

From: Christopher Stubbs *Christopher Stubbs*  
Acting Eastern Region Manager for Audits, Inspections, and Evaluations

Subject: Verification of Recommendations for the Report,  
"Bureau of Land Management and Bureau of Indian Affairs Bridge Safety Programs" (Report No. ER-EV-MOA-0002-2011)  
Report No. ER-VS-MOA-0011-2014

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 U.S. Department of the Interior (DOI) implemented our recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. PFM reported to OIG that it has closed the recommendations. We concur that the recommendations have been resolved and implemented.

**Background**

Our April 2012 report, "Bureau of Land Management and Bureau of Indian Affairs Bridge Safety Programs," made six recommendations, four to the Bureau of Land Management (BLM) and two to the Bureau of Indian Affairs (BIA), pertaining to the need to improve management oversight and documentation of the bridges in their inventories.

In a March 1, 2012 memorandum to OIG, BLM concurred with the report's recommendations and outlined steps to implement them. Likewise, in a March 14, 2012 memorandum to OIG, BIA concurred with the recommendations and outlined steps to implement them. On April 30, 2012, we referred the recommendations to PFM for tracking and implementation; at that time, we considered three of the six recommendations to be resolved and implemented and the remaining three to be resolved but not implemented. On March 14, 2013, PFM reported that the necessary steps had been taken to consider two of the recommendations implemented and closed. On May 8, 2013, PFM reported that the necessary steps had been taken to consider the last recommendation implemented and closed.

**Scope and Methodology**

We limited the scope of this review to determining whether BLM and BIA implemented the recommendations in our report. We reviewed the auditees' responses in the audit and

requested, and subsequently reviewed, additional documentation from both bureaus supporting the steps taken to close the recommendations.

We did not perform site visits or conduct fieldwork to determine whether DOI corrected the underlying deficiencies that were 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 BLM and BIA implemented the recommendations as indicated by PFM's closure notification.

### *BLM Recommendations and Actions Taken:*

**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.

**Action Taken:** BLM issued Instruction Memorandum (IM) 2011-198 (titled "Compliance With the National Bridge Inspection Standards" and dated September 28, 2011), and subsequent IMs, directing State offices to annually complete and submit National Bridge Inventory (NBI) data, which include bridge specifications and the actions taken to ensure bridge safety. BLM identified and submitted data on 444 bridges defined as "public" to the NBI. BLM stated that it will continue to evaluate the usage of these bridges on an annual basis to protect public safety.

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

**Action Taken:** BLM submitted the remaining qualifying bridges for inclusion in the NBI. BLM updates the NBI annually by issuing IMs to State offices requesting that they submit NBI data to the Washington Office, which in turn forwards the data to FHWA.

**Recommendation 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 National Bridge Safety Inspection Standards (Standards).

**Action Taken:** BLM issued IM 2011-198, providing guidance on procedures for verifying the inventory and ensuring regular inspections in compliance with the NBI. Annual updates continue via IMs to State offices requesting that they submit NBI data to the Washington Office, which in turn forwards the data to FHWA.

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

**Action Taken:** Through the use of its annual IMs requesting NBI data updates from each State office, BLM has developed a process to collect, maintain, and report the data required to meet NBI standards.

*BIA Recommendations and Actions Taken:*

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

**Action Taken:** In coordination with structural engineers from the Eastern Federal Lands Bridge Safety Program, BIA has verified the accuracy of its bridge inventory by addressing the data errors from reviews for 2013 and 2014.

**Recommendation 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.

**Action Taken:** BIA developed a Bridge Inspection Guide (Guide) that defines the policy and prescribes procedures and responsibilities for the periodic inspection and evaluation of public bridges owned or maintained by BIA. BIA drafted the Guide in September 2013; however, it has not been finalized. BIA stated that full implementation of the Guide is contingent upon development of requirements regarding the inspection of tribally owned bridges. To date, no guidance or regulations have been published regarding the inclusion of bridges owned by tribal governments. These inspections are now required by 23 U.S.C. § 144. FHWA has been working with its Office of Federal Lands Highway and BIA on draft regulations for the inspection of tribally owned bridges. In addition, BIA has been submitting its bridge inventory updates to NBI on an annual basis.

**Conclusion**

We informed DOI officials of the results of this review at an exit conference on July 31, 2014. The officials agreed with the results.

cc: Nancy Thomas, Audit Liaison Officer, Office of Financial Management  
Sharon Blake, Audit Liaison Officer, Office of Financial Management  
LaVanna Stevenson, Audit Liaison Officer, Bureau of Land Management  
Michael Oliva, Director, Bureau of Indian Affairs