




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

August 24, 2012

Memorandum

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

From: Charles Haman 
Regional Manager for Audits, Inspections, and Evaluations

Subject: Verification Review of Recommendations for the Inspection Report, "Inspection of the Implementation of the Motor Vehicle Operation Policy, Bureau of Indian Affairs, (Report No. NM-IS-BIA-0002-2008)"
Report No. Q-VS-BIA-0001-2012

We have completed a verification review of the six recommendations presented in the inspection report noted above. Our objective was to determine if the Bureau of Indian Affairs (BIA) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget (PMB). BIA provided PFM with supporting documentation, and PFM reported to us when BIA had addressed each of the six recommendations in the subject report. Based on our verification, we agree that BIA resolved and implemented all six recommendations.

Background

In July 2008, our inspection report, "Inspection of the Implementation of the Motor Vehicle Operation Policy, Bureau of Indian Affairs, (Report No. NM-IS-BIA-0002-2008)" noted that BIA's Motor Vehicle Operation Policy did not allow for timely and effective monitoring of driver's histories and training. We made six recommendations to improve policy implementation.

In a memorandum dated September 26, 2008, BIA's Acting Deputy Assistant Secretary for Policy and Economic Development responded to the inspection report concurring with all six recommendations. On October 1, 2008, we referred the recommendations to PMB for tracking and implementation.

PFM subsequently issued a series of memorandums. On April 19, 2010, PFM reported that Recommendations 4 and 5 were implemented and closed. On April 27, 2011, PFM reported that Recommendation 6 was implemented and closed. The final memorandum from PFM dated September 30, 2011 reported that Recommendations 1, 2, and 3 were implemented and closed.

Scope and Methodology

We limited the scope of this review to obtaining sufficient documentation and then analyzing the documents in order to evaluate BIA's implementation of our recommendations. To accomplish our objective, we reviewed the supporting documentation that BIA officials provided to PFM and us. We discussed BIA's actions relating to each of the six recommendations and independently verified their implementation.

We did not visit any sites or conduct other fieldwork to determine if BIA corrected the underlying deficiencies that we initially identified. As a result, this review is not in accordance with "Government Auditing Standards" issued by the Comptroller General of the United States or "Quality Standards for Inspection and Evaluation" from the Council of the Inspectors General on Integrity and Efficiency.

Results of Review

We concluded that BIA implemented and resolved all six recommendations.

Recommendation 1: Establish specific schedules at the regional level for receiving and processing Form 3607s to ensure that all forms are received timely.

We consider Recommendation 1 resolved and implemented.

Action Taken: The Assistant Secretary—Indian Affairs in a January 12, 2010 memorandum established a specific schedule by requiring employees to submit Form 3607 annually by October 1 of each year to the Safety Office. The memorandum further stated that if an employee fails to submit the form, the supervisor shall suspend the employee's Motor Vehicle Operators Authorization until the form is submitted. Indian Affairs also submitted compliance certificates submitted by the Office of the Secretary, Bureau of Indian Affairs, and the Bureau of Indian Education attesting to compliance with Form 3607 submission requirements.

Recommendation 2: Ensure that the driving requirements for each position description be identified as required by the Policy Guidance Memorandum.

We consider Recommendation 2 resolved and implemented.

Action Taken: A September 30, 2011 memorandum from the Deputy Assistant Secretary—Indian Affairs stated that a "Position Description Addendum, Motor Vehicle Operation" was created and has been attached to every Indian Affairs position description. A sample position description addendum provided includes three levels of employee driving requirements (Regularly, Occasionally, or Not Required) to select from for each position description. Furthermore, senior supervisors of Human Resources responsible for the classification and maintenance of employee position descriptions signed certifications to memorialize full compliance.

Recommendation 3: Record the training completed for each employee on the respective regional safety office's spreadsheet database or, alternatively, create a new training database.

We consider Recommendation 3 resolved and implemented.

Action Taken: A memorandum from the Deputy Assistant Secretary—Indian Affairs dated September 30, 2011, indicates that the Office of Human Capital Management (OHCM) has compiled a training database listing which employees are required to take training, who has completed the training, and who has not. This information is available to supervisors. Additionally, OHCM maintains a separate training database for the Learning Management System, which includes an applicable driver training course, and this employee-specific information is also available to managers and supervisors. Lastly, OHCM created an entry in the Federal Personnel/Payroll System (FPPS) to flag employees in positions that require the regular operation of Government vehicles, and can now provide FPPS reports to supervisors and managers identifying all current employees who have a mandatory driving or training requirement.

Recommendation 4: Require regional Safety Officers to obtain employee driver records from the National Highway Traffic Safety Administration's National Driver Registry as part of their annual review process.

We consider Recommendation 4 resolved and implemented.

Action Taken: The Assistant Secretary—Indian Affairs, sent a memorandum dated January 12, 2010, to the Director of the Bureau of Indian Affairs, the Director of the Bureau of Indian Education, and to the Deputy Assistant Secretaries of Indian Affairs. The memorandum required an annual submission of the Form GSA-3607, Motor Vehicle Operator's License and Driving Record by subordinate employees required to operate motor vehicles. Upon receipt of Form-3607, driving history records were required and processed from the National Driving Registry. The memorandum also stated that if an employee failed to submit Form-3607, the employee's Motor Vehicle Operators Authorization would be suspended.

Recommendation 5: Ensure that regional Safety Officers' notification letter includes (1) the requirement to notify the Safety Officer when authorization cards were suspended and cards revoked, and (2) a deadline by which these actions are to occur.

We consider Recommendation 5 resolved and implemented.

Action Taken: The Assistant Secretary—Indian Affairs in a memorandum dated January 12, 2010, to the Director of the Bureau of Indian Affairs, the Director of the Bureau of Indian Education, and the Deputy Assistant Secretaries, stated that the safety officers' notification letter will require notifying the appropriate safety officer within one business day when an employee's Motor Vehicle Operations Authorization card is suspended or revoked. A sample safety officer's notification letter was provided, and the suspension and revocation language was included in the letter.

Recommendation 6: Conduct routine reviews of the regional safety offices to ensure uniformity in program implementation.

We consider Recommendation 6 resolved and implemented.

Action Taken: A Memorandum dated April 27, 2011, from the Deputy Assistant Secretary—Indian Affairs to the Office of Financial Management addresses a Regional Safety Management Program evaluation and audit process. It states that there is a quarterly audit schedule for fiscal years 2011 to 2013, and that audits will be on a 3-year cycle. The quarterly audit schedule was attached. In addition, sample regional evaluations already completed were also provided. We noted that the audit Component 7 "Motor Vehicle Operation/Driver Authorization" addressed the relevant topics.

Conclusion

We informed BIA officials of the results of this review on July 27, 2012. BIA officials agreed with the results of our review.

cc: Donald Laverdure, Acting Assistant Secretary – Indian Affairs
Michael Black, Director, Bureau of Indian Affairs
Michael Oliva, Audit Liaison Officer, Assistant Secretary – Indian Affairs
Alexandra Lampros, Audit Liaison Officer, Office of the Secretary