



OFFICE OF INSPECTOR GENERAL



DEPARTMENT OF THE INTERIOR

RECOVERY OVERSIGHT ADVISORY

A Critical Point Evaluation Product






RECOVERY OVERSIGHT OFFICE
Washington, DC 20240

APR 09 2010

To: Jon Jarvis
Director, National Park Service

From: Robert A. Knox 
Assistant Inspector General for Recovery Oversight

Subject: Recovery Oversight Advisory – Historic Black Colleges and Universities
(HBCU) Application Evaluation (ROO-ROA-NPS-6002-2010)

Congress provided us with funding to oversee and ensure accountability of the \$3 billion appropriated to the U.S. Department of the Interior (Department) in the American Recovery and Reinvestment Act of 2009 (Recovery Act). To help safeguard these taxpayer dollars, we are focused on preventing fraud, waste, and mismanagement; early detection to reduce the impact of misuses when they do occur; and ensuring transparency in our oversight efforts.

In a spirit of collaboration with the Department as it implements the massive programs envisioned under the Act, this advisory informs you of our finding regarding a failure by the National Park Service (NPS) to adequately solicit and evaluate grant applications under the Historically Black Colleges and Universities (HBCU) program. Additionally, we found that HBCU program officials believe they are exempt from the Secretary's accelerated project mobilization date of June 30, 2010.

Please provide, within 30 days from receipt of this advisory, a written response detailing the corrective actions that the Department plans to take to implement the recommendations, including targeted completion dates. We will post this advisory on our website (www.doioig.gov/recovery) and Recovery.gov. Information contained in this advisory may also be included in our semiannual report to Congress. Please contact me if you have any questions.

Background and Finding

The Recovery Act provides \$15 million to the HBCU program to award historic preservation grants aimed at providing assistance in the repair of historic buildings. On March 12, 2009, a grant opportunity announcement was posted on www.grants.gov. The announcement was subsequently modified and reposted on May 6th. The second announcement included a list of criteria that were to be used by an NPS evaluation panel in scoring applications. These criteria were publicized in accordance with 505 Departmental Manual (DM) 2.16, which states that applications are to be “scored on the basis of announced criteria.” We found that the announced criteria failed to disclose that recipients of other NPS grants would be ineligible for HBCU awards. At least one application, which was scored higher by the NPS evaluation panel than other successful applications, was rejected because of this additional, undisclosed criterion. This practice was contrary to the Departmental Manual guidance.

We also found that the evaluation panel believed it was urgent to select grant recipients as quickly as possible. As a result, the panel changed their evaluation method for 12 of the total 76 applications. Applications were initially scored by individual evaluators, and scores were then averaged to determine a final score. Due to the pressure to expedite the awards, the four member panel did not review all applications. The panel reviewed the last 12 applications using a team-scoring process involving only a subset of the panel, consisting of at least two evaluators. We found that six of these grant applications received scores near the range selected for an award. If only two members score an application, we are concerned that these may not be consistent with average scores of the entire panel and that, if these applications had been scored by the entire panel, some may have received awards.

After the applications were scored, the panel members discussed the scores to determine those selected for awards. Tied scores were resolved by the panel based on which historic structure was in more need of repair or preservation. We found that no panel discussions were formally documented. The failure to document discussions makes it difficult to provide unsuccessful applicants with an explanation of the reasons why their applications were unsuccessful, as required by 505 DM 2.16 B.

We also found that the NPS program manager believes this grant program is exempt from the Secretary's accelerated project mobilization date because the grant announcement indicated there would be a three-year timeframe to complete projects. The schedule permitted one year for design and two more years for actual construction work. The NPS manager considers this previously announced schedule to be a contractual obligation that is not affected by the Secretary's subsequent announcement to accelerate the mobilization of ARRA projects.

Recommendations

We recommend that the Director of NPS:

1. Direct a review of the selection process and take appropriate action to mitigate any perceived inequities.
2. Ensure all grant applications are scored on the basis of announced criteria in accordance with 505 DM 2.
3. Ensure that evaluation panels consistently evaluate all applications, using the announced criteria, and document panel discussions in an award summary document.
4. Determine if the HBCU program is subject to the Secretary's accelerated mobilization date.

cc: Senior Advisor to the Secretary for Economic Recovery and Stimulus
Deputy Secretary, Department of the Interior
Assistant Secretary – Policy, Management, and Budget
Acting Director, Office of Financial Management
Director, Office of Acquisition and Property Management

Chief, Historic Architecture Branch, National Park Service
Departmental GAO/ OIG Audit Liaison
Audit Liaison, Office of the Secretary
Audit Liaison, National Park Service
Recovery Coordinator, National Park Service

Report Fraud, Waste, and Mismanagement



Fraud, waste, and mismanagement in government concerns everyone: Office of Inspector General staff, Departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and abuse related to Departmental or Insular Area programs and operations. You can report allegations to us in several ways.



By Mail:

U.S. Department of the Interior
Office of Inspector General
Mail Stop 4428 MIB
1849 C Street, NW
Washington, D.C. 20240

By Phone:

24-Hour Toll Free	800-424-5081
Washington Metro Area	703-487-5435

By Fax:

703-487-5402

By Internet:

www.doiioig.gov/hotline