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Memorandum

To:

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Eric Eisenstein

Division Chief, Internal Control and Audit Follow-up

Office of Financial Management

From:

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Subject:

Verification Review of Recommendations for the Report, "Office of Inspector

General's Independent Report on the "ONDCP [Office of

National Drug Control Policy Performance Summary Report - BIA" (Report No.

ER-IN-BIA-0014-2009)

Report No. VI-VS-BIA-0003-2013

The U.S. Department of the Interior (DOI) Office of Inspector General (OIG) has completed a verification review of the four recommendations presented in the subject report. Our objective was to determine whether the recommendations were implemented by the Bureau of Indian Affairs (BIA) as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. As a result, PFM closed all four recommendations. We concur that all recommendations are resolved and implemented.

Background

The November 10, 2009 report, "Office of Inspector General's Independent Report on the "ONDCP [Office of National Drug Control Policy] Performance Summary Report - BIA" (Report No. ER-IN-BIA-0014-2009)," contained four recommendations made to improve the quality and timeliness of future Performance Summary Reports (see Attachment 1).

In a memorandum dated April 9, 2010, BIA concurred with all four recommendations, detailing its plans to implement the recommendations as well as actions it had already taken (see Attachment 2). On May 7, 2010, we referred the recommendations to PFM for tracking and implementation. PFM reported on April 27, 2011; September 27, 2011; January 17, 2012; and March 19, 2012, that BLM had implemented each of the recommendations, respectively. PFM subsequently closed all four recommendations.

Scope and Methodology

Our scope was limited to determining whether BIA implemented the recommendations. We reviewed the supporting documentation provided by BIA officials and discussed with them actions taken relating to each of the four recommendations. We did not perform any site visits 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 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

BIA implemented all four of OIG's recommendations as indicated by their closure.

Recommendation 1: We recommend that the BIA Director ensure that the Office of Justice Services (OJS) implements proper procedures to accurately track and report training information.

Action Taken: OJS issued "Procedure for Annual In-Service Training and Training Logs" on January 6, 2012. The policy requires training applicants to complete a training request form (Form SF-182) prior to attending in-service training. Upon completion of training, the employee's supervisor is required to complete the supervisory portion of the SF-182 confirming that the employee completed the training. Supervisors must track their employees' training using a training log and submit the completed SF-182s to the Indian Affairs Indian Police Academy training technicians to be filed in the training program file. In addition, the training technicians maintain an Excel spreadsheet of every training program conducted or sponsored by the Police Academy. Upon completion of each training, a final class roster is produced that contains all of the pertinent information, such as the name of the program, the dates of the program, the name and agency for each student, and the completion status. When training data are required for a specific report, a data call is issued to the training technicians, who then compile the data and submit a training tracking report.

Recommendation 2: We recommend that the BIA Director ensure that OJS provide the Performance Summary Report and supporting information to OIG in sufficient time (December 31 of each year or earlier) to meet the reporting deadline.

Action Taken: OJS submitted the ONDCP Performance Summary Report to OIG and the Office of Budget on December 29, 2011, and on December 31, 2012.

Recommendation 3a: We recommend that the BIA Director ensure that OJS continues to work with tribes and agencies to improve the reliability and timeliness of reporting performance information. In conjunction with this, OJS should have tribes and agencies complete a report for each month whether or not they have related activity.

Action Taken: OJS instructed the BIA special agents in charge to submit monthly crime reports and to remind tribal leaders and tribal chiefs of police of the importance of submitting these reports. If a tribe does not report, a reminder is sent to the designated point of contact to submit the report.

Recommendation 3b: We recommend that the BIA Director ensure that OJS continues to work with tribes and agencies to improve the reliability and timeliness of reporting performance information. In conjunction with this, OJS should monitor whether tribes and agencies are reporting in a timely manner.

Action Taken: The OJS district manager monitors the submissions of crime reports on a monthly basis. OJS program managers and program analysts monitor the submissions of crime reports through the OJS database on a quarterly basis.

Recommendation 3c: We recommend that the BIA Director ensure that OJS continues to work with tribes and agencies to improve the reliability and timeliness of reporting performance information. In conjunction with this, OJS should provide training and instruction on use of the reporting system.

Action Taken: OJS identified 17 BIA employees who work with the data collection system used to track crime data and suggested these employees take training on the reporting system. The training was provided in June 2011 and is available for future training needs through a WebEx link. BIA officials stated that it has not hired new employees since the last training was conducted.

Recommendation 4: We recommend that the BIA Director ensure that OJS reviews on a test basis the accuracy of support for reported information.

Action Taken: OJS developed a protocol for the sampling and verification of drug data within a newly developed Lotus Notes database. In August 2011, OJS used the new protocol to conduct a random sampling of two December 2010 drug cases from each tribal police department.

Conclusion

We informed BIA officials of the results of this review at an exit conference on July 23, 2013. BIA officials agreed with the results.

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