



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

**RECOMMENDATIONS FOR THE  
EVALUATION REPORT TITLED  
*BUREAU OF INDIAN AFFAIRS FUNDED  
AND/OR OPERATED DETENTION  
PROGRAMS (2015-WR-012)***




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

Memorandum

**JUN 28 2019**

To: Allen Lawrence  
Division Chief, Internal Control and Audit Follow-Up  
Office of Financial Management

From: Michael P. Colombo   
Western Regional Manager for Audits, Inspections, and Evaluations

Subject: Verification Review – Recommendations for the Evaluation Report Titled *Bureau of Indian Affairs Funded and/or Operated Detention Programs* (2015-WR-012)  
Report No. 2019-WR-013

The Office of Inspector General (OIG) has completed a verification review of Recommendations 1, 4, 6, and 7 presented in the subject report. Our objective was to determine whether the Bureau of Indian Affairs (BIA) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. On October 3, 2016, the PFM reported to us that it had closed Recommendations 1, 6, and 7, and on April 26, 2017, the PFM reported that it had closed Recommendation 4. Based on our review, we concur that all four recommendations have been resolved and implemented.

### **Background**

Our February 2016 evaluation report, *Bureau of Indian Affairs Funded and/or Operated Detention Programs*, made nine recommendations designed to enhance detention programs through increasing oversight, improving serious incident reporting, performing required health and safety inspections, ensuring accurate and complete facility maintenance data, improving communication, reducing overcrowding, and recruiting and retaining qualified corrections staff.

On January 8, 2016, the BIA responded to our draft report, concurring with the nine recommendations. Based on the BIA's response, we considered Recommendations 2 and 3 resolved and implemented. In a February 16, 2016 memorandum, we referred the remaining seven recommendations to the Assistant Secretary for Policy, Management and Budget to track their implementation.

### **Scope and Methodology**

We limited the scope of this review to determining whether the BIA took sufficient action to implement Recommendations 1, 4, 6, and 7. To accomplish this objective, we reviewed the PFM's documentation supporting its closure of the four recommendations. We also reviewed additional documentation provided by the BIA.

We did not test internal controls, perform any site visits, or conduct fieldwork to determine whether the BIA had corrected the underlying deficiencies that we initially identified. 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 the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency.

## **Results of Review**

We found that the BIA has resolved and implemented Recommendations 1, 4, 6, and 7.

**Recommendation 1:** Expand the CAST [corrective action support team] review process to the tribally operated programs that are subject to BIA oversight.

**Action Taken:** The BIA expanded the CAST review process to tribally operated programs that are subject to BIA oversight and completed CAST reviews for fiscal years 2016 – 2018.

**Recommendation 4:** Develop an action plan and a timeframe for implementing the plan to ensure that health and safety inspections are completed annually as required by BIA policy.

**Action Taken:** The BIA (1) included new performance standards in its employee performance appraisal plans that require safety officers to complete all annual safety inspections for BIE and Office of Justice Services facilities; (2) instituted safety, health, and accessibility inspection and evaluation guidelines; and (3) formalized the inspection and evaluation guidelines as official policy by issuing memoranda requiring all BIA and BIE safety inspection personnel to use these guidelines. As a result, the BIA has completed and documented all required annual workplace inspections for fiscal years 2016 – 2018.

**Recommendation 6:** Develop a communication plan for IA-FMS [Indian Affairs Facilities Management System] implementation that includes roles and responsibilities to ensure that applicable staff are aware of management's expectations.

**Action Taken:** The Division of Facilities Management and Construction (DFMC) developed and implemented a communication plan during fiscal year 2016. The DFMC also defined the roles and responsibilities for the overall implementation of the IA-FMS and provided executive level training about the system to teach leadership about its capabilities and to ensure successful implementation.

**Recommendation 7:** Provide IA-FMS training to DFMC, BIA, and tribal maintenance personnel as needed to ensure successful implementation of IA-FMS.

**Action Taken:** DFMC, BIA, and tribal personnel received training on the IA-FMS in each of the fiscal years 2015 – 2018.

## **Conclusion**

We conclude that Recommendations 1, 4, 6, and 7 are resolved and implemented.

We informed BIA officials of the results of this review at an exit conference on April 2, 2019. They concurred with our findings.

If you have any questions about this verification review, please contact me at 916-978-5650.

cc: Andrea Brandon, Deputy Assistant Secretary-Budget, Finance, Grants and Acquisition  
Nancy Thomas, Audit Liaison Officer, Office of Financial Management  
Alexandra Lampros, Audit Liaison Officer, Office of Financial Management  
Tara Sweeney, Assistant Secretary, Indian Affairs  
Richard Myers, Audit Liaison Officer, Indian Affairs

