



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

**RECOMMENDATIONS FOR THE  
EVALUATION REPORT TITLED  
*OPERATION AND MANAGEMENT OF THE  
BRINKERHOFF LODGE AT GRAND TETON  
NATIONAL PARK (2015-WR-019)***



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Memorandum

SEP 28 2018

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  
*Operation and Management of the Brinkerhoff Lodge at Grand Teton National  
Park* (2015-WR-019)  
Report No. 2018-WR-054

The Office of Inspector General (OIG) has completed a verification review of six recommendations presented in the subject report (Recommendations 3 and 5 – 9). Our objective was to determine whether the National Park Service (NPS) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. On June 8, 2016, the PFM reported to us that it had closed Recommendations 5 – 9, and on August 31, 2016, the PFM reported that it had closed Recommendation 3. Based on our review, we concur that all six recommendations are resolved and implemented.

### **Background**

Our September 2015 evaluation report titled *Operation and Management of the Brinkerhoff Lodge at Grand Teton National Park* contained nine recommendations. The report included three recommendations to ensure the safety and security of the lodge and its guests and one recommendation to determine the best use of the U.S. Government's building. The report provided five additional recommendations designed to improve the NPS' operation and management of the lodge should the NPS determine that the lodge is safe and secure and that its use as a lodging facility is the best use.

On September 15, 2015, the NPS responded to our draft report, concurring with eight recommendations and partially concurring with one. Based on the NPS' response, we considered Recommendations 1 and 2 to be resolved and implemented. In a memo dated September 30, 2015, we referred the remaining seven recommendations to the Assistant Secretary of Policy, Management and Budget to track implementation. As of the date of this verification review, Recommendation 4 remains unimplemented.

## Scope and Methodology

We limited the scope of this review to determining whether the NPS took sufficient action to implement Recommendations 3 and 5 – 9. To accomplish this objective, we reviewed the PFM’s documentation supporting its closure of the six recommendations and additional documentation provided by the NPS at our request.

We did not test internal controls, perform any site visits, or conduct fieldwork to determine whether the NPS had corrected the underlying deficiencies that we initially identified. As a result, this review was not conducted in accordance with the Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States or the Quality Standards for Inspections and Evaluations issued by the Council of the Inspectors General on Integrity and Efficiency.

## Results of Review

We found that the NPS has resolved and implemented Recommendations 3 and 5 – 9.

**Recommendation 3:** Develop and implement a security and protection plan to ensure the lodge, its guests, and its contents are appropriately protected and secured.

**Actions Taken:** The NPS approved a physical security plan for the Brinkerhoff Lodge on June 20, 2016, and subsequently updated the plan on August 6, 2018. Based on our review, we concluded that the NPS’ plan, if followed, provides assurance that the lodge, its guests, and its contents are appropriately protected and secured. We therefore consider the recommendation to be resolved and implemented.

**Recommendation 5:** Establish and implement policy to clearly define official-use eligibility.

**Actions Taken:** The NPS created a standard operating procedure (SOP) document establishing and implementing official-use policy. The SOP, titled *2016 Brinkerhoff Lodge Administrative Operations*, was approved and distributed in March 2016. The document stipulates that the lodge is to be used only for official administrative purposes. These include NPS-sponsored meetings, trainings, and official administrative gatherings and overnight lodging for Federal employees on temporary duty in Grand Teton National Park and John D. Rockefeller, Jr. Memorial Parkway. The park superintendent is responsible for confirming eligibility for overnight and day use and ensuring the requirements of the SOP are met. We concluded that the SOP adequately defines official-use eligibility and therefore consider the recommendation to be resolved and implemented.

**Recommendation 6:** Establish and implement policy and procedures as to how the NPS will document lodge guest information. Such information should include the lodge’s primary guest, the official use during his or her stay, whether additional persons

accompanied the guest during his or her stay, and whether the stay combined official and personal uses.

**Actions Taken:** The NPS' SOP has a lodge reservation request form to collect information including the lodge's primary guest, the official use during the stay, and whether there were additional guests. In the SOP, the NPS stipulated that official use is the only approved use. We concluded that the reservation form is adequate documentation of guest information and therefore consider the recommendation to be resolved and implemented.

**Recommendation 7:** Establish and implement policy and procedures to identify when and how a waiver may be obtained for an individual or stay that would otherwise be considered ineligible.

**Actions Taken:** In the SOP, the NPS stipulated that no eligibility waivers will be granted. We therefore consider the recommendation to be resolved and implemented.

**Recommendation 8:** Review and update current policy to establish a system to bill and collect payment from lodge guests and to determine what documentation is needed to authorize guests who are not billed according to policy.

**Actions Taken:** In the SOP, the NPS identified a system to bill and collect payment from lodge guests. Overnight accommodations at the lodge are to be used only for official administrative purposes by Federal employees. Employees staying at the lodge are billed via email and must pay with a Government charge card through Pay.gov. If the employee uses additional rooms for non-Government members of their party, a separate bill will be issued to the employee, who must pay the bill through Pay.gov with a personal credit card. We consider the recommendation to be resolved and implemented.

**Recommendation 9:** Reevaluate the 1992 secretarial policy to determine whether the prevailing Federal per diem rate or market rate should apply, taking into consideration the costs to operate and maintain the lodge.

**Actions Taken:** In its response to our draft report, the NPS stated it was appropriate to charge overnight guests the Federal per diem rate for Jackson, WY. The NPS determined that the use of the per diem rate was appropriate since only Federal employees are permitted to stay overnight and only for official administrative purposes. In addition, the use of the per diem rate will encourage Federal employees with approved use to continue occupancy of the lodge, therefore helping to fund some of the cost to operate and maintain the lodge. We therefore consider the recommendation to be resolved and implemented.

## Conclusion

We conclude that Recommendations 3 and 5 – 9 are resolved and implemented.

We informed Department officials of the results of this review at an exit conference on September 11, 2018. Department officials concurred with our findings.

If you have any questions about this verification review, please contact me at 916-978-5653.

cc: Grayford Payne, Acting Deputy Assistant Secretary for Budget, Finance, Performance and Acquisition  
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