




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

May 31, 2013

Memorandum

To: Eric Eisenstein
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 of Recommendations for the Inspection Report, "Museum Collections: Preservation and Protection Issues with Collections Maintained by the Bureau of Indian Affairs" (C-IS-BIA-0004-2010, January 2010)
Report No. WR-VS-BIA-0010-2013

The U.S. Department of the Interior (DOI) Office of Inspector General (OIG) has completed a verification review of the two recommendations presented in the subject inspection 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. PFM reported to OIG when BIA had addressed and provided supporting information for the two recommendations in the subject report. As a result, the inspection report closed May 18, 2011. Based on our verification, we consider Recommendation 1 resolved and implemented and Recommendation 2 resolved but not implemented.

Background

Our January 2010 inspection report, "Museum Collections: Preservation and Protection Issues with Collections Maintained by the Bureau of Indian Affairs," contained two recommendations relating to correcting and/or mitigating, to the greatest extent possible, all identified deficiencies at the seven BIA regional offices and inspecting all remaining BIA repository sites that house museum collections.

On March 15, 2010, OIG referred the recommendations to PFM for tracking and implementation. In a memorandum dated March 19, 2010, BIA concurred with OIG's recommendations in the report. On May 13, 2011, BIA requested that PFM close the two recommendations based on actions they had taken to date and its plans for fully implementing both recommendations. Subsequently, PFM reported in a memorandum dated May 18, 2011, that BIA met the intent of the recommendations and is correcting and/or mitigating, to the greatest extent possible, the deficiencies identified in the report. PFM considered both recommendations to be implemented and closed the report.

Scope and Methodology

The scope of this review was limited to determining whether BIA took action to implement our recommendations. To accomplish our objective, we reviewed the supporting documentation that BIA officials provided and discussed actions taken relating to the two recommendations.

We did not perform any site visits or conduct fieldwork to determine whether BIA 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 of the Council of the Inspectors General on Integrity and Efficiency.

Results of Review

Our current review found that BIA implemented Recommendation 1 but did not implement Recommendation 2. We are requesting that PFM reinstate Recommendation 2 and take appropriate follow-up actions.

Recommendation 1: Correct and/or mitigate, to the greatest extent possible, all identified deficiencies at the seven sites identified in this report.

BIA appears to be correcting and/or mitigating, to the greatest extent possible, all of the identified deficiencies at the seven sites identified in this report.

According to BIA's Museum Program Manager, BIA developed a Corrective Action Plan (CAP) which lists all of the deficiencies noted by the OIG at each of the seven sites visited. The CAP identifies the deficiencies that have been addressed and describes the work BIA is doing to correct and/or mitigate the remaining deficiencies.

In addition, BIA's Museum Program Manager told us that BIA staff has been directed to follow three new DOI directives created specifically for the management of museum collections and repositories. Directive 3, "Required Standards for Documenting Museum Property," establishes policy on maintaining documentation accessioning, cataloging, inventories, and loans. The policy covers documentation in both paper format and in the Interior Collection Management System (ICMS) database. Directive 4, "Required Standards for Managing and Preserving Museum Property," requires that BIA staff assess the environmental controls, security and fire protection, and appropriate display of museum objects. Directive 18, "Interior Collection Management System," implements the use of the ICMS as the database for managing the specific collection management activities of all museum collection repositories.

We concluded that BIA is correcting and/or mitigating, to the greatest extent possible, the identified deficiencies at the seven sites identified in our report. We therefore consider this recommendation to be implemented.

Recommendation 2: Inspect all remaining BIA sites that house museum collections and correct and/or mitigate, to the greatest extent possible, all identified deficiencies.

In BIA's memo to PFM dated May 13, 2011, it stated that it had completed site visits to 24 out of 108 BIA repositories holding museum collections to verify condition assessments. As of March 2013, BIA's Museum Program Manager told us that the number of repositories has since been reduced to 95 and that BIA has inspected 48 of the 95 repositories. While BIA has made progress in this regard, BIA museum program staff has not yet inspected all of the remaining BIA sites that house museum collections. We therefore concluded that this recommendation has not been implemented.

Conclusion

We informed BIA officials of the results of this review at an exit conference on May 23, 2013. BIA officials agreed with the results of our review. We request that PFM reinstate Recommendation 2 as not implemented from the subject inspection report and inform us of the actions to be taken for this recommendation.

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

cc: Michael S. Black, Director, Bureau of Indian Affairs
Andrea Nygren, DOI/GAO Liaison, Office of Financial Management
Michael Oliva, Director, Office of Internal Evaluation and Assessment, Indian Affairs
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