




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

July 1, 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 Fish and Wildlife Service" (C-IS-FWS-0007-2010, January 2010)  
Report No. WR-VS-FWS-0015-2013

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 U.S. Fish and Wildlife Service (FWS) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. PFM reported to OIG that FWS had addressed and provided supporting information for the two recommendations in the subject report. As a result, Recommendation 1 was closed on March 8, 2011, and Recommendation 2 was closed on January 17, 2012. Based on our verification, we consider both recommendations not implemented.

**Background**

Our January 2010 inspection report, "Museum Collections: Preservation and Protection Issues with Collections Maintained by the Fish and Wildlife Service," contained two recommendations relating to correcting and/or mitigating, to the greatest extent possible, all identified deficiencies at seven FWS museum repository sites and inspecting all remaining FWS museum repositories.

On March 15, 2010, OIG referred the recommendations to PFM for tracking and implementation. PFM reported in a memorandum dated March 8, 2011, that upon reviewing documentation submitted by FWS, PFM determined that FWS had met the intent of Recommendation 1 and considered it closed. PFM stated that Recommendation 2 remained outstanding and that it would continue to track and monitor resolution of the recommendation. PFM reported in a memorandum dated January 17, 2012, that upon reviewing additional documentation, PFM determined that the FWS had met the intent of Recommendation 2 and considered it closed.



## Scope and Methodology

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

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

## Results of Review

Our current review found that FWS has not implemented Recommendations 1 and 2. We are requesting that PFM reinstate both recommendations 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.

On February 23, 2011, FWS requested that PFM consider Recommendation 1 resolved and implemented based on information contained in its “FY 2010 Report on Museum Property Management and Heritage Assets.” FWS’ report stated that as of December 2010, FWS had corrected 98 percent of the deficiencies at three of the seven sites (Mason Neck and Parker River National Wildlife Refuges and Patuxent Research Refuge) and that it would complete the remaining 2 percent during calendar year 2011. In its report, FWS also stated that corrections were in progress at a fourth site (Rocky Mountain Arsenal National Wildlife Refuge) and would be completed in 2011. FWS’ report did not discuss whether it had corrected any of the identified deficiencies at the remaining three sites. Despite this omission, PFM determined that FWS had met the intent of the recommendation and closed it.

FWS could not provide sufficient evidence to determine where it currently stands with correcting and/or mitigating the deficiencies at the seven sites we inspected in our 2010 report or at the remaining FWS Federal and non-Federal repository sites. From the documentation that was provided to OIG, it appears little has been done to implement the recommendation since 2010. The FWS national curator stated that FWS would require more time to complete the recommendation.

We reviewed “Appendix 3 – A Workload Analysis for the U.S. Fish and Wildlife Service Cultural Resources Program” in FWS’ FY 2011 “Annual Report of Cultural Resources Management.” This report notes that museum property management represents a largely unfunded workload. It also states that:

FWS is falling well short of minimum acceptable standards and without an investment the management practices will continue to be a source of risk through

either continued audit findings or potential litigation. . . . At current staffing levels there will be little progress in mitigating audit report findings or improving levels of service available for protecting cultural resources through museum property management, continued risk of future findings and possible litigation will remain and likely expand.

Based on the aforementioned information, we concluded that FWS has not corrected and/or mitigated, to the greatest extent possible, the deficiencies at the seven sites identified in our report. We therefore consider this recommendation not implemented.

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

FWS was unable to provide evidence that it physically inspected the seven sites we inspected in our 2010 report or any of the remaining FWS Federal and non-Federal sites. Further, we did not receive any plans or schedules showing when any inspections may begin. The FWS national curator stated that inspections of museum repositories would be completed by FWS regional staff or by field staff at the location, but at the same time, stated that FWS does not possess anywhere near the staff required to truly address all potential deficiencies noted. He also acknowledged that implementing Recommendation 2 would take considerably more time.

We concluded that FWS has not implemented Recommendation 2.

## **Conclusion**

We informed FWS officials of the results of this review at an exit conference on May 23, 2013. FWS officials generally agreed with our results. We request that PFM reinstate both recommendations from the subject evaluation report as not implemented and inform us of the actions to be taken for these recommendations.

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

cc: Dan Ashe, Director, Fish and Wildlife Service  
Sharon J. Blake, Liaison Officer, Office of Financial Management  
Katherine Garrity, Deputy Division Chief, Audit Liaison Officer and Internal Control Coordinator