




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

August 21, 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 Evaluation Report,
"Whereabouts Unknown" (WR-IS-OST-0006-2009, June 2010)
Report No. WR-VS-OST-0019-2013

The U.S. Department of the Interior Office of Inspector General (OIG) has completed a verification review of the three recommendations presented in the subject evaluation report. The objective of the verification was to determine whether the Office of the Special Trustee for American Indians (OST) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. PFM reported to OIG when OST had addressed and provided supporting documentation for each of the three recommendations in the subject report. Based on our review, we determined that all three recommendations have been resolved and implemented.

Background

Our June 2010 evaluation report, "Whereabouts Unknown," contained three recommendations pertaining to the management of Individual Indian Money (IIM) accounts and coordination between OST and the Bureau of Indian Affairs (BIA).

In a memorandum dated August 9, 2010, OST and BIA concurred with Recommendations 1 and 3 and partially concurred with Recommendation 2. They stated that implementing a policy with a priority system based on specific dollar amounts would be unfair to all IIM account holders. Based on this response, we considered Recommendations 1 and 3 resolved and unimplemented and Recommendation 2 unresolved and unimplemented. On February 24, 2012, PFM reported to OIG that OST and BIA had implemented all recommendations; PFM then closed the three recommendations.

Scope and Methodology

The scope of this review was limited to determining whether OST took action to implement our recommendations. To accomplish our objective, we reviewed the supporting

documentation that OST officials provided and discussed actions taken relating to each of the three recommendations.

We did not perform any site visits or conduct fieldwork to determine whether OST 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 as put forth by the Council of the Inspectors General on Integrity and Efficiency.

Results of Review

Based on the information provided, we determined that all three recommendations have been resolved and implemented.

Recommendation 1: Develop and implement procedures that improve the quality and frequency of communication between OST, BIA, and Tribal Social Services to settle unresolved supervised trust accounts. This includes developing and implementing procedures that provide BIA Social Services offices across the country access to the OST beneficiary call center's tracking system.

Action Taken: OST and BIA agreed to hold conference calls on the first Wednesday of every quarter. Participants of these meetings discuss collaborative efforts, protected supervised and restricted IIM accounts, and joint training.

In addition, OST has provided BIA with access to its trust beneficiary call center. To facilitate this transition, OST designated a contact person to aid in training BIA field staff. Along with access, OST also provided guidelines to BIA for use of the call center.

Recommendation 2: Identify located Whereabouts Unknown high-dollar account holders who are waiting for assessments by Social Services or title changes by the Land Title and Records Office, and prioritize resolution of these cases.

Action Taken: OST and BIA determined that a policy with a priority system based on specific dollar amounts would be unfair and decided that they would instead base the service level on the need of the individual account holder. OST and BIA developed three levels of priority: critical, major, and normal. They define the "critical" category as IIM account holders who are at risk for exploitation or who lack resources for basic needs or emergencies; appointments are scheduled for these individuals within 3 working days. They define "major" as IIM account holders with ordinary or routine need; appointments are scheduled for these individuals within 5 working days. They define "normal" as IIM account holders who need case management service but not account disbursement; appointments are scheduled for these individuals within 10 working days. In all three levels, action is required on the application within 30 days.

Recommendation 3: Coordinate with top officials at the U.S. Department of Health and Human Services and the U.S. Social Security Administration to ensure that Medicaid and Supplemental Security Income eligibility requirements are applied consistently for restricted trust account holders with supervised accounts.

Action Taken: The U.S. Department of Health and Human Services provided guidance to State Medicare Directors on implementing the American Recovery and Reinvestment Act of 2009. This guidance provided additional clarification for the application of Medicaid, the Social Security Act, and the Children's Health Insurance Program eligibility requirements.

Conclusion

We informed OST and BIA officials of the results of this review in an email on July 18, 2013. OST and BIA declined to schedule an exit conference.

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

cc: Nancy Thomas, Audit Liaison Officer, Office of Financial Management
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