




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

Memorandum

AUG 08 2017

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 Report, “Bureau of Indian Affairs and U.S. Fish and Wildlife Service Safety of Dams: Emergency Preparedness” (WR-EV-MOA-0002-2013)  
Report No. 2017-WR-030

The Office of Inspector General (OIG) has completed a verification review of the 13 recommendations presented in the subject report. Our objective was to determine whether the Bureau of Indian Affairs (BIA) and the U.S. Fish and Wildlife Service (FWS) have taken sufficient action to implement the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. The PFM reported to the OIG that it has closed the recommendations. Based on our review, we concur that all recommendations have been resolved and implemented.

### **Background**

Our September 24, 2013 report titled “Bureau of Indian Affairs and U.S. Fish and Wildlife Service Safety of Dams: Emergency Preparedness” made 13 recommendations designed to improve BIA and FWS’s emergency action planning. Recommendations 1 – 11 were directed to the BIA, and Recommendations 12 and 13 were directed to the FWS. The BIA Director concurred with Recommendations 1 – 11 in a memorandum dated August 29, 2013, and detailed the BIA’s plans to implement them. The Principal Deputy Assistant Secretary for Fish Wildlife and Parks concurred with Recommendations 12 and 13 on August 6, 2013, and issued the FWS’ plans to implement them. On November 6, 2013, we referred all 13 recommendations to the Assistant Secretary of Policy, Management and Budget to track implementation.

On November 22, 2013, the PFM reported to the OIG that it considered Recommendation 12 to be implemented and closed.

On July 22, 2014, the PFM reported to the OIG that it considered Recommendation 13 to be implemented and closed.

On September 26, 2014, the PFM reported to the OIG that it considered Recommendations 1 – 11 to be implemented and closed.

## **Scope and Methodology**

We limited the scope of this review to determining whether the BIA and the FWS took sufficient action to implement the recommendations directed to them. To accomplish our objective, we reviewed the PFM's documentation supporting its closure of the recommendations and bureau documentation of the actions they took to implement the recommendations. We did not perform internal control testing, site visits, or fieldwork to determine whether the underlying deficiencies that were initially identified have been corrected. 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 Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency.

## **Results of Review**

Our review found that the BIA has resolved and implemented Recommendations 1 – 11 and the FWS has resolved and implemented Recommendations 12 and 13.

**Recommendation 1:** Update BIA policies to align with the FGDS [Federal Guidelines for Dam Safety] dam hazard classification.

**Action Taken:** The BIA updated its *Safety of Dams Program Handbook* definitions for high- and significant-hazard dams to align with the Federal Emergency Management Agency's *Federal Guidelines for Dam Safety: Hazard Potential Classification System for Dams*.

**Recommendation 2:** Comply with requirements to exercise the EAPs [emergency action plans] for high- and significant-hazard dams.

**Action Taken:** The BIA's handbook contains guidance that EAPs are to be exercised by means of functional or tabletop exercise every 5 years. Also, the BIA developed a spreadsheet to track the completion of EAP exercises.

**Recommendation 3:** Comply with requirements to prepare an exercise completion report after an EAP exercise or dam incident that includes a planned course of action to implement and track the recommended corrective actions.

**Action Taken:** The BIA's handbook contains guidance that draft exercise completion reports are to be completed within 30 days of an exercise and finalized within 60 days of an exercise. The BIA developed a spreadsheet to track the finalization of EAP exercise completion reports, which were renamed as After-Action Report and Improvement Plan (AAR/IP) reports. The AAR/IP contains a schedule that contained a column for the estimated completion date of the AAR/IP recommendations.

**Recommendation 4:** Establish consistent documentation for annual EAP reviews and communication drills.

**Action Taken:** The BIA's handbook contains a procedure for consistently documenting completed annual EAP communication drills. Communication directories are updated annually, and the BIA tracks the annual drills in a spreadsheet.

**Recommendation 5:** Establish a timeline to finalize all the EAPs currently in draft.

**Action Taken:** The BIA's handbook contains guidance that EAPs are to be finalized within 120 days of the exercise through signing the certification and distribution page.

**Recommendation 6:** Maintain an inventory for all high- and significant-hazard dams' EAPs and exercise completion reports.

**Action Taken:** The BIA developed a spreadsheet to track the EAP inventory and reported that its Central Office in Lakewood, CO, has digital and hard copies of the EAPs and AAR/IPs.

**Recommendation 7:** Ensure EAPs for all high- and significant-hazard dams have a listing of materials and equipment to the extent possible, and document the process of verifying the location and existence of equipment and materials listed in the EAPs as part of the annual EAP reviews.

**Action Taken:** The BIA's handbook contains guidance to verify and update the list of materials and equipment during annual communication drills. The BIA reported that it can also update the list during tabletop exercises or other meetings. During these meetings, the BIA can request that tribal program personnel and local responders verify and provide updated information to the equipment and materials list. The BIA tracks the annual EAP updates in a spreadsheet.

**Recommendation 8:** Determine if EWSs [early warning systems] are needed and feasible at all high- and significant-hazard dams. If BIA determines that any of the remaining dams need an EWS and it is feasible, BIA should develop and initiate an implementation plan.

**Action Taken:** The BIA determined that EWSs are needed and feasible at all high- and significant-hazard dams. According to the handbook, the BIA has installed 116 EWSs. The BIA has a list containing 22 dams that do not have EWSs of which 16 do not require EWSs.

**Recommendation 9:** Incorporate the EWS information into the EAPs for those dams with an EWS.

**Action Taken:** The BIA reported that it would start incorporating EWS information into the EAPs for dams with EWSs starting in fiscal year 2014 and that it would be tracked in

the EAP tracking system. The BIA provided three examples of dams with EWS information in the EAP.

**Recommendation 10:** Establish a policy to periodically review and update the established EWS decision criteria for each dam site and the communication directories at NMC [the BIA's National Monitoring Center], and document those reviews.

**Action Taken:** The BIA's handbook contains guidance for alarm threshold level confirmation during EAP exercises, and modifications are made as required based on the results of the exercise. The EWS alarm thresholds are confirmed during EAP exercises and modified as required based on the results of the exercise. EAP exercises are done every 5 years. Also, the communication directories are updated annually during communication drills, and the thresholds are verified during maintenance of EWS equipment.

**Recommendation 11:** Work with USBR [Bureau of Reclamation] to make all existing EWSs fully functional.

**Action Taken:** The BIA has three agreements with the USBR to make EWSs fully functional through training, maintenance, and system updates.

**Recommendation 12:** Document the process of verifying the location and existence of equipment and materials listed in the EAPs as part of the annual EAP reviews.

**Action Taken:** The FWS developed an item in a checklist to verify the location and existence of equipment and materials as part of the annual EAP reviews.

**Recommendation 13:** Create a written policy that requires the preparation and issuance of an AAR [after-action report] after each incident or exercise and the inclusion of a planned course of action to implement and track the recommended corrective actions in the AAR to formalize its existing practice.

**Action Taken:** The FWS added written policy to its manual 361 *FW 3* to conduct AARs for exercises and incidents and to track and verify the completion of AAR recommendations.

## **Conclusion**

We informed BIA and FWS officials of the results of this review on June 19, 2017.

cc: Olivia Ferriter, Deputy Assistant Secretary for Policy, Management and Budget  
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