



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

JUN 08 2018

Memorandum

To: Kristen J. Sarri  
Principal Deputy Assistant Secretary for Policy, Management and Budget

Lawrence S. "Larry" Roberts  
Acting Assistant Secretary for Indian Affairs

From: Amy R. Billings *Amy R. Billings*  
Central Region Manager for Audits, Inspections, and Evaluations

Subject: Verification Review – Recommendations for the Report, "Department of the Interior's Accountability and Preservation of Museum Collections" (Audit No. C-IN-MOA-0010-2008)  
Report No. 2016-CR-018

The Office of Inspector General (OIG) has completed a verification review of 10 of the 13 recommendations presented in our December 2009 audit report "Department of the Interior Accountability and Preservation of Museum Collections" (Report No. C-IN-MOA-0010-2008). Our objective for this review was to determine whether the U.S. Department of the Interior (DOI) implemented the recommendations as reported to the Office of Financial Management (PFM); Office of Policy, Management and Budget.

In our 2009 audit, we found that DOI was failing to fulfill its stewardship responsibilities and that there was widespread failure to properly accession, catalog, or inventory museum collections. In addition, we found that DOI had little idea of what museum collections non-DOI facilities held. At the conclusion of our audit, we also conducted a brief evaluation of DOI's preservation practices and found neglected collections at many DOI sites; and that countless artwork, artifacts, and other museum objects were in jeopardy. Our report included 10 recommendations related to accountability over museum collections and 3 recommendations related to their preservation. Recommendation 10 addressed the management of museum collections specifically at the Bureau of Indian Affairs (BIA).

Between August 2010 and September 2015, PFM reported to OIG that DOI had addressed, implemented, and closed 10 recommendations (1, 3, 4, 5, 6, 7, 8, 10, 12, and 13). Three recommendations (2, 9, and 11) have not been reported to us as closed and, therefore, were not included in this review.

We limited the scope of this review to determine if DOI implemented the 10 recommendations reported closed by PFM. To accomplish our objective, we reviewed the supporting documentation that DOI officials provided to PFM, discussed issues with DOI

museum staff, and collected and reviewed additional supporting documentation as required to verify each recommendation's implementation independently.

We did not test internal controls, visit sites, or conduct fieldwork to determine whether the underlying deficiencies that we initially identified have been corrected. As a result, we did not conduct this verification review 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.

Based on our review, we conclude that the following 10 recommendations have been resolved, implemented, and closed.

**Recommendation 1:** Develop and implement a policy that provides for greater Department-level oversight of bureau museum programs to ensure that they comply with Department Manual requirements.

**Recommendation 3:** Develop and implement a comprehensive plan to be used by all bureaus to eliminate accessioning and cataloging backlogs so that all museum collections can be properly identified, tracked, and accounted for. The plan should identify the necessary resources, should consider some type of prioritization for more valuable objects, and address missing items.

**Recommendation 4:** Ensure that the Scope of Collection Statement of every site is reviewed and updated at least every 5 years, as required by Departmental Manual 411.

**Recommendation 5:** Ensure that required annual physical inventories are conducted at all DOI facilities that have museum collections and that appropriate steps are taken to address missing items.

**Recommendation 6:** Complete Department-wide implementation of the Interior Collections Management System (ICMS) to ensure uniform recordkeeping.

**Recommendation 7:** Reduce the number of facilities managing collections by consolidating collections at larger curation centers.

**Recommendation 8:** Pursue additional partnerships with interested organizations, such as universities, foundations, and other special interest groups, to aid in managing museum collections.

**Recommendation 10:** (BIA) Issue a policy that clarifies the roles and responsibilities of the Division of Environmental and Cultural Resource Management (DECRM) and the Division of Property in the management of museum collections.

**Recommendation 12:** Increase effectiveness of protection of collections held at DOI and non-DOI facilities by ensuring that annual physical inventories, which clearly identify the condition of museum property held, are conducted as required.

**Recommendation 13:** Direct all sites that have DOI property complete the comprehensive checklist included in Departmental Manual Part 411.

We informed DOI officials of the results of this review on May 9, 2016.

cc: Olivia Ferriter, Deputy Assistant Secretary for Policy, Management and Budget  
Douglas Glenn, Director, Office of Financial Management  
Allen Lawrence, Division Chief, Internal Control and Audit Follow-up, Office  
of Financial Management  
Nancy Thomas, Audit Liaison Officer, Office of Financial Management  
Patrick McHugh, Audit Liaison Officer, Office of Financial Management  
Alexandra Lampros, Audit Liaison Officer, Office of Financial Management  
Michael Oliva, Audit Liaison Officer, Indian Affairs  
Terry Childs, Manager, Interior Museum Program, Office of Acquisition and Property  
Management