



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

# **Recommendations 1 – 15, 19, and 21 From the Evaluation Report Titled Condition of Indian School Facilities (C-EV-BIE-0023-2014)**

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NOV 06 2020

Memorandum

To: Tonya Johnson  
Deputy Chief Financial Officer and Director, Office of Financial Management

From: Amy R. Billings *Amy R Billings*  
Regional Manager, Central Region

Subject: Verification Review – Recommendations 1 – 15, 19, and 21 From the Evaluation Report Titled *Condition of Indian School Facilities* (C-EV-BIE-0023-2014)  
Report No. 2020-CR-026

The Office of Inspector General has completed a verification review of 17 of the 21 recommendations presented in the subject report. Our objective was to determine whether the Office of the Assistant Secretary- Indian Affairs (IA) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. The PFM reported to us when each of the 17 recommendations were addressed and provided supporting documentation. Based on our review, we consider recommendations 1 – 13, 15, and 21 resolved, implemented, and closed. We consider Recommendations 14 and 19 not implemented and recommend they be reopened for implementation tracking.

**Background**

In our September 30, 2016 evaluation report, *Condition of Indian School Facilities*, we found systemic issues with facilities management, major facility deficiencies, health and safety concerns, and information not documented in the Bureau of Indian Affairs' (BIA's) facility management system for the 13 schools we visited. We made 21 recommendations designed to help the BIA and the Bureau of Indian Education (BIE) develop promising practices to ensure that Indian school facilities are operated and maintained properly for the students.

We did not receive a formal response from the IA prior to our final report's publication, thus, we referred all 21 recommendations to the Director of the PFM to track their resolution and implementation. Shortly thereafter, we learned that the IA had already begun implementing some of our recommendations and in April 2017, the PFM reported that the IA generally concurred with all our recommendations, except Recommendation 8, and provided the names of responsible parties and target dates for implementation of each recommendation.

**Scope and Methodology**

We limited the scope of this review to the 17 recommendations reported closed by the PFM. Between May 2017 and October 2018, the PFM reported Recommendations 1 – 15, 19,

and 21 as closed. Recommendations 16, 17, 18, and 20 were not reported as closed and are not included in this review.

To accomplish our objective, we reviewed the supporting documentation the IA provided to the PFM, and collected and reviewed additional supporting documentation from the IA. We did not perform internal control testing, site visits, or conduct fieldwork to determine whether the underlying deficiencies that we 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**

We found that the IA implemented 15 of the 17 recommendations reported closed by the PFM. We determined that recommendations 14 and 19 have not been fully implemented and should be reopened until the IA:

- Ensures facility condition assessments are conducted every 3 years (Recommendation 14)
- Confirms that all the deficiencies identified in our previous report have been corrected or accounted for in the IA-Facility Management System (Recommendation 19)

**Recommendation 1:** Develop, implement, and communicate a detailed project plan for completing the transition to Maximo.

**Action Taken:** When transitioning to the new system, the IA developed a communication plan for IA-FMS that included numerous training sessions, quick user guides for Maximo applications, and, in November 2015, an IA-FMS briefing for stakeholders. Among the topics covered in this briefing were the IA's system implementation strategy, the status and milestones of the system transition, and the IA end-user training. We consider Recommendation 1 resolved, implemented, and closed.

**Recommendation 2:** Provide access to a more consistent training program for school staff on entering data into both FMIS and Maximo until Maximo is fully implemented

**Action Taken:** The IA fully transitioned to IA-FMS in July 2015. Through its Division of Facilities Management and Construction (DFMC) and the DIT, the IA provided classroom training on entering data into Maximo to over 680 school staff, as well as 29 webinars on a variety of topics, many of which were posted on the BIE's website. In addition, another division within the IA, the Division of Safety and Risk Management, hosted Safety Inspector trainings from 2015 through 2017. Further, in fiscal year (FY) 2018, the DFMC and the DIT collaborated on developing other training capabilities, such as how-to documents and demonstrations, in response to new topics and changes. The previous system, FMIS, was closed and subsequently decommissioned once Maximo was fully implemented, therefore the training related to the FMIS is no longer relevant. We consider Recommendation 2 resolved, implemented, and closed.

**Recommendation 3:** Communicate to schools regarding points of contact for technical assistance.

**Action Taken:** In September 2017, the IA issued a memorandum to all programs supporting BIE-funded schools defining the roles and responsibilities for various facilities management staff, including those available to provide technical assistance. Additionally, a national directory on the BIE's website includes points of contact at the regional level and within the DFMC. We consider Recommendation 3 resolved, implemented, and closed.

**Recommendation 4:** Ensure accounts and passwords for Maximo are established and used.

**Action Taken:** The DFMC and the supporting contractor, DIT, established access requirements, accounts, and passwords for the IA-FMS. Instructions on IA web applications and user roles are outlined in the *IA User Management Portal Guide* developed in April 2017. The guide requires passwords and registration to access the portal. Further, users are required to access IA-FMS at least once every 90 days to remain active. To monitor account usage and the status of inactive users, the DFMC sends monthly Users Audit Reports to BIA and BIE managers. We consider Recommendation 4 resolved, implemented, and closed.

**Recommendation 5:** Create a tracking and reminder system to document which schools are actively accessing their accounts and entering information.

**Action Taken:** The Users Audit Report, created by the DFMC and the DIT, identifies users' activities within IA-FMS. The report contains user information, including active or inactive status, number of days not logged in, and date of the last login. On a monthly basis, the DFMC sends the user report to BIA and BIE managers for their information or action. In addition to the report, the DFMC and the DIT created a gatekeeper review process that includes levels of review for each work order submitted by schools. The IA does not track which schools actively enter work orders in the system because of varied conditions and number of work orders for each school. However, the DFMC can review work order history to see when status changes occur. We consider Recommendation 5 resolved, implemented, and closed.

**Recommendation 6:** Determine which schools have connectivity issues, help the schools identify what is necessary to enhance the networks from the grid reliability stance, and document any infrastructure needs in the facility management system.

**Action Taken:** The IA's Office of Information Management Technology (OIMT), in conjunction with the BIE, is responsible for monitoring network reliability and coordinating and tracking network upgrades. To determine which schools had connectivity issues, the IA issued the *Education Native American Network II Broadband Progress* report, which identified whether school connectivity speeds, for both tribally controlled and BIE-operated schools, met the established modified and full standards set forth by the State Education Technology Directors Association. The report determined that in FY 2017, 68 schools did not meet modified standards and 78 schools did not meet full standards. To enhance networks and grid reliability, the IA completed upgrades at 53 schools in FY 2017, and planned to upgrade the remaining schools by

FY 2019. Further, the OIMT noted that it documents infrastructure needs in Remedy, the DOI's system of record for IT service needs, not in the IA-FMS. We determined that the IA met the intention of Recommendation 6. We consider Recommendation 6 resolved, implemented, and closed.

**Recommendation 7:** Until networks issues are resolved, explore alternative means for capturing the schools' data in the facility management system.

**Action Taken:** The IA allowed access to the IA-FMS Maximo application from the public Internet. This enabled all users (BIA, BIE, tribal, or IA) to access the Maximo application, enter work orders, and create job plans. However, some applications that work in conjunction with Maximo, like the Safety and Condition Assessment Portal (S&CAP) where inspections are tracked and recorded, must reside within the restrictive IA Trust Network. The IA stated that it plans to move the S&CAP system to an internet-based application called ColdFusion, but in the meantime, users must coordinate with their region or agency location to gain access directly. We determined that the IA mitigated S&CAP access issues by developing and communicating a procedure for non-Trust network users to complete abatement plans outside of the S&CAP until the ColdFusion application is live. We consider Recommendation 7 resolved, implemented, and closed.

**Recommendation 8:** Redesign the way FCI is calculated and used in funding allocations to allow consideration for the condition of individual structures.

**Action Taken:** The IA disagreed with our recommendation and provided two reports to demonstrate its assertion that the Facility Condition Index (FCI) allows consideration for the condition of individual structures. Based on a structure summary report provided by the DFMC, we determined that the IA uses FCI scores to grade both the condition of the school as a whole, and individual structures at each school. Specifically, the FCI Summary Report with Location Detail, provided by the DFMC, assigned numerical FCI scores and a rating of Poor, Fair, or Good, to all individual structures. Further, the IA's School Deferred Maintenance Work Order Report contained detailed descriptions about facility deficiencies, category, rank, and estimated costs. The IA stated that it considers these data and additional factors other than the FCI when making funding decisions such as the size, age, and isolation of the school. We determined that the IA demonstrated its use of the FCI that allows for consideration of the condition of individual structures, and reports provided by the DFMC indicate the FCI is not the sole factor used in its capital improvement and funding decisions. Therefore, we determined that the IA has met the intent of Recommendation 8 and consider the recommendation resolved, implemented, and closed.

**Recommendation 9:** Identify and clarify the specific roles and responsibilities that BIA and BIE have in school facilities management and then publicize those roles and responsibilities to bureau staff and schools.

**Action Taken:** In September 2017, the IA issued a memorandum titled *Facilities Management Communication and Organizational Roles and Responsibilities Clarification* to all BIE, BIA, and Central Office programs supporting BIE-funded

Schools; associate deputy directors; BIE facility managers; regional directors; and regional facility managers. The memorandum delineated the various roles and responsibilities within BIA and BIE related to BIE-funded schools. Additionally, the memorandum identified weekly status conference calls and process action teams as methods to publicize the roles and responsibilities. Lastly, the IA met with the Ramah Navajo School Board and Pine Hill Boarding School in September 2017, to further ensure that these responsibilities were understood. We determined that the IA identified and clarified the BIA's and the BIE's specific roles and responsibilities in school facilities management and publicized those roles and responsibilities to bureau staff and schools. We consider Recommendation 9 resolved, implemented, and closed.

**Recommendation 10:** Update contact lists for both BIA and BIE facilities personnel and post them online and distribute them to the schools.

**Action Taken:** The IA chose to develop a national directory instead of updating a contact list that may become irrelevant with employee turnover. The directory—including points of contact at the BIE, the BIA, and the DFMC—is posted on the BIE's website and accessible to schools. We determined that the IA updated contact lists for both BIA and BIE facilities personnel and posted them online. Therefore, we consider Recommendation 10 resolved, implemented, and closed.

**Recommendation 11:** Devise and implement a strategy to improve communication between the bureaus and the schools and to share information including alternate and in-house funding sources, updated contact information, and best practices.

**Action Taken:** To help improve communications between the IA and the schools, the DFMC developed a *Communication Improvement Plan With Bureau of Indian Education*. The plan identifies priority communication issues, communication strategies and themes, and numerous communication channels to be used to disseminate focused messages to a variety of stakeholders. The improvement plan also contains a detailed action plan clarifying the activities, responsible parties, milestones, and outcomes for identified priority communication issues. Further, the DFMC maintains and updates a public internet site with pertinent facilities related information; conducts weekly regional facility managers conference calls; and participates in BIE-sponsored training events, conferences, and meetings. We consider Recommendation 11 resolved, implemented, and closed.

**Recommendation 12:** Improve monitoring to ensure funds are used for the intended and approved purposes and that projects are completed to applicable quality standards.

**Action Taken:** In its closure request, the IA outlined the DFMC's responsibility for providing program management, construction, and program oversight. The DFMC tracks projects by ensuring all funded projects are assigned a unique code tracked within IA-FMS that ties the project to an approved deferred maintenance entry and to specific budget activities. According to the IA, all funding requests require approval from the DFMC division chief. In addition, the DFMC holds regular meetings with program

managers to discuss project issues and conducts annual internal control reviews. We determined that the IA met the intent of Recommendation 12 and consider the recommendation resolved, implemented, and closed.

**Recommendation 13:** Communicate that unspent funds should be returned for potential reallocation.

**Action Taken:** The IA issued a National Policy Memorandum (NPM), effective in February 2018 and until official policy can be established, which delineated procedures to follow in returning unspent funds for reallocation purposes. Additionally, the IA has used weekly staff conference calls and emails to communicate information about the reallocation of unspent funds. For example, minutes from a January 2017 conference call with regional facility managers, the BIE, and the Office of Justice Services, documented approval of the NPM and underscored a provision about returning any savings or carryover to the DFMC for reallocation. Procedures for returning unspent funds for allocation have not yet been formally incorporated into the BIA's policy manual; however, a recent amendment to the NPM extended the memorandum's provisions to February 2021. We determined that the IA communicated that unspent funds should be returned for potential reallocation. Therefore, we consider Recommendation 13 resolved, implemented, and closed.

**Recommendation 14:** Revisit the condition assessment contract to ensure that inspections are thorough, captured in the facilities management system, and completed every 3 years.

**Action Taken:** The IA modified its Facility Condition Assessment (FCA) contract performance work statement in 2016, to include an enhanced scope of services beyond a snapshot of current conditions. In addition, between 2015 and 2017, the DFMC held regularly scheduled quarterly contract performance meetings with the FCA contractor and other IA stakeholders to ensure inspections were thorough and that any problems were identified. It also hosted financial management and other coordination meetings to discuss how information would be captured in the newly released IA-FMS, among other topics. Further, in its recommendation closure to the PFM, the IA provided the DFMC's *Three Year Condition Assessment-Inventory Validation Site Visit Schedule*. In reviewing the schedule, however, we noted several instances in which it appeared that school inspections would not be completed every 3 years.

We asked the DFMC for additional information and it provided an assessment site listing status report covering the current FCA contract's 3-year period of performance, from 2018 to 2020. Our review of this document confirmed that school inspections were not being completed every 3 years. The DFMC told us that the gaps in assessments of some sites was due to acquisition issues that delayed the award of a new contract. Further, the DFMC noted that it was currently soliciting for yet another new contract due to the failure of the current contractor to perform adequately. We confirmed that the DFMC's final FCA statement of work for the new contract—dated June 2020—specifically outlines the IA's standard that comprehensive assessment inspections be conducted every 3 years. However, until the IA's current contract is in place and it can

confirm that inspections have taken place every 3 years, we recommend the PFM reopen Recommendation 14 and continue tracking its implementation.

**Recommendation 15:** Create a standardized checklist for minimum critical factors for health and safety inspections.

**Action Taken:** In December 2016, the IA's Division of Safety and Risk Management (DSRM) published comprehensive inspection guidelines for safety, health, and accessibility, and fire systems inspection, testing, and maintenance. Included in the guidelines are detailed checklists for identifying unsafe, unhealthy, and non-compliant items and conditions needing correction. To disseminate this information, the IA conducted webinars, issued memoranda to senior responsible officials and program managers in the BIA and the BIE, and developed PowerPoint presentations about the new guidelines. We determined that the IA created a standardized checklist for minimum critical factors for health and safety inspections. We consider Recommendation 15 resolved, implemented, and closed.

**Recommendation 19:** Take corrective action for the deficiencies noted in this report or ensure that these items are entered into FMIS for future funding consideration.

**Action Taken:** We identified 24 deficiencies in our previous evaluation report. In its recommendation closure to the PFM, the IA stated that the DFMC worked with BIA and BIE officials to confirm the status of the deficiencies identified in the report, and provided a Deferred Maintenance (DM) work order report dated September 2017, along with an explanation as to how identified deficiencies are added to IA-FMS. The IA did not provide evidence that the identified deficiencies were corrected. We asked for additional information and received a project funding summary report dated June 29, 2020, which included the status of current DM work orders within IA-FMS. Based on our review of both reports, we found that only 7 of the 24 reported deficiencies from our previous evaluation were entered into IA-FMS. We also confirmed, during a separate inspection we conducted in November 2019, that one additional deficiency—undocumented fire extinguisher inspections at Pine Hill School—had been corrected. In total 16 deficiencies identified in our previous report appear to be unaddressed (see attachment). Until the IA can confirm that all the deficiencies noted in our evaluation report have been corrected or submitted into IA-FMS for future funding consideration, we recommend the PFM reopen Recommendation 19 and continue tracking its implementation.

**Recommendation 21:** Review the existing inventory for the schools and make any necessary corrections so the inventory and additional needs of the schools are accurately reflected for funding considerations.

**Action Taken:** The IA issued a memorandum to all regional directors, central office directors, the BIE, and education resources centers in January 2018, which formally addressed and transmitted property inventory and certification procedures for FY 2018, including key due dates. The memorandum provided explicit instructions for completing the personal and property annual inventory. Once completed, each regional director signed a certification statement, acknowledging their compliance with all the requirements of the procedures and accuracy of



their reported inventories. Although physically verifying these inventories was beyond the scope of this review, we believe annual certifications by the regional directors meet the intent of the recommendation. We consider Recommendation 21 resolved, implemented, and closed.

## **Conclusion**

We conclude that Recommendations 1 – 13, 15, and 21 are resolved and implemented, but Recommendations 14 and 19 have not been fully implemented. We recommend the PFM reopen Recommendations 14 and 19 and continue tracking their implementation until the IA can (1) ensure that facility condition assessments are conducted every 3 years, and (2) confirm that all the deficiencies identified in our previous report have been corrected or accounted for in IA-FMS. We informed BIA officials of the results of this review on August 21, 2020.

We would like to thank the DFMC for providing us the information requested during our review. If you have questions about this verification review, please contact me at 303-236-9243.

## **Attachment**

cc: Tara Sweeney, Assistant Secretary – Indian Affairs  
Richard Myers, Audit Liaison Officer, Chief of Staff – Indian Affairs  
Andrea Brandon, Deputy Assistant Secretary – Budget, Finance, Grants and Acquisition  
Chadrick Minnifield, Chief, Internal Control and Audit Follow-Up, Office of Financial Management  
Alexis Vann, Office of Financial Management  
Karen Frejo, Bureau of Indian Affairs Audit Liaison Officer  
Spike Bighorn, Bureau of Indian Education, Audit Liaison Officer

### Unaddressed Deficiencies Identified in our Prior Report

School Name	Report Deficiency
Borrego Pass (Dibe Yazhi)	Water valves in computer lab were not capped off or removed
Laguna Elementary*	Structural cracking
Lukachukai Boarding School*	Roofing issue 5 years after being replaced
Moencopi Day School	Boiler room bolted shut, which did not allow for inspection
Tonalea Day School*	Sprinklers not working
Pierre Indian Learning Center	<ul style="list-style-type: none"> <li>• Damaged bathroom walls and floor</li> <li>• No ventilation system in main building</li> <li>• Gutters drain to foundation</li> <li>• Administration building foundation cracked and asbestos tiles in basement utility room</li> <li>• Roofing materials left exposed</li> <li>• Portable damage</li> </ul>
Rosebud Dormitory (Sicangu Owayawa Oti)	Equipment not inspected for more than 8 years
Ahfachkee Day School	Portable floor damage
Cherokee Central Schools	Improper drainage allowed rain to flow into 5-year-old facilities and contributed to cracking in floors and walls, flooded utility bays under bleachers, and standing water
Flandreau Indian School	Sprinkler installed adjacent to light fixture
Tuba City Boarding School	Exposed wiring in elementary school

\* IA identified these three schools for total school replacements in 2016.

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