



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

**Recommendations From the  
Evaluation Report Titled  
*The Bureau of Safety and  
Environmental Enforcement's  
Flight Services Contract  
(2018-EAU-034)***



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Memorandum

**SEP 07 2021**

To: Tonya R. Johnson  
Deputy Chief Financial Officer, Director of the Office of Financial Management

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

Subject: Verification Review – Recommendations From the Evaluation Report Titled  
*The Bureau of Safety and Environmental Enforcement's Flight Services Contract*  
(2018-EAU-034)  
Report No. 2021-CR-041

The Office of Inspector General has completed a verification review of the five recommendations presented in the subject report. Our objective was to determine whether the Bureau of Safety and Environmental Enforcement (BSEE) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. The PFM reported to us that it has closed the recommendations. We concur that all the recommendations have been implemented and should be considered closed.

### **Background**

In our September 2019 evaluation report, *The Bureau of Safety and Environmental Enforcement's Flight Services Contract*, we made five recommendations to help BSEE address issues related to its helicopter flight services contract.

The BSEE Director concurred with the report's recommendations on July 9, 2019, and detailed BSEE's plan to implement them. In a September 19, 2019 memorandum, we referred all five of the recommendations to the Assistant Secretary for Policy, Management and Budget to track their implementation.

### **Scope and Methodology**

The scope of this review was limited to determining whether BSEE implemented the recommendations. To accomplish our objective, we reviewed the supporting documentation BSEE provided to the PFM and collected and reviewed additional supporting documentation from BSEE. We did not perform internal control testing, site visits, or conduct fieldwork to determine whether the underlying deficiencies 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 BSEE implemented all five recommendations.

**Recommendation 1:** Notify lessees and operators that they bear responsibility for the actions of their contractors in the Gulf of Mexico Region (GOMR) as it relates to 30 C.F.R. § 250.132(a)(2).

**Action Taken:** The BSEE Director sent a letter, dated November 13, 2019, to lessees, designated operators, and aviation service providers operating in the GOMR notifying them that on December 13, 2019, BSEE would begin issuing Incidents of Noncompliance (INCs) to the lessee(s) or designated operator when BSEE's flight services contractor is not provided access to refueling facility on an Outer Continental Shelf (OCS) platform. The letter cited 30 C.F.R. § 250.132(a)(2) as the authority providing BSEE's flight services contractors with access to helicopter landing sites and refueling facilities when BSEE is inspecting facilities in the GOMR. BSEE also provided documentation to support the delivery and receipt of the November 13 letter. Therefore, we consider Recommendation 1 implemented and closed.

**Recommendation 2:** Enforce 30 C.F.R. § 250.132(a)(2), as clarified in the December 2014 Notice to Lessees, requiring operators to provide access to refueling stations for BSEE-contracted flights.

**Action Taken:** The BSEE Director's letter, dated November 13, 2019, notified stakeholders that effective December 13, 2019, BSEE would begin issuing INCs to the lessee(s) or designated operator when BSEE's flight services contractor is not provided access to refueling facilities on an OCS platform. Additionally, BSEE updated eInspections, the program used by inspectors to record deficiencies, to more clearly direct inspectors to issue INCs in cases where access to fuel is not granted. Therefore, we consider Recommendation 2 implemented and closed.

**Recommendation 3:** Obtain a copy of the flight log immediately upon signature, or create an independent record, and deliver this to the BSEE operations assistant for record and review purposes.

**Action Taken:** BSEE formalized its flight log procedures in a standard operating procedure (SOP) titled, *GOM Flight Log Verification SOP*, and incorporated it as an appendix within its 2019 *Gulf of Mexico Regional Aviation Management Plan*. The flight log SOP addresses issues with flight log verification procedures but does not require a copy of the flight log be obtained immediately upon signature or for the creation of an independent record. However, the main concern from our report was the possibility for flight logs to be altered by the contractor after a BSEE flight is complete. BSEE's SOP appears to strengthen the flight log verification process and reduce the potential for changes to be made to flight logs after the fact. Specifically, the SOP now requires inspectors to initial next to the start time on the log to verify it matches the meter and requires inspectors to follow the same process at the end of the flight.<sup>1</sup>

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<sup>1</sup> The Hobbs meter tracks flight time in one-tenth of a minute segments. BSEE inspectors and contractors use the meter to track and bill flight hours.

Further, inspectors are required to verify flight mission codes at the end of the day, draw a line under the last entry, and then initial the entry. BSEE also provided training on the SOP, and listed resources to help inspectors verify the accuracy of meter information. The training also instructed inspectors to direct questions to the supervisor or aviation project inspector.

We reviewed the closure documentation and concluded that, although BSEE did not create its own independent record or require inspectors to immediately obtain a copy of the flight log upon signature, BSEE mitigated the flight log alteration concern with its new procedures, which include the meter reading verification as well as initialing the last entry on each flight log. Therefore, we determined that BSEE met the intent of Recommendation 3, and we consider it implemented and closed.

**Recommendation 4:** Provide training and guidance for inspectors on how to determine that hours flown are accurate before they sign the flight log and ensure all inspectors sign the flight log to confirm flight hours are accurate.

**Action Taken:** BSEE conducted training for its new flight log SOP for all GOMR district and regional offices. The training covered information from BSEE's new flight log SOP, which provides guidance for inspectors on how to determine that flight hours are accurate. Specifically, inspectors record the meter reading at the beginning and end of each flight. In addition, inspectors verify mission codes—which are used to describe various flight situations—at the end of the day, draw a line under the last entry for the day, and then initial the entry. Therefore, we consider Recommendation 4 implemented and closed.

**Recommendation 5:** Establish a flight log signature procedure for instances when a BSEE employee is not on a claimed flight (e.g., overnight stay) to assess the reasonableness of the claim.

**Action Taken:** BSEE established a new flight log SOP, which it incorporated into the 2019 *Gulf of Mexico Regional Aviation Management Plan*. The SOP established a flight log procedure for inspectors that addresses when flights are flown without a BSEE employee and when an overnight stay occurs. Specifically, inspectors draw a line under the last entry and write “Overnight” for overnight stays. When a flight returns without a BSEE employee, the pilot must have an available inspector for the return trip, or the pilot must scan and email the supervisor or flight coordinator if none are available. Additionally, the SOP directs inspectors to contact the supervisor if the solo flight return seems unreasonable or deviates too much from the outgoing trip. Therefore, based on the closure documentation provided, we consider Recommendation 5 implemented and closed.

## **Conclusion**

We conclude that all five recommendations have been implemented. We informed BSEE officials of the results of this review on July 14, 2021.

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

cc: Andrea Brandon, Deputy Assistant Secretary for Budget, Finance, Grants and Acquisition  
Chadrick Minnifield, Division Chief, Internal Control and Audit Follow-Up, PFM  
Scott Mabry, Acting Director, BSEE  
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