

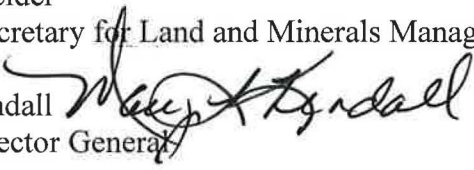


OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

OCT 30 2015

Memorandum

To: Janice Schneider  
Assistant Secretary for Land and Minerals Management

From: Mary L. Kendall   
Deputy Inspector General

Subject: Management Advisory – Ongoing Concerns with Realignment Planning for the  
Bureau of Safety and Environmental Enforcement  
Assignment No.: 2015-EAU-077

This advisory is part of our ongoing effort to monitor and evaluate the Bureau of Safety and Environmental Enforcement's (BSEE) endeavor to realign its organization using the National Program Manager concept. The concept follows a national program model, which will coordinate headquarters policy development with field execution. BSEE has been discussing using this model for over a year, but BSEE has yet to provide our office with timelines associated with milestones for this initiative. Without milestones including timelines, BSEE's realignment initiative may not be timely implemented. See the attached timeline for additional information regarding BSEE's reorganization efforts.

During our survey work on the evaluation titled "The Bureau of Safety and Environmental Enforcement, Incident Investigation Program" (Report No. CR-EV-BSEE-0014-2014 issued August 18, 2015), we learned that BSEE is realigning its organization and is developing and implementing policies and procedures related to its new National Program Manager initiative. On November 17, 2014, BSEE's Director and Deputy Director presented the initiative to us, requesting that we suspend our evaluation until BSEE completes its realignment. Interviews of BSEE staff had earlier informed us that this realignment was proposed as early as April 2014.

We agreed to suspend our evaluation to allow BSEE's management more time to finish its realignment; however, we issued a report with findings and recommendations developed during the survey phase of our evaluation. We informed BSEE that we would conduct an evaluation after the realignment's completion to review the National Program Manager initiative's implementation, and to verify that the proposed plan is in place, and also ensure that BSEE has carried out proposed changes. In the meantime, BSEE agreed to update us quarterly on its progress. Specifically, BSEE officials said they would provide us with quarterly updates on developing and implementing the Incident Investigation Program, which includes, at a minimum, timelines and milestones for the next 2 years.

Approximately 8 months after we initially learned about BSEE's realignment, we met with BSEE officials, expecting them to provide us with their new alignment strategy and timelines. Instead, BSEE gave us an overarching organization chart, showing its proposed National Program Manager Initiative. We learned that BSEE would be submitting this organization chart and functional statements to the Office of Policy, Management and Budget and that these items would be included in the Departmental Manual. While we have received the Management Council Action Plan for the BSEE director's realignment effort, showing that BSEE has developed strategic implementation milestones for its National Program Manager Initiative, we have not received target dates for the completion of those milestones. When we asked for timelines for the realignment implementation, we were told that BSEE did not have them but was developing its priorities.

Key components of an action plan include timelines as well as the names of responsible officials for each step or milestone. Without these components, an action plan may not be successfully implemented. The U.S. Government Accountability Office has identified goals associated with a timeline as key components of successful reorganizations, describing them as "essential" and stating that timeline and milestone dates establish progress and build momentum. Milestone dates are required to pinpoint performance shortfalls, gaps, and any needed changes to future milestones.

Without an action plan identifying target dates (timelines) for implementation milestones, BSEE's realignment initiative may not be effectively or successfully implemented. We make the following recommendation to help ensure the success of this initiative.

#### Recommendation

1. BSEE should promptly develop an action plan for the implementation of the National Program Manager Initiative. This action plan should include timelines and responsible officials for major milestones associated with the realignment implementation, including policy and procedure development, and staffing and training plans.

Please provide a written response to this advisory within 30 days. The response should provide information on actions taken or planned to address the recommendation, as well as targeted completion dates and title(s) of the official(s) responsible for implementation.

Information contained in this advisory will be included in our semiannual report to the Congress. Please contact me at 202-208-5745 if you have any questions.

We did not conduct this review of BSEE in accordance with standards, such as "Government Auditing Standards" issued by the Comptroller General of the United States or the "Quality Standards for Inspections and Evaluations" issued by the President's Council of Inspectors General on Integrity and Efficiency. We did, however, plan and perform work to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions.

Much of this work was conducted under the related evaluation titled “The Bureau of Safety and Environmental Enforcement, Incident Investigation Program.”

Attachment

cc: Brian Salerno, Director, BSEE

## BSEE Timeline of Events

**9/13/2011** - In response to Recommendation 48 in the report titled: "A New Horizon: Looking to the Future of the Bureau of Ocean Energy Management, Regulation and Enforcement," BSEE provided an organizational chart dated July 19, 2011.



**8/20/2012** - BSEE implements a new organization chart, which includes an Oil Spill Response Division and Environmental Enforcement Division. The Incident Review Unit still reports to the BSEE Director in this structure.



**12/3-4/2013** - BSEE holds a Senior Management Session and BSEE Director Brian Salerno discusses realigning BSEE. During this session, participants discuss BSEE's risks including "lack of policies and procedures, lack of strategic implementation (e.g., too much talk, not enough action). . ."



**3/11/2014** - BSEE Director Brian Salerno announced to all BSEE employees, his intent to implement a national level program for investigations.



**10/21/2014** - During the OIG entrance conference for the evaluation of BSEE's Incident Investigation Program, BSEE asks that the evaluation be postponed until BSEE has a chance to complete its realignment. BSEE's current leadership said they had never seen the response to Recommendation 48 or the organization chart included in that response letter.



**11/07/2014** - BSEE's Management Council Action Plan identifies Strategic Implementation Milestones for its realignment effort. The Action Plan does not have timelines associated with its milestones.



**06/03/2015** - BSEE met with OIG and presented a new organization chart. This chart shows the Incident Review Unit reporting to the Deputy Director. BSEE said it did not yet have a timeline for its realignment because it is developing its priorities.



**10/6/2015** - BSEE provides its first quarterly update for the BSEE Incident Investigations Evaluation. BSEE said it expects to start implementing its realignment within 2 weeks, but states it does not have an action plan with detailed milestones and who is responsible for those milestones; for example, staffing or training plans. BSEE said it is still developing its priorities.