

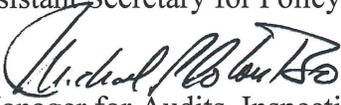


OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

JUL 07 2016

Memorandum

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

From: Michael P. Colombo   
Western Regional Manager for Audits, Inspections, and Evaluations

Subject: Verification Review – Recommendations for the Report, “Management of Social Services in BIA: Opportunity for Action” (WR-EV-BIA-0001-2012)  
Report No. 2016-WR-050

The Office of Inspector General (OIG) has completed a verification review of Recommendations 1, 2, 4, 5, and 6 presented in the subject report. Our objective was to verify that the recommendations were implemented as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. PFM reported to OIG that it has closed the recommendations. We concur that Recommendations 1, 2, 4, 5, and 6 have been resolved and implemented.

**Background**

Our March 18, 2013 report titled “Management of Social Services in BIA: Opportunity for Action” made seven recommendations designed to strengthen the Bureau of Indian Affairs’ (BIA) management of social services.

The Director of BIA concurred with Recommendations 1 through 5 and 7 in a memorandum dated February 4, 2013, and detailed BIA’s plans to implement those recommendations as well as reasoning for not concurring with Recommendation 6.

On August 14, 2013, we referred Recommendations 1 through 5 and 7 for implementation and Recommendation 6 for resolution to the Assistant Secretary for Policy, Management and Budget.

On June 17, 2014, PFM reported to OIG that it considered Recommendations 1 and 2 to be implemented and closed. PFM also reported to OIG that Recommendation 6 had been resolved and that the recommendation would be tracked for implementation.

On August 25, 2014, PFM reported to OIG that it considered Recommendations 5 and 6 to be implemented and closed.

On March 3, 2015, PFM reported to OIG that it considered Recommendation 4 to be implemented and closed.

## **Scope and Methodology**

The scope of this review was limited to determining whether Recommendations 1, 2, 4, 5, and 6 were implemented by BIA. Recommendations 3 and 7 were resolved but not implemented and therefore not included in the scope of this review.

To accomplish our objective, we reviewed PFM's documentation supporting its closure of our recommendations and BIA's documentation relating the actions it took to implement the recommendations. We did not perform internal control testing, visit sites, or conduct 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 current review found that BIA has resolved and implemented Recommendations 1, 2, 4, 5, and 6.

**Recommendation 1:** Update its Bureau manual to include minimum requirements for delivering social services and that the manual be used across regions and offices to standardize delivery systems.

**Action Taken:** BIA updated the Indian Affairs Manual (IAM) to contain current program directives, citations to regulatory and statutory requirements, policy directives, and memoranda for the delivery of social services programs. These updates were uploaded to the BIA website and communicated to the appropriate personnel.

**Recommendation 2:** Establish clearly defined roles and responsibilities for delivering social services when updating its Bureau manual.

**Action Taken:** BIA defined the roles and responsibilities at each operational level for the delivery of social services programs. These definitions were added to the IAM and uploaded to the BIA website.

**Recommendation 4:** Specify reporting requirements in the contract and provide ample time to tribes when requesting additional data.

**Action Taken:** According to a legal opinion from the Office of the Solicitor, the tribes are under no legal requirement to provide data in response to BIA data calls. BIA can only request tribal organizations to amend their contracts or compacts to comply with BIA's data collection requests. In a January 2015 letter to tribal leaders, the Director of

BIA highlighted the importance of the data calls and stated that much of the data is gathered to guide program decisions and report on the Government Performance and Results Act (GPRA) of 1993. The Director requested that tribal organizations consider including a clause related to providing GPRA data in future funding agreements. The Director also acknowledged that BIA data calls can be both time consuming and burdensome to tribes and consortia, but he requested their cooperation.

**Recommendation 5:** Create a central Internet “go-to” location where up-to-date information is regularly available to BIA regional and field offices and tribal office staffs on a regular basis.

**Action Taken:** BIA updated the Office of Indian Services’ (OIS) website with current program directives and links to regulatory requirements, policy directives, and memoranda for the delivery of social services programs.

**Recommendation 6:** Benchmark those elements of its social services program that work well and can serve as a model to others.

**Action Taken:** BIA provided information on its website pertaining to the best practices and successes achieved by the tribal agencies.

## Conclusion

We informed BIA officials of the results of this review on June 21, 2016.

cc: Olivia Ferriter, Deputy Assistant Secretary for Policy, Management  
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  
Alexandra Lampros, Audit Liaison Officer, Office of Financial Management  
Michael A. Oliva, Audit Liaison Officer – Indian Affairs  
Lawrence S. Roberts, Acting Assistant Secretary for Indian Affairs  
Michael S. Black, Director, Bureau of Indian Affairs  
Hankie P. Ortiz, Deputy Bureau Director, Office of Indian Services  
Spike Bighorn, Associate Deputy Bureau Director, Office of Indian Services  
Evangeline Campbell, Chief, Division of Human Services, Office of Indian Services