



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

# **The U.S. Department of the Interior Needs a Strategy To Coordinate Implementation of the Great American Outdoors Act**

**This is a revised version of the report prepared for public release.**



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

MAR 23 2022

Memorandum

To: Deb Haaland  
Secretary, U.S. Department of the Interior

From: Mark Lee Greenblatt   
Inspector General

Subject: Final Inspection Report – *The U.S. Department of the Interior Needs a Strategy To Coordinate Implementation of the Great American Outdoors Act*  
Report No. 2021-CR-031

This report presents the results of our inspection of the status of the implementation steps outlined in the U.S. Department of the Interior Secretary's Order 3383, *Great American Outdoors Act Coordination and Implementation Task Force*, dated August 11, 2020.

We determined the Department did not complete two steps identified in the order but completed the other four steps. We make two recommendations to help the Department fulfill the Great American Outdoors Act's (GAOA's) intent to reduce deferred maintenance.

## Why We Conducted This Inspection

The GAOA (Pub. L. No. 116-152) was signed into law on August 4, 2020, and authorized up to \$1.9 billion per fiscal year (FY) from 2021 to 2025 to reduce deferred maintenance<sup>1</sup> on public lands and at Indian schools through the National Parks and Public Land Legacy Restoration Fund (LRF).<sup>2</sup> The LRF allocates these funds to the National Park Service, the U.S. Fish and Wildlife Service, the Bureau of Land Management, the Bureau of Indian Education, and the U.S. Forest Service (under the U.S. Department of Agriculture).<sup>3</sup> According to the U.S. Department of the Interior's Agency Financial Reports, its deferred maintenance and repair costs have increased from \$16 billion in FY 2015 to \$22 billion in FY 2020. The Department invested \$1.6 billion from the LRF for deferred maintenance projects in FY 2021.

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<sup>1</sup> Deferred maintenance refers to maintenance and repairs that were not performed as scheduled and were delayed until a future period. Performing annual maintenance is more cost effective than deferred maintenance because delayed repairs tend to grow in scope and cost.

<sup>2</sup> The LRF is funded from an amount equal to 50 percent of all energy development revenues due and payable to the United States from oil, gas, coal, or alternative or renewable energy development on Federal land and water credited, covered, or deposited as miscellaneous receipts under Federal law in the preceding fiscal year. Although the GAOA also provides permanent funding for the Land and Water Conservation Fund, this inspection reports on only the LRF component of the GAOA.

<sup>3</sup> Of the \$1.9 billion annually, the National Park Service will receive 70 percent, and the U.S. Fish and Wildlife Service, Bureau of Land Management, and Bureau of Indian Education will each receive 5 percent. The remaining 15 percent is allocated to the U.S. Forest Service under the U.S. Department of Agriculture. We do not have an oversight role for the U.S. Department of Agriculture disbursements.

On August 11, 2020, the Secretary of the Interior established the GAOA Coordination and Implementation Task Force under Secretary's Order 3383.<sup>4</sup> The order stated that successfully implementing the GAOA is one of the Department's highest priorities. Section 5 of the order stipulated six GAOA implementation steps for the task force to complete.

We identified implementation of the GAOA as an emerging issue in our FY 2020 *Major Management and Performance Challenges* report.<sup>5</sup> For our FY 2021 report, we discussed the Department's challenges related to its infrastructure responsibilities, including deferred maintenance and implementation of the GAOA.<sup>6</sup>

## What We Reviewed

Our initial objective was to determine the status of the steps the task force took to lead and coordinate implementation of the Department's portion of the GAOA. The order stated that it would remain in effect until its provisions were converted to the *Departmental Manual (DM)*. The Department published 110 DM 18 on January 14, 2021, which established the GAOA Program Management Office (PMO) to replace the task force and effectively superseded Secretary's Order 3383.<sup>7</sup> The DM incorporated the remaining responsibilities and requirements identified in the order, and we accordingly continued to focus our inspection on the following implementation steps originally stipulated in the order:<sup>8</sup>

- Develop a strategy to maximize the impact of the GAOA.
- Develop best management practices for deferred maintenance projects.
- Identify an initial list of priority deferred maintenance projects that are ready to be implemented in FY 2021 and provide the list to the Secretary of the Interior within 50 days of the date of the order.
- Evaluate staffing needs and direct relevant bureaus and offices to initiate necessary hiring and recruitment efforts.
- Identify additional policies or revisions to existing policies or practices that are needed to maximize successful implementation of the GAOA.

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<sup>4</sup> The task force consisted of the counselor to the Secretary, exercising the delegated authority of the National Park Service Director (task force chair); the Deputy Secretary; Assistant Secretary-Policy, Management and Budget; Assistant Secretary-Land and Minerals Management; Assistant Secretary-Fish and Wildlife and Parks; Assistant Secretary-Indian Affairs; and the Solicitor.

<sup>5</sup> *Inspector General's Statement Summarizing the Major Management and Performance Challenges Facing the U.S. Department of the Interior, FY 2020* (Report No. 2020-ER-043), issued November 2020.

<sup>6</sup> *Inspector General's Statement Summarizing the Major Management and Performance Challenges Facing the U.S. Department of the Interior, Fiscal Year 2021* (Report No. 2021-ER-039), issued November 2021.

<sup>7</sup> The scope of the GAOA PMO authority does not include the implementation, oversight, or administration of Land and Water Conservation Fund projects or activities.

<sup>8</sup> We modified the sequence of the steps that appeared in the order to align with the sequence of our findings in this report.

- Recommend any other actions necessary to fulfill the goals of the order.

See Attachment 1 for the inspection’s scope and our methodology.

## What We Found

We determined the Department did not complete two steps identified in the order but completed the other four steps. Specifically, we found that the Department did not develop a strategy to maximize the impact of the GAOA. In addition, the Department did not develop best management practices for deferred maintenance projects.

Attachment 2 provides a snapshot of the Department’s progress on the six steps outlined in Section 5 of the order.

### **The Department Did Not Develop a Strategy To Maximize the Impact of the GAOA**

The order directed the Department to develop a strategy to maximize the impact of the GAOA funding. The order further stated, “The strategy shall ensure a timely project proposal and review process that minimizes delay and ensures decisive action; cuts across [b]ureaus; and includes establishment and utilization of a centralized project management office.”

We found that the Department established the GAOA PMO as required by the order. The Department, however, did not develop a documented strategy for implementing the LRF portion of the GAOA.

The U.S. Government Accountability Office (GAO) has identified six characteristics of a national strategy to help Federal agencies shape policies, programs, priorities, resource allocations, and standards to achieve identified results.<sup>9</sup> The six characteristics are: (1) purpose, scope, and methodology; (2) problem definition and risk assessment; (3) goals, subordinate objectives, activities, and performance measures; (4) resources, investments, and risk management; (5) organizational roles, responsibilities, and coordination; and (6) integration and implementation.

We learned that the task force discussed some of the key characteristics of a strategy that the GAO identified, including goals, roles and responsibilities for some positions within the Department, and guidelines for deferred maintenance project selection. However, we did not find that the Department developed a formal strategy that incorporated other key characteristics of a national strategy such as performance measures, problem definition, risk assessment, and risk management. The Department told us that although its GAOA LRF strategy does not reside in a single, overarching document, it believes that the intent behind the order has been fulfilled. We

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<sup>9</sup> In 2004, the GAO developed a set of desirable characteristics for national strategies in GAO Report No. GAO-04-408T, *Combatting Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism*, dated February 3, 2004. The GAO has cited these characteristics in subsequent reports that address a range of issues, most recently in GAO Report No. GAO-22-105051, *COVID-19: Additional Actions Needed to Improve Accountability and Program Effectiveness of Federal Response*, dated October 27, 2021.

acknowledge that the Department has held strategic discussions and provided guidance to the bureaus, but we concluded that it has yet to document a strategy to maximize the GAOA's impact more than a year after its enactment. Instead, various elements that could be part of a strategy are included in different documents that reside throughout the agency—for example, in various PowerPoint presentations, emails, and other materials. We do not believe that this fragmented approach constitutes a “strategy” within the meaning of the order or relevant guidance, particularly for a program of this size with such far-reaching implications.

### **The Department Did Not Develop Best Management Practices for Deferred Maintenance Projects**

Although the Department began to research and identify best management practices, it did not develop them specifically for deferred maintenance projects. We found that the Department met with bureau staff to discuss and collect lessons learned from managing the influx of funding received through the American Recovery and Reinvestment Act. The Department told us that the funding lessons learned directly influenced how it structured the bureau program management offices, implementation plans, and project selection methodologies. We did not find, however, that the Department sought or received lessons learned regarding deferred maintenance that it could use to develop a strategic approach to the Department's longstanding challenges, and it did not develop or incorporate deferred maintenance best management practices into departmental policies, guidelines, or strategy.

### **The Department Completed Four of the Six Steps Outlined in Secretary's Order 3383**

We found that the Department completed four steps from the order (see Attachment 2 for a full listing of the steps). Specifically, the Department (1) identified priority deferred maintenance projects, (2) evaluated staffing needs, (3) identified new policies or revisions to existing policies, and (4) recommended other necessary actions.

#### *Priority Projects*

The order directed the Department to identify an initial list of priority deferred maintenance projects that were ready for implementation in FY 2021 and provide the list to the Secretary within 50 days of the date of the order. The Department reported to us that it sent the initial list of projects to the Secretary on October 1, 2020. On November 2, 2020, the Secretary submitted an initial list of 169 priority deferred maintenance projects to Congress.<sup>10</sup> The list provided the number of projects for each bureau by project type, State, and area, and included dollar amounts by project category.

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<sup>10</sup> The Department also sent more detailed project data sheets to Congress in January 2021.

### *Staffing Needs*

The order directed the Department to evaluate staffing needs and direct relevant bureaus and offices to initiate necessary hiring and recruitment efforts. We found that the task force worked with the bureaus to establish GAOA program offices and evaluated staffing and hiring needs to support LRF project selection and planning. Each bureau provided the task force with staffing needs, and the task force evaluated standardized hiring practices to allow for expedited hiring to meet those staffing needs. The task force also proposed a GAOA program management structure that was incorporated into 110 *DM* 18.3, “Organization.”

### *Policy Needs*

The order directed the Department to identify additional policies or revisions to existing policies or practices that were needed to maximize successful implementation of the GAOA. On January 14, 2021, the Department published 110 *DM* 18, establishing the GAOA PMO, which is responsible for administering and directing the implementation of the LRF program. According to the 110 *DM* 18, the GAOA PMO will issue guidance to and assist bureaus with strategically selecting and executing priority deferred maintenance projects with the overarching goal of reducing deferred maintenance and improving the condition of deteriorating assets.

### *Other Needs*

Lastly, the order directed the Department to recommend any other actions necessary to fulfill the goals of the order. We learned that in fall 2020, the task force coordinated with the bureaus to develop the following goals to guide the LRF project selection process:

- **Maximize Return on Investment and Citizens Served:** restore and protect high-visitation and public use facilities; improve accessibility; expand recreation opportunities and public access; remediate facilities with the poorest Facility Condition Index scores.
- **Improve Financial Health:** reduce or eliminate deferred maintenance; leverage funding and pursue partnering opportunities; reduce annual operating costs; remove, replace, or dispose of assets.
- **Protect Those We Serve:** address safety issues; protect employees and improve retention.
- **Plan for the Future:** modernize infrastructure.

In early 2021, the GAOA PMO emailed LRF project selection guidance to the bureaus’ GAOA project managers.

## Why This Matters

At the end of FY 2020, the Department reported that deferred maintenance and repair needs totaled more than \$22 billion. The Department invested \$1.6 billion for FY 2021 LRF projects and has requested \$1.3 billion for FY 2022 LRF projects.

We acknowledge that the Department was directed to implement these steps over a short period and that it completed four of the six steps and transferred the remaining responsibilities to the GAOA PMO. However, without a documented strategy or best management practices for deferred maintenance, the Department and its bureaus are at risk of repeating the same practices that led to the continued increase in deferred maintenance. In addition, without a sound, documented strategy, the Department may face other risks—for example, financial, contracting, or logistical risks—as it spends the resources allocated to it.

## What We Recommend

We make two recommendations to help the Department fulfill the GAOA's intent to reduce deferred maintenance. In response to our draft report, the Department concurred with our recommendations. Based on this response, we consider the recommendations to be resolved but not implemented. See Attachment 3 for the full text of the Department's response and Attachment 4 for the status of all recommendations.

We recommend that the Department:

1. Develop, document, and implement a strategy for the National Parks and Public Land Legacy Restoration Fund that incorporates the GAO's six characteristics of an effective strategy.

**Department Response:** The Department concurred with the recommendation, stated that it recognizes the benefits of a single overarching strategy document, and provided a target implementation date of December 31, 2022.

**OIG Comment:** Based on the Department's response, we consider Recommendation 1 resolved but not implemented.

2. Develop best management practices for deferred maintenance projects and incorporate the practices into its strategy.

**Department Response:** The Department concurred with the recommendation, stated that it will develop and incorporate best management practices for deferred maintenance projects into its strategy, and provided a target implementation date of December 31, 2022.

**OIG Comment:** Based on the Department's response, we consider Recommendation 2 resolved but not implemented.

We will refer Recommendations 1 and 2 to the Office of Policy, Management and Budget for implementation tracking and to report to us on their status. In addition, we will notify Congress about our findings, and we will report semiannually, as required by law, on actions you have taken to implement the recommendations and on recommendations that have not been implemented. We will also post a public version of this report on our website.

If you have any questions about this report, please call me, or your staff may call Kathleen Sedney, Assistant Inspector General for Audits, Inspections, and Evaluations, at 202-208-5745.

Attachments (4)

# Attachment 1: Scope and Methodology

## Scope

The scope of our inspection was Secretary's Order 3383, *Great American Outdoors Act Coordination and Implementation Task Force*, dated August 11, 2020, which established a task force and six steps for it to take to lead and coordinate implementation of the U.S. Department of the Interior's portion of the Great American Outdoors Act (GAOA).

## Methodology

We conducted our inspection in accordance with the *Quality Standards for Inspection and Evaluation* as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions and recommendation.

To accomplish our objective, we:

- Gathered and reviewed general, administrative, and background information to provide a working knowledge of GAOA and the task force established under Secretary's Order 3383.
- Obtained and reviewed relevant reports, as well as applicable laws and regulations.
- Identified and reviewed criteria and documentation related to GAOA and the National Parks and Public Land Legacy Restoration Fund.
- Interviewed Department staff familiar with the GAOA task force, including the GAOA Program Management Office (PMO) Director, to gain an understanding of roles and responsibilities of the task force and the status of the steps stipulated in Secretary's Order 3383.<sup>11</sup>
- Obtained, reviewed, and documented meeting agendas, reports, memos, guidance, and planning materials developed by the task force, the bureaus, and the PMO to help identify the task force's accomplishments.
- Reviewed 110 *Department Manual* 18 to determine roles and responsibilities transferred from the task force to the PMO.

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<sup>11</sup> We did not interview the GAOA task force members because all members left the Department in January 2021, before we started our inspection.

## Attachment 2: Status of the Implementation Steps Identified in Secretary's Order 3383

Secretary's Order 3383 Steps	Status
(a) Develop a strategy to maximize the impact of the Great American Outdoors Act. The strategy shall ensure a timely project proposal and review process that minimizes delay and ensures decisive action; cuts across Bureaus; and includes establishment and utilization of a centralized project management office.	Not completed
(b) Identify an initial list of priority deferred maintenance projects that are ready to be implemented in Fiscal Year 2021 and provide the list to the Secretary of the Interior within 50 days of the date of this Order.	Completed
(c) Evaluate staffing needs and direct relevant Bureaus/Offices to initiate necessary hiring and recruitment efforts.	Completed
(d) Identify additional policies and/or revisions to existing policies or practices that are needed to maximize successful implementation of the Great American Outdoors Act.	Completed
(e) Develop best management practices for deferred maintenance projects.	Not completed
(f) Recommend such other actions as may be necessary to fulfill the goals of this Order.	Completed

## **Attachment 3: Response to Draft Report**

The U.S. Department of the Interior's response to our draft report follows on page 11.



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240

## Memorandum

To: Mark Lee Greenblatt  
Inspector General

From: Brian Bloodsworth  
Director, Great American Outdoors Act Program Management Office

 Digitally signed by BRIAN BLOODSWORTH  
Date: 2022.02.22 15:10:19 -05'00'

Subject: Draft Inspection Report – *The U.S. Department of the Interior Needs a Strategy to Coordinate Implementation of the Great American Outdoors Act*  
Report No. 2021-CR-031

Thank you for providing the opportunity to respond to the Office of Inspector General (OIG) Draft Inspect Report – *The U.S. Department of the Interior Needs a Strategy to Coordinate Implementation of the Great American Outdoors Act*, Report No. 2021-CR-031. The Draft Inspection Report communicates two recommendations. The Great American Outdoors Act Program Management Office (GAOA PMO) responses to the two recommendations are outlined below.

**Recommendation 1.** Develop, document, and implement a strategy for the National Parks and Public Land Legacy Restoration Fund (LRF) that incorporates the U.S. Government Accountability Office’s (GAO) six characteristics of an effective strategy.

**Response:** Concur. While the Department of the Interior has already defined and is utilizing many of the key elements of a national strategy to shape its implementation of the GAOA LRF program (e.g., goals, objectives, performance measures), the GAOA PMO agrees these elements have not been incorporated into a single, overarching document. The GAOA PMO recognizes the benefits of doing so and concurs with the OIG’s recommendation.

**Responsible Official:** Brian Bloodsworth, Director, Great American Outdoors Act Program Management Office, is the official responsible for implementing the recommendation.

**Target Date:** December 31, 2022.

**Recommendation 2.** Develop best management practices for deferred maintenance projects and incorporate the practices into its strategy.

**Response:** Concur. As noted in the OIG’s Inspection Report, the Department of the Interior made a concerted effort to collect and apply lessons learned from planning and executing the American Recovery and Reinvestment Act (ARRA), a major infrastructure program with many similarities. These and other lessons learned directly influenced how bureaus structured their GAOA LRF program management offices, implementation plans, and project selection

methodologies. To further amplify the impact of the GAOA LRF program, the GAOA PMO will develop best management practices for deferred maintenance projects and incorporate them into its LRF strategy.

**Responsible Official:** Brian Bloodsworth, Director, Great American Outdoors Act Program Management Office, is the official responsible for implementing the recommendation.

**Target Date:** December 31, 2022.

If you have questions or require additional information, please contact me at [REDACTED] or [REDACTED]@ios.doi.gov.

cc: Eric Werwa, Deputy Assistant Secretary - Policy and Environmental Management  
exercising the delegated authority of Assistant Secretary for Policy, Management and  
Budget  
Tonya Johnson, Director, Office of Financial Management  
Shannon Estenoz, Assistant Secretary for Fish and Wildlife and Parks  
Bryan Newland, Assistant Secretary for Indian Affairs  
Laura Daniel-Davis, Principal Deputy Assistant Secretary for Land and Minerals  
Management

## Attachment 4: Status of Recommendations

In response to our draft report, the U.S. Department of the Interior concurred with our two recommendations.

<b>Recommendation</b>	<b>Status</b>	<b>Action Required</b>
1 and 2	Resolved but not implemented	We will refer these recommendations to the Assistant Secretary for Policy, Management and Budget to track implementation.

