



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

# **The National Park Service and the U.S. Geological Survey Did Not Consistently Obtain or Maintain Evidence of Management Review and Approval of Modifications Made to Construction Contracts**

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




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

FEB 02 2022

Memorandum

To: Beth Walden-McCabe  
Head of Contracting Activity, National Park Service

Scott Morton  
Head of Contracting Activity, U.S. Geological Survey

From: Chris Stubbs   
Director, Office of Financial and Contract Audits

Subject: Final Audit Report – *The National Park Service and the U.S. Geological Survey Did Not Consistently Obtain or Maintain Evidence of Management Review and Approval of Modifications Made to Construction Contracts*  
Report No. 2020-FIN-007

This report presents the results of our audit of modifications made to construction contracts competitively awarded by the National Park Service (NPS) and the U.S. Geological Survey (USGS). We audited these contracts to determine whether NPS and USGS contracting officers adequately competed and modified contracts according to applicable laws, regulations, and bureau policies and procedures.

During fiscal years 2016 through 2019, the U.S. Department of the Interior (DOI) awarded more than 251,000 contracting actions totaling \$16.9 billion in obligations. Of those contracting actions, more than 1,000 were contract modifications to competitively bid construction or building-type contracts. These contracts and modifications totaled \$93.6 million in obligations. Modifications were made to these contracts for change orders, supplemental or additional work, and exercising contract options. We reviewed 20 construction or building-type contract files (17 from the NPS and 3 from the USGS), which contained 140 modifications.<sup>1</sup> We specifically sought to determine whether NPS and USGS contracting personnel complied with applicable criteria when 1) competing construction contracts, 2) awarding modifications to competitive construction contracts, and 3) modifying construction contracts for equitable adjustments<sup>2</sup> (Attachment 1 details our full audit scope and methodology).

---

<sup>1</sup> Our original audit scope included contract files from the Bureau of Reclamation. We could not review those files, in addition to one NPS contract file, because of COVID-19 travel restrictions, so we adjusted our scope accordingly.

<sup>2</sup> Federal Acquisition Regulation (FAR) 52.243-5, “Changes and Changed Conditions,” provides for the contracting officer to make an equitable adjustment if changes to the scope of a contract increase or decrease the cost or time needed to perform the work before final payment under the contract. An “equitable adjustment” can be described as any change under FAR 52.243 proposed by the contractor that may cause an increase or decrease in cost of or time required for the performance of any part of the work under the contract. The contractor must assert its right to adjustment within 30 days after receiving the written change order by submitting a proposal for the general nature and amount caused by the change.

We found the NPS and the USGS complied with applicable criteria when competing construction contracts and when modifying construction contracts for equitable adjustments. We also found, however, that the NPS and the USGS did not comply with the criteria to obtain or maintain appropriate reviews and approvals when awarding modifications to competitive construction contracts. In particular, the NPS and the USGS did not consistently obtain or maintain evidence of management review and approval for 16 of the 140 (12 for the NPS and 4 for the USGS) modifications examined (approximately 11 percent), valued at more than \$6 million. This demonstrated that the NPS and the USGS did not have proper internal controls, as required by DOI policies and procedures, to ensure that procurement files are complete and accurate and that contracting personnel monitor the contract modification process.

Failure to follow DOI policies and procedures to maintain evidence of management review and approval can result in awarding contract modifications that may not be in the best interest of or provide the best value to the Federal Government. We make two recommendations to help the NPS and the USGS improve their contract modification processes and oversight. In response to our draft report, the NPS and the USGS concurred with the recommendations. Based on those responses, we consider the recommendations resolved but not implemented.

## Background

The modifications to construction and building contracts present a risk to the Federal Government because of the potential for delays in completing the work and updates to the contractor's period of performance, unforeseen costs, and inferior work. These contracts present additional risk if contracting personnel do not adequately evaluate competing proposals and then award the contract to an unqualified contractor. To ensure minimal risk to the Government, contracting personnel must follow the Federal Acquisition Regulation (FAR) and other applicable laws and regulations when awarding these contracts and the associated modifications.

The FAR part 15 outlines various requirements for competitive contracting. These include:

- Evaluating factors and significant subfactors (e.g., price or cost, quality, past performance, etc.) that apply to an acquisition and the relative importance (FAR 15.304)
- Maintaining source selection documentation demonstrating the assessments performed on competing proposals (FAR 15.305)
- Ensuring required elements of adequate price competition are met (i.e., two or more priced offers, award made to best value proposal) (FAR 15.403-1)

The U.S. Government Accountability Office's (GAO's) *Standards for Internal Control in the Federal Government* provides the criteria for internal control systems and defines five components of a strong internal control system: control environment, risk assessment, control activities, information and communication, and monitoring. Grouped within those components are 17 principles, including designing control activities and identifying and remediating

deficiencies, which represent the requirements necessary to establish an effective internal control system.

## Results of Audit

For the contracts and contract modifications we tested (17 NPS contracts with 124 modifications and 3 USGS contracts with 16 modifications), we found that the NPS and the USGS complied with applicable criteria when competing construction contracts and when modifying construction contracts for equitable adjustments. We also found, however, that 16 (12 from the NPS and 4 from the USGS) out of the 140 modifications examined (approximately 11 percent), valued at more than \$6 million, did not consistently obtain or maintain evidence of management review and approval.

### **The NPS and the USGS Did Not Consistently Obtain and Maintain Evidence of Management Reviews and Approvals for Contract Modifications**

The GAO's *Standards for Internal Control in the Federal Government* require an organization's management to design and implement an internal control system that includes control activities—such as policies and procedures—to achieve objectives and respond to risks and to monitor the system to remediate identified deficiencies in a timely fashion (see Attachment 2).<sup>3</sup> These internal controls also help the organization ensure it completes its work according to applicable Federal regulations (here, the FAR). We identified weaknesses in the NPS' and the USGS' design and implementation of internal control activities for obtaining and maintaining evidence of management reviews and approvals in construction contract files.

NPS policy requires management review of justifications for contracting actions, including modifications over certain thresholds. Contracting officers may review and approve justifications for modifications up to \$25,000. Justifications for modifications over \$25,000 but not exceeding \$150,000 require written concurrence by a warranted<sup>4</sup> individual one level above the contracting officer, such as a branch chief. Justifications for modifications exceeding \$150,000 require review and concurrence by a regional or center chief of contracting, such as a division chief.

USGS policy requires personnel to document and include in the award file reviews of all contracting actions. A team lead, such as a contracting officer, may review and approve justifications for modifications up to \$499,999.

Both the NPS and the USGS require management to review a modification if 1) it increases the total contract value by more than 25 percent, 2) it increases the total value of the

---

<sup>3</sup> *Standards for Internal Control in the Federal Government*, control activities component, Principles 10 (“Design Control Activities”) and 12 (“Implement Control Activities”); and monitoring component, Principles 16 (“Perform Monitoring Activities”) and 17 (“Evaluate Issues and Remediate Deficiencies”).

<sup>4</sup> FAR 2.101 defines a contracting officer as a “person with the authority to enter into, administer, and/or terminate contracts and make related determinations and findings.” A contracting officer receives a warrant granting authority to enter into contracting actions on behalf of the Government. The authority may be restricted by dollar values.

award over the simplified acquisition threshold,<sup>5</sup> and 3) in the contracting officer's opinion, it is not within the initial contract's scope.

We found that 16 contract modification files provided by the NPS and the USGS did not contain evidence of management review and approval for the modifications. Such evidence could include management signatures on a form, email documentation of reviews and approvals, or any other type of tracking mechanism, such as a checklist.

We confirmed with NPS contracting officers that six contract modification files contained an internal modification review checklist but were missing the required signatures to document the appropriate management review (see Figure 1). NPS contracting personnel told us there were no other signed versions of the checklists for those files to document that the proper reviews had occurred. They further explained it was an oversight to award the modifications before obtaining the proper signatures and reviews.

We further found that 10 contract modification files (6 NPS files and 4 USGS files) contained no evidence of management reviews or approvals (see Figure 1). Contracting officers informed us that the evidence for this type of management review and approval could be an email from management. When asked, contracting officers who managed these files told us they do not have or use a checklist or other documentation to ensure the appropriate management approvals occur. They were also unable to provide any other information regarding management approvals, leaving uncertainty as to whether such approvals actually occurred.

**Figure 1: Contract Modifications Without Evidence of Management Review or Approval**

<b>Issue</b>	<b>Number of Modifications</b>	<b>Bureau</b>	<b>Value of Modifications (\$)</b>
Missing signatures	6	NPS	2,417,781
No evidence of management reviews or approvals	6	NPS	2,369,035
	4	USGS	1,350,267
<b>Total</b>	<b>16</b>		<b>\$6,137,083</b>

Without evidence of appropriate management review and approval of contracting actions, including modifications, contracting officials expose the Federal Government to the potential for fraud, waste, and abuse of Government funds and cannot ensure they awarded contracts or modifications in the Government's best interest.

<sup>5</sup> FAR 2.101 defines the simplified acquisition threshold as \$250,000. There are also exceptions for contingency operations, emergency or disaster support, recovery from attack, and other circumstances.

## Conclusion and Recommendations

The NPS and the USGS complied with applicable laws, regulations, and bureau policies and procedures when competing construction contracts and when modifying construction contracts for equitable adjustments. They did not, however, have complete and accurate procurement files for contract modifications and therefore cannot assure compliance with departmental and bureau policies and procedures when modifying construction contracts. As such, the NPS and the USGS risk awarding construction contract modifications that are not in the best interest of or do not provide the best value to the Federal Government.

We recommend that the NPS and the USGS:

1. Ensure contracting officials use a tracking mechanism when obtaining the proper management reviews and approvals before awarding contract modifications. Contracting officials should maintain this documentation in the official contract files.
2. Monitor compliance with bureau policies and procedures to identify any weaknesses in the internal controls meant to ensure appropriate reviews and approvals occur and are maintained in contract files.

In response to our draft report, the NPS and the USGS concurred with both of our recommendations and provided information regarding steps that have been taken and that they anticipate taking. Based on this response, we consider both recommendations resolved but not implemented. The target date for implementation of both recommendations is January 1, 2022, for the NPS and February 1, 2022, for the USGS. See Attachment 3 for the full text of the NPS' and the USGS' responses and Attachment 4 for the status of all recommendations.

We will refer both recommendations 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 Kathleen Sedney, Assistant Inspector General for Audits, Inspections, and Evaluations, at 202-208-5745.

Attachments (4)

# **Attachment 1: Objective, Scope, and Methodology**

## **Objective**

We audited construction contracts competitively awarded by the National Park Service (NPS) and the U.S. Geological Survey (USGS) to determine whether NPS and USGS contracting officers adequately competed and modified contracts according to applicable laws, regulations, and bureau policies and procedures.

## **Scope**

We reviewed competitively awarded construction contracts modified during fiscal years 2016 through 2019. Our initial data analysis indicated that the NPS, the USGS, and the Bureau of Reclamation (BOR) had the largest amount of contract files meeting our criteria for number of modifications and dollar values during this period.

## **Scope Limitation**

Our original audit scope included reviewing seven hardcopy BOR contract files and one NPS contract file.<sup>6</sup> We planned to review these files for evidence of compliance with regulations, policies, and procedures by traveling to the physical office locations. We could not, however, travel to those offices because of COVID-19 pandemic travel restrictions, and the BOR represented that the amount of effort required of contracting personnel at those locations to scan and upload potentially thousands of pages of contract and modification files is excessive. Under the circumstances, we agreed with the BOR and limited our scope accordingly.

The files we could not review comprised 29 percent of the contracts and more than 21 percent of the dollar value of our initial review selection (see Figure 1).

---

<sup>6</sup> The U.S. Department of the Interior implemented a policy, DOI-AAAP-0046 v.4, “Electronic Contract Files,” on September 11, 2017. The policy, in part, states that the transition to the Financial and Business Management System’s e-file capability for new contract awards was effective January 1, 2017. The BOR received a waiver exempting it from the transition until fiscal year 2019 due to an incompatible server environment. These NPS and BOR contracts predated the applicable effective dates and were therefore still in hardcopy form.

**Figure 1: Details of Hardcopy Files We Could Not Review**

<b>PIID Number</b>	<b>Bureau</b>	<b>Location</b>	<b>Obligations (\$)</b>
INP16PC00129	NPS	Boston, MA	1,341,718
INR17PC00002	BOR	Boulder City, NV	2,403,774
INR16PC00091	BOR	Sacramento, CA	1,298,529
INR16PC00103	BOR	Billings, MT	1,327,115
INR16PC00102	BOR	Boise, ID	6,722,365
140R3018C0020	BOR	Boulder City, NV	902,926
INR16PC00023	BOR	Billings, MT	1,042,992
INR13PC20092	BOR	Sacramento, CA	1,497,737
<b>Total</b>			<b>\$16,537,156</b>

### **Methodology**

We conducted this audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We tested records and conducted auditing procedures as necessary under the circumstances, except for those items discussed in our scope limitation. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We reviewed the contract files, except for those included in our scope limitation, to determine whether the contracting officials had complied with the Federal Acquisition Regulation (FAR), the Department of the Interior Acquisition Regulation System (DIARS), and the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*.

To accomplish our objectives, we:

- Reviewed the FAR related to the preaward processes for competitive construction contracts and modifications
- Reviewed the *Standards for Internal Control in the Federal Government's* 5 components and 17 principles of an effective internal control system
- Reviewed the U.S. Department of the Interior's (DOI's), the NPS', and the USGS' preaward process guidelines, policies, and procedures for competitive and sole-sourced procurements
- Reviewed the NPS' and the USGS' documentation supporting compliance with criteria over its preaward process



- Reviewed the internal control questionnaires completed by management at the NPS, the BOR, and the USGS, including control components and principles
- Reviewed NPS and USGS hardcopy and electronic contract and modification files for evidence of compliance with the FAR, DIARS, and DOI and bureau policies and procedures
- Visited the NPS offices in Lakewood, CO, and USGS offices in Reston, VA

We also judgmentally selected the three bureaus with the largest dollar value of competitive construction contract modifications over the period covered by our audit. We judgmentally selected 28 contracts with at least 5 contract modifications. Our sample included 18 contracts from the NPS, 7 from the BOR, and 3 from the USGS; these 28 contracts had 340 modifications with more than \$79.3 million in obligated amounts for change orders, supplemental or additional work, and exercising contract options. We could not test one of the NPS or any of the BOR contracts (these 8 contracts had 95 modifications) because of COVID-19 travel restrictions, which reduced our sample to 20 contracts with 245 modifications and more than \$62.8 million in obligated amounts. After reducing our scope to these selected items, we further narrowed our testing to the 140 modifications with the highest dollar value or other risk factors (see Figure 2). We did not project the results of the tests to the total population of recorded transactions.

**Figure 2: Breakdown of the Contract Modifications Tested**

<b>Bureau</b>	<b>Contracts</b>	<b>Modifications</b>	<b>Total (\$)</b>
NPS	17	124	50,064,639
USGS	3	16	5,817,853
<b>Total</b>	<b>20</b>	<b>140</b>	<b>\$55,882,492</b>

We asked contracting officials to provide supporting documentation to demonstrate compliance with applicable criteria. The contracting officials shared permanent files, which contained support for contracting actions—such as contract modifications—that had been held for recordkeeping purposes, in addition to departmental and bureau policies and procedures. We did not test underlying information system controls. Because the procurement files we reviewed were scanned hard copies, we did not rely on computer-generated data from the bureau information systems.

## Attachment 2: Consideration of Internal Controls

We assessed whether internal control was significant to our audit objective. Based on our risk and fraud assessments, we determined that the following components and principles of the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* were significant to the audit objectives:

### Control Environment:

- Principle 1, "Demonstrate commitment to integrity and ethical values"
- Principle 4, "Demonstrate commitment to competence"

### Risk Assessment:

- Principle 6, "Define objectives and risk tolerances"
- Principle 7, "Identify, analyze, and respond to risk"
- Principle 8, "Assess fraud risk"

### Control Activities:

- Principle 10, "Design control activities"
- Principle 12, "Implement control activities"

### Information and Communication:

- Principle 14, "Communicate internally"

### Monitoring:

- Principle 16, "Perform monitoring activities"

We tested the operation and reliability of internal control over activities related to our audit objective. Our tests and procedures included the following:

- We selected a sample of 340 modifications across 28 contracts for testing. We narrowed our testing based on significance and other factors to 195 modifications for testing. We further reduced our sample to 140 NPS and USGS contract modifications because of COVID-19 travel restrictions.
- We obtained and reviewed evidence that supports contracting officer approval to award contracts and modifications.

During our audit, we identified weaknesses in internal control significant to our audit objectives. These weakness in internal control were:

- Control Activities: Principle 10, “Design control activities”
- Monitoring: Principle 16, “Perform monitoring activities”

We provided these deficiencies in writing to the audited entities on March 22, 2021.

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

The bureaus' responses to our draft report follow on page 12.



# United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, NW

Washington, DC 20240

Memorandum

**To:** Office of Inspector General

**From:** Justin Unger  
Associate Director for Business Services  
National Park Service

JUSTIN  
UNGER

Digitally signed by  
JUSTIN UNGER  
Date: 2021.11.16 10:25:11  
-05'00'

**Subject:** National Park Service Response to Office of Inspector General Report entitled The National Park Service and the U.S. Geological Survey Did Not Consistently Obtain or Maintain Evidence of Management Review and Approval of Modifications Made to Construction Contracts, Report No. 2020-FIN-007.

The National Park Service (NPS) has reviewed the referenced draft report. The NPS takes these matters seriously and is working to ensure that contractual actions comply with statutes, regulations, and with applicable policies.

Below are the responses to the specific recommendations, including steps the NPS has taken or will be taking to address the concerns raised.

Recommendations:

1. Ensure contracting officials use a tracking mechanism when obtaining the proper management reviews and approvals before awarding contract modifications. Contracting officials should maintain this documentation in the official contract files.

NPS Response: We concur with this recommendation.

After further evaluation of National Park Service (NPS) Acquisition Policy and Procedures Memorandum (AP&P) 1443.06-01, we have evaluated all potential risks as it relates to management reviews below the stated Simplified Acquisition Threshold (SAT) and have determined that this policy will be updated.

This issue was initially identified internally by NPS in October 2019. Department of the Interior Acquisition, Assistance, and Asset Policy (AAAP) 0148, was issued on May 5, 2018 and implemented the CAAC deviation for new micro-purchase and simplified acquisition thresholds. This deviation implemented the Simplified Acquisition Threshold (SAT) of \$250,000 as stated in pending FAR case 2018-004. NPS AP&P 1443.06-01 lists the management review threshold of \$150,000.

In taking a proactive approach, NPS conducted modification training for the NPS Acquisition community in February 2020 with an emphasis on modification authorities, required documentation, mandatory reviews IAW AP&P 1443.06-01, and the new SAT threshold IAW DOI-AAAP-0148. NPS decided to not increase the management review threshold as listed in AP&P 1443.06-01 (\$150,000) for modifications until a risk analysis of modifications could be conducted through a review of at least two internal review cycles, which would allow NPS to evaluate the effectiveness of the modification training presented in February 2020.

DOI-AAAP-148 was archived in June 2021 as FAR case 2018-004 became effective August 2020, changing the Federal Acquisition Regulation (FAR) Simplified Acquisition Threshold to \$250,000.

NPS acknowledges revisions to AP&P 1443.06-01 will be issued prior to January 1, 2022.

Although AP&P 1443.06-01 needs to be revised, NPS does not believe there is any additional risk by raising the modification review threshold from \$150,000 to the current SAT. Updates to AP&P 1443.06-01 will include:

- Management review thresholds will be increased to the current SAT.
- Modifications as listed in AP&P 1443.06-01 must be concurred upon by the Chief of the Contracting Office.
- Required written approvals for modifications will be required to be included in the official electronic file IAW Department of the Interior Acquisition, Assistance, and Asset Policy 0046 – Electronic Contract Files.
- All electronic checklists will be required to be signed and uploaded at the completion of an award and are to be stored within the folder titled “Checklist” in e-File (xECM). Only the most updated version of the checklist will be uploaded to e-File at the completion of an award or modification and updated again at contract closeout.

Additionally, NPS will issue a supplementary AP&P requiring a quality control plan at each region that will necessitate standard operating procedures, review and approval procedures, and a mechanism for testing each control within the required quality control plan. This will include the use of checklists as a tracking mechanism for modifications.

Target Date of Implementation: January 1, 2022

Responsible Official: Beth Walden McCabe

2. Monitor compliance with bureau policies and procedures to identify any weaknesses in the internal controls meant to ensure appropriate reviews and approvals occur and are maintained in contract files.

NPS Response: NPS concurs with this recommendation. NPS has recently strengthened its overall acquisition internal control plan to include the methodology used to select actions to be reviewed and the requirement of spot reviews at both the regional and headquarters level. The methodology used to select contracting actions during the annual acquisition review cycle requires a review of 60 actions from each region. All selected actions for review are required to be current, meaning they were executed after the completion of the last internal review cycle. Additionally, a portion of

these actions are required to be modifications. Also, and as stated previously, NPS will issue a supplementary AP&P requiring a quality control plan at each region that will necessitate standard operating procedures, review and approval procedures, and a mechanism for testing each control within the required quality control plan. This will include the use of checklists as a tracking mechanism for modifications.

Target Date of Implementation: January 1, 2022

Responsible Official: Beth Walden McCabe

If you should have any questions or need additional information, contact Vera Washington, NPS Audit Liaison Officer at [REDACTED].



United States Department of the Interior  
U.S. Geological Survey  
Office of the Director  
Reston, Virginia 20192

Memorandum

To: Chris Stubbs  
Director, Department of the Interior Office of Financial and Contract Audits

Through: Tanya Trujillo **TANYA TRUJILLO**  
Assistant Secretary for Water and Science  
Digitally signed by TANYA TRUJILLO  
Date: 2021 11 19 07:01:53 -06'00'

From: David Applegate **JAMES D. APPLEGATE**  
Associate Director for Natural Hazards  
Exercising the Delegated Authority of the Director, U.S. Geological Survey  
Digitally signed by JAMES D. APPLEGATE  
Date: 2021 11 18 15:48:33 -05'00'

Subject: U.S. Geological Survey (USGS) response to the Office of Inspector General (OIG) Audit Report "*The National Park Service and the U.S. Geological Survey Did Not Consistently Obtain or Maintain Evidence of Management Review and Approval of Modifications Made to Construction Contracts*" (Report # 2020-FIN-007).

The U.S. Geological Survey (USGS) reviewed the Office of Inspector General report entitled, *The National Park Service and the U.S. Geological Survey Did Not Consistently Obtain or Maintain Evidence of Management Review and Approval of Modifications Made to Construction Contracts*. Thank you for the opportunity to respond to the referenced report.

The USGS takes these matters seriously and is working to ensure the bureau complies with statutes and regulations and with applicable policies.

Below are the responses to the specific recommendations, including steps the USGS will be taking to address the concerns raised.

**Recommendation 1:** Ensure contracting officials use a tracking mechanism when obtaining the proper management reviews and approvals before awarding contract modifications. Contracting officials should maintain this documentation in the official contract files.

USGS Action: Concur. The USGS Office of Acquisition and Grants (OAG) will provide training to staff reinforcing proper use of file checklists and filing documents in official contract files, as appropriate.

Target Date of Implementation: No later than February 1, 2022.

Responsible Official: Jennifer Kelley, Senior Policy Analyst



**Recommendation 2:** Monitor compliance with bureau policies and procedures to identify any weaknesses in the internal controls meant to ensure appropriate reviews and approvals occur and are maintained in contract files.

USGS Action Item: Concur. OAG will provide training to staff as noted in Recommendation 1. OAG Chiefs of the Contracting Office and their Team Leads also review all files, as appropriate, and ensures proper filing of award documentation is complete. OAG also completes an annual Acquisition Management Review (AMR) each Spring. The AMR audits randomly selected files across the bureau, including verification of file reviews and proper documentation filing.

Target Date of Implementation: No later than February 1, 2022.

Responsible Official: Jennifer Kelley, Senior Policy Analyst

If you should have any questions or need additional information, contact Mahela Sanguinetti, USGS Acting Audit Liaison Officer at [REDACTED]@usgs.gov or via Teams.

cc: AS/WS  
AS/PMB  
Dir Files, MS 114  
Dir Chron, MS 114  
BPI, MS 105

## Attachment 4: Status of Recommendations

In response to our findings, the NPS and the USGS concurred with both recommendations.

Recommendation	Status	Action Required
1	Resolved but not implemented	We will refer this recommendation to the Office of Policy, Management and Budget for implementation tracking.
2	Resolved but not implemented	We will refer this recommendation to the Office of Policy, Management and Budget for implementation tracking.

# **Report Fraud, Waste, and Mismanagement**



Fraud, waste, and mismanagement in Government concern everyone: Office of Inspector General staff, departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and mismanagement related to departmental or Insular Area programs and operations. You can report allegations to us in several ways.



---

**By Internet:**      [www.doioig.gov](http://www.doioig.gov)

**By Phone:**      24-Hour Toll Free:      800-424-5081  
Washington Metro Area:      202-208-5300

**By Fax:**      703-487-5402

**By Mail:**      U.S. Department of the Interior  
Office of Inspector General  
Mail Stop 4428 MIB  
1849 C Street, NW.  
Washington, DC 20240