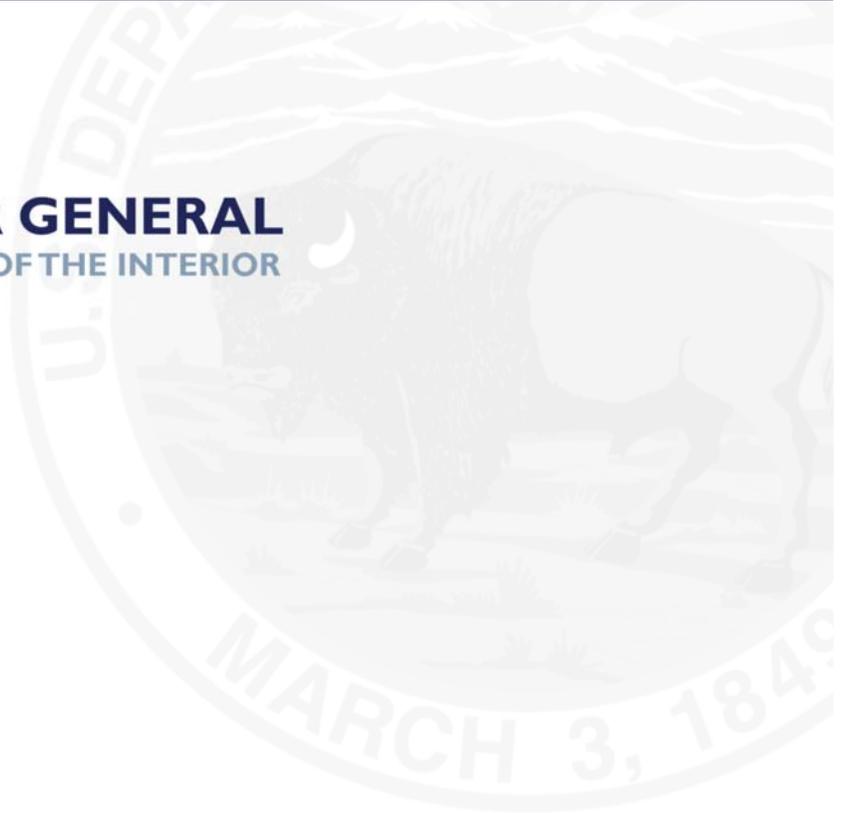




OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR



EVALUATION OF USGS SCIENTIFIC COLLECTION MANAGEMENT POLICY



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

Memorandum

SEP 28 2017

To: Amy Holley
Acting Assistant Secretary for Policy, Management and Budget

William Werkheiser
Acting Director, U.S. Geological Survey

From: Mary L. Kendall 
Deputy Inspector General

Subject: Final Evaluation Report – Evaluation of USGS Scientific Collection Management Policy
Report No. 2016-ER-057

The Office of Inspector General reviewed the current policies of the U.S. Geological Survey (USGS) for managing its scientific collections. Specifically, we reviewed these policies for consistency with established U.S. Department of the Interior (DOI) policies and compared them with those of two other bureaus—the National Park Service (NPS) and U.S. Fish and Wildlife Service (FWS). We found that USGS scientific collection management policies are not consistent with DOI policies as defined in the Department Manual (DM) and are not comparable to policies of the other two bureaus. In addition, we found that USGS did not have a final policy on the management of its biologic specimens; therefore, we could not review this policy for consistency with the DM.

This report provides the findings of our evaluation and offers one recommendation to USGS to adjust its policies to be consistent with the DM to ensure the USGS protects and preserves valuable scientific specimens.

Background

DOI bureaus collectively manage a variety of historic, biologic, and geologic objects that all fall under the umbrella of scientific collections. These collections are further categorized as being “museum” or “working” collections in the DOI policies found in the DM. One difference between the two types lies in the rules for the long-term preservation of the artifacts within the collection: museum collections are retained for long-term preservation and study, while working collections are not subject to such stringent preservation requirements.

A former USGS employee and a nonprofit organization have criticized USGS collections management policies. OIG received three requests to review USGS policies and procedures. The

requests alleged that USGS uses misleading language and terms to improperly categorize collections as working collections for use in research, potentially allowing the USGS to avoid DM requirements for the preservation of specimens that otherwise would be maintained as museum collections. The NPS and FWS, whose policies align with the DM, preserve most of DOI’s museum artifacts (see Figure 1).

Bureau	Number of Museum Objects Preserved
NPS	167,012,704
FWS	4,517,955
USGS	52,506

Figure 1: Number of museum objects maintained by select bureaus, drawn from fiscal year 2014 data.

Scope and Methodology

We conducted our review in 2016–2017 and focused on Department and bureau policies related to museum collections. To accomplish our objectives, we obtained a general understanding of departmental standards for the management of scientific collections, and interviewed officials from the DOI and USGS. We also reviewed policies from the DOI, USGS, NPS, and FWS, and compared USGS policies with them to determine whether they were consistent with each other.

Evaluation Results

We found that USGS’ scientific collection management policies are not consistent with DM policies and are not comparable to policies of other bureaus. In addition, we found that USGS did not have a final policy to address its biologic specimens; therefore, we could not review this policy for consistency with the DM.

USGS’ policy uses language that differs from the language set forth in Part 411 of the DM. Rather than match the naming conventions for collections that the DM uses, such as “museum collection” and “working collection,” USGS policy uses the terms “resource collection” to describe items to be preserved indefinitely, and “active” collection for material from ongoing research. It has also publicly documented its intent to limit the growth of collections maintained indefinitely to curtail future maintenance costs.

USGS has also cited adherence to the requirements of Title 20 of the United States Code (U.S.C.), Section 59 as its reason for aligning its policy language with that of the Smithsonian Institution rather than with the DM. USGS’ stance does not appear to account for the potential applicability of other statutory authorities. The differing museum authorities have led to the USGS not complying with DOI policy, which could result in the destruction or loss of specimens that any other bureau would be required to preserve.

When compared to the NPS and FWS, which manage nearly 88 percent of the DOI’s museum objects, we found that policies for these bureaus were similar to each other, and that

each bureau used the DM as a starting point for developing its policies in a way that expanded on the DM requirements rather than departed from it. Because of the consistency in policy shown between these two bureaus, USGS' dissimilar policy appears to represent an intentional departure from the DM.

In addition, the USGS policy only applies to collections of geologic specimens. The USGS has stated that it is developing a policy for biologic specimens, but has not yet issued it. The use of different terminology, as well as the absence of a policy for biologic specimens, could result in the loss or destruction of otherwise valuable specimens.

Conclusion and Recommendation

USGS scientific collection policy and absence of policy allow the USGS to exclude its collections from preservation requirements prescribed by the DM. The different authorities noted have led to confusion that could leave valuable scientific specimens—that may otherwise be candidates for long-term preservation—at risk of loss or destruction.

We recommend that USGS—

1. Reconcile and justify current and future scientific collection policies with the requirements of the Departmental Manual.

USGS response and OIG analysis: Although the USGS stated that its current policy aligns with the DM requirements for managing scientific collections, our results suggest otherwise. As noted previously in this report, USGS policy uses language that is inconsistent with the DM naming conventions for its collections, and the current USGS policy only addresses the geologic collections and not USGS's biologic collections. In its response, USGS stated that it is in the process of developing new policy and implementation guidelines and procedures that will align its scientific collections with the DM requirements. The target completion date for that policy is September 30, 2018. We consider this recommendation resolved but not implemented, and will refer it to the Assistant Secretary for Policy, Management and Budget for tracking.

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

We conducted our evaluation 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 recommendations.

Attachment



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Office of the Director
Reston, Virginia 20192

Memorandum

AUG 02 2017

To: Mary L. Kendall
Deputy Inspector General

Through: Andrea Travnicek 
Acting Assistant Secretary for Water and Science

From: William H. Werkheiser 
Acting Director

Subject: Office of the Inspector General (OIG) Draft Evaluation Report - Evaluation of USGS Scientific Collection Management Policy, Report No. 2016-ER-057

In the subject report, dated June 2017, the OIG of the Department of the Interior (DOI) reviewed the current policies of the U.S. Geological Survey (USGS) for managing its scientific collections. The OIG found that the USGS scientific collection management policies are not consistent with DOI policies as defined in the Department Manual (DM) and are not comparable to policies of two other bureaus--the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS). In addition, the OIG found that the USGS did not have a final policy on the management of its biologic specimens, which meant the OIG could not review such policy for consistency with the DM.

OIG Recommendation: Reconcile and justify current and future scientific collection policies with the requirements of the Departmental Manual.

Response: It is the perspective of the USGS that its scientific collection policy is in alignment with the Departmental Manual requirements for working scientific collections. Specifically, it aligns with the DM Part 411, Chapter 3, Section 1b, which provides the following language: “Non-Museum Property – Working Collections. A bureau may decide that working scientific collections will not be managed as museum property.”

The USGS policy applies to the management of scientific collections. By contrast, the NPS and FWS policies apply to the management of museum collections. The language used to describe USGS scientific collections is well aligned with that of other science agencies, such as NASA (NASA Policy Directive, NPD 7100.10F) and the U.S. Department of Agriculture (USDA) Agricultural Research Service (ARS) (USDA ARS Scientific Collections Management and Access Policy September 2014).

The USGS scientific collections policy employs terminology promulgated by the White House Office of Science and Technology Policy (OSTP) and the National Science and Technology Council Interagency Working Group for Scientific Collections (IWGSC), in accordance with U.S Code, Title 42, Chapter 79, Subchapter II, Section 6624, the OSTP Memorandum of March 20, 2014: Improving the Management of and Access to Scientific Collections, and the IWGSC report: Scientific Collections: Mission-Critical Infrastructure for Federal Science Agencies.

By the Sundry Civil Act of March 3, 1879 [20 USC § 59], Congress explicitly separated the scientific investigation functions of “the Ocean Survey, the Geological Survey, or any other parties of the Government” from museum functions that it mandated to the National Museum [of Natural History, Smithsonian Institution]. “All collections of rocks, minerals, fossils, and objects of natural history, archaeology and ethnology, made by the National Ocean Survey, the United States Geological Survey, or by any other parties of the Government of the United States, when no longer needed for investigation in progress shall be deposited in the National Museum.”

USGS Policy:

The USGS is in the process of developing policy that will apply to all scientific collections, which will be constituted as a USGS Survey Manual Chapter. The policy will continue to align with the DM Part 411. Chapter 3, Section 1b. The USGS will also develop implementation guidelines and procedures that will apply to all scientific collections including biological collections.

Target Completion Date: September 30, 2018

Responsible Official: Kevin Gallagher, Associate Director, USGS Core Science Systems Mission Area

If you have any questions, please contact Lindsay Powers at (303) 202-4828 or lpowers@usgs.gov.

