



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

# SEMIANNUAL REPORT TO CONGRESS

For the Period Ending  
September 30, 2024





# SEMIANNUAL REPORT TO CONGRESS APRIL 1, 2024–SEPTEMBER 30, 2024

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## Abbreviations List

<b>AIE</b>	Audits, Inspections, and Evaluations	<b>IBC</b>	Interior Business Center
<b>AML</b>	Abandoned Mine Land	<b>IJA</b>	Infrastructure Investment and Jobs Act
<b>AS-IA</b>	Assistant Secretary for Indian Affairs	<b>IRA</b>	Inflation Reduction Act of 2022
<b>AS-WS</b>	Assistant Secretary for Water and Science	<b>IT</b>	Information Technology
<b>BIA</b>	Bureau of Indian Affairs	<b>LWCF</b>	Land and Water Conservation Fund
<b>BIE</b>	Bureau of Indian Education	<b>NPS</b>	National Park Service
<b>BLM</b>	Bureau of Land Management	<b>OCIO</b>	Office of the Chief Information Officer
<b>BOR</b>	Bureau of Reclamation	<b>OI</b>	Office of Investigations
<b>BSEE</b>	Bureau of Safety and Environmental Enforcement	<b>OIG</b>	Office of Inspector General
<b>BTFA</b>	Bureau of Trust Funds Administration	<b>OLES</b>	Office of Law Enforcement and Security
<b>DAS-M</b>	Deputy Assistant Secretary for Management [AS-IA]	<b>ONRR</b>	Office of Natural Resources Revenue
<b>DEO</b>	Departmental Ethics Office	<b>OS</b>	Office of the Secretary
<b>DOI</b>	U.S. Department of the Interior	<b>OSMRE</b>	Office of Surface Mining Reclamation and Enforcement
<b>DOJ</b>	U.S. Department of Justice	<b>OWF</b>	Office of Wildland Fire
<b>FWS</b>	U.S. Fish and Wildlife Service	<b>PFM</b>	Office of Financial Management
<b>FY</b>	Fiscal year	<b>PMB</b>	Office of Policy, Management and Budget
<b>IA</b>	Indian Affairs	<b>SOL</b>	Office of the Solicitor
		<b>WSFR</b>	Wildlife and Sport Fish Restoration Program



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## Our Mission and Values

**A**s the Department of the Interior Office of Inspector General (DOI OIG), we provide independent oversight to promote accountability, integrity, economy, efficiency, and effectiveness within DOI. We achieve our mission by conducting independent investigations, audits, inspections, and evaluations and by reporting our findings of fraud, waste, abuse, or mismanagement along with recommendations for improvement. Depending on the nature of the information, we share it with DOI officials, Congress, the U.S. Department of Justice (DOJ) and other law enforcement entities, and the public.

We use our findings to prompt corrective action when we find shortcomings and deficiencies and to prevent wrongdoing and mismanagement. We conduct outreach to those responsible for the expenditure of DOI funds, including employees, contractors, grantees, and Tribes. These outreach efforts help inform these audiences of the consequences of wrongdoing, red flags that they can identify, and how to report problems or concerns to us. We also make recommendations to DOI for the suspension and/or debarment of recipients and potential recipients of DOI awards, which can protect taxpayer resources by preventing wrongdoers or those with a history

of poor performance or noncompliance from receiving new Federal awards.

Our core values define the OIG's overall approach by guiding employee behavior and decisions at all levels. By adhering to these values—integrity, objectivity, and impact—we provide effective oversight that improves DOI.

### INTEGRITY



We demonstrate our integrity by acting with honesty and professionalism. We treat people with dignity and respect.

### OBJECTIVITY



Objectivity is the foundation of our work. We maintain independence, gather all relevant facts, and base our findings on supportable evidence.

### IMPACT



Our work provides decision makers with information so that they can take corrective actions. We strive for continuous improvement in our own organization and DOI.



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## Focus Areas of Oversight

**D**OI's own responsibilities have a significant public impact, and we accordingly strive to conduct oversight that will have a positive effect on DOI's programs and operations. To arrive at focus areas for our oversight, we considered DOI's three major management challenges as we have defined them—managing spending, delivering core services, and ensuring health and safety—and stakeholder priorities, prior work, and emerging threats or vulnerabilities. The work we completed this reporting period addressed several areas, which are summarized below.

### CLIMATE CHANGE RESPONSE



DOI has identified climate change as a cross-cutting issue that presents challenges related to how it fulfills its responsibility to Tribal communities; manages land use, water resources, and wildlife and their habitats; and adapts to the frequency and severity of natural disasters. Natural disasters can expose Federal real property assets—including office buildings, levees, roads, and bridges—to physical damage that can require substantial resources to repair or rebuild. We focus our oversight on DOI's expenditures of monies and monitoring of grants and whether DOI can define success in addressing the challenges that climate change poses.

### CONTRACT AND GRANT OVERSIGHT



One key DOI responsibility is managing its significant funding, which is often accomplished using contracts, grants, and cooperative agreements. According to [USAspending.gov](https://www.usaspending.gov), DOI awarded \$8.1 billion in contracts and approximately \$12.4 billion in financial assistance totaling \$20.5 billion in FY 2024 (as of August 30, 2024).

### CYBERSECURITY



Cybersecurity continues to be a high-risk area for Federal agencies, including DOI. DOI relies on complex, interconnected information systems to carry out its daily operations and spent about \$2 billion in FY 2024 on its portfolio of IT assets, according to the [Federal IT Portfolio Dashboard](#). Our oversight in this area helps ensure that DOI's systems are protected from external threats and comply with Federal standards and regulations.

### DATA QUALITY



DOI relies on a wide variety of data to perform its mission, and the quality and accuracy of this data impacts how DOI accomplishes its mission. Our work continues to identify data reliability issues across a variety of DOI programs. Without complete, timely, and accurate data, DOI will continue to face challenges in fostering accountability and accomplishing its mission efficiently. Our oversight in this area helps ensure DOI has access to quality data when making decisions.



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## ENERGY



We conduct oversight of the implementation of DOI programs that manage lands, subsurface rights, and offshore areas that produce approximately 30 percent of the Nation's domestically produced energy—including oil, gas, coal, hydropower, and renewable energy.

## FINANCIAL MANAGEMENT



DOI manages significant financial assets, including contracts and financial assistance awards as well as property and other resources. The OIG's oversight of these programs ensures taxpayer dollars are spent appropriately.

## INFRASTRUCTURE SPENDING



As the steward for America's public lands, DOI manages critical infrastructure that it describes as essential to protect natural resources, support American jobs, and provide water to the Western United States.<sup>1</sup> We define infrastructure spending as projects funded by the Great American Outdoors Act, the Infrastructure Investment and Jobs Act (IIJA), the Inflation Reduction Act of 2022 (IRA), and other sources. In November 2021, the IIJA was enacted with the intent of addressing aging infrastructure. The legislation provides more than \$30 billion to DOI to address legacy pollution, support water and drought resilience, assist with wildland fire management, restore critical habitats, and help communities prepare for extreme weather events. DOI also received funds from the IRA, which provides an additional \$6.6 billion for similar programs aimed at water management and conservation efforts in high-drought areas. Our series of flash reports, combined with reviews examining DOI's preparedness to expend and oversee supplemental funds, help ensure that

stakeholders understand DOI's approach to these programs and identify lessons learned.

## LAW ENFORCEMENT AND PUBLIC SAFETY



DOI's law enforcement and public safety responsibilities include protecting natural and cultural resources; working with Tribes; managing special events and providing crowd control in areas where multiple agencies must coordinate; and ensuring the safety of employees, volunteers, and visitors on public lands. Among executive branch departments, DOI has the fourth largest law enforcement component, totaling approximately 3,400 law enforcement officers that are assigned predominantly to four bureaus and offices: Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (FWS), and National Park Service (NPS).

## RESPONSIBILITY TO NATIVE AMERICANS



DOI is the primary Federal agency charged with carrying out the United States' trust responsibility to American Indian and Alaska Native people, maintaining the Government-to-Government relationship with the federally recognized Indian Tribes, and promoting and supporting Tribal self determination. DOI provides services to 574 federally recognized Tribes and has trust responsibilities for extensive mineral resources on Tribal lands. Our oversight in this area helps ensure that DOI programs fulfill its responsibilities to these communities and that DOI expends funds appropriately.

## WATER AND POWER MANAGEMENT



Oversight of the DOI's water programs, such as conservation projects and ecosystem restoration to address drought, helps ensure that DOI—the

<sup>1</sup>BOR considers the following States to be the "Western United States": Arizona, California, Colorado, Idaho, Kansas, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, and Wyoming.



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largest wholesaler of water in the country—complies with relevant guidance for managing the delivery of water, protecting habitats, and the generation of hydroelectric power.

## WILDFIRE MANAGEMENT



Wildfires can have devastating effects on local communities, public resources, ecosystems, life, and personal property. According to the National Interagency

Fire Center, more than 56,000 wildfires burned around 2.7 million acres in the United States during 2023; 18 percent of these fires burned 1.5 million acres of Federal land, representing a disproportional 54 percent of total acres burned. In 2024, DOI fire suppression costs totaled more than \$466 million. DOI's wildfire management program consists of the Office of Wildland Fire ((OWF) responsible for oversight) and the

four bureaus with wildland fire management responsibilities—BIA, BLM, FWS, and NPS. The program manages wildfire response for more than 500 million acres of national parks, wildlife refuges and preserves, other public lands, and Indian reservations, and it is part of the Federal interagency wildfire response framework.

## WORKPLACE CULTURE AND HUMAN CAPITAL



Workplace culture and management of human capital affect the DOI's ability to execute its mission efficiently. Reviews and investigations of workplace culture and human capital hold the DOI and its workforce accountable to Government standards and regulations.



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## Message From the Inspector General

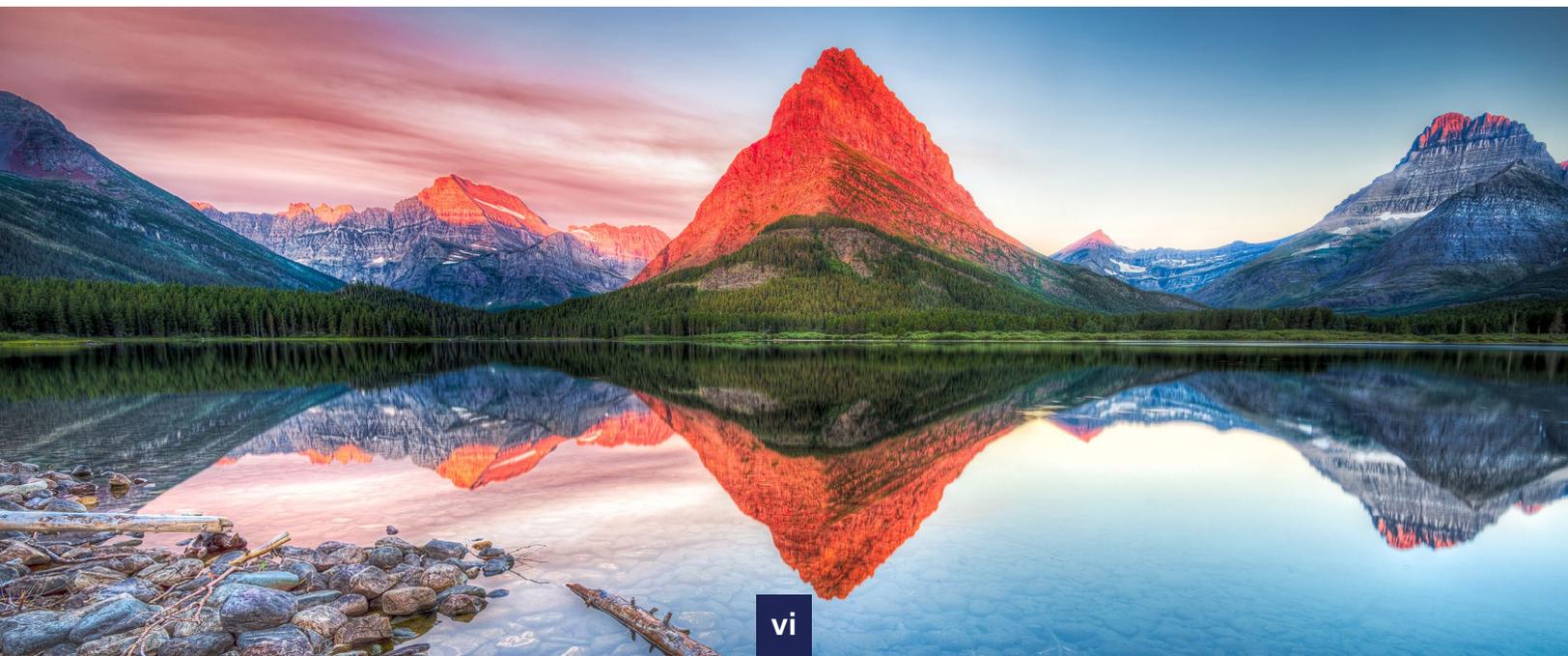
**T**his reporting period marks five years since I became the Inspector General of DOI. During that time, we have issued 261 audit, inspection, and evaluation reports that made 1,374 recommendations and identified \$78.5 million in questioned costs. Our investigations have resulted in \$161.8 million in investigative recoveries, 58 convictions, 55 personnel actions, and 67 procurement remedies. Perhaps most importantly, the OIG's work has resulted in significant improvements in departmental operations, particularly in the areas of cybersecurity and public safety.



The OIG's results this reporting period continue our office's 45-year tradition of conducting independent, objective oversight to promote accountability, integrity, economy, efficiency, and effectiveness within DOI. For example, our Office of Audits, Inspections, and Evaluations (AIE) issued several key reports addressing critical risks facing DOI, including:

- The Bureau of Reclamation's (BOR) Central Valley Project (CVP), one of the largest water supply projects in the United States, cost approximately \$4.4 billion to construct. We conducted an audit and found that BOR did not have internal controls for the cost allocation and ratesetting processes. For example, one individual was responsible for the entire cost allocation—there were no policies in place and no one reviewed his detailed calculations. Given the significant taxpayer investment in the CVP and the substantial costs associated with its operation, BOR should accordingly establish controls to ensure the accuracy of cost allocations and the costs that feed into those allocations, which in turn will ensure the appropriate water rate is established.
- DOI bureaus rely on radio communications to conduct mission-critical operations such as law enforcement, wildland fire management, and search and rescue. We first reviewed this program in 2007 and found that it was fragmented and the infrastructure was poorly maintained. In 2024, we

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performed an evaluation of the program and found these issues continue to exist, which could hinder DOI's ability to respond to emergencies quickly and effectively. Specifically, we found that the BIA, FWS, and NPS generally did not inventory, inspect, or maintain all radio infrastructure as required. The problems in the program have resulted in unsafe and unreliable infrastructure throughout DOI-administered lands.

- The IJJA provided the Office of Surface Mining Reclamation and Enforcement (OSMRE) with \$11.2 billion in new funding for the existing Abandoned Mine Reclamation Fund. We examined the program, which quickly became DOI's largest, and found that OSMRE is not prepared to effectively expend this funding. For example, OSMRE did not properly identify and analyze risk, the organizational structure was not strategically aligned, and it does not have a mechanism to track grant timelines. Given the significant taxpayer funds involved in this program, it is critical that OSMRE ensure that it have proper grant oversight procedures in place.
- The IJJA and IRA provided nearly \$20 million in funding to the Office of Insular Affairs (OIA), which OIA allocated to the U.S. territories in the Pacific Ocean—American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands. Our flash report shared information to promote transparency and discussed the issues and risks the territories and OIA may face when ensuring that the planned work is completed. We look forward to additional cross-cutting projects in partnership with other OIGs over the coming years that will provide oversight of these territories.

In three of these reports, we issued actionable recommendations that, if implemented, will improve the DOI's operations and its ability to fulfill its mission.

During this reporting period, our Office of Investigations (OI) was involved in a wide range of criminal, civil, and administrative matters, and OI's work covered the full spectrum of DOI programs. OI's work addressed financial management, our responsibility to Native Americans, cybersecurity, energy, and workplace culture and human capital. For example, the work of OIG investigators resulted in the general manager for a public water district in California pleading guilty to conspiring to take federally owned water valued at over \$1.5 million and filing a false tax return. In another case, OIG investigators found that a senior BLM executive failed to declare their holdings in their financial disclosures, resulting in that official owning prohibited investments in violation of DOI supplemental ethics regulations.

This semiannual report includes some important updates to help us better communicate with our stakeholders regarding the OIG's work. Appendix 1 of this report includes graphic representations of the data related to reports with open recommendations. During this reporting period, we have moved Appendix 2 into an online resource that our AIE team updates regularly. All significant unimplemented recommendations are identified in this online resource. This information provides DOI and the American public with a concise summary of these high-impact unimplemented recommendations.

Our talented staff deserve the credit for the accomplishments reflected in this semiannual report, and I look forward to continuing to identify ways that DOI can improve its programs and practices.

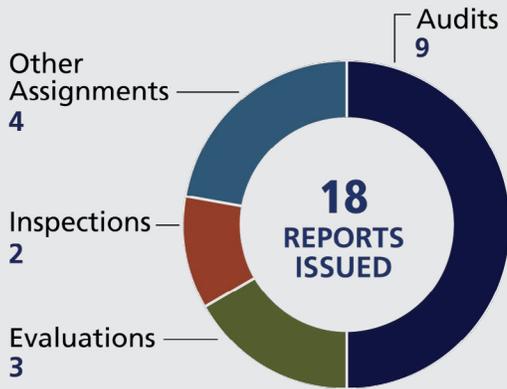
Mark Lee Greenblatt  
Inspector General



# HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS

## STATISTICAL HIGHLIGHTS | APRIL 1, 2024–SEPTEMBER 30, 2024

### REPORTING ACTIVITIES

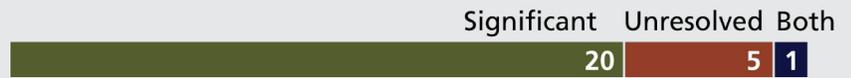


### RECOMMENDATIONS ISSUED

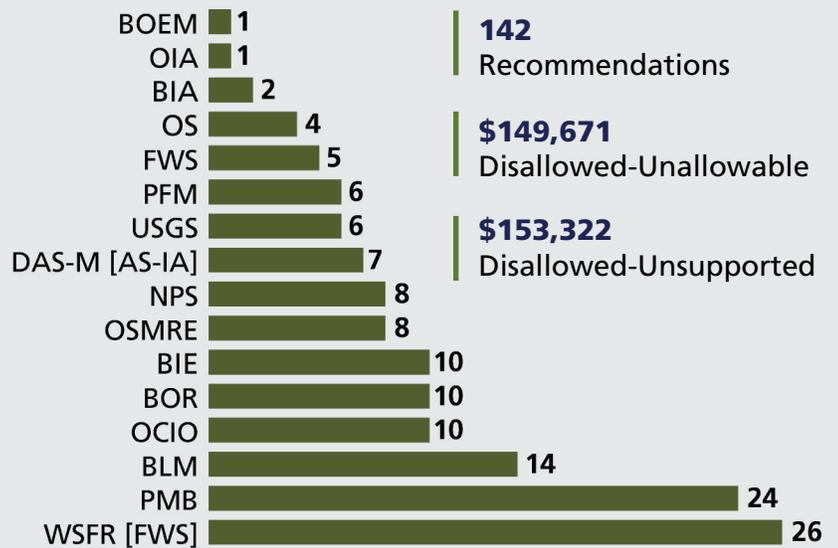
- 141** Recommendations
- \$100,759** Questioned Costs-Unallowable
- \$1,447,775** Questioned Costs-Unsupported

Note: No funds for better use were identified during this reporting period.

### Significant & Unresolved Recommendations



### RECOMMENDATIONS CLOSED



## FEATURED REPORTS

### STRONGER CONTROLS NEEDED OVER THE BUREAU OF RECLAMATION'S CENTRAL VALLEY PROJECT COST ALLOCATION AND RATESETTING PROCESSES (2022-WR-048)



The BOR's CVP is one of the largest water supply projects in the United States and provides irrigation and municipal water to much of California's Central Valley. The CVP consists of 20 dams and reservoirs, 11 power plants, and 500 miles of major canals as well as conduits, tunnels, and related facilities. Along with

supplying water, the CVP has seven other authorized purposes: power, flood control, water quality, recreation, navigation, fish and wildlife enhancement, and fish and wildlife mitigation.<sup>2</sup> Decades ago, BOR established long-term contracts with contractors that receive water from the CVP. These contractors, which now number more than 200, consist of entities such as water, municipal, and irrigation districts; cities; counties; water companies; and farms.

These contractors are required to repay by 2030 the Federal investment to construct the CVP infrastructure; they are also required to pay for the annual cost to operate and maintain the CVP.<sup>3</sup>

<sup>2</sup> BOR, *Central Valley Project Final Cost Allocation Study*, Chapter 5.7 (January 2020).

<sup>3</sup> The authority for recovering the Federal investment in constructing, operating, and maintaining authorized water resources is found in the Reclamation Project Act of 1939, Pub. L. No. 76-260, 53 Stat. 1187 (1939). The Coordinated Operations Act of 1986, Pub. L. No. 99-546, 100 Stat. 3050 (1986), established a firm repayment deadline for contractors to repay all construction costs by 2030.



## HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS

To facilitate repayment, BOR allocates billions of dollars in costs each year, then recoups the construction and operations and maintenance costs by establishing annual water rates that are charged to the contractors for each acre foot of water used.<sup>4</sup>

BOR's three area offices that primarily manage the CVP's vast infrastructure—Central California, Northern California, and South-Central California—acquire goods and services through purchase cards and contract awards to operate, maintain, and manage the land and water resources for the CVP. BOR annually allocates these costs, which are then used to calculate the annual water rate. The objective of our audit was to determine whether BOR effectively designed, implemented, and operated internal controls necessary to ensure the accuracy of the CVP cost allocation and ratesetting processes.<sup>5</sup>

We found BOR did not effectively design, implement, and operate internal controls necessary to ensure the CVP's cost allocation and ratesetting processes are accurate. Specifically, BOR did not conduct oversight or develop standard operating procedures (SOPs) for the cost allocation process. We also found incomplete evidence that management performed required reviews of the ratesetting schedules, and we concluded that the ratesetting SOPs themselves were outdated and missing in some cases. In addition, we identified unsupported purchase card transactions and unprotected purchase card information. Lastly, at two of the area offices, supervisors or managers in the field and budget analysts did not consistently approve the initiation of contract awards, which is contrary to Federal Green Book requirements.

The cost to construct the CVP totaled approximately \$4.4 billion—\$1.3 billion of that amount is attributable to the authorized

purpose of providing water. Currently, the contractors are responsible for repaying the unpaid balance of approximately \$7.8 million of that \$1.3 billion. In addition, the contractors must pay a proportional share of the CVP's annual operations and maintenance costs, which is approximately \$54 million.

Given the significant Federal investment in the CVP, as well as ongoing charges to contractors, BOR must establish appropriate controls to ensure costs are accurately allocated and that water rates are established to sufficiently recoup the remaining construction costs and the ongoing costs to operate and maintain the CVP. Moreover, given outdated and, in some cases, nonexistent SOPs, BOR faces the risk that its employees will not follow existing practices and may lose institutional knowledge regarding how to perform the cost allocations and the ratesetting schedules. In addition, inadequate controls over micropurchases and the requisition process for contract awards put BOR at risk of improper, unnecessary, and fraudulent purchases.

We made 20 recommendations that, if implemented, will help BOR improve its internal controls and ensure the accuracy of the CVP cost allocation and ratesetting processes. We consider four of these recommendations significant because of their monetary impact. BOR implemented three recommendations before we issued our final report.

### **USGS LABORATORIES REMAIN VULNERABLE TO BREACHES OF SCIENTIFIC INTEGRITY (2022-CR-035)**



The U.S. Geological Survey (USGS) is a Federal earth science agency with the mission of delivering actionable science relevant to U.S. decision makers. USGS is responsible for monitoring, analyzing, and predicting earth-system interactions<sup>6</sup>

<sup>4</sup> An acre foot of water equals about 326,000 gallons, or enough water to cover an acre of land to a depth of 1 foot.

<sup>5</sup> We did not conduct an independent assessment of the accuracy of the cost allocations or water rates.

<sup>6</sup> "Earth-system interactions" are the interactions of the Earth's geosphere and biosphere. The geosphere consists of the atmosphere, lithosphere, cryosphere, and hydrosphere.



## HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS

and providing science about natural hazards, energy and mineral resources, environmental health, and water resources. USGS' reputation for scientific excellence, integrity, and objectivity is crucial to its ability to perform its mission effectively. With nearly 500 laboratories spanning 7 geographic regions and 5 mission areas, the quality of results generated is a critical component of both USGS' reputation and the integrity of its science.

USGS states that these reputational considerations depend on consistent adherence to policies related to fundamental science practices and scientific integrity. Scientific integrity, in turn, is the condition resulting from adherence to professional values and practices when conducting, reporting, and applying the results of scientific activities that ensures objectivity, clarity, and reproducibility and that provides insulation from bias, fabrication, falsification, plagiarism, inappropriate influence, political interference, censorship, and inadequate procedural and information security.<sup>7</sup>

We performed this audit to determine whether there are sufficient internal controls in USGS laboratories to identify vulnerabilities and prevent losses associated with breaches of scientific integrity and misconduct. Specifically, we audited the overarching quality management system (QMS) that has been developed for USGS laboratories to ensure that their laboratory science meets consistent quality assurance standards.

We found that USGS lacks sufficient internal controls in laboratories to identify vulnerabilities and prevent losses associated with breaches of scientific integrity and misconduct. After three incidents of misconduct were identified in USGS laboratories, the bureau began developing and implementing an overarching Bureau QMS in 2018 to address potential risks to data and



Source: iStockphoto

breaches of scientific integrity. However, we identified several continuing deficiencies in the development of the Bureau QMS and its implementation in laboratories.

The Bureau QMS has been in development since 2018 and originally had a 2023 target for full implementation. That implementation date was subsequently modified to the end of 2025 due to the COVID-19 pandemic. As of July 2023, however, less than 20 percent of USGS laboratories had fully implemented the Bureau QMS. Further, USGS has not clearly established oversight roles and responsibilities for the Bureau QMS. Policy identifies different entities within USGS that provide oversight of the Bureau QMS: the Office of Science Quality and Integrity, regional directors, and associate directors in the laboratories. However, no centralized oversight function within USGS ensures that all laboratories are appropriately implementing a QMS.

We tested QMS checklists for 32 laboratories. Of the eight laboratories that USGS deemed to have fully implemented the Bureau QMS, we found that none, in fact, had implemented basic internal controls such as supervisory reviews of staff work, and only one laboratory required standard operating procedures. The

<sup>7</sup> USGS does not itself define "scientific integrity." Accordingly, we considered definitions from other analogous entities. See the National Institute of Standards and Technology's (NIST's) webpage, "NIST Scientific Integrity Program."



## HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS

absence of adequate internal controls occurred because the Bureau QMS lacks established minimum requirements, which are necessary for an effective internal control system. The Bureau QMS was designed to be flexible and accommodate the diverse needs and activities of USGS' nearly 500 laboratories. However, the flexibility and discretion provided to laboratories on whether and how to implement certain internal control elements of the Bureau QMS could compromise the very purpose of a QMS.

We found that the USGS Quality Management System Manual does not establish all requirements needed to comply with Federal standards. Specifically, the manual lacks risk assessment internal controls and information technology controls. More specifically, USGS does not require holistic risk assessments at the laboratory level, and the manual does not require assessments of the risk factors that have led to past misconduct, which include factors such as workload capacity and unmet staffing needs. We also found issues with information system controls. For example, many laboratories program or alter software to meet their unique needs, yet there is insufficient review of software designs, which increases risks of compromising USGS networks, exposing data, and creating

inefficiencies due to incompatibility with current systems. Further, the lack of controls has caused USGS to be unaware of what information systems are being used and that these risks even exist.

USGS has reported three serious incidents of scientific misconduct in USGS laboratories since 1996, two of which involved inappropriate conduct that lasted for several years. According to USGS, these breaches of scientific integrity have had significant consequences, including compromise to data integrity, the reputation of USGS, and the work of scientists who used the erroneous data. Because scientific results, studies, and products from USGS are used by different parties in the U.S. Government and the public, breaches of scientific integrity have significant impacts throughout the scientific community. Indeed, even a single breach can jeopardize others' ability to rely on years of scientific research produced by the laboratory in question. If USGS does not take efforts to strengthen its Bureau QMS, which is intended to address these concerns, its data—either produced from laboratories or affected by them—will remain vulnerable to breaches of scientific integrity.

We made nine recommendations that, if implemented, will help ensure USGS laboratories have sufficient internal controls to identify vulnerabilities and deter losses associated with breaches of scientific integrity and misconduct. We consider eight of these recommendations significant because of their impact on data quality. USGS implemented two recommendations before we issued our final report.

### IMPROVEMENTS NEEDED TO DOI'S AND BUREAUS' OVERSIGHT OF RADIO INFRASTRUCTURE (2021-WR-020)



DOI bureaus rely on radio communications to conduct mission critical operations such as law enforcement,



Source: iStockphoto



## HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS



Source: DOI OIG

wildland fire management, and search and rescue. Accordingly, effective and reliable radio communications are important to protect the public and DOI employees and to efficiently manage public lands. However, weaknesses with the DOI's radio infrastructure, which includes the towers, shelters, and fencing needed to operate and protect installed radio equipment, are longstanding. Most notably, in a 2007 audit report,<sup>8</sup> we identified the poor condition of the DOI's radio infrastructure.

Our objective for this evaluation was to determine whether BIA, BLM, FWS, and NPS inventoried, inspected, and maintained radio infrastructure as required by policy and whether improvements had been made since our 2007 report.

We found that the bureaus generally did not properly inventory or inspect radio infrastructure as required by the DOI Office of the Chief Information Officer's (OCIO's) directive regarding radio communications site standards. Specifically, BIA, FWS, and NPS did not properly track or inventory their radio infrastructure and could not provide complete or accurate inventories from their facilities asset management systems. In contrast, BLM was more effective

at inventorying its radio infrastructure due to its implementation of more comprehensive policies and procedures. Further, none of the four bureaus sufficiently completed condition assessments. Without regular condition assessments, none of the four bureaus were able to ensure that their radio infrastructure was maintained in accordance with the directive. These deficiencies occurred primarily because DOI's OCIO did not have a mechanism to enforce its own requirements and because the bureaus did not conduct sufficient oversight.

Without proper inventory and periodic condition assessments, the bureaus do not know the condition of their radio infrastructure and what corrective actions may be needed. Despite DOI's efforts in these areas over the last several years, we found little improvement in the oversight of its radio communications program; as a result, the potential for unreliable radio communication and unsafe radio infrastructure continues. For example, we identified two radio communication sites that are potentially dangerous: one site due to falling objects and another site with toxic fumes.

We made 26 recommendations that, if implemented, will help DOI and its bureaus ensure that all radio infrastructure is properly inventoried, inspected, and maintained in accordance with the directive. We consider two of these recommendations significant because of their impact on health and safety.

### FLASH REPORT: THE U.S. DEPARTMENT OF THE INTERIOR'S SUPPLEMENTAL FUNDING TO THE PACIFIC ISLANDS (2024-INF-001)



Section 40804 of the IIA provides new and additional funding to DOI's Office of the Secretary (OS), for ecosystem restoration programs.<sup>9</sup> The OS in turn directed this funding to other DOI bureaus and offices, including OIA, which helps

<sup>8</sup> U.S. Department of the Interior Radio Communications Program (Report No. C-IN-MOA-0007-2005), issued January 2007.

<sup>9</sup> 16 U.S.C. § 6592a.



# HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS

coordinate Federal policy for the U.S. territories and manages Federal funding programs for the Insular Areas.

In addition, the President signed the IRA, Pub. L. No. 117-169, into law on August 16, 2022. Section 50241 of the IRA provides new funding to OIA “to provide technical assistance for climate change planning, mitigation, adaptation, and resilience to the United States Insular Areas.”

We issued this flash report to share information and promote transparency. This report describes the nearly \$20 million in IIJA and IRA funding OIA allocated to the U.S. territories in the Pacific Ocean—American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands.<sup>10</sup> We also discuss issues and risks the territories and OIA may face when ensuring that the planned work is completed.

## REPORTS ISSUED

### INDEPENDENT AUDITORS’ PERFORMANCE AUDIT REPORT ON THE U.S. DEPARTMENT OF THE INTERIOR FEDERAL INFORMATION SECURITY MODERNIZATION ACT FOR FISCAL YEAR 2023 (2023-ITA-008)



<sup>10</sup> The U.S. Virgin Islands also received IIJA and IRA funding through OIA; however, we focused this report on OIA’s IIJA and IRA funding to the Pacific Islands.

### FLASH REPORT: STATUS OF THE U.S. DEPARTMENT OF THE INTERIOR’S 2019 ADDITIONAL SUPPLEMENTAL APPROPRIATIONS FOR DISASTER RELIEF (2023-CR-029)



### U.S. DEPARTMENT OF THE INTERIOR’S COMPLIANCE WITH THE PAYMENT INTEGRITY INFORMATION ACT OF 2019 IN ITS FISCAL YEAR 2023 AGENCY FINANCIAL REPORT (2024-FIN-005)



### NPS SHOULD ENSURE THE LAND AND WATER CONSERVATION FUND STATE SIDE PROGRAM COMPLIES WITH THE JUSTICE40 INITIATIVE AND IDENTIFY DATA NECESSARY FOR THE PROGRAM TO SUCCESSFULLY IMPLEMENT THE U.S. DEPARTMENT OF THE INTERIOR’S “EQUITY ACTION PLAN” (2022-ER-017)



Source: iStockphoto





# HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS



Source: iStockphoto

## WILDLIFE AND SPORT FISH RESTORATION PROGRAM GRANTS AWARDED TO THE STATE OF VERMONT BY THE U.S. FISH AND WILDLIFE SERVICE (2023-CGD-022)



## WILDLIFE AND SPORT FISH RESTORATION GRANTS AWARDED TO THE STATE OF ALASKA BY THE U.S. FISH AND WILDLIFE SERVICE (2023-CGD-011)



## FLASH REPORT: THE NATIONAL PARK SERVICE'S INFLATION REDUCTION ACT HIRING EFFORTS AND ACTIVITIES (2024-ISP-011)



## THE U.S. DEPARTMENT OF THE INTERIOR MADE PROGRESS IN IMPLEMENTING RECOMMENDATIONS RELATED TO RIGHTS-OF-WAY MANAGEMENT (2023-CR-027)



## WILDLIFE AND SPORT FISH RESTORATION GRANTS AWARDED TO THE STATE OF MONTANA BY THE U.S. FISH AND WILDLIFE SERVICE (2023-CGD-041)



## WILDLIFE AND SPORT FISH RESTORATION GRANTS AWARDED TO THE STATE OF IDAHO BY THE U.S. FISH AND WILDLIFE SERVICE (2023-CGD-006)





## HIGHLIGHTS FROM THE OFFICE OF AUDITS, INSPECTIONS, AND EVALUATIONS

**THE OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT SHOULD IMPROVE EFFORTS FOR EXPENDING INFRASTRUCTURE INVESTMENT AND JOBS ACT FUNDS (2023-INF-014)**



**WILDLIFE AND SPORT FISH RESTORATION GRANTS AWARDED TO THE STATE OF CALIFORNIA BY THE U.S. FISH AND WILDLIFE SERVICE (2022-WR-030)**



**THE U.S. DEPARTMENT OF THE INTERIOR IS MAKING PROGRESS IN ITS MANAGEMENT OF GEOSPATIAL DATA BUT IMPROVEMENTS ARE NEEDED (2024-ER-003)**



**WILDLIFE AND SPORT FISH RESTORATION GRANTS AWARDED TO THE STATE OF NEW JERSEY BY THE U.S. FISH AND WILDLIFE SERVICE (2023-CGD-023)**



Source: iStockphoto

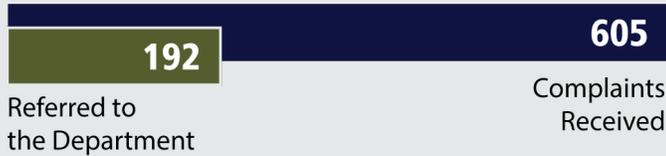


# HIGHLIGHTS FROM THE OFFICE OF INVESTIGATIONS

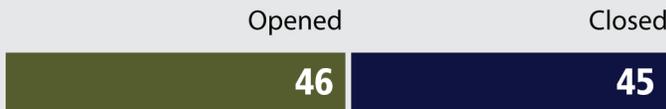
## STATISTICAL HIGHLIGHTS | APRIL 1, 2024–SEPTEMBER 30, 2024

### INVESTIGATIVE ACTIVITIES

#### Complaints



#### Investigations



### CRIMINAL PROSECUTION ACTIVITIES

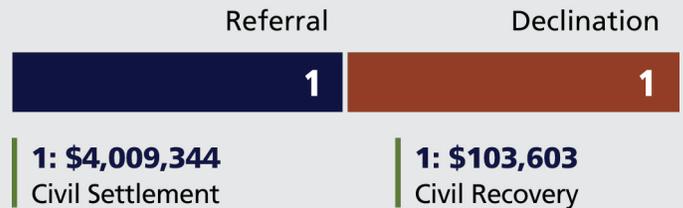


Note: These formulas represent the number of judgments and the resulting penalties. For example, 6 judgments resulted in a total of 252 months of probation.

#### Criminal Matters



### CIVIL INVESTIGATIVE ACTIVITIES



### ADMINISTRATIVE INVESTIGATIVE ACTIVITIES

#### 3 Personnel Actions

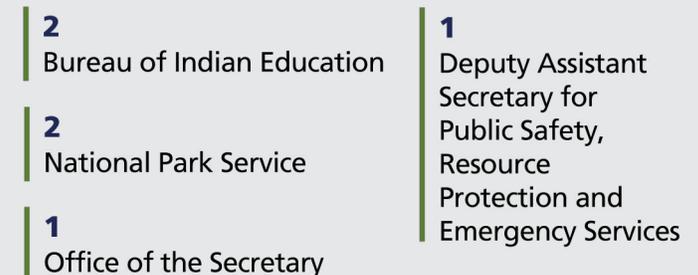


#### 1 Procurement Remedy



#### 3 General Policy Actions

### 6 PAST DUE RESPONSES



Update: In our April 2024 SAR, we reported a "Recovery of Over Payment" of \$169,852. Subsequently, ONRR conducted a review of this recovery and determined that additional royalties were not owed and therefore not recovered. The "Recovery of Over Payment" amount should be \$0 for April 2024.



# HIGHLIGHTS FROM THE OFFICE OF INVESTIGATIONS

## SECURE DATABASE



Source: iStockphoto

### FEATURED REPORTS

#### DOI EMPLOYEE VIOLATED DEPARTMENT POLICY AND ETHICS STANDARDS BY ACCESSING SECURE DATABASE (23-0730)



We investigated allegations that a Personnel Security Specialist in the Office of Law Enforcement and Security exceeded their authority by accessing records they were not authorized to access within a secure U.S. Government database. We substantiated the allegations. We found that the employee used their role as a Personnel Security Specialist to access the Defense Counterintelligence and Security Agency's Central Verification System (CVS) to view the records of a former DOI employee with whom they had a personal relationship. The employee's access of these records violated DOI policy, their CVS user agreement, and the Standards of Ethical Conduct for Employees of the Executive Branch.

#### SUMMARY: FORMER ALAMO NAVAJO SCHOOL BOARD MEMBER STOLE FEDERAL FUNDS AND ACCEPTED KICKBACKS (18-0361)



The OIG investigated allegations that Bucky Apache and three other elected Alamo Navajo School Board (ANSB) members defrauded the ANSB by misusing Federal travel funds.

We substantiated these allegations. Our investigation determined that Apache and three other ANSB members defrauded the ANSB out of nearly \$60,000 in Federal travel funds. This amount consisted of payments made directly to the four ANSB members for traveling to meetings that never took place, traveling to meetings that took place but the members did not attend, failing to return advance payments received for canceled trips, and submitting falsified receipts and documents to increase the amounts reimbursed.



## HIGHLIGHTS FROM THE OFFICE OF INVESTIGATIONS

We also determined that Apache and one other ANSB member received kickbacks from an IT company in exchange for an IT services contract awarded by the ANSB.

On April 24, 2023, Apache pleaded guilty in the U.S. District Court for the District of New Mexico to one count of Federal Program Theft and of Aiding and Abetting in violation of 18 U.S.C § 666(a)(1)(A) and 18 U.S.C § 2. On November 2, 2023, Apache was sentenced to 5 years of probation and ordered to pay \$15,079.14 in restitution.

During our investigation, two of the ANSB members who were under investigation died, and a third member who was originally indicted was not prosecuted after the District Court of New Mexico dismissed the indictment against him for reasons unrelated to this investigation.

### ALLEGED ETHICS VIOLATIONS, BLM, DC (23-0282)



We investigated allegations that Nada Culver, Principal Deputy Director for Policy and Programs for BLM, may have violated ethics requirements when she participated in particular matters involving ConocoPhillips (Conoco), an oil and gas company and a prohibited investment for certain DOI employees. We also investigated whether Culver failed to disclose her spouse's interest in Conoco and other prohibited investments, such as Berkshire Hathaway, to the Departmental Ethics Office (DEO). Finally, we assessed whether Culver's participation in the DOI's review of the Federal oil and gas program impermissibly affected any of her financial holdings.

We found that Culver initially failed to identify her holdings of Berkshire Hathaway stock, a prohibited investment for certain DOI employees under the DOI's supplemental ethics regulation, 5 C.F.R. § 3501.103(b)(1)(ii), when asked about her financial interests by the DEO during her initial ethics review. Although Culver subsequently disclosed her financial interests in



Source: iStockphoto

Berkshire Hathaway when she submitted her new entrant public financial disclosure report, Culver's failure to disclose these holdings earlier resulted in Culver owning Berkshire Hathaway stock in violation of DOI's supplemental ethics regulation and the Standards of Ethical Conduct. We note that once the DEO reviewed Culver's public financial disclosure report and advised her to sell all holdings of Berkshire Hathaway, Culver did so that same day.

We also concluded that Culver did not violate the criminal conflict of interest statute, 18 U.S.C. § 208, through her participation in the DOI's review of the Federal oil and gas leasing program while she and her spouse held financial interests in Berkshire Hathaway because the review did not have a direct and predictable effect on these financial interests. Moreover, we found that 18 U.S.C. § 208 did not restrict Culver from participating in matters involving Conoco because Culver herself did not have a prohibited financial interest in Conoco, and the amount of her spouse's Conoco holdings did not trigger application of the statute.



## HIGHLIGHTS FROM THE OFFICE OF INVESTIGATIONS

### INVESTIGATION OF IMPROPER ROYALTY ESTIMATES LEADS TO RECOVERY OF FEDERAL MINERAL REVENUES (19-0893)



We investigated allegations that Hilcorp San Juan, LP (Hilcorp), provided false, misleading, or inaccurate information when it reported its mineral production and royalties associated with Indian mineral leases in the San Juan Basin to the Office of Natural Resources Revenue (ONRR) and the Southern Ute Indian Tribe. During our investigation, we learned that the alleged activity also affected more than 1,200 Federal leases and leases belonging to multiple Indian entities. We substantiated the allegations.

We found that between August 2017 and December 2018, Hilcorp paid Federal royalties on oil, natural gas, and natural gas liquids based on estimated volumes and prices instead of on actual volumes and prices. Further, Hilcorp did so without indicating that the payments were based on estimates and without subsequently making payments in the following month based on actual volumes and values.<sup>11</sup> As a result, Hilcorp knowingly and improperly avoided its obligation to pay ONRR full royalty payments on its Federal leases.

We also found that between August 2017 and June 2020, Hilcorp intermittently reported estimated volumes and prices instead of actual volumes and prices for its Indian properties, resulting in an underpayment of royalties. Hilcorp stated its Indian royalty reporting was amended in April 2020 and June 2020 to report actual volumes and values.

We referred this matter to the DOJ, Commercial Litigation Branch, and the U.S. Attorney's Office for the Southern District of Texas. On January 18, 2024, Hilcorp and DOJ finalized a settlement agreement wherein Hilcorp agreed to pay the United States \$34,640,957 to resolve its improper Federal mineral reporting and for releases from



Source: iStockphoto

any civil or administrative monetary claims the United States has under the False Claims Act (31 U.S.C. §§ 3729-3733), the Program Fraud Civil Remedies Act (31 U.S.C. §§ 3801-3812), and the common law theories of breach of contract, payment by mistake, unjust enrichment, and fraud for the covered conduct as specified by the settlement agreement.

DOJ declined to pursue the additional alleged conduct associated with minerals produced from Indian properties, and we referred our findings to ONRR for potential administrative action. For example, ONRR has the authority to review or audit Hilcorp's amended reporting and determine if the company properly reported and paid mineral royalties owed to the Southern Ute Indian Tribe. On February 6, 2024, Hilcorp and ONRR finalized a settlement agreement related to Hilcorp's improper use of estimates in its Federal mineral reporting to ONRR for the period August 2017 through February 2024. Hilcorp agreed to pay ONRR an additional \$10,000,000 to resolve unpaid Federal royalties and for releases from all claims ONRR has from any civil, criminal, or administrative actions under the Federal Oil and Gas Royalty Management Act (30 U.S.C. §§ 1701-1759) arising out of, or related directly or indirectly to, the covered conduct as specified in the settlement agreement.

<sup>11</sup>Under 30 U.S.C. § 1721(h), when an estimated payment is made to ONRR, actual royalties are payable at the end of the month following the month in which the estimated payment is made.



# HIGHLIGHTS FROM THE OFFICE OF INVESTIGATIONS

## LETTERS SENT TO STATES REGARDING CONFLICTS OF INTEREST ON AML GRANTS



A recent OIG investigation determined that individuals apparently intended

in advance to use Federal subaward funds to contract out Abandoned Mine Land (AML) and orphaned well reclamation work, under the IJJA, to entities in which they may have a financial or other interest. Another recent OIG investigation determined that a State contractor plugging orphaned wells through IJJA-funding may have had familial ties with one of its subcontractors.

After discovering this, we sent letters to States explaining how conflicts of interest may affect the integrity of State-issued, IJJA-funded subawards and contracts, and encouraging them to review their current conflict of interest disclosure and resolution process for contractors and subrecipients.

Our letters explained that this situation is concerning because:

- The potential for conflicts of interest may adversely affect the selection, award, and administration of grants or contracts.
- Actual or perceived conflicts of interest can undermine public confidence in the integrity of government programs and diminish free and open competition.
- There is an increased potential for violations of Federal antitrust and competition laws if actual financial conflicts of interest exist between grant recipients and subrecipients.

DOI grant awards are governed by 2 C.F.R. § 200, which includes requirements for limiting the impact of conflicts of interest. For example, applicants must disclose in writing any conflicts

of interest to the DOI awarding agency or to a State government “pass-through” entity. Award recipients and subrecipients must also establish internal controls, including procedures to identify, disclose, and mitigate or eliminate conflicts of interest.<sup>12</sup> The regulation further states that “no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner . . . has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.”<sup>13</sup>

Preventing actual or potential conflicts of interest is critical to ensuring the public has confidence that the award process for these grants is fair and transparent. Our letters also explained that, as a result of these recent investigations, two States modified their respective orphaned well and AML program applications to require the disclosure of potential conflicts of interest between subrecipients or subcontractors and the companies with which they plan to do business.

## REPORTS ISSUED

### SUMMARY: BIE EMAIL SPOOFED TO CHANGE BANK ACCOUNT INFORMATION AFFECTING EMPLOYEE’S PAYCHECK (22-0895)



### NATIONAL PARK SERVICE DEPUTY SUPERINTENDENT SENTENCED IN FRAUD CASE (DOJ PRESS RELEASE)



<sup>12</sup> 2 C.F.R. § 1402.112(b)(2).

<sup>13</sup> Id. § 200.318.



## HIGHLIGHTS FROM THE OFFICE OF INVESTIGATIONS

**REVIEW OF DEPARTMENTAL ETHICS OFFICE'S ASSESSMENT OF PROHIBITED INVESTMENTS (22-0498)**



**BECKLEY WOMAN PLEADS GUILTY TO FEDERAL THEFT CRIME (DOJ PRESS RELEASE)**



**FORMER WATER DISTRICT GENERAL MANAGER PLEADS GUILTY TO CONSPIRACY TO COMMIT WATER THEFT AND SEPARATE TAX CHARGE (DOJ PRESS RELEASE)**



**EX-BLM EMPLOYEE SENTENCED TO PRISON FOR STEALING MONEY BY FORGING GOVERNMENT CHECKS (DOJ PRESS RELEASE)**



**FORMER FWS EMPLOYEE MISUSED GOVERNMENT TRAVEL CREDIT CARD FOR PERSONAL EXPENSES (21-0153)**



**BIE EMPLOYEE VIOLATED ETHICS LAWS AND REGULATIONS (23-0326)**



**ALLEGED ETHICS VIOLATIONS, DOI, DC (22-0932)**



**SUMMARY: FORMER BOR EMPLOYEE VIOLATED ETHICS LAWS BY ACCEPTING LOANS FROM A GOVERNMENT CONTRACTOR (23-0164)**



**CONTRACTOR ADMITS GUILT IN \$1.5 MILLION BID-RIGGING SCHEME (DOJ PRESS RELEASE)**



**POLLUTION AND FALSIFIED LOG ENTRIES AT MP 310-JA FACILITY (15-0716)**



**FORMER TRIBAL COUNCIL EMPLOYEE CHARGED WITH EMBEZZLEMENT, WIRE FRAUD, AGGRAVATED IDENTITY THEFT (DOJ PRESS RELEASE)**



**SAFETY SYSTEMS BYPASS CAUSES POLLUTION EVENT IN THE GULF OF MEXICO (18-0490)**



**FEDERAL EMPLOYEE CHARGED WITH DEFRAUDING U.S. GOVERNMENT OF MORE THAN \$1 MILLION (DOJ PRESS RELEASE)**



**BECKLEY WOMAN SENTENCED FOR FEDERAL THEFT CRIME (DOJ PRESS RELEASE)**





## Summary of Recommendation Activity

We are tracking a total of 492 open recommendations, including 96 that are considered significant and 19 that are unresolved. These open recommendations are related to questioned costs of \$51,525,216, and we identified \$5,701,319 in funds to be put to better use.

In this reporting period, we issued 141 recommendations in 18 audit, inspection, and evaluation reports. Of those recommendations, 21 were determined to be significant, and 6 are unresolved. We identified \$1,548,534 in questioned costs.

We closed 142 recommendations this period, of which 39 recommendations were from reports issued in this reporting period and 103 recommendations were from reports issued in prior reporting periods (older than 6 months). In those closed recommendations, \$302,993 in costs were disallowed and recovered by the Department and 16 significant recommendations were closed.

Thirty-four recommendations that were previously unresolved have since been resolved through discussions with the Department and revisions to corrective action plans. We continue to coordinate with the Department and its bureaus to address 19 unresolved recommendations.

### SUMMARY

**492**

Number of Recommendations

**\$5,701,319**

Funds for Better Use

**\$15,252,054**

Questioned Costs-Unallowable

**\$36,273,162**

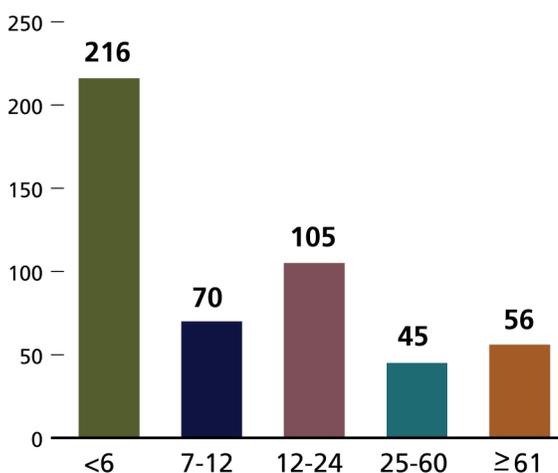
Questioned Costs-Unsupported

### Significant & Unresolved Recommendations

Significant    Unresolved    Both



### Age of Recommendations (in Months)



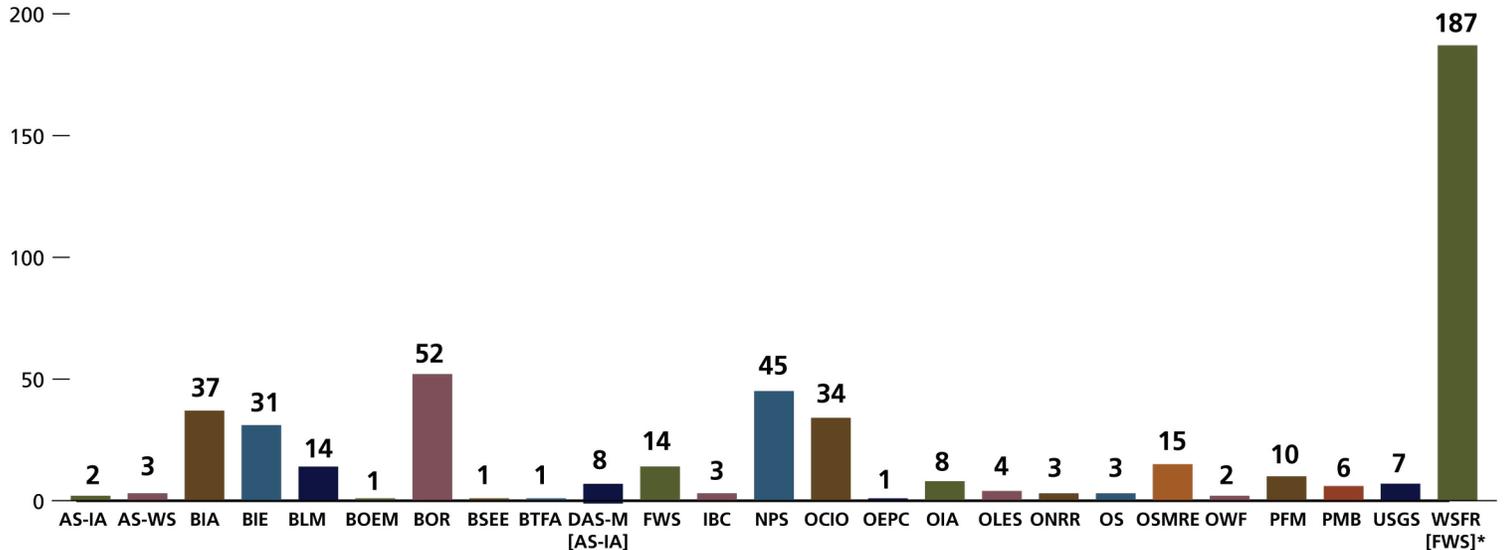
### Number Unresolved by Bureau





# APPENDIX 1

## Number of Recommendations by Bureau



\* The Wildlife and Sport Fish Restoration Program (WSFR) program is the largest grant program managed by DOI. It provides funding for States and territories to support projects that promote the conservation and restoration of wild birds and mammals and their habitats and programs that provide hunter education and safety training and opportunities. The OIG has an agreement with FWS to conduct audits for all the States and territories receiving funds through the program on a five-year cycle. FWS coordinates implementation with the States and territories, reviews and endorses the closure packages, and then forwards them to the OIG for final approval.

## Bureau and Office Abbreviations

<b>AS-IA</b>	Assistant Secretary for Indian Affairs
<b>AS-WS</b>	Assistant Secretary for Water and Science
<b>BIA</b>	Bureau of Indian Affairs
<b>BIE</b>	Bureau of Indian Education
<b>BLM</b>	Bureau of Land Management
<b>BOEM</b>	Bureau of Ocean Energy Management
<b>BOR</b>	Bureau of Reclamation
<b>BSEE</b>	Bureau of Safety and Environmental Enforcement
<b>BTFA</b>	Bureau of Trust Funds Administration
<b>DAS-M [AS-IA]</b>	Deputy Assistant Secretary for Management [AS-IA]
<b>FWS</b>	U.S. Fish and Wildlife Service
<b>IBC</b>	Interior Business Center

<b>NPS</b>	National Park Service
<b>OCIO</b>	Office of the Chief Information Officer
<b>OEPC</b>	Office of Environmental Policy and Compliance
<b>OIA</b>	Office of Insular Affairs
<b>OLES</b>	Office of Law Enforcement and Security
<b>ONRR</b>	Office of Natural Resources Revenue
<b>OS</b>	Office of the Secretary
<b>OSMRE</b>	Office of Surface Mining Reclamation and Enforcement
<b>OWF</b>	Office of Wildland Fire
<b>PFM</b>	Office of Financial Management
<b>PMB</b>	Office of Policy, Management and Budget
<b>USGS</b>	U.S. Geological Survey
<b>WSFR</b>	Wildlife and Sport Fish Restoration Program



## APPENDIX 2

### Open Recommendations

We have moved this appendix to an online resource that is updated regularly. Data related to reports with open recommendations is now available on the OIG website. This online listing also identifies all significant and unresolved recommendations that have not been implemented. This webpage provides a searchable list of AIE open recommendations. Since the listing only includes open recommendations, it may not include all recommendations made in each report.

<https://www.doioig.gov/recommendations>



## APPENDIX 3

# Monetary Resolution Activities

For the Period Ending September 30, 2024

**TABLE 1: INSPECTOR GENERAL REPORTS WITH QUESTIONED COSTS\***

	Number of Reports	Unallowable Costs	Unsupported Costs	Total Questioned Costs
A. For which no management decision has been made by the commencement of the reporting period. (As of March 31, 2024)	29	\$15,335,956	\$35,916,770	\$51,252,726
B. Which were issued during the reporting period.	6	\$100,579	\$1,447,775	\$1,548,534
<b>Subtotal (A+B)</b>	<b>35</b>	<b>\$15,436,715</b>	<b>\$37,364,545</b>	<b>\$52,801,260</b>
C. For which a management decision was made during the reporting period. ((i)+(ii))	8	\$184,661	\$1,091,383	\$1,276,044
(i) Dollar value of costs disallowed.	–	\$149,671	\$153,322	\$302,993
(ii) Dollar value of costs allowed.	–	\$34,990	\$938,061	\$973,051
D. For which no management decision had been made by the end of the reporting period. (Subtotal – C)	27	\$15,252,054	\$36,273,162	\$51,525,216

\* Does not include non-Federal funds.



## Monetary Resolution Activities

For the Period Ending September 30, 2024

**TABLE 2: INSPECTOR GENERAL REPORTS WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE**

	Number of Reports	Dollar Value
A. For which no management decision has been made by the commencement of the reporting period. (As of March 31, 2024)	5	\$5,822,262
B. Which were issued during the reporting period.	0	\$0
<b>Subtotal (A+B)</b>	<b>5</b>	<b>\$5,822,262</b>
C. For which a management decision was made during the reporting. <b>((i)+(ii))</b>	1	\$120,493
<i>(i) Dollar value of recommendations that were agreed to by management.</i>	–	\$0
<i>(ii) Dollar value of recommendations that were not agreed to by management.</i>	–	\$120,943
D. For which no management decision had been made by the end of the reporting period. <b>(Subtotal – C)</b>	4	\$5,701,319



## APPENDIX 4

# Federal Financial Management Improvement Act

The OIG's Independent Public Accountant, KPMG, disclosed no instances in which the DOI's financial management systems did not substantially comply with the Federal Financial Management Improvement Act.



# Peer Reviews of OIG Operations

Government audit, inspection and evaluation, and investigative standards require each statutory OIG to receive an independent, comprehensive peer review of its audit and investigative operations once every three years, consistent with applicable standards and guidelines.

In general, these peer reviews determine whether the OIG's internal quality control system is adequate as designed and provides reasonable assurance that the OIG follows applicable standards, policies, and procedures. The Inspector General Act of 1978 requires that OIGs provide in their semiannual reports to Congress information about peer reviews of their respective organizations and their peer reviews of other OIGs.

## AUDITS, INSPECTIONS, AND EVALUATIONS

We conducted an audit peer review of NASA OIG for the period ended March 31, 2024, and issued our report and letter of comment on September 30, 2024. No peer reviews were completed on the DOI OIG during this reporting period. The most recent audit peer review of our office was performed by Treasury OIG and covered our system of quality control in effect for the year ended September 30, 2022. Treasury issued its final report and letter of comment on June 27, 2023. The most recent inspection and evaluation peer review of our office was performed by the Department of Defense OIG and covered our policies and procedures, as well as select inspections and evaluations completed between April 1, 2021, and March 31, 2022. The Department of Defense OIG issued its final report and letter of comment on August 30, 2023.

## INVESTIGATIONS

We did not complete any peer reviews of other OIGs during this reporting period. No investigative peer reviews were completed on the DOI OIG during this reporting period.



## APPENDIX 6

### Instances of Agency Interference

The OIG did not encounter any attempts to interfere with our independence—whether through budgetary constraints designed to limit our capabilities, resistance or objection to oversight activities, or restrictions on or significant delays in access for information—during this reporting period.



## APPENDIX 7

# Investigations Involving Senior Government Employees

### **Investigation Involving a Senior Government Official Where Misconduct Was Substantiated**

The OIG investigated allegations that Nada Culver, BLM's Principal Deputy Director for Policy and Programs, violated ethics requirements, failed to disclose prohibited investments, and participated in a review affecting her financial holdings. We partially substantiated the allegations.

### **Investigation Involving a Senior Government Official That Was Closed But Not Disclosed to the Public**

The OIG investigated allegations that a senior official held financial interests that might conflict with official duties, including financial interests that were prohibited investments for certain DOI employees under the DOI's supplemental ethics regulation. We did not find any violation of laws, rules, or regulations.



## APPENDIX 8

# Alleged Whistleblower Retaliation

The OIG did not complete any investigations on alleged whistleblower retaliation.

# OIG CONTACT INFORMATION



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