



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

The U.S. Department of the Interior Could Expand Its Use of Contracting Flexibilities and Should Establish an Acquisition Policy for Future Disasters



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AUG 08 2022

Memorandum

To: Megan Olsen
Director, Office of Acquisition and Property Management,
U.S. Department of the Interior

From: Kathleen Sedney *Kathleen Sedney*
Assistant Inspector General for Audits, Inspections, and Evaluations

Subject: Final Evaluation Report – *The U.S. Department of the Interior Could Expand Its Use of Contracting Flexibilities and Should Establish an Acquisition Policy for Future Disasters*
Report No. 2020–CGD–006

This memorandum transmits the results of our evaluation of the U.S. Department of the Interior's (DOI's) use of contracting flexibilities for disaster response and recovery.

We will refer Recommendations 1–3 to the Office of Policy, Management and Budget (PMB) for implementation tracking and to report to us on their status. We note that Recommendations 2 and 3 have target implementation dates that are midway through the 2023 Atlantic hurricane season. The DOI should provide revised target implementation dates for Recommendations 2 and 3 to the PMB. 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, please call me at 202–208–5745.

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Results in Brief

What We Evaluated

We evaluated the U.S. Department of the Interior's (DOI's) use of contracting flexibilities for disaster response and recovery. Specifically, we reviewed the extent to which the National Park Service (NPS), the U.S. Fish and Wildlife Service (FWS), and the U.S. Geological Survey (USGS) used contracting flexibilities for disaster recovery funds related to Hurricanes Harvey, Irma, and Maria.

What We Found

We found that NPS, FWS, and USGS contracting officers did not widely use flexibilities provided under Federal Acquisition Regulation (FAR) subparts 18.1 and 18.2. The limited use of flexibilities occurred because the DOI does not have a documented emergency acquisition policy, which would ensure that DOI personnel can use available emergency contracting procedures to help optimize the U.S. Government's responsiveness during and after an emergency. We also found that DOI policy provided contracting officers with only 3 to 4 months to use increased acquisition threshold flexibilities under FAR subpart 18.2 for Hurricanes Harvey, Irma, and Maria. Further, the DOI relied on past precedent to determine the applicable time period to use the increased acquisition thresholds but did not consider whether or how extended time periods could streamline procurements.

Why This Matters

Contracting flexibilities, which are identified under Federal Acquisition Regulation part 18, "Emergency Acquisitions," are intended to streamline the standard acquisition process by relaxing some regulatory contracting requirements and increasing spending thresholds for micropurchases, simplified acquisitions, and purchases of some commercial items. After the President declares an emergency, the head of the agency can increase certain spending thresholds to facilitate recovery by reducing timeframes for provision of assistance and the amount of documentation for emergency contracting. Other flexibilities that are available as tools for contracting officers to award contracts more quickly in emergency situations include reduced or eliminated competition, use of blanket purchase agreements, or use of oral requests for proposal.

Hurricanes Harvey, Irma, and Maria were declared emergencies, and the DOI increased: (1) the micropurchase threshold from \$3,500 to \$20,000, (2) the simplified acquisition threshold from \$150,000 to \$750,000, and (3) the threshold for certain commercial items from \$7 million to \$13 million. Contracting officials also had the ability to use other tools, such as reduced or eliminated competition and blanket purchase agreements. That is, these were situations in which contracting flexibilities were permitted because of the potential need for quick provision of recovery assistance. Although we do not express an opinion on whether contracting flexibilities should have been exercised in any particular situation, it is important for the DOI to ensure that there is a clear understanding of when these flexibilities may be appropriate and useful; otherwise, the goals of permitting these flexibilities in the first instance may not be met.

What We Recommend

We make three recommendations to help the DOI improve its emergency acquisition policies and procedures.

Introduction

Objective

Our objective was to determine the extent to which bureau acquisition offices used available contracting flexibilities for disaster recovery funds related to Hurricanes Harvey, Irma, and Maria.

See Appendix 1 for the scope and methodology of our evaluation.

Background

On February 9, 2018, Congress passed the Bipartisan Budget Act of 2018 (Pub. L. No. 115–123), which provided supplemental appropriations for expenses related to Hurricanes Harvey, Irma, and Maria, as well as the 2017 California wildfires. The National Park Service (NPS) received \$207.6 million, the U.S. Fish and Wildlife Service (FWS) received \$210.6 million, and the U.S. Geological Survey (USGS) received \$42.2 million. Supplemental appropriations generally cover emergencies, such as disaster relief, or other needs deemed too urgent to be postponed until the enactment of the next year’s regular appropriations.

Federal Acquisition Regulation (FAR) part 18, “Emergency Acquisitions,” provides flexibilities that allow acquisition offices to streamline the process in response to certain emergencies. FAR subpart 18.1, “Available Acquisition Flexibilities,” permits the use of streamlined contracting methods such as reduced or eliminated competition, use of blanket purchase agreements or indefinite-delivery contracts, and use of oral requests or letter contracts.¹ Flexibilities also include increased thresholds for micropurchases, simplified acquisitions, and certain commercial items under FAR subpart 18.2, “Emergency Acquisition Flexibilities.”² The provisions under FAR subpart 18.1 are available to contracting officers (COs) when certain conditions are met but do not require an emergency declaration; in contrast, FAR subpart 18.2 applies once the President declares an emergency.

¹ Blanket purchase agreements are established under a schedule contract to fill repetitive future needs for supplies or services. Schedule contracts provide Federal agencies with a simplified process of acquiring commercial supplies and services; Federal supply schedules are awarded competitively, and Federal agencies can order from the supply schedules as they would from a catalog. Indefinite-delivery contracts may be used to acquire supplies or services when exact future delivery times or quantities are not known at the time of award. Oral requests can be used when processing a written solicitation would delay acquisition of supplies or services in an emergency situation. A letter contract is a written preliminary contractual instrument that authorizes the contractor to begin immediately manufacturing supplies or performing services.

² Micropurchases are typically made with a Government purchase card. Simplified acquisitions, which generally occur under FAR part 13, are used to purchase supplies and services and are intended to reduce administrative costs, promote efficiency and economy in contracting, and improve Federal contracting opportunities for several types of small and disadvantaged businesses. Commercial items are items customarily available to the general public or nongovernmental entities and are governed by FAR part 12.

Prior Reporting Related to Disaster Preparedness and Response

In a previous inspection on disaster preparedness and response, we found that the NPS and the FWS may not have used contracting flexibilities to the extent possible and that recovery obligations and expenditures of supplemental funds had been slow.³ Specifically, we found that the bureaus began obligating supplemental appropriations in May 2018 for such projects as hurricane debris cleanup and repairing or replacing damaged assets, but, during the period from June 2018 to July 2019, the bureaus were slow in their recovery efforts even with minimal fiscal constraints in using the funds. Neither bureau could specify any contract flexibilities that it used other than the increase of micropurchase thresholds. We recommended that the NPS and the FWS analyze the procurement process for supplemental funds to identify improvements that could be made to ensure the timely obligation and expenditure of funds. The NPS told us it would address the recommendation to identify improvements (e.g., use of advance agreements), and the FWS stated that it would make additions to its *Contracting Officer's Handbook*.⁴

In another earlier inspection report we issued in 2018, we summarized the results of 19 projects related to the DOI's response to Hurricane Sandy cleanup efforts.⁵ We found that the DOI did not have its own comprehensive emergency acquisition policy and guidance in place during or since Hurricane Sandy recovery efforts. Further, the DOI did not use emergency acquisition guidance available from the Office of Management and Budget (OMB) or disseminate it to the bureaus as directed in the guidance. As a result, when these disasters occurred, the bureaus had no standing emergency acquisition response teams, no specific disaster response training, and no standardized forms or processes for awarding or maintaining contracts and grants to support emergency response. Although we did not make any formal recommendations, we identified these and other concerns and suggested that the DOI enact Departmentwide disaster emergency acquisition policy and incorporate available OMB guidance.

³ *The U.S. Department of the Interior Has Opportunities to Improve Disaster Preparedness and Response*, Report No. 2018–FIN–052, issued November 2020.

⁴ Based on these representations, we considered this recommendation resolved but did not verify that the reported actions were implemented.

⁵ *Summary of Hurricane Sandy Audit and Inspection Reports and Management Advisories*, Report No. 2017–FIN–057, issued April 2018.

Findings

Notwithstanding the conclusions in our earlier reports, in this followup work, we found that that NPS, FWS, and USGS contracting officers still did not widely use flexibilities provided under FAR subparts 18.1 and 18.2. The limited use of contracting flexibilities occurred because the DOI does not have a documented emergency acquisition policy, which would ensure that DOI personnel are in the best position to use available emergency contracting procedures to help optimize the U.S. Government's responsiveness during and after an emergency. We also found that DOI policy provided contracting officers with limited time—only 3 to 4 months—to use the increased acquisition thresholds under FAR subpart 18.2 for Hurricanes Harvey, Irma, and Maria. Further, the DOI relied on past precedent to determine the applicable time period to use the increased acquisition thresholds without considering whether and how extended time periods could streamline procurements.

Bureaus Did Not Widely Use FAR Contracting Flexibilities Despite Being Aware They Existed

We found that bureau acquisition staff were aware of contracting flexibilities available under FAR subparts 18.1 and 18.2 but generally did not use them. The FAR sets forth examples of contracting flexibilities in subpart 18.1 and also references other applicable sections of the FAR where those flexibilities are discussed in more detail. Examples of FAR subpart 18.1 flexibilities include allowing advance payments; limiting the number of sources; allowing expanded use of sole source acquisitions; using multi-agency agreements, oral requests for proposal, overtime approvals, and letter contracts for work that needs to start immediately; and contracting through the Small Business Administration's 8(a) Business Development program. Use of these flexibilities does not require an emergency declaration or designation of contingency operation. However, these flexibilities—along with the increased thresholds in FAR subpart 18.2 mentioned below—can help streamline the standard acquisition process to enable faster disaster response and recovery.

We surveyed and interviewed⁶ the DOI's Office of Acquisition and Property Management leadership, 3 current and former bureau procurement chiefs at the NPS and the FWS, and 19 COs to determine the extent to which the bureaus used flexibilities under FAR subparts 18.1 and 18.2. While we did find that some COs used small businesses or sole source contracting, we learned that three COs used FAR subpart 18.1 flexibilities in the past but did not do so for any Hurricane Harvey, Irma, or Maria acquisitions; and four COs have not used FAR part 18 in the past. Some COs also told us that the DOI generally used traditional contracting procedures (e.g., FAR part 12, "Acquisition of Commercial Items"; FAR part 36, "Construction and Architect-Engineer Contracts"; and FAR part 37, "Service Contracting") for emergency acquisitions because these methods were adequate for disaster response.

⁶ We took this approach because the Federal acquisition tracking system does not include a mechanism to record this information.

In addition, we determined that the DOI did not promote innovative contracting techniques as described in FAR part 18 until 2020.⁷ In 2016, the OMB requested agencies to assign an advocate to promote acquisition innovation (e.g., testing new or improved existing practices, and applying emerging and best practices). In its request, the OMB recognized the Department of Homeland Security's Procurement Innovation Lab (PIL) for its acquisition innovation in the Federal Government. We spoke with the PIL and learned through its work with other Federal agencies that the use of innovations or new ideas within the constructs of the FAR helped shorten some acquisitions from 5 or 6 months to 1 to 3 months. The PIL has also identified best practices to streamline emergency acquisitions in advance of a disaster occurring, such as advance contracts and payments⁸ and streamlining documentation processes.⁹

The DOI Did Not Develop Emergency Acquisition Policies

Despite the number of declared emergencies over the past two decades, the DOI has not developed written policies and procedures to use available resources and streamline disaster response and recovery. We previously determined that DOI hurricane response policies (including emergency acquisition plans) were deficient and that the DOI had not used or communicated OMB guidance to bureaus.¹⁰

In our work for this evaluation, we found that the DOI still did not have documented emergency acquisition plans or guidance in place notwithstanding our earlier recommendations. The DOI created an *Emergency Contracting Kit* in response to 9/11 and Hurricane Katrina to provide COs with prompt access to urgent contracting information and guidance. We found, however, that the DOI has not updated the kit to reflect current policies and that senior acquisition leadership was unaware of its existence. The NPS, FWS, and USGS bureau procurement chiefs told us that bureau plans and policies are specific to bureau needs, but they also said that a DOI-wide emergency contracting plan or guide for hurricane response would be beneficial.

Providing policy and guidance from the headquarters level could promote consistency among all bureaus and offices, assist contracting staff with acquisitions related to disaster response and recovery, communicate agency expectations, and provide information on available resources to aid staff in efficiently processing acquisitions in time-sensitive emergency situations.

⁷ We interviewed the DOI's recently assigned acquisition innovation advocate and learned that the DOI is developing innovation initiatives for acquisitions and is also planning to develop them for emergency acquisitions.

⁸ FAR subpart 18.122, "Advance payments."

⁹ FAR subpart 18.102, "System for Award Management"; FAR subpart 18.103, "Synopsis of proposed contract actions"; and FAR subpart 18.108, "Qualifications requirements."

¹⁰ *Summary of Hurricane Sandy Audit and Inspection Reports and Management Advisories*, Report No. 2017-FIN-057, issued April 2018.

Recommendations

We recommend that the DOI:

1. Develop and implement a communications plan to ensure that acquisition personnel are fully aware of and understand potential uses of FAR part 18 contracting flexibilities.
2. Develop emergency acquisition guidance or update the DOI *Emergency Contracting Kit* and communicate it to applicable staff.

The DOI's FAR Waiver Periods Did Not Allow Bureaus To Take Full Advantage of Flexibilities

When the President declares an emergency, the head of the agency can increase certain thresholds to streamline acquisitions under FAR subpart 18.2. In these cases, agencies issue specific policies that approve deviations from the limits set forth in the FAR to facilitate recovery by reducing timeframes and the amount of documentation for emergency contracting. The increased limits are dictated by the FAR; however, the specific policies related to use and timing are at the discretion of the head of the agency.

The DOI's Office of Acquisition Management is responsible for issuing new and updated acquisition policies, including those related to emergency response and recovery. For Hurricanes Harvey, Irma, and Maria, the DOI issued policies DOI-AAAP-0097, -0098, and -0140, which implemented increased spending thresholds for disaster response and recovery under FAR part 18.¹¹ Specifically, the DOI issued FAR waivers to increase: (1) the micropurchase threshold from \$3,500 to \$20,000, (2) the simplified acquisition threshold from \$150,000 to \$750,000, and (3) the threshold for certain commercial items from \$7 million to \$13 million. When available, agencies can use increased thresholds to meet their acquisition needs more quickly than they could using standard acquisition methods.

We found that although the DOI issued policy to invoke increased thresholds for Hurricanes Harvey, Irma, and Maria, COs only had a short period of time in which to use the increased limits. In particular, each DOI policy limited the use of these increased thresholds to 3 or 4 months (see Figure 1).

¹¹ In this report, we refer to the DOI's implementation of FAR subpart 18.2 flexibilities as a "FAR waiver."

Figure 1: DOI FAR Waiver Periods for Hurricanes Harvey, Irma, and Maria

Hurricane	DOI Waiver No.	Landfall Date	Waiver Issue Date	Waiver Expiration Date
Harvey	AAAP-0097	8/26/2017	9/8/2017	12/31/2017
Irma	AAAP-0098	9/10/2017	9/12/2017	12/31/2017
Maria	AAAP-0140	9/20/2017	10/2/2017	12/31/2017

In our interviews with senior acquisition officials, we learned that the DOI generally issues FAR waivers for 90 days. The DOI, however, does not have a specific written policy detailing this timeframe—the 90-day waiver is instead based on past DOI practice. We also learned that:

- Only two COs used the increased acquisition thresholds available through the FAR subpart 18.2 waivers.
- One procurement chief noted a timing issue regarding the use of FAR subpart 18.2 waivers and explained that the supplemental disaster funding was received after the waivers expired.

In addition, while contracting personnel and officials at the NPS and the FWS stated that longer waiver periods would be helpful, particularly in relation to speeding up procurements for disaster response and recovery using supplemental funding, none of the bureaus we evaluated requested extensions to the waivers.

We determined that if the waivers had been extended past December 31, 2017, and utilized after supplemental funding was received, the NPS, the FWS, and the USGS could have used flexibilities for \$36.9 million in procurements from May 2018 (when supplemental funds were received) through January 2019. Increasing the availability period of FAR waivers could help ensure that bureaus can use the emergency contracting flexibilities to spend funds that are appropriated in the months following a disaster. It is important to note that should these flexibilities be used, the contracting actions would still be subject to the controls that are in place under the FAR.¹²

Recommendation

We recommend that the DOI:

3. Revise policy to include guidance to consider and document whether a longer waiver period for future disasters is warranted when creating FAR waivers.

¹² For example, FAR part 13 requirements related to competition and evaluation of quotes would still be applicable.

Conclusion and Recommendations

Conclusion

In 2017, Hurricanes Harvey, Irma, and Maria caused significant devastation and destruction. Greater understanding of contracting flexibilities for emergencies would potentially allow the DOI to streamline acquisitions when responding to and recovering from future disasters. Although those flexibilities must be used with appropriate acquisition processes and controls in place, their use may be beneficial in emergency situations. Developing and implementing emergency contracting guidance would both encourage the appropriate use of available flexibilities and ensure that necessary acquisition controls remain in place. It is essential to have these policies in place before crisis arises.

We make three recommendations to help the DOI improve its emergency acquisition policies and procedures.

Recommendations Summary

We provided a draft of this report to the DOI for review. The DOI concurred with all three recommendations, and we consider them each resolved but not implemented. Below we summarize the DOI's response, as well as provide comments on its response. See Appendix 2 for the full text of the DOI's response; Appendix 3 lists the status of each recommendation.

We recommend that the DOI:

1. Develop and implement a communications plan to ensure that acquisition personnel are fully aware of and understand potential uses of FAR part 18 contracting flexibilities.

DOI Response: The DOI concurred with the recommendation and stated that the Office of Acquisition and Property Management (PAM) will review the potential uses of the contracting flexibilities in FAR part 18, "Emergency Acquisitions," with the DOI contracting workforce during an upcoming Contracting Workforce Town Hall. The DOI also stated that PAM will communicate the potential uses of the contracting flexibilities in FAR part 18 to the DOI acquisition workforce via a PAM Acquisition Flash email. The DOI provided a target implementation date of December 30, 2022.

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

2. Develop emergency acquisition guidance or update the DOI *Emergency Contracting Kit* and communicate it to applicable staff.

DOI Response: The DOI concurred with the recommendation and stated that "PAM will develop a toolkit to serve as a single site for emergency contracting resources,

policies, and guidance.” The DOI provided a target implementation date of September 29, 2023.

OIG Comment: Based on the DOI’s response, we consider Recommendation 2 resolved but not implemented. We note, however, that the proposed target implementation date is at the end of the next fiscal year. Aside from any other concerns, this proposed date is midway through the typical Atlantic hurricane season (June 1 through November 30). The DOI should revise the target implementation date to occur before June 1, 2023, and provide the revised date to the Office of Policy, Management and Budget (PMB).

3. Revise policy to include guidance to consider and document whether a longer waiver period for future disasters is warranted when creating FAR waivers.

DOI Response: The DOI concurred with the recommendation and stated that “PAM will review existing policy and standard operating procedures to ensure various factors are considered in determining an appropriate period for emergency contracting FAR waivers.” The DOI provided a target implementation date of September 29, 2023.

OIG Comment: Based on the DOI’s response, we consider Recommendation 3 resolved but not implemented. We note, however, that the proposed target implementation date is at the end of the next fiscal year. Aside from any other concerns, this proposed date is midway through the typical Atlantic hurricane season. The DOI should revise the target implementation date to occur before June 1, 2023, and provide the revised date to the PMB.

Appendix 1: Scope and Methodology

Scope

We evaluated National Park Service (NPS), U.S. Fish and Wildlife Service (FWS), and U.S. Geological Survey (USGS) acquisitions funded through the Bipartisan Budget Act of 2018 through October 31, 2020. We also examined other acquisitions eligible for FAR part 18 flexibilities authorized by the U.S. Department of the Interior's (DOI's) FAR waiver policies DOI-AAAP-0097, -0098, and -0140 for response and recovery after Hurricanes Harvey, Irma, and Maria.

Methodology

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.

To accomplish our objective, we:

- Identified and reviewed Federal laws and regulations and DOI policies related to disaster acquisition.
- Identified and reviewed Federal laws and guidance and DOI policies specific to response to Hurricanes Harvey, Irma, and Maria.
- Identified and reviewed Office of Management and Budget guidance related to Federal agency use of acquisition innovations.
- Surveyed and interviewed the DOI's Office of Acquisition Management Director and four current and former bureau procurement chiefs at the NPS, the FWS, and the USGS.
- Identified a universe of 52 contracting officers (COs) and 1,065 acquisition actions reported in the Financial and Business Management System from the NPS, the FWS, and the USGS and judgmentally selected a sample of COs to survey and interview:
 - NPS: 7 COs responsible for 165 actions (69.6 percent of 237 total reported actions).
 - FWS: 6 COs responsible for 388 actions (86.4 percent of 449 total reported actions).
 - USGS: 6 COs responsible for 240 actions (63.3 percent of 379 total reported actions).

- Interviewed the DOI's acquisition innovation advocate.
- Interviewed the Department of Homeland Security acquisition innovation advocate and the testing and reengineering lead at the agency's Procurement Innovation Lab.
- Reviewed 2017 and 2018 DOI Office of Inspector General projects related to hurricane recovery and response.

Appendix 2: Response to Draft Report

The U.S. Department of the Interior's response to our draft report follows on page 14.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

Jun 7, 2022

Memorandum

To: Kathleen R. Sedney
Assistant Inspector General for Audits, Inspections, and Evaluations

From: Megan Olsen, Director
Office of Acquisition and Property Management, and Senior Procurement Executive

Subject: Draft Evaluation Report – *The U.S. Department of the Interior Could Expand Its Use of Contracting Flexibilities and Establish an Acquisition Policy for Future Disasters*, Report No. 2020–CGD–006

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Thank you for providing us the opportunity to respond to the Office of Inspector General (OIG) Draft Evaluation Report – *The U.S. Department of the Interior Could Expand Its Use of Contracting Flexibilities and Establish an Acquisition Policy for Future Disasters*, Report No. 2020-CGD-006. The Draft Evaluation Report communicates a total of three recommendations for the Department of the Interior (DOI). The DOI's responses to the recommendations are outlined below.

Recommendation 1. Develop and implement a communications plan to ensure that acquisition personnel are fully aware of and understand potential uses of the contracting flexibilities in FAR Part 18 - Emergency Acquisitions.

Response: Concur. The Office of Acquisition and Property Management (PAM) will review the potential uses of the contracting flexibilities in FAR Part 18 - Emergency Acquisitions with the DOI contracting workforce during an upcoming Contracting Workforce Town Hall. Additionally, PAM will communicate the potential uses of the contracting flexibilities in FAR Part 18 - Emergency Acquisitions to the DOI acquisition workforce via a PAM *Acquisition Flash* email.

Responsible Official: Megan Olsen, Director, PAM, and Senior Procurement Executive (SPE)

Target Date: December 30, 2022

Recommendation 2. Develop emergency acquisition guidance or update the DOI Emergency Contracting Kit and communicate it to applicable staff

Response: Concur. PAM will develop a toolkit to serve as a single site for emergency contracting resources, policies, and guidance.

Responsible Official: Megan Olsen, Director, PAM, and SPE

Target Date: September 29, 2023

Recommendation 3. Revise policy to include guidance to consider and document whether a longer waiver period for future disasters is warranted when creating FAR waivers.

Response: Concur. PAM will review existing policy and standard operating procedures to ensure various factors are considered in determining an appropriate period for emergency contracting FAR waivers.

Responsible Official: Megan Olsen, Director, PAM, and SPE

Target Date: September 29, 2023

If you have questions or require additional information, please contact me at (202) 513-0692 or megan_olsen@ios.doi.gov.

cc:

Joan M. Mooney, Principal Deputy Assistant Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget (PMB)

Andrea L. Brandon, Deputy Assistant Secretary for Budget, Finance, Grants and Acquisition

Tonya Johnson, Deputy Chief Financial Officer (Deputy CFO) for the Department and Director, Office of Financial Management (PFM)

Katherine McCulloch, Acting Chief of Staff, PMB

Appendix 3: Status of Recommendations

Recommendation	Status	Action Required
1	Resolved but not implemented	We will refer this recommendation to the Assistant Secretary for Policy, Management and Budget (PMB) to track implementation.
2-3	Resolved but not implemented	The U.S. Department of the Interior should revise its target implementation dates for these recommendations and provide the revised dates to the PMB. We will refer these recommendations to the Assistant Secretary for the PMB to track implementation.



REPORT FRAUD, WASTE, ABUSE, AND MISMANAGEMENT

The Office of Inspector General (OIG) provides independent oversight and promotes integrity and accountability in the programs and operations of the U.S. Department of the Interior (DOI). One way we achieve this mission is by working with the people who contact us through our hotline.



If you wish to file a complaint about potential fraud, waste, abuse, or mismanagement in the DOI, please visit the OIG's online hotline at **www.doioig.gov/hotline** or call the OIG hotline's toll-free number: **1-800-424-5081**

Who Can Report?

Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement involving the DOI should contact the OIG hotline. This includes knowledge of potential misuse involving DOI grants and contracts.

How Does it Help?

Every day, DOI employees and non-employees alike contact the OIG, and the information they share can lead to reviews and investigations that result in accountability and positive change for the DOI, its employees, and the public.

Who Is Protected?

Anyone may request confidentiality. The Privacy Act, the Inspector General Act, and other applicable laws protect complainants. Section 7(b) of the Inspector General Act of 1978 states that the Inspector General shall not disclose the identity of a DOI employee who reports an allegation or provides information without the employee's consent, unless the Inspector General determines that disclosure is unavoidable during the course of the investigation. By law, Federal employees may not take or threaten to take a personnel action because of whistleblowing or the exercise of a lawful appeal, complaint, or grievance right. Non-DOI employees who report allegations may also specifically request confidentiality.