



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

# **The U.S. Department of the Interior and Its Bureaus Made Progress Implementing Corrective Actions To Improve Disaster Preparedness**



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

DEC 08 2023

Memorandum

To: Tom Balint  
Director, Office of Emergency Management

Tonya R. Johnson  
Deputy Chief Financial Officer and Director, Office of Financial Management

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

Subject: Final Inspection Report – *The U.S. Department of the Interior and Its Bureaus Made Progress Implementing Corrective Actions To Improve Disaster Preparedness*  
Report No. 2022–WR–041

This memorandum transmits our inspection report on the U.S. Department of the Interior's (DOI's) disaster preparedness. Our objective was to determine the extent to which the DOI implemented six of the seven recommendations made in our November 2020 inspection, *The U.S. Department of the Interior Has Opportunities to Improve Disaster Preparedness and Response* (Report No. 2018–FIN–052).<sup>1</sup> We determined that all six recommendations we reviewed have been implemented.

We will notify Congress about our findings, and we will include this report in our next *Semiannual Report to Congress*, as required by law. We will also post a public version of this report on our website.

If you have any questions about this report, please contact me at [aie\\_reports@doioig.gov](mailto:aie_reports@doioig.gov).

---

<sup>1</sup> We issued seven recommendations to help the DOI improve disaster preparedness. We reviewed the extent to which the DOI implemented six recommendations (Recommendations 1 through 4, 6, and 7; we previously reviewed Recommendation 5 as part of a separate evaluation).

---

# Contents

Results in Brief .....	1
Introduction.....	2
Objective .....	2
Background .....	2
The OEM’s Responsibility for Natural Disaster Preparedness and Response .....	2
Summary of Findings From Our 2020 Inspection .....	3
Results of Inspection.....	4
The DOI and Its Bureaus Made Improvements to Disaster Preparedness.....	4
The OEM Revised the <i>Master Improvement Plan</i> —Recommendations 1 and 2 .....	5
The DOI Required the NPS and FWS to Use the GSA COMSATCOM Contract— Recommendation 3 .....	5
The NPS and FWS Developed Policies for Disaster Response Cash Requirements— Recommendation 4 .....	6
The Bureaus Addressed Emergency Acquisitions and Disaster Contracting Training— Recommendation 6 .....	7
The OEM Issued Guidance For Managing Staffing and Interagency Support—Recommendation 7.....	9
Conclusion and Recommendations.....	11
Conclusion .....	11
Appendix 1: Scope and Methodology.....	12
Appendix 2: Status of Recommendations From 2020 Inspection Report.....	13

---

# Results in Brief

## What We Inspected

In November 2020, we issued an inspection report titled, [\*The U.S. Department of the Interior Has Opportunities to Improve Disaster Preparedness and Response\*](#) (Report No. 2018–FIN–052).<sup>1</sup> Our inspection was a part of the Council of Inspectors General on Integrity and Efficiency cross-cutting initiative involving various agencies throughout the Federal Government. Our report focused on the Department of the Interior’s (DOI’s) and its bureaus’ natural disaster preparedness. We issued seven recommendations to help the DOI’s Office of Emergency Management (OEM), the U.S. Fish and Wildlife Service (FWS), the National Park Service (NPS), and the U.S. Geological Survey (USGS) improve their disaster preparedness. In this project, we reviewed the extent to which the DOI implemented six of the seven recommendations (Recommendations 1 through 4, 6, and 7). We reviewed the remaining recommendation—Recommendation 5—as part of a separate evaluation.<sup>2</sup>

## What We Found

We found that the DOI and its bureaus took actions to address the six recommendations we reviewed, including updating the OEM’s emergency response corrective action plan and implementing specific policies. We also found during this inspection, however, that more improvements were needed to the OEM’s corrective action plan and bureau policies. Specifically, we found that some of the required information, including milestones, was left blank in the OEM’s emergency response corrective action plan. Additionally, the FWS’ Fire/Emergency Purchase Charge Card policy did not include a response time requirement in the policy’s emergency cash section. Finally, the FWS and the USGS policies did not include a requirement for all applicable contracting staff to complete emergency acquisitions and disaster contracting training. The OEM and bureaus, however, took additional corrective actions to address each of these findings before this report was issued.

## Why This Matters

To enhance safety and disaster preparedness and response, the OEM is responsible for policy development, direction, coordination, evaluation, inspection, and support of the DOI programs concerning disaster preparedness, planning, response, and recovery. Additionally, all bureaus within the DOI play a key role in national response to natural disasters. Continuing to make process improvements to the DOI’s disaster preparedness and response program is critical to protecting the health and safety of the public.

---

<sup>1</sup> Available at [https://www.doioig.gov/sites/default/files/2021-migration/FinalInspection\\_CIGIEDisasterPreparedness\\_110620.pdf](https://www.doioig.gov/sites/default/files/2021-migration/FinalInspection_CIGIEDisasterPreparedness_110620.pdf).

<sup>2</sup> *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, issued August 8, 2022. Available at <https://www.doioig.gov/reports/evaluation/us-department-interior-could-expand-its-use-contracting-flexibilities-and-should>.

---

# Introduction

## Objective

Our objective was to determine the extent to which the U.S. Department of the Interior’s (DOI) Office of Emergency Management (OEM), U.S. Fish and Wildlife Service (FWS), National Park Service (NPS), and U.S. Geological Survey (USGS) implemented recommendations from our November 2020 inspection report titled, *The U.S. Department of the Interior Has Opportunities to Improve Disaster Preparedness and Response* (Report No. 2018–FIN–052), and if the corrective actions taken are still in effect. We specifically reviewed Recommendations 1 through 4, 6, and 7; we reviewed Recommendation 5 as part of a separate inspection.<sup>3</sup> See Appendix 1 for our scope and methodology.

## Background

The United States experiences various types of natural disasters including hurricanes, severe storms, wildfires, drought, winter storms, and flooding. In 2017, the National Oceanic and Atmospheric Administration reported that the landfall of Hurricanes Harvey, Irma, and Maria caused an estimated \$328.6 billion<sup>4</sup> in costs associated with damage and loss.<sup>5</sup>

In 2018, the Bipartisan Budget Act of 2018 provided \$2.36 billion in funding for necessary expenses related to the consequences of these hurricanes as well as other hurricanes and wildfires occurring in calendar year 2017.<sup>6</sup> The DOI received nearly \$516 million of these funds.<sup>7</sup> In 2018, we began our review of the DOI’s disaster preparedness for and responsiveness to the three storms that made landfall in 2017 and communicated our findings in our November 2020 report.

## The OEM’s Responsibility for Natural Disaster Preparedness and Response

The DOI’s *Departmental Manual (DM)* requires the OEM to develop emergency management programs that include “plan(s) based on the Department’s specific hazards and risks to prevent, protect against, mitigate the effects of, respond to, and recover from incidents, declared

---

<sup>3</sup> *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), issued August 8, 2022. Available at <https://www.doioig.gov/reports/evaluation/us-department-interior-could-expand-its-use-contracting-flexibilities-and-should>.

<sup>4</sup> National Oceanic and Atmospheric Administration National Centers for Environmental Information (NCEI), “U.S. Billion-Dollar Weather and Climate Disasters.” 2017 data available at [https://www.ncei.noaa.gov/access/billions/events/US/2017?disasters\[\]=tropical-cyclone](https://www.ncei.noaa.gov/access/billions/events/US/2017?disasters[]=tropical-cyclone).

<sup>5</sup> The National Oceanic and Atmospheric Administration calculates cost assessments by reviewing the direct costs of weather and climate events. This includes—but is not limited to—costs associated with physical damage to residential, commercial, and government or municipal buildings; interruption of business operations; loss of vehicles and boats; damage to public infrastructure like roads, bridges, and buildings; and disaster restoration and wildfire suppression. Available at <https://www.ncei.noaa.gov/news/calculating-cost-weather-and-climate-disasters>.

<sup>6</sup> Bipartisan Budget Act of 2018, Pub. L. No. 115–123, 132 Stat. 64.

<sup>7</sup> The funds were dispersed to the NPS, FWS, USGS, the Office of Insular Affairs, and the Office of Inspector General.

emergencies, major disasters, and special events.”<sup>8</sup> In line with those requirements, the OEM is responsible for “policy development, direction, coordination, evaluation, inspection, and support of Departmental programs concerning disaster preparedness, planning, response and recovery, continuity of operations, coordination of interagency emergency response activities, and operation of the Interior Operations Center.”<sup>9</sup> As such, the OEM created the Emergency Management Policy Bulletin (EMPB) 2009–1, *DOI Emergency Management Corrective Action Program*, and EMPB 2011–1, *DOI All-Hazards Incident Staffing*. These polices provide guidance to assist bureaus and offices in establishing corrective action programs and to define the DOI’s framework for managing incident staffing for all-hazard incidents.

In addition, to improve upon its preparedness and response functions, the OEM prepared a report on the 2017 Atlantic Hurricane season that contained 33 recommendations across 9 areas.<sup>10</sup> Those areas included intra-agency coordination; incident support and surge staffing; policies, plans, and procedures; and information technology and support tools. From that report, the OEM developed its *Master Improvement Plan*, which contained proposed corrective actions.

### **Summary of Findings From Our 2020 Inspection**

In our November 2020 inspection report, we communicated our findings of missing information and unrealistic milestones in OEM’s *Master Improvement Plan*, weaknesses in communications and purchase card use, the recovery of obligations and expenditures of supplemental funds, disaster response training for contracting officers, and a lack of awareness of interbureau resources. We made seven recommendations to the DOI and its bureaus to improve preparedness and response to future disasters.

---

<sup>8</sup> 900 DM 1, “Emergency Management Program Policy, Responsibilities, and Requirements.”

<sup>9</sup> 112 DM 18, “Office of Emergency Management.”

<sup>10</sup> We describe this report in our November 2020 inspection, [The U.S. Department of the Interior Has Opportunities to Improve Disaster Preparedness and Response](#) (Report No. 2018–FIN–052).

---

## Results of Inspection

We reviewed and analyzed the actions taken by the OEM, NPS, FWS, and USGS to address Recommendations 1 through 4, 6, and 7.<sup>11</sup> We found that the DOI's bureaus addressed these six recommendations through updates to the *Master Improvement Plan* and implementation of specific policies. In addition, the OEM, FWS, and USGS made improvements in response to issues we identified during our fieldwork for this inspection. The bureaus' corrective actions are described in Appendix 2.

We consider the six recommendations we reviewed implemented.

### The DOI and Its Bureaus Made Improvements to Disaster Preparedness

We found that the DOI addressed all six recommendations that we reviewed. The DOI also implemented additional improvements in response to issues we identified during our fieldwork for this inspection. Specifically, we found the following:

- The OEM revised the *Master Improvement Plan* to include fields for required information and milestones (Recommendations 1 and 2).
- The DOI required the NPS and FWS to use the General Services Administration (GSA) Communications Satellite Communication (COMSATCOM) contract for obtaining equipment (Recommendation 3).
- The NPS and FWS created policies and procedures to ensure that employees have access to cash as needed when a natural disaster causes a loss of infrastructure (Recommendation 4).
- The NPS, FWS, and USGS created policies and requirements for emergency acquisitions and contracting training (Recommendation 6).
- The OEM provided the bureaus with policies, guidance, programs, and a framework for managing incident staffing and interagency support during an emergency, including use of the interagency ordering system (Recommendation 7).

Based on these actions, we consider Recommendations 1 through 4, 6, and 7 to be implemented.

---

<sup>11</sup> As noted previously, we reviewed Recommendation 5 as a part of a separate evaluation.

## **The OEM Revised the *Master Improvement Plan*—Recommendations 1 and 2**

We previously found that the OEM's *Master Improvement Plan* was missing required information and did not contain realistic milestones. Specifically, it did not include a problem statement, the submitting bureau, correspondence, milestones for all recommendations, timelines, or a due date as required by EMPB 2009–1, *DOI Emergency Management Corrective Action Program*. Therefore, we made the following recommendations:

**Recommendation 1:** The OEM revise the *Master Improvement Plan* to include all information required by EMPB 2009–1.

**Recommendation 2:** The OEM update the milestones for each recommendation based on current estimates for completion.

We found that, while the OEM revised the *Master Improvement Plan* to include most of the information required by EMPB 2009–1, some of the required information was either still left blank or contained unrelated notes. For example, there were multiple recommendations in which the milestone sections for each contained notes on the remedial process rather than information as to how the milestones for each recommendation were determined. After discussion with the OEM, it provided us with the following:

- An updated version of the *Master Improvement Plan* with all required information populated (Recommendation 1).
- An updated version of the *Master Improvement Plan* with all unimplemented recommendations and either the updated milestones in place or an explanation as to why the milestone could not be provided (Recommendation 2).
- Support demonstrating that the updated *Master Improvement Plan* was uploaded on the OEM's internal site and available to OEM employees for review.

Based on the OEM's corrective actions, we consider Recommendations 1 and 2 implemented.

## **The DOI Required the NPS and FWS to Use the GSA COMSATCOM Contract—Recommendation 3**

We previously found that the NPS and FWS had connectivity, availability, and continuity difficulties with communication technologies. Therefore, we made the following recommendation:

**Recommendation 3:** The NPS and the FWS research options for obtaining equipment that will provide reliable communication among NPS and FWS officials involved in disaster recovery (e.g., satellite phones with texting capabilities) and develop recommendations based on that research.

When requesting closure of this recommendation, the NPS and FWS stated that, in January 2021, the DOI's Chief Information Officer and the Director of the Office of Acquisition and Property Management issued a mandatory-use policy for the GSA COMSATCOM contract.<sup>12</sup> Prior to this requirement, bureaus reported that they had limited supplies and satellite phones that lacked texting capabilities. The bureaus use the COMSATCOM contract to purchase a wide variety of commercial satellite products and services as well as dedicated bandwidth in a commercial satellite in any commercially available COMSATCOM frequency band. We found that, because the DOI issued a mandatory-use policy for the acquisition of commercial satellite products and because the bureaus are compliant with the policy, the recommendation that the bureaus research other acquisition options no longer applies.

The NPS has yet to use the contract, and the FWS has only one active contract. However, both bureaus provided documentation supporting that they are compliant with the policy and can research other purchasing possibilities and obtain a waiver to the mandatory contract if no options are available in the COMSATCOM contract.

Based on the COMSATCOM requirement and waiver process, we consider Recommendation 3 implemented.

#### **The NPS and FWS Developed Policies for Disaster Response Cash Requirements—Recommendation 4**

We previously found that, in the immediate aftermath of Hurricanes Harvey, Irma, and Maria, the NPS and FWS personnel sometimes could not pay for necessities while providing disaster relief because of the absence of infrastructure (e.g., electricity and banking systems) caused by power outages. Therefore, we made the following recommendation:

**Recommendation 4:** The NPS and the FWS develop policies and procedures, with proper oversight, to determine cash requirements and use during a natural disaster.

We found that the FWS and NPS met with the DOI Charge Card Program Policy Manager and the DOI Charge Card Support Center to develop a consolidated response to our recommendation. They determined that the best course of action would be to use the Fire/Emergency Purchase (FEP) card with an option for cash to be withdrawn from a bank or ATM prior to arriving at an emergency site. The DOI authorizes<sup>13</sup> the use of an FEP card when purchases of disaster relief supplies and services for support are needed at the scene of a fire, disaster, or emergency and amount to no more than \$10,000. Personnel can receive authorization to add the cash option to an FEP card for emergency cash to make these purchases.

---

<sup>12</sup> According to the GSA, the COMSATCOM contract is a preferred Governmentwide solution for obtaining a variety of commercial satellite products and services. The goal of the contract is to reduce costs and simplify acquisitions while standardizing mobile satellite communication products and subscription services.

<sup>13</sup> DOI-AAAP-0156, *DOI Purchase Card Program Policy*, dated June 25, 2021.

Additionally, the NPS and FWS each created policies and procedures to ensure that employees have access to cash as needed when a natural disaster causes a loss of infrastructure. Both stated that “through experience with previous disasters, we have found the first five days to be the most sensitive period where needs and infrastructure failure is the greatest and transportation is limited.” The FWS also stated, “In the resolution prescribed by the joint efforts of FWS and NPS, the assumptions made regarding the need for cash to maintain emergency operations were that the ground personnel will need cash within five days for use at local vendors in the absence of infrastructure caused by natural disasters.”

The NPS issued a memorandum to provide guidance to cardholders for obtaining cash from the FEP card during a natural disaster.<sup>14</sup> This memorandum, which is an addendum to the NPS charge card policy, provides instructions on how to add the “Cash Withdrawal” option to the FEP card in times when cash is needed. The guidance also requires FEP cardholders to be at the emergency site with cash within 1 week.

The FWS issued a financial operations technical bulletin that establishes policy for using the FEP card with the cash withdrawal option when cash payments are the only option for responding to a natural disaster because there is no infrastructure.<sup>15</sup> The FEP card with the cash withdrawal option replaced the practice of allowing the Fire Crew Chief to use a standard purchase card, which has a lower purchase limit, a smaller variety of merchants, and no cash withdrawal option.

Although the FWS created policies and procedures to ensure cash is made available to FWS employees when necessary, we found it did not identify a response time requirement for FEP card holders to be at the emergency site with cash. As noted above, the FWS stated in its closure request that the first 5 days is “the most sensitive period where needs and infrastructure failure is the greatest,” and that “ground personnel will need cash within five days.” The policies and procedures did not, however, specifically address this issue. Without a required timeframe for employees to respond to emergencies with cash, the FWS cannot ensure that the necessary emergency cash purchasing can be completed in a timely manner. We brought the lack of required response time to the FWS’ attention, and the FWS updated its policy to state that the cardholder “will be on site within 5 days to provide needed cash.”

Based on the NPS and FWS policies and procedures in place, we consider Recommendation 4 implemented.

### **The Bureaus Addressed Emergency Acquisitions and Disaster Contracting Training—Recommendation 6**

The Office of Federal Procurement Policy’s *Emergency Acquisition Guide* recommends training be provided before a disaster happens. It also provides detailed information and references to specific training that acquisition personnel could take. We previously reported, however, that

---

<sup>14</sup> NPS, *Charge Card Policy and Procedures* Memorandum 2022.12, issued November 1, 2021.

<sup>15</sup> FWS Financial Operations Technical Bulletin, Reference No. CC-02, *Fire/Emergency Purchase (FEP) Charge Card*, issued September 29, 2022, updated April 27, 2023.

NPS, FWS, and USGS contracting officers did not receive training related to emergency contracting. Therefore, we made the following recommendation:

**Recommendation 6:** The NPS, FWS, and USGS develop and provide mandatory training to applicable contracting staff on emergency acquisitions and disaster contracting policies and procedures.

The NPS addressed this recommendation by issuing training policy that includes a list of mandatory courses for all contracting officers providing emergency contracting. It also includes the requirement that each contracting officer “selected to respond to emergency/disaster incidents shall complete the following mandatory training prior to being formally designated.”<sup>16</sup> The NPS also provided a training seminar to contracting officers and created an NPS incident contracting website that provides contracting officers access to multiple online tools pertaining to emergency contracting.

The FWS addressed this recommendation by implementing online training<sup>17</sup> that contained FWS-specific emergency contract training and two existing Governmentwide courses: Federal Emergency Management Agency (FEMA) IS100 “Introduction to the Incident Command System”<sup>18</sup> and FCN 400 “Emergency Contracting Basic Course.”<sup>19</sup> However, although the training was made available to all FWS employees, the FWS required only supervisory contracting officers to take it; no other contracting officers who support emergency acquisition and disaster contracting were required to attend.

During our fieldwork, we informed the FWS that by limiting the training requirement to contracting supervisors, it could not ensure that those nonsupervisory contracting employees who provide acquisition support during emergencies will be familiar with all phases of contracting during an emergency or contingency and effective in helping optimize the Government’s responsiveness. The FWS agreed and implemented a new online training for nonsupervisors<sup>20</sup> and assigned the training to all present and future nonsupervisory contracting officers (contracting series 1102). This training provides these employees with an overview of Federal emergency and disaster contracting and how to respond quickly and appropriately to disasters.

The USGS addressed this recommendation by adding a training requirement for emergency acquisitions to its acquisition policy. All USGS Office of Acquisition and Grants (OAG) branches (National, Washington, D.C.; Reston, Virginia; Denver, Colorado; and Sacramento, California) assigned one staff member each to four FEMA courses.

During our fieldwork, however, we found that none of these training courses covered emergency acquisition or disaster contracting. We informed the USGS that, without providing mandatory

---

<sup>16</sup> NPS Acquisition Policy and Procedures Memorandum 1443.18–02, *Contracting Officer Training on Emergency Disaster Contracting Policies and Procedures*, issued August 6, 2020.

<sup>17</sup> FWS–JAO–0002, “FWS Emergency Contracting.”

<sup>18</sup> IS100 introduces the Incident Command System (ICS) and provides the foundation for higher level ICS training.

<sup>19</sup> FCN 400 provides an overview of disaster contracting, including complying with standard acquisition regulations and specialized rules for emergencies.

<sup>20</sup> FWS–JAO–0003, “FWS Emergency Contracting for Non-Supervisors.”

training on emergency acquisitions and disaster contracting to all applicable contracting staff, it cannot ensure that contracting employees will be familiar with all contracting phases of an emergency or contingency and effective in helping optimize the Government's responsiveness. The USGS agreed and updated its acquisition operating procedures<sup>21</sup> to require that:

At least one Contracting Officer in each major OAG servicing office shall be trained to process emergency purchase requests. Training (FCN400, Emergency Contracting Basics) is available via the Federal Acquisition Institute. Only Contracting Officers who have taken FCN400 may process emergency purchase requests for declared disaster areas. This requirement cannot be delegated.

Based on NPS, FWS, and USGS requirements that applicable contracting staff complete mandatory training on emergency acquisitions and disaster contracting, we consider Recommendation 6 implemented.

### **The OEM Issued Guidance For Managing Staffing and Interagency Support—Recommendation 7**

We previously reported that incident commanders found the Incident Qualifications and Certification Management System (IQCS)<sup>22</sup> and the system it feeds into, the Interagency Resource Ordering Capability (IROC),<sup>23</sup> to be unhelpful, out of date, and confusing to use. Specifically, information about qualified employees was not uploaded to the IQCS (and subsequently the IROC), so it did not clearly describe the services the employees could provide. In addition, incident commanders stated that bureaus do not have enough staff to maintain the IQCS and ensure the data in the system is current. Therefore, we made the following recommendation:

**Recommendation 7:** The OEM develop and disseminate a plan for obtaining inter-bureau resources that includes explaining inter-bureau memoranda of understanding and identifying and classifying available resources and guidance on how to add available resources into the ordering system.

The OEM addressed our recommendation by developing and disseminating an interagency support agreement that includes guidance and templates for resource requests and financial documentation.<sup>24</sup> It also stated that it already had existing policy and guidance: the EMPB 2011–1, *Department of Interior All Hazards Incident Staffing*, which provides a framework for emergency incident staffing and training requirements, and the DOI's *Incident Positions Qualifications Guide (IPQG)*, which describes position training and qualifications. The

---

<sup>21</sup> *USGS Acquisition Operating Procedure*, "Acquisition and Financial Assistance Guidance for Declared Disaster Areas and Other Emergency Situations."

<sup>22</sup> The [IQCS](#) is an interagency information application that tracks responder qualifications for the Federal partners of the National Wildfire Coordinating Group, the DOI bureaus, the U.S. Air Force, the U.S. Army, and other approved agencies. The information from the IQCS feeds into the IROC.

<sup>23</sup> [IROC](#) is a web-based application managed by U.S. Department of Agriculture that provides the dispatch community with a resource ordering system for all interagency business needs during hazard incidents.

<sup>24</sup> In June 2019, the DOI issued the *Master Agreement for Interagency Support During Emergency Incidents* and the *Master Agreement Operations Guide*.

OEM acknowledged challenges with the resource identification and ordering process but stated that, with the policies provided, it did not believe those challenges were due to an absence of policies and guidance. At that time, we determined that the plan and existing policies were sufficient to consider the recommendation implemented.

We noted during this review, however, that the bureaus were not following the EMPB 2011–1 requirement that employees who voluntarily become trained to qualify for incident positions must submit and maintain their qualifications in the IQCS. For example, the FWS stated that it does not require those who voluntarily become qualified to submit their names into the IQCS. As noted in our November 2020 inspection, the OEM Acting Director stated that bureaus and offices need to add qualified employees into the IQCS so that they can be mobilized during emergencies.

As the DOI does not own or manage the IROC and IQCS, we did not review them as part of this inspection or develop related findings and recommendations. We did, however, highlight it as an area of concern during our discussions with OEM and bureau officials.

---

# Conclusion and Recommendations

## Conclusion

To enhance safety and disaster preparedness and response, the OEM is responsible for support of the DOI programs concerning disaster preparedness, and all bureaus within the DOI play a key role in responding to natural disasters. Therefore, continuing to improve disaster preparedness and response is critical to protecting the public.

We found that the OEM, NPS, FWS, and USGS addressed Recommendations 1 through 4, 6, and 7 from our previous report and have made progress in strengthening their disaster preparedness and response. Specifically, we reaffirmed the implementation and closure of the recommendations with the following bureau actions:

- The OEM revised the *Master Improvement Plan* to include all required information.
- The DOI required the NPS and FWS to follow mandatory use policy for the GSA COMSATCOM contract.
- The NPS and FWS created policies and procedures to ensure that employees have access to cash as needed to provide disaster relief. The policies require the use of an FEP card, which provides a cash withdrawal option, and include a timeframe for the employee to be at the emergency site with cash.
- The NPS, FWS, and USGS required training on emergency acquisitions and disaster contracting to all applicable staff.
- The OEM provided guidance to bureaus for obtaining interbureau resources through the IROC and adding resources to the IQCS.

In addition, although Recommendation 7 is implemented and closed, we note that the bureaus are not following issued guidance. As the DOI does not own or manage the interagency ordering system mentioned in Recommendation 7, we did not review it as part of this inspection. We provided a draft of this report to the OEM and relevant bureaus. Given the absence of recommendations, we did not request (and did not receive) a formal response.

---

# Appendix 1: Scope and Methodology

## Scope

The scope of our inspection included the actions taken by the Office of Emergency Management (OEM), the National Parks Service (NPS), the U.S. Fish and Wildlife Service (FWS), and the U.S. Geological Survey (USGS) to address six of the seven recommendations made in our inspection report titled, *The U.S. Department of the Interior Has Opportunities to Improve Disaster Preparedness and Response* (Report No. 2018–FIN–052), issued November 6, 2020. As a result of the COVID–19 pandemic and associated limitations on our ability to travel, we performed the inspection virtually and did not conduct site visits or observe the bureaus’ disaster preparedness oversight activities.

We reviewed Recommendations 1 through 4, 6, and 7. We excluded Recommendation 5 during our planning phase; the recommendation was related to contracting flexibilities during natural disasters, which we addressed in an audit report<sup>25</sup> that was issued while we were planning this inspection. To avoid duplication of efforts, we did not review corrective actions taken to address this recommendation.

## Methodology

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

To accomplish our objective, we:

- Reviewed and documented prior reports, applicable laws and regulations, and bureau policies and procedures related to the closure of six of the seven recommendations in our prior report.
- Documented and analyzed the corrective action plans and closure documents that the bureaus provided to the Office of Financial Management for closure of the recommendations in our prior report.
- Interviewed responsible officials (at the OEM, NPS, FWS, and USGS) and identified roles, responsibilities, actions the bureaus have taken since the initial implementation of each recommendation, and the status of each recommendation.
- Obtained and reviewed documentation provided by the responsible bureau/office to identify whether each recommendation was implemented as intended and whether the corrective actions are still in effect.

---

<sup>25</sup>*The U.S. Department of the Interior Could Expand Its Use of Contracting Flexibilities and Should Establish an Acquisition Policy for Future Disaster* (Report No. 2020–CGD–006), issued August 8, 2022.

## Appendix 2: Status of Recommendations From 2020 Inspection Report

Recommendation	Closure Requested and Date	Status	Actions Taken
<p><b>2018-FIN-052-01</b> We recommend that the Office of Emergency Management (OEM) revise the <i>Master Improvement Plan</i> to include all information required by Emergency Management Policy Bulletin (EMPB) 2009-1.</p>	<p>Yes 09/2021</p>	Implemented	The OEM revised the <i>Master Improvement Plan</i> to include all information required by EMPB 2009-1, <i>DOI Emergency Management Corrective Action Program</i> .
<p><b>2018-FIN-052-02</b> We recommend that the OEM update the milestones for each recommendation based on current estimates for completion.</p>	<p>Yes 09/2021</p>	Implemented	The OEM updated the milestones in the <i>Master Improvement Plan</i> for each recommendation.
<p><b>2018-FIN-052-03</b> We recommend that the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) research options for obtaining equipment that will provide reliable communication among NPS and FWS officials involved in disaster recovery (e.g., satellite phones with texting capabilities) and develop recommendations based on that research.</p>	<p>Yes NPS: 04/2021 FWS: 3/2021</p>	Implemented	The General Services Administration created the Communications Satellite Communications (COMSATCOM) contract, which is mandatory for all bureaus to follow. Both the NPS and the FWS are following the contract and have a process in place to obtain a waiver to the contract should the need arise.

<b>Recommendation</b>	<b>Closure Requested and Date</b>	<b>Status</b>	<b>Actions Taken</b>
<p><b>2018-FIN-052-04</b> We recommend that the NPS and the FWS develop policies and procedures, with proper oversight, to determine cash requirements and use during a natural disaster.</p>	<p>Yes</p> <p>NPS: 11/2021</p> <p>FWS: 12/2021</p>	<p>Implemented</p>	<p>The NPS issued the NPS Memorandum 2022.12, <i>Charge Card Policy and Procedures</i> on November 1, 2021.</p> <p>The FWS issued the Financial Operations Technical Bulletin, Reference No. CC-02, <i>Emergency/Fire Charge Card</i> on April 27, 2023.</p>
<p><b>2018-FIN-052-05</b> We recommend 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.</p>	<p>N/A</p>	<p>N/A</p>	<p>We did not review the corrective actions taken by the bureaus for this recommendation as they were part of a separate OIG review. Findings were issued in the report titled, <i>The U.S Department of the Interior Could Expand Its Use of Contracting Flexibilities and Should Establish an Acquisition Policy for Future Disasters</i> (Report No. 2020-CGD-006).</p>
<p><b>2018-FIN-052-06</b> We recommend that the NPS, FWS, and U.S. Geological Survey (USGS) develop and provide mandatory training to applicable contracting staff on emergency acquisitions and disaster contracting policies and procedures.</p>	<p>Yes</p> <p>NPS: 03/2022</p> <p>FWS: 04/2022</p> <p>USGS: 01/2021</p>	<p>Implemented</p>	<p>The NPS created policy that requires mandatory emergency disaster contracting training for contracting officers.</p> <p>The FWS created separate emergency contracting courses for supervisors and nonsupervisors and assigned them to all applicable contracting officers.</p> <p>The USGS created policy that states only contracting officers who have taken the "Emergency Contracting Basics" course may process emergency purchase requests.</p>

Recommendation	Closure Requested and Date	Status	Actions Taken
<p><b>2018-FIN-052-07</b>            We recommend that the OEM develop and disseminate a plan for obtaining inter-bureau resources that includes explaining inter-bureau memoranda of understanding and identifying and classifying available resources and guidance on how to add available resources into the ordering system.</p>	N/A	Implemented	The OEM provided the guidance to all bureaus for obtaining interbureau resources through the Interagency Resource Ordering Capability and on how to add resources to the Interagency Qualifications and Certifications System.



# 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](http://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.