Part 5. Appendices

Improper Payments Information Act Reporting Details

Description of the Risk Assessment Process

Interior's Management Control Guidance for FY 2004 issued November 10, 2003, required managers to conduct risk assessments of all programs meeting OMB's definition of "program" (see *Table 1-22* in Part 1, Compliance with Legal and Regulatory Requirements section) to determine if any programs were risk-susceptible for making significant improper payments. The risk assessments were used to establish risk profiles for all bureau programs. In particular, three programs of the Department were initially thought to have potential for meeting the threshold of significant erroneous payments. This determination was based on prior audit and management control review efforts. The three programs are: (1) Bureau of Indian Affairs (BIA)- Indian Self-Determination and Education Act (PL 93- 638), (2) U.S. Fish and Wildlife Service (FWS) - Federal Aid Program, and (3) the Office of Insular Affairs (OIA) - Financial Assistance Program. The managers of these three programs were required to make a more in-depth risk assessment. *Table 5-1* summarizes these program reviews.

TABLE 5-1

Summary of Programs Reviewed as Potentially High Risk					
Bureau/Program	Annual Outlays (millions)	Major Review Component	High Risk Determination	Planned Enhancements Based on Review	
BIA PL 93-638 *	1,725	OMB A-133 and Single Audit Act	Not High Risk	Quantify and describe the nature of services to be provided. Describe the award recipient population and method of program delivery. Identify appropriate performance metrics.	
FWS Federal Aid (43 &50 CFR)	466	OMB A-133 and Single Audit Act	Not High Risk	Approximately 50% of the States have "pre-audit" reviews. Increased emphasis will be placed on "pre-audit" reviews. Individual grantees determined to be "high risk" will be required to submit invoices for approval prior to drawdowns.	
OIA Annual Interior Appropriations	397	OMB A-133 and Single Audit Act	Not High Risk	Developed a financial assistance manual to ensure that funds are properly managed. (See http://www.doi.gov/oia)	

^{*} By statute, the Secretary has limited ability to monitor third-party payments made by Tribes and Tribal organizations.

Description of the Departmental Functional Review (DFR) Process:

The Office of Financial Management (PFM) developed a DFR questionnaire based on requirements from Treasury, OMB, and IPIA. Questionnaires were developed for five different subject areas: finance, grants, payroll, time and attendance, and charge cards (for small purchases). Prior to issuance, the questionnaires were reviewed and refined by subject matter experts within the Department. Subject matter experts are employees with direct knowledge and/or hands-on experience in the above identified payment areas. The questionnaires were posted to a secure web site for employee access. PFM obtained a list of employee candidates to complete the questionnaires from the subject area experts. The questionnaires were completed in June 2004. The responses for all of the questionnaires were tabulated using the automated management control assessment tool.

The questionnaire for finance was the most detailed, covering all payment types including travel-related payments. The other four questionnaires were for specific payment types; i.e., grants, payroll, time and attendance, and charge cards. *Table 5-2* provides the number of questionnaires sent and the number of responses received.

As shown, 51% of the candidates responded. Over 85% of the respondents were non-supervisory and non-management personnel. An integrity score of 2.5 or greater indicates that the internal control processes are sufficient. An assessment score below 2.5 indicates a potential weakness. Bureaus are required to re-examine the areas that scored below 2.5 and adjust the processes and/or provide additional training as needed.

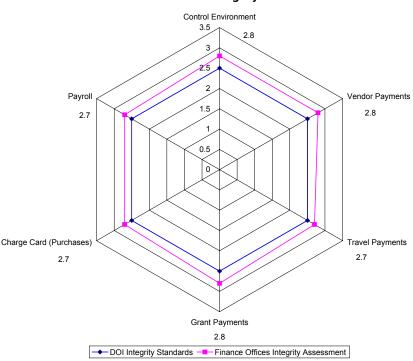
The results of the DFRs submitted by the bureau Finance Officers are illustrated in *Figure 5-1*. The diagram compares the collective scores from all the respondents in six payment processing areas assessed: control environment, vendor, travel, grants, charge card, and payroll. Each of the areas scored higher than the standard desirable level of 2.5.

Also examined were four specific payment types by the program offices: grants, charge card, payroll, and time and attendance. Each questionnaire contained three sections: Control Environment, Specific Payment Type – Subject Area Expert, and Miscellaneous Information (this section contained general information about the person responding - e.g., bureau, job series, etc.). Questionnaire responses were anonymous. Results of the scoring for the general control environment are summarized the sections that follow.

TABLE 5-2

Department-Wide Functional Review Payment Processing					
Payment Types	Surveys Sent	Surveys Received	Percent Received		
Finance Offices	11	7	65%		
Time and Attendance	83	46	55%		
Grants	82	34	41%		
Charge Cards	59	35	59%		
Payroll Operations	20	9	45%		
Total	255	130	51%		

FIGURE 5-1
Finance Offices Integrity Scores



Control Environment

Figure 5-2 shows a comparison of the responses by the various respondents. The lowest integrity scores were for Payroll, and Time and Attendance, which had scores of 2.1 and 2.3, respectively. As a result of the slightly lower scores in payroll and time and attendance, the Department recommended that a specific segment on internal controls be included in future training for these employees. We also recognize the need to continuously perform reviews and assessments of internal control processes as inevitable business process changes occur.

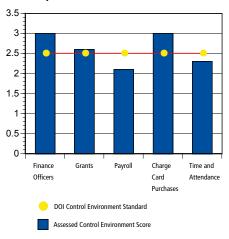
Conclusion

Based on the results of the risk assessments and the DFR, the Department believes that sufficient internal control processes exist to minimize the occurrent of improper payments and that processes are in place to perform recovery audits and recover overpayments.

Recovery Audits

Toward the end of FY 2003 the Department selected PRG Schultz to perform recovery audit services. PRG Schultz started working with the Office of the Secretary and performed a pilot effort to set up its program. By the end of FY 2004, all bureaus had issued a task order engaging PRG Schultz to perform recovery auditing services. *Table 5-3* summarizes Interior's recovery audit activities during FY 2004.

FIGURE 5-2
Comparisons of Control Environment



All bureaus, except for the Office of the Secretary, began working with the contractor late in the fiscal year. The figures shown in *Table 5-3* relate primarily to the work that the contractor accomplished for the Office of the Secretary during the pilot effort started in early FY 2004.

The recovery audit contractor and the Department are reviewing payments identified in the "Amount Pending Resolution" column shown in *Table 5-3*. The recovery audit process includes a review step to reasonably confirm that the payments identified through data mining and other techniques are valid overpayments before recovery notices are issued. In such cases, the recovery notices are issued within weeks after discovery and confirmation. This is an ongoing process and will continue until we reach a point where such activities are no longer cost-beneficial.

Since this was Interior's first year using a recovery auditor, we do not have a sound basis to project expected recoveries. The amounts recovered so far are almost exclusively the result of the pilot program conducted in the Office of the Secretary. The remaining bureaus did not begin recovery audit efforts until late in FY 2004. However, we conservatively estimate that the amount of FY 2005 recoveries will exceed FY 2004 amounts by a factor of ten.

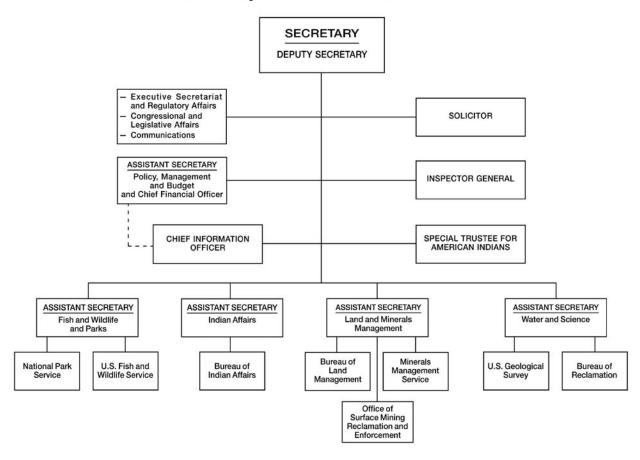
Most of Interior's funds are single year appropriations. Consequently, most recoveries will be made after the funds have expired and must be returned to the General Fund of the U.S. Treasury. In accordance with applicable laws and regulations, the amounts returned to the U.S. Treasury are reduced by recovery contractor's fees and program administration costs. As a function of the contractor's efforts, we will be advised of the areas where our payment control processes can be strengthened. As we gain additional experience in this effort, we will be able to formulate meaningful corrective actions. At this time, however, it is too early to have a clear understanding of the major causes. These causes should become clear as a result of continuing and expanding recovery audit efforts in FY 2005.

TABLE 5-3

	FY 2004 Recovery Audit Activities						
Amount of Payment Errors		Amount Recovered	Amount Pending Resolution	Found by Internal Agency	Found by Recovery Auditor	Agency Costs	Amount Earned by Contractor
\$231,188	None	\$39,875	\$191,313	Not tracked	\$39,875	Not tracked but very minimal	\$7,975

FIGURE 5-3

U.S. Department of the Interior



Glossary of Acronyms

AAPC Accounting and Auditing Policy Committee

ABACIS Advanced Budget/Accounting Control and Information System

ABC/PM Activity-Based Costing

ACWI Advisory Council for Water Information
AHERA Asbestos Hazard Emergency Response Act
AMCR Alternate Management Control Review

AML Abandoned Mine Land
ARTF Aquatic Resources Trust Fund
ASG American Samoa Government
ASQ Allowable Sale Quantity
AVS Applicant/Violator System

BIA Bureau of Indian Affairs
BLM Bureau of Land Management
BOR Bureau of Reclamation
BPA Blanket Purchase Agreement
BSF Budget Subfunction

C&A Certification and Accreditation
C&MGP Coastal and Marine Geology Progam

CAA Clean Air Act
CAP Corrective Action Plan

CCA Candidate Conservation Agreement

CCAA Candidate Conservation Agreement with Assurances

CCI Cooperative Conservation Initiative

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CFO Chief Financial Officer
CIO Chief Information Officer

CISSP Certified Information System Security Professional

COG Continuity of Government COOP Continuity of Operations

COTS Commercial Off-the-Shelf Software
CPIC Capital Planning and Investment Control
CRPP Cultural Resource Preservation Program

CRV Current Replacement Value
CSRS Civil Service Retirement System
CUPCA Central Utah Project Completion Act

CWA Clean Water Act

DCIA Debt Collection Improvement Act

DEAR Department Enterprise Architecture Repository
DEQ Department of Environmental Qualify
DFR Departmental Functional Review

DHS Department of Homeland Security
DM Departmental Manual

DMB Deferred Maintenance Backlog
DOE Department of Education
DOL Department of Labor

DSS/EIS Decision Support System/Executive Information System

EA Enterprise Architecture
EFT Electronic Fund Transfer

EHP Earthquake Hazards Program

EIRF Environmental Improvement and Restoration Fund

EPA Environmental Protection Agency
ESN Enterprise Services Network

FASAB Federal Accounting Standards Advisory Board FBMS Financial and Business Management System

FBU Funds Put to Better Use FCI Facilities Condition Index

FECA Federal Employees Compensation Act
FEGLI Federal Employee Group Life Insurance
FERS Federal Employees Retirement System

FFMIA Federal Financial Management Improvement Act

FFS Federal Financial System

FIRM Foundation Information for Real Property Management System

FISMA Federal Information Security Management Act FLPMA Federal Land Policy and Management Act

FM Financial Management

FMCIP Financial Management Career Intern Program
FMFIA Federal Managers' Financial Integrity Act
FMSP Facilities Management System Partnership

FPPS Federal Personnel/Payroll System

FTE Full-Time Equivalent
FWS Fish and Wildlife Service

FY Fiscal Year

GAAP Generally Accepted Accounting Principles
GAM Geographic Analysis and Monitoring
GAO General Accountability Office
GBL Government Bill of Landing
GED General Equivalency Diploma

GISRA Government Information Security Reform Act
GMRA Government Management Reform Act
GPRA Government Performance and Results Act

GSA General Services Administration
GSS General Support Systems

HPF Historic Preservation Fund

IACB Indian Arts and Crafts Board

IDEAS Interior Department Electronic Acquisition System

IEA Interior's Enterprise Architecture

IFF Interior Franchise Fund

IGET Intra-Governmental Eliminations Taskforce

IIM Individual Indian Monies
ILCP Indian Land Consolidation Project

IMARS Incident Management, Analysis, and Reporting System

IPIA Improper Payments Information Act

IRB Investment Review Board

IRRPIndian Reservation and Roads ProgramISEPIndian School Equalization Program

IT Information Technology

JFMIP Joint Financial Management Improvement Program

JOM Johnson-O'Malley

Appendix C: Glossary of Acronyms

LCS List of Classified Structures

LEED Leadership in Energy and Environmental Design

LHP Landslide Hazards Program

LOB Line of Business

LWCF Land and Water Conservation Fund

M&I Municipal and Industrial
MA Major Applications
MAF Million Acre Feet
MBF Thousand Board Feet
MCR Management Control Review

MMBF Million Board Feet

MMS Minerals Management Service MRM Minerals Revenue Management

MRMFS Minerals Revenue Management Financial System

NBC National Business Center

NCBA National Cattlemen's Beef Association
NCIP National Critical Infrastructure Program
NFHS National Fish Hatcheries System

NFPORS National Fire Plan Operations and Reporting System

NHL National Historic Landmark

NIGC National Indian Gaming Commission

NIIMS National Irrigation Information Management System
NIST National Institute of Standards and Technology

NPR Notice of Proposed Rulemaking

NPS National Park Service
NRC National Resource Council

NRDAR Natural Resources Damage Assessment and Restoration Fund

NRP National Response Plan

NRPP Natural Resource Preservation Program

O&M Operation and Maintenance
OAS Office of Aircraft Services
OCS Outer Continental Shelf

OCSLA Outer Continental Shelf Lands Act
OHA Office of Hearings and Appeals
OHTA Office of Historical Trust Accounting

OIA Office of Insular Affairs

OIEP Office of Indian Education Programs

OIG Office of Inspector General

OLES Office of Law Enforcement and Security
OMB Office of Management and Budget
OMM Onshore Minerals Management

OPA Oil Pollution Act

OPM Office of Personnel Management

OSM Office of Surface Mining

OST Office of the Special Trustee for American Indians

OTR Office of Trust Records

PAR Performance and Accountability Report
PART Program Assessment Rating Tool
PFM Office of Financial Management
PMA President's Management Agenda
POA&M Plan of Actions and Milestones

PP&E Property, Plant, and Equipment

PPA Prompt Payment Act

RCRA Resource Conservation and Recovery Act

RIK Royalty-in-Kind

RMIP Records Management Improvement Project

ROW Right-of-Way

RSSI Required Supplementary Stewardship Information

SACAT Standard Accounting Classification Advisory Team

SBR Statement of Budgetary Resources

SDWA Safe Drinking Water Act SES Senior Executive Service

SFFAS Statement of Federal Financial Accounting Standards

SFRA Sport Fish Restoration Account SGL Standard General Ledger

SIPI Southwestern Indian Polytechnic Institute
SNPLMA Southern Nevada Public Land Management Act

SPR Strategic Petroleum Reserve

STIGS Security Technical Implementation Guides

TAAMS Trust Asset and Accounting Management System

TFAS Trust Funds Accounting System

UMWA CBF United Mine Workers of America Combined Benefit Fund

USBM U.S. Bureau of Mines

U.S. Computer Emergency Readiness Team

USGS U.S. Geological Survey USPP U.S. Park Police

V&V Validation and Verification

WAU Whereabouts Unknown WCF Working Capital Fund WUI Wildland Urban Interface

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