

**Bureau of Land Management**  
**Division of Environmental Quality and Protection (WO-280)**  
**Abandoned Mine Lands Program**  
**Program Internal Control Review Fiscal Year 2010**

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**1. Background:**

The Bureau of Land Management (BLM) is charged with the responsibility of managing 264 million acres of surface acres of public lands located primarily in the 12 Western States, including Alaska. The BLM also manages an additional 300 million acres of below ground mineral estate located throughout the country. Originally valued principally for the commodities extracted from them; today, the lands are prized for the recreational opportunities they provide and the natural, historical, and cultural resources they contain.

The BLM's Director and staff are located in Washington, DC, along with the Office of National Landscape Conservation System and Community Programs and the Office of Law Enforcement and Security. The National Operations Center is located in Denver, Colorado at the Denver Federal Center. The Washington Office consists of 7 associate directorates which set policy for the 12 state offices, as well as the various BLM district and field offices.

The Division of Environmental Quality and Protection (DEQP) is one of 8 divisions which form the Renewable Resources and Planning Directorate. The division consists of three programs: Abandoned Mine Lands (AML), Hazardous Management and Resource Restoration and Soil, Water, and Air.

Each year, bureaus are required to submit assurance statements over financial reporting as well as programs to the Department's Office of Financial Management. These assurance statements ensure the integrity of the Department's programs and are submitted along with the Department's annual Performance and Accountability Report to the Office of Management and Budget (OMB). These activities are part of the Department's compliance with the Federal Managers' Financial Integrity Act; the Office of OMB Circular A-123, *Management's Responsibility for Internal Controls*; OMB A-123, Appendix A, *Internal Control over Financial Reporting*; and OMB Circular A-127, *Financial Systems*.

In order to help comply with the requirements above, the DEQP will be conducting an Internal Control Review (ICR) of its programs. An ICR is a detailed evaluation of controls over areas or activities which have the highest potential for ineffective or inefficient operation or loss of government resources. The ICRs make use of recently issued audits of an assessable unit's major control systems performed by the Office of Inspector General or the General Accountability Office management evaluations; audits of financial statements pursuant to the Chief Financial Officers Act; financial systems reviews pursuant to the OMB Circular A-127; and reviews of

management of federal information resources pursuant to OMB Circular A-130. An ICR include an evaluation of the program and the testing of key controls, and all results must be documented. A final report of the ICR findings is due to senior management by June 30, 2010. The results of the plan can be used as part of the Bureau's annual assurance statement.

## **2. AML Program Strategic Objectives**

The main AML program strategic objectives are as follows:

1. Protect and restore the Nation's watersheds impacted by abandoned mines through a risk-based, watershed approach that uses partnerships to effectively leverage funding and facilitate projects.
2. Protect public safety and reduce liabilities by eliminating or reducing risks posed by abandoned mines.
3. Reduce environmental degradation caused by abandoned mines to ensure compliance with all applicable soil, water, and air quality standards, and applicable Federal, State, Tribal, and local laws.
4. Identify and prioritize for reclamation abandoned mines that most affect at-risk resources and functioning ecosystems.
5. Reduce Environmental and Disposal Liability 3 of the Department of the Interior and the BLM by reducing the inventory of un-reclaimed abandoned mines.
6. Apply the "polluter pays" principle to achieve cost avoidance/cost recovery for funding AML projects wherever possible.
7. Reclaim abandoned mine lands to productive uses including, but not limited to, recreation, fish and wildlife habitat, and preservation of historical/cultural resources.
8. Integrate abandoned mine land support in land use planning efforts.
9. Assure that actions are effective and that lessons learned through post-project monitoring and study benefit risk- and pollution-reducing efforts.
10. Educate employees and the public about the potential dangers posed by abandoned mines and the actions the BLM takes to address those dangers.
11. Develop partnerships, where possible, with States, local governments, Tribes, and voluntary environmental and citizen groups to pool resources and expertise to address abandoned mines.

### **3. Essential Program Components and Analysis**

**Component:** DEQP

**Assessable Unit:** AML Program

#### **Key Process 1: Develop, encourage, and reiterate national AML policy and guidance to the field.**

Subprocess 1.1 AML program staff receives and maintains proper and appropriate training to promote employee and public safety and use of technically sound corrective actions.

Risk 1.1.1 Training is not applicable, adequate, available, or does not occur at regular intervals.

Control 1.1.1.1 Informal surveys are conducted at the end of training courses requesting suggestions on what other courses could be offered by the National Training Center (NTC) in the future.

Control 1.1.1.2 Program leads work with NTC Training Coordinator to layout training curriculum.

Control 1.1.1.3 Online AML Program Policy Handbook Training (NTC-3700-12)

Risk 1.1.2 State Office and Field Office management does not support the activities associated with the AML program.

Control 1.1.2.1 AML Program Policy Manual (MS-3720-1)

Control 1.1.2.2 AML Program Policy Handbook (H-3720-1)

Control 1.1.2.3 Instruction Memorandum 2008-190

Subprocess 1.2 Post links to policy, guidance, and other related policies which impact the implementation of the AML program.

Risk 1.2.1 State and Field office AML employees do not receive policy and guidance in a timely manner.

Control 1.2.1.1 State Office AML program leads are provided new policy and guidance, or other guidance which impacts the AML program by the national AML program lead.

Control 1.2.1.2 The AML SharePoint website has links to the posted policy and guidance. The website also includes the AML manual, handbook, and strategic plan.

Subprocess 1.3 Use the BLM's authorities and responsibilities under Comprehensive Environmental Response, Compensations, and Liability Act (CERCLA).

Risk 1.3.1 Project managers do not initiate or pursue potential responsible party searches to recover government costs for response actions.

Control 1.3.1.1 CERCLA Response Action Handbook (H-1703-1).

Control 1.3.1.2 AML Program Policy Manual (MS-3720-1).

Control 1.3.1.3 AML Program Policy Handbook (MS-3720-1).

Control 1.3.1.4 NTC Training Course: HazMat/AML Response Actions (BLM-TC-1703-25)

Risk 1.3.2 Project managers do not adequately or properly characterize an AML site as to the scope of impact and risks present.

Control 1.3.2.1 CERCLA Response Action Handbook (H-1703-1).

Control 1.3.2.2 AML Program Policy Manual (MS-3720-1).

Control 1.3.2.3 AML Program Policy Handbook (MS-3720-1).

Control 1.3.2.4 National Operations Center supports AML projects through technical expertise and experience for complex AML sites.

Control 1.3.2.5 National Training Center provides training in CERCLA and project management.

Subprocess 1.4 Implement cost avoidance/cost recovery actions under the BLM's CERCLA authorities.

Risk 1.4.1 Cost avoidance/cost recovery is not being done or done well; therefore money is not being collected and responsible parties are not being held accountable.

Control 1.4.1.1 CERCLA Response Action Handbook (H-1703-1).

Control 1.4.1.2 AML Program Policy Manual (MS-3720-1).

Control 1.4.1.3 AML Program Policy Handbook (H-3720-1).

Control 1.4.1.4 National Operations Center supports and provides technical guidance for AML projects.

Control 1.4.1.5 Regional BLM Solicitor provides support and guidance.

## **Key Process 2: Maintain, update, and add accurate AML data into the Abandoned Mine Site Cleanup Module (AMSCM) database.**

Subprocess 2.1 Identify and inventory AML sites.

Risk 2.1.1 AML sites are not accurately identified.

Control 2.1.1.1 Field personnel knowledge of the area.

Control 2.1.1.2 Historic mining claim data.

Control 2.1.1.3 External reports (public and other agencies and nongovernmental organizations).

Control 2.1.1.4 Geographic information systems analysis.

Subprocess 2.2 Enter data into the Abandoned Mine Site Cleanup Module (AMSCM) database.

Risk 2.2.1 Site/feature/project information entered is inaccurate, and/or incomplete.

Control 2.2.1.1 Instruction Memorandum 2008-189.

Control 2.2.1.2 Instruction Memorandum 2008-190.

Control 2.2.1.3 AML Program Policy Manual (MS-3720-1).

Control 2.2.1.4 AML Program Policy Handbook (H-3720-1).

Control 2.2.1.5 Structural database limitations to prevent errors.

Subprocess 2.3 National Operations Center (NOC) maintains and manages database.

Risk 2.3.1 Data will be lost due to software incompatibility.

Control 2.3.1.1 Software experts can resolve backwards compatibility and integrity.

Control 2.3.1.2 Project Change Management Board.

Control 2.3.1.3 Dependence on National Integrated Lands System (NILS).

Control 2.3.1.4 Structural database limitations to prevent errors.

### **Key Process 3: Work with partners (internal and external) on the implementation of AML policy.**

Subprocess 3.1 Identify, inventory, and mitigate potential AML hazards.

Risk 3.1.1 Public exposure to hazardous materials sites and safety hazards on public lands.

Control 3.1.1.1 Follow risk-based approach to selecting high priority sites for funding.

Control 3.1.1.2 AML Program Strategic Plan.

Control 3.1.1.3 AML Program Policy Manual (MS-3720-1).

Control 3.1.1.4 AML Program Policy Handbook (H-3720-1).

Subprocess 3.2 Concurrence with AML priorities.

Risk 3.2.1 Opportunities to leverage funds and activities with partners and watershed groups are not pursued.

Control 3.2.1.1 AML Program Policy Manual (MS-3720-1).

Control 3.2.1.2 AML Program Policy Handbook (H-3720-1).

### **Key Process 4: Planning, budget, and performance for the AML program.**

Subprocess 4.1 Strategic planning to identify and prioritize those sites that most affect at-risk resources and functioning ecosystems, and the public.

Risk 4.1.1 AML Program leads do not give accurate and timely information for planning current and future budgets.

Control 4.1.1.1 AML Program Policy Manual (MS-3720-1).

Control 4.1.1.2 AML Program Policy Handbook (H-3720-1).

Control 4.1.1.3 AML Program Strategic Plan (Government Performance Results Act of 1993).

Control 4.1.1.4 Budget office Instruction Memorandums.

Subprocess 4.2 Provide adequate funding levels for resource staff.

Risk 4.2.1 Base funding levels for full-time equivalents or collateral duty staff are not sufficient to meet program needs and priorities.

Control 4.2.1.1 Budget process allows for field offices to provide input for needed funding levels annually.

Control 4.2.1.2 AML Program Policy Manual (MS-3720-1).

Control 4.2.1.3 AML Program Policy Handbook (H-3720-1).

Control 4.2.1.4 Conduct workload analysis to identify needed staff levels.

Subprocess 4.3 Ensure performance reporting is correct.

Risk 4.3.1 Performance reporting is incorrect and under-reported.

Control 4.3.1.1 Annual performance reports are required by the budget office.

Control 4.3.1.2 AML Program Policy Manual (MS-3720-1).

Control 4.3.1.3 AML Program Policy Handbook (H-3720-1).

Control 4.3.1.4 Program element definitions are posted on the BLM's budget website.

Control 4.3.1.5 Performance measure definitions are posted on the BLM's budget website.