




Business Risk Through a Government Lens:

Putting Your Company in the Best Light

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I am familiar with the Office of the Inspector General and what their mission is?

Yes

No

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The Human Costs of Compliance Failures



Coast Guard Photo. http://oig.uscg.mil/media/main.php?pic_id=841761



Processing Plants



Chemical Safety Board Photo. http://www.csb.gov/assets/news/image/BP_PLANT_EXPLOSION_1_large2.jpg



Pipeline Blowout



By Broken Imagery - Own work, CC BY-SA 3.0. <https://commons.wikimedia.org/w/index.php?title=11488873>



Storage Facilities



By Jonathan Perea - Own work, CC BY-SA 2.0; <https://www.flickr.com/photos/ianjacy/5787021923>



**A MISTAKE REPEATED
MORE THAN ONCE IS
A DECISION**



**In the vast number of cases,
you and your employees are
doing your best to:**

- **be diligent**
- **anticipate risks**
- **take steps to limit those risks**

Employees of the OIG receive performance ratings based on the number of convictions and recoveries they obtain

True

False

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Most Cases are Not Criminal

NOT GUILTY



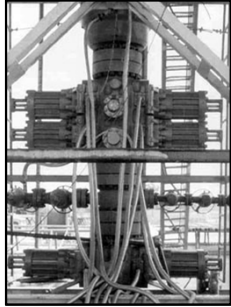
But sometimes...



by Tom Rocco - Own work. CC BY-SA 2.0. <https://www.flickr.com/photos/330-worship/79200871/>



Case Study: False Certification BOP and Hot Work



OSHA Photo.
https://commons.wikimedia.org/wiki/File:OSHA_Blowout_preventer.jpg



Case Study: Improper Oil Discharge into the Gulf



By U.S. — NOAA · <http://response.restoration.noaa.gov/index.php>, Public Domain, <https://commons.wikimedia.org/wiki/File:183925>



Case Study: False Statements



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Case Study: Failure to Correct Indian Royalty Payments



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Case Study: False Documents Provided to ONRR to Avoid Payment



By Nick Youngson, CC BY-SA 3.0: <http://thebluediamondgallery.com/bankruptcy.html>



Case Study: Underreporting of Coalbed Methane



By McCrometer, Inc., CC BY-SA 3.0: https://commons.wikimedia.org/wiki/File:VW8-WN-RF-Cls300_composite_Low_Res.jpg



Case Study: Corporate Collusion to Reduce Bid Prices on Federal Leases



By Pedant, et al., CC BY-SA 3.0, https://commons.wikimedia.org/wiki/File:Barstar_Whistleblower.png



Investigation Examples



Types of allegations that we typically investigate:

- **Misreporting and/or failure to report production or make royalty payments**
- **Non-Compliance with contract requirements resulting in loss of income due to lower sales prices**
- **Intentional alteration of gas meters to reduce reportable production volumes**



Investigation Examples


- **Marketable condition – improper deduction of transportation and processing costs**
- **Non-arms length sales transactions**
- **Horizontally drilling into and producing from Federal or Indian land without a lease**
- **Falsification of safety or environmental tests**
- **Failure to report and cover up an oil spill**
- **Theft of product**

I know what debarment is.

True

False

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Section 746 of the Consolidated Appropriations Act, 2017,
Pub. L. No. 115-31,
and FAR 9.104-5

There are other potential,
administrative consequences for a
felony criminal conviction...

Suspension & Debarment



What is Suspension and
Debarment?





Who can be suspended or
debarred?



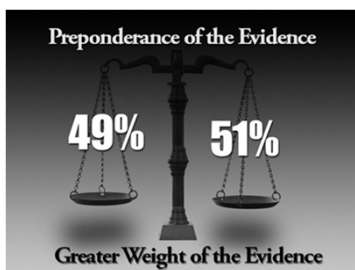


Is there an evidentiary standard
which must be met for a
suspension?





Is there an evidentiary standard
which must be met for a
debarment?





When it all goes wrong





How?

Proactive
Responsible
Truthful



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Get out in front of it and show you're responsible

- **Don't wait for an indictment or conviction**
- **Meet agency officials early**
- **Recognize and show compliance and ethics is important**
- **Discuss corrective actions**
- **Be Truthful**



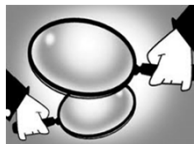
Actions Make a Difference



part of
a set of ideas
policy. noun
course of
adopted



Actions Make a Difference





Put your best foot forward with debaring officials





Methods of Contacting the OIG

Mail: *U.S. Department of the Interior
Office of Inspector General
1849 C Street, NW (Mail Stop 5341)
Washington, DC 20240*

Internet: *www.doioig.gov/hotline*

Phone: *1-800-424-5081*

Fax: *(703) 487-5402
(Attention: Hotline Operations)*

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