

Wildlife Restoration/Hunter Education Advisory Team



Advisory 2020-003: Calls to Action

May 28, 2020

May States use Wildlife Restoration funds for costs associated with Calls to Action, which are public announcements encouraging the public to take a specific action, for the following:

- a. Buying a license**
- b. Buying a product**
- c. Applying for a draw**

Discussion:

a. Activities to create awareness and encourage the public to obtain a license may be an eligible cost in an approved grant. Licenses serve multiple purposes: 1) as a requirement for the public to legally participate in the harvest of wildlife and sometimes required to access public target ranges or other facilities; 2) as the measure that States must track and report to WSFR to determine apportionments; and 3) as a measure (or metric) by which an agency tracks participation, evaluates R3 efforts, or identifies needs. License sales can be used as an evaluation measure, but not as a primary purpose. Informing the public of access and opportunities to hunt and shoot, and the availability of how/where to obtain a license, may be eligible if supported in a grant. Activities to encourage the public to purchase a product or merchandise for the sole purpose of making a profit are not eligible costs.

b. Buying a product is a revenue producing activity. Encouraging the public to make a purchase for the sole purpose of producing revenue is not an eligible activity. If the activity supports the objective of a grant, it could possibly be eligible. An example is if a State were to design a product intended to increase awareness of hunting opportunities or promote being a hunter, it could include costs that may be properly allocated to a grant. The grant would need to describe how program income would be applied and adjusted for other contributions, such as advertisements from other supporters.

c. This is similar to buying a license as described in "a" above, in that awareness of the draw and access to the hunting opportunity may be an eligible activity in a grant. The activity of selling and collecting revenue is ineligible.

The term "Call to Action" seems very specific to wanting the public to do something, and not just to inform.

Advisory: Calls to Action that support an eligible grant objective may be considered eligible. Producing revenue is never an eligible grant objective. These activities need preapproval and will be assessed on a case-by-case basis. If the objective is "raising awareness and public understanding of hunting, target shooting, and how to hunt and shoot," it would be considered eligible using funds at 16 U.S.C. 669c(c) (Basic Hunter Education or R3), or using funds at 16 U.S.C. 669h-1 (Enhanced Hunter Education/R3). If the objective is raising awareness and public understanding of hunting as a wildlife management tool (see 50 CFR 80.50(a)), it would be considered eligible using funds at 16 U.S.C. 669c(b) (Traditional Wildlife Restoration).

