

Wildlife Restoration/Hunter Education Advisory Team



Advisory 2020-012: Purchasing Search Engine Services and Transaction Data/Mailing Lists

July 1, 2020

1. May a State use Wildlife Restoration funding to purchase paid search engine services for the purpose of enhancing outreach and communication to hunters, recreational shooters, and the public?

Discussion: The paid search engine services would allow targeted messages and content to be at the top of returned pages when members of the public are seeking information on hunting and recreational shooting via a search engine (Google, Bing, etc.). The Team agrees that these costs could potentially be eligible for other objectives as well, under other Wildlife Restoration funding sources. For example, in addition to these activities being considered eligible using funds at 16 U.S.C. 669c(c) (R3) and 16 U.S.C. 669h-1 (Enhanced Hunter Education), making information more accessible to the public on wildlife restoration management goals or locations of wildlife management areas could be considered eligible using funds at 16 U.S.C. 669c(b) (Wildlife Restoration) or improved access to information on hunter education opportunities or locations of public target ranges could be considered eligible using funds at 16 U.S.C. 669c(c) (Basic Hunter Education).

Advisory: Yes, these costs could be eligible using funds from any of the Wildlife Restoration funding sources if you justify costs are necessary and reasonable to the objectives of the grant, properly allocate costs to eligible activities and funding sources, and the activities:

(a) Do not promote the agency, but focus on access, opportunities, information, etc. as necessary and reasonable to support the objectives of the grant.

(b) Do not include information on license sales or other activity that generates income.

As this approach is not one that WSFR has typically done in the past under Wildlife Restoration, States should discuss with the WSFR Regional Office acceptable options for reporting and monitoring these activities.

2. May a State use Wildlife Restoration funding to purchase outdoor equipment transaction data and mail lists that are not necessarily associated with hunting and recreational shooting to identify new groups for R3 efforts?

Discussion: This activity would have the goal of reaching members of the public who are not currently hunters and/or recreational shooters but have interest in outdoor activities that make them a good target audience for R3 efforts. Although the question asked only about outdoor equipment transactions, there could potentially be other interests that members of the public might have that would allow the State to target other focus groups.

Advisory: Yes, these activities could be considered eligible using funds at 16 U.S.C. 669c(c)(4) (R3) or 16 U.S.C. 669h-1 (Enhanced Hunter Education/R3) when supported in an approved grant. We advise a State participating in such activities to be fully aware of any Federal or State privacy policies that may need to be considered when participating in activities that mine personal information.