



United States Department of the Interior

FISH AND WILDLIFE SERVICE



In Reply Refer To:
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Memorandum

To: Deputy Assistant Inspector General for Audits, Inspections, and Evaluations

From: Aurelia Skipwith, Director, U.S. Fish and Wildlife Service

Subject: Response to Management Advisory – Issues Identified with Wildlife Restoration Subawards to the University of Tennessee, National Bobwhite Conservation Initiative (Report No. 2020-WR-019)

The purpose of this memorandum is to provide the response of the U.S. Fish and Wildlife Service (Service) to the Department of the Interior Office of Inspector General (OIG) Management Advisory Report No. 2020-WR-019.

During the OIG's audits of grants awarded under the Wildlife and Sport Fish Restoration (WSFR) Program, the auditors identified issues with subawards to the University of Tennessee, National Bobwhite Conservation Initiative (NBCI), which is a national initiative that works to restore bobwhite quail populations to target densities set by State wildlife agencies. State fish and game agencies fund NBCI through WSFR subawards, and hunting and fishing license revenues. NBCI also receives funding from other Federal and non-Federal sources.

The auditors determined that NBCI did not properly distribute costs among all participating States and external partners in proportion to benefits received. That was due, in part, to financial system limitations, and, in part, because all contributing partners benefitted similarly, regardless of the amount of funding provided. Because NBCI did not use a reasonable methodology to distribute costs to WSFR program grants, the auditors determined those costs to be ineligible, and issued the subject Management Advisory.

The Advisory makes four recommendations to the Service:

Recommendation 1: Require WSFR States to discontinue providing grant and/or license revenue funding to the NBCI.

Response: We do not agree that it is necessary to discontinue WSFR grant funding for NBCI. We will work with the States and NBCI to develop and implement policies and procedures that comply with Federal regulations (see the response to recommendation 4).

We do not agree that State use of license revenue to support NBCI is a diversion of license revenue. States may use of license revenue only for administration of the State fish and wildlife agency, which includes only the functions required to manage the agency and the fish and wildlife-related resources for which the agency has authority under State law. NBCI is working to restore wild populations of bobwhite quail which is a wildlife-related resource for which the agency has authority under State law. As long as the agency follows State law to manage its wildlife related resources, it is an allowable use of license revenue.

Target Date: N/A

Responsible Official: Paul Rauch, Assistant Director, Wildlife and Sport Fish Restoration

Recommendation 2: Resolve the amount of questioned costs related to subawards to NBCI before and after implementation of the recharge center.

Response: We agree that NBCI did not allocate costs among participating States and external partners according to relative benefit received by each partner. However, NBCI used the combined resources of the State agencies to coordinate a regional approach to the restoration of native grassland habitat, benefitting the overall population of wild bobwhites, and all participating States, to a greater degree than might otherwise have been achieved through the lone efforts of individual States. Those combined resources and the inclusion of non-WSFR funding sources resulted in the Wildlife Restoration Program receiving benefit well beyond the value of the grant funds.

NBCI conducts research and coordinates efforts to restore habitat for wild populations of bobwhite quail for the benefit of the American public. These activities and accomplishments are consistent with the eligible activities listed in 50 CFR 80.50(a), satisfy the purposes of the Pittman-Robertson Wildlife Restoration Act and are in line with the Department of the Interior's vision to spend funding productively on the ground to better meet our natural resource management responsibilities. Because the combined grant costs were necessary and reasonable relative to the overall benefit to the WSFR program, the Service will not require the repayment of prior awarded funds.

We are developing a method for States to identify and partner in regional conservation projects that focus their financial resources in the most efficient way (see the response to recommendation 4).

Target Date: Completed

Responsible Official: Paul Rauch, Assistant Director, Wildlife and Sport Fish Restoration

Recommendation 3: Identify other similar programs or grantees receiving WSFR awards or subawards that may also have the issues outlined in this advisory and take corrective action.

¹ 50 CFR §80.10 Who is eligible to receive the benefits of the Acts?

Response: We agree with this recommendation. We will work with our regional managers and our State partners to review the WSFR awards, identify programs or grantees with issues outlined in the advisory, and take appropriate corrective action.

Target Date: January 31, 2021

Responsible Official: Paul Rauch, Assistant Director, Wildlife and Sport Fish Restoration

Recommendation 4: Work with the NBCI to develop and implement policies and procedures that comply with Federal regulations.

Response: We agree with this recommendation, and we see in it an opportunity to streamline bureaucracy and provide a significant conservation value to the American public. We are creating a mechanism for States to be able to pool their resources in partnerships that allow for spending more WSFR funding on productive on the ground natural resource management and less on administrative burdens. We will work with the States to develop a proposed change of regulation to implement a new process for State agencies to cooperatively plan and enter into Service-approved initiatives that benefit an array of wildlife and associated habitats, using their apportioned WSFR program funds in the most cost effective way possible.

Target Date: September 30, 2021

Responsible Official: Paul Rauch, Assistant Director, Wildlife and Sport Fish Restoration

We believe that these actions will ensure that the WSFR Program bears its fair share of costs and that grantees comply with Federal regulations. We also think that these actions will help achieve the Department's vision to improve management of species and their habitats by focusing our financial and staff resources on improving the status of our nation's fish and wildlife and the healthy habitats that support them, and by streamlining bureaucracy to help us spend relatively more of our funding productively on the ground to better meet societal needs and our own natural resource management responsibilities.

If you have any questions concerning these responses, please contact Mr. Paul Rauch, the Service's Assistant Director for Wildlife and Sport Fishing Restoration, at 202-208-5078, or Mr. Scott Knight, the Service's Chief, Division of Financial Assistance Support and Oversight, at 703-358-2237.