



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

**U.S. Fish and Wildlife Service Grants
Awarded to the State of Mississippi,
Department of Marine Resources,
From July 1, 2019, Through June 30, 2021,
Under the Wildlife and Sport Fish Restoration
Program**

This is a revised version of the report prepared for public release.



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

OCT 25 2022

Memorandum

To: Martha Williams
Director, U.S. Fish and Wildlife Service

From: Michelle Diggs *Michelle Diggs*
Acting Regional Manager, Eastern Region

Subject: Final Audit Report – *U.S. Fish and Wildlife Service Grants Awarded to the State of Mississippi, Department of Marine Resources, From July 1, 2019, Through June 30, 2021, Under the Wildlife and Sport Fish Restoration Program*
Report No. 2022–ER–001

This report presents the results of our audit of costs claimed by the Mississippi Department of Marine Resources (Department) under grants awarded by the U.S. Fish and Wildlife Service (FWS) through the Wildlife and Sport Fish Restoration Program.

We provided a draft of this report to the FWS. The FWS concurred with all of our recommendations and worked with the Department to implement corrective actions. We consider all recommendations resolved and implemented and do not require a response to this report. The full responses from the FWS and the Department are included in Appendix 3. We list the status of the recommendations in Appendix 4.

We will notify Congress about our findings, and we will report semiannually, as required by law, on actions you have taken to implement the recommendations and on recommendations that have not been implemented. We will also post a public version of this report on our website.

If you have any questions regarding this report, please contact me at 202–208–5745.

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Introduction

Objectives

In March 2021, we entered into an intra-agency agreement with the U.S. Fish and Wildlife Service (FWS) to conduct audits of State agencies receiving grant funds under the Wildlife and Sport Fish Restoration Program (WSFR). These audits assist the FWS in fulfilling its statutory responsibility to oversee State agencies' use of these grant funds.

The objectives of this audit were to determine whether the Mississippi Department of Marine Resources (Department) used grant funds and State fishing license revenue for allowable fish and wildlife activities and complied with applicable laws and regulations, FWS guidelines, and grant agreements.

See Appendix 1 for details about our scope and methodology. See Appendix 2 for sites we reviewed.

Background

The FWS provides grants to States¹ through WSFR for the conservation, restoration, and management of wildlife and sport fish resources as well as educational and recreational activities. WSFR was established by the Pittman-Robertson Wildlife Restoration Act and the Dingell-Johnson Sport Fish Restoration Act.² The Acts and related Federal regulations allow the FWS to reimburse grantees a portion of eligible costs incurred under WSFR grants—up to 75 percent for States and up to 100 percent for the Commonwealths, territories, and the District of Columbia.³ The reimbursement amount is called the Federal share. The Acts require that hunting and fishing license revenue be used only for the administration of participating fish and wildlife agencies. In addition, Federal regulations require participants to account for any income earned from grant-funded activities and to spend this income before requesting grant reimbursements.

¹ Federal regulations define the term “State” as the 50 States; the Commonwealths of Puerto Rico and the Northern Mariana Islands; the territories of Guam, the U.S. Virgin Islands, and American Samoa; and the District of Columbia (Dingell-Johnson Sport Fish Restoration Act only).

² Formally known, respectively, as the Federal Aid in Wildlife Restoration Act, 16 U.S.C. § 669, as amended, and the Federal Aid in Sport Fish Restoration Act, 16 U.S.C. § 777, as amended.

³ The District of Columbia does not receive funding under the Pittman-Robertson Wildlife Restoration Act.

Results of Audit

We determined that the Department generally ensured that grant funds and State fishing license revenue were used for allowable fish and wildlife activities and complied with applicable laws and regulations, FWS guidelines, and grant agreements. We noted, however, issues with subawards and calculations related to indirect costs.

We found opportunities for the Department to improve its oversight of subawards and calculations related to indirect costs.

Control Deficiencies

Insufficient Oversight of Subawards

We found issues with the Department's determination and documentation of subrecipients, reporting of subawards, and risk assessments and monitoring of subrecipients. Consequently, the Department is not in compliance with Federal regulations on subrecipients and subawards.

Determining and Documenting Subawards

According to 2 C.F.R. § 200.330:⁴

[N]on-Federal entities may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities. Therefore, pass-through entities must make case-by-case determinations whether each agreement on the disbursement of Federal program funds casts the party receiving the funds as a subrecipient or a contractor.

The Department reviews all grant-funded agreements to determine the nature of the work that is being performed. If the recipient is doing work that the Department is directing, or if they are providing a product or service, the Department would deem that a contract. If the Department is only passing funds to a recipient with no agency interest, the Department would deem that a subaward.

Although the Department has a process, there is no evidence to support how it makes subaward versus contract determinations. If an agreement is not classified appropriately, there is a risk of inappropriately applying the rules and regulations. Further, we outlined the accountability and monetary impacts of misclassifying subawards in a 2019 management advisory issued to the FWS.⁵

⁴ In November 2020, 2 C.F.R. §200.330 was updated to 2 C.F.R. § 200.331.

⁵ *Issues Identified with State Practices in Subaward Administration for Wildlife and Sport Fish Restoration Program Grants* (Report No. 2018–CR–064), issued September 2019.

Reporting Subawards

Appendix A, Paragraphs I.a.1 and I.a.2.i. of 2 C.F.R. § 170 state non-Federal entities must report each subaward action obligating \$25,000⁶ or more in Federal funds at www.fsr.gov. This information is then posted on USASpending.gov.

We found the Department did not comply with Federal requirements for its subrecipients because it did not report any of the five subawards with \$25,000 or more in Federal funds, as required by the Federal Funding Accountability and Transparency Act (see Figure 1). The Department stated it was not aware of the requirements to report subawards, conduct subrecipient risk assessments, or develop monitoring plans for subawards.

Figure 1: Unreported Subawards

Grant No.	Subrecipient	Title	Subaward Amount (\$)
F19AF00153	USM	Sport Fish Tag and Release	67,934
F19AF00154	USM	Mississippi Coastal Sport Fish Studies	255,144
F19AF00463	Hancock County	Bayou Talla Boat Access	253,958
F20AF00133	USM	Sport Fish Tag and Release	92,066
F20AF00134	USM	Mississippi Coastal Sport Fish Studies	255,143
Total			\$924,245

Abbreviation: USM = University of Southern Mississippi

Failure to report subawards greater than \$25,000 creates a lack of transparency to the public on how Federal money was spent. In this case, \$924,245 went unreported.

Subrecipient Risk Assessments and Monitoring Plans

Federal regulations at 2 C.F.R. § 200.331 (b)⁷ state, “All pass-through entities must evaluate each subrecipient’s risk of non-compliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring.” In addition, 2 C.F.R § 200.331(d)(1) states:

All pass-through entities must monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring must include . . . [r]eviewing financial and performance reports required by the pass-through entity.

⁶ In November 2020 to 2 C.F.R. § 170, Appendix A(I)(a) was updated to increase the threshold to \$30,000.

⁷ In November 2020, 2 C.F.R. §200.331(b) was updated to 2 C.F.R. § 200.332(b) and (d)(1).

We determined that the Department did not have risk assessments or monitoring plans in place for the subrecipients, as required by Federal regulations. Without performing a risk assessment, the Department cannot ensure that the passthrough entities are eligible to receive Federal funds. Risk assessments help States prioritize monitoring activities on areas with the highest risk (such as accounting system, payroll, and equipment inventory). Without monitoring plans in place, the Department cannot ensure that program objectives are being met and the grant funds are being spent in accordance with the Federal regulations. Competent monitoring can help ensure project success and accurate reporting by detecting and correcting deficiencies.

For example, the Department issued a subaward agreement to Hancock County Board of Supervisors to improve the Bayou Talla Boat Access site under Grant No. F19AF00463, with a period of performance of April 1, 2019, through March 30, 2020. The Department extended the period of performance on Grant No. F19AF00463, but neglected to extend the period of performance on the subaward. The subrecipient continued work on the subaward and incurred \$175,864 (\$131,898 Federal share) in additional expenditures after March 2020. The failure to extend the period of performance is indicative of poor monitoring; had the Department been appropriately monitoring, they would have been aware that the subaward had expired.

By not performing risk assessments and monitoring activities, the Department is at risk of subaward projects not being completed as required, subaward performance goals not being achieved, and Federal grant dollars being misused.

Recommendations
<p>We recommend that the FWS require the Department to:</p> <ol style="list-style-type: none">1. Develop and implement detailed guidance for making subrecipient versus contractor determinations for Federal awards to include requiring justifications for determinations.2. Ensure staff are trained on how to make determinations using the newly developed guidance.3. Develop and implement procedures to ensure compliance with Federal Funding Accountability and Transparency Act requirements for the proper reporting of subawards.4. Develop and implement policies and procedures for evaluating each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward.5. Develop and implement a process for monitoring subrecipient activities.

Incorrect Calculation of the 3-Percent Limitation Related to Indirect Costs

Appendix VII of 2 C.F.R. § 200(C.2.c) and (C.3.e) allows the Department to select a distribution base for calculating its indirect costs. The modified total direct cost base excludes capital expenditures, pass-through funds, and any other distorting transactions “to avoid a serious inequity in the distribution of indirect costs.” Further, 50 C.F.R. § 80.53 allows the Department to claim administrative costs for State central services outside of the State fish and game agency as long as these costs do not exceed 3 percent of the State’s annual apportionment. Each year the Department must complete an indirect cost rate proposal to have its indirect cost rate approved for the following year. Within the proposal, Schedule G depicts how the 3-percent limitation relates to the calculation of the indirect cost rate. In the current SFY, the Department must use the prior year’s actual expenditures to calculate the following year’s indirect cost rate.

The Department used the modified total direct cost method but incorrectly included capital expenditures, pass-through expenditures, and indirect costs in its base. By including these costs, it applied the indirect cost rate to a higher dollar amount than it should have, thus impacting the amount subject to the 3-percent limitation. As such, the Department did not properly calculate its indirect costs related to the 3-percent limitation found on Schedule G of the indirect cost rate proposals used to calculate the rates for State fiscal years (SFYs) 2020 and 2021.

Additionally, the percentage of total WSFR-related⁸ costs is incorrect for SFY 2021 because the Department used the SFY 2018 data instead of SFY 2019 data. Since our audit covered SFYs 2020 and 2021, we did not review the SFY 2019 total WSFR-related direct costs.

The Department did not exceed the 3-percent limitation on the amount of Statewide costs allowed to be applied to the WSFR grants; however, its calculation of the 3-percent limitation was inaccurate. Department personnel acknowledged that they followed the methodology their predecessor used in the calculations. They also acknowledged that they did not understand the calculations and had not had training on how to complete Schedule G and the related calculations. Using inaccurate data could potentially cause the Department to exceed the 3-percent limitation and not be in compliance with 50 C.F.R. § 80.53.

Recommendation

We recommend that the FWS require the Department to:

6. Ensure accounting professionals who calculate these rates and provide related support follow instructions on the Schedule G form, attend appropriate training, and can demonstrate their understanding of the process as well as the key components used in calculating the 3-percent limitation.

⁸ The Department only receives Dingell-Johnson funds under WSFR.

Recommendations Summary

We provided a draft of this report to the FWS for review. The FWS concurred with all recommendations, and we consider all recommendations resolved and implemented. See Appendix 3 for the full text of the FWS' and the Department's responses. Appendix 4 lists the status of each recommendation.

We recommend that the U.S. Fish and Wildlife Service require the Department to:

1. Develop and implement detailed guidance for making subrecipient versus contractor determinations for Federal awards to include requiring justifications for determinations.

Department Response: The Department concurred with the finding and provided a copy of the *Grants Management Bureau Compliance Manual*, which was implemented on July 29, 2022. The Manual includes detailed guidance pertaining to subrecipient versus contractor determinations for Federal awards.

FWS Response: The FWS concurred with the finding.

OIG Comment: Based on the responses from the Department and the FWS, we consider the recommendation resolved and implemented. We reviewed the *Grants Management Bureau Compliance Manual* and confirmed that it implemented detailed guidance for making subrecipient versus contractor determinations for Federal awards to include requiring justifications for determinations.

2. Ensure staff are trained in how to make determinations using the newly developed guidance.

Department Response: The Department concurred with the finding and provided a memorandum with a detailed description of a training held on May 17, 2022, to implement the guidance for subrecipient versus contractor determination.

FWS Response: The FWS concurred with the finding.

OIG Comment: Based on the responses from the Department and the FWS, we consider the recommendation resolved and implemented. We reviewed the memorandum provided and confirmed that the training included the Department's newly developed guidance for how to make contractor determinations.

3. Develop and implement procedures to ensure compliance with Federal Funding Accountability and Transparency Act (FFATA) requirements for the proper reporting of subawards.

Department Response: The Department concurred with the finding and provided a copy of the *Grants Management Bureau Compliance Manual*, which was implemented on July

29, 2022. The Manual included detailed guidance on FFATA reporting for Federal awards.

FWS Response: The FWS concurred with the finding.

OIG Comment: Based on the responses from the Department and the FWS, we consider the recommendation resolved and implemented. We reviewed the *Grants Management Bureau Compliance Manual* and confirmed that it implemented procedures to ensure compliance with FFATA requirements for the proper reporting of subawards.

4. Develop and implement policies and procedures for evaluating each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward.

Department Response: The Department concurred with the finding and provided a copy of the *Grants Management Bureau Compliance Manual*, which was implemented on July 29, 2022. The Manual included detailed guidance on subrecipient risk assessments.

FWS Response: The FWS concurred with the finding.

OIG Comment: Based on the responses from the Department and the FWS, we consider the recommendation resolved and implemented. We reviewed the *Grants Management Bureau Compliance Manual* and confirmed that it implemented policies and procedures for evaluating each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward.

5. Develop and implement a process for monitoring subrecipient activities.

Department Response: The Department concurred with the finding and provided a copy of the *Grants Management Bureau Compliance Manual*, which was implemented on July 29, 2022. The Manual included detailed guidance on monitoring activities for subrecipients.

FWS Response: The FWS concurred with the finding.

OIG Comment: Based on the responses from the Department and the FWS, we consider the recommendation resolved and implemented. We reviewed the *Grants Management Bureau Compliance Manual* and confirmed that it implemented a process for monitoring subrecipient activities.

6. Ensure accounting professionals who calculate these rates and provide related support follow instructions on the Schedule G form, attend appropriate training, and can demonstrate their understanding of the process as well as the key components used in calculating the 3-percent limitation.

Department Response: The Department concurred with the finding. In January 2022, prior to submitting the fiscal year 2021 Indirect Cost Rate Proposal, the Department

worked with the audit team to correct the Schedule G and base amount to calculate the 3-percent limitation correctly. Pertinent personnel virtually attended a training (titled, *Developing and Monitoring Indirect/F&A Cost Rate Proposals Under 2 C.F.R. 200*), provided by Management Concepts, from May 25, 2022, through May 26, 2022.

FWS Response: The FWS concurred with the finding.

OIG Comment: Based on the responses from the Department and the FWS, we consider the recommendation resolved and implemented. We reviewed the training and confirmed that it included sufficient information concerning the Schedule G and the key components used in calculating the 3-percent limitation.

Appendix 1: Scope and Methodology

Scope

We audited the Mississippi Department of Marine Resources (Department's) use of grants awarded by the U.S. Fish and Wildlife Service (FWS) under the Wildlife and Sport Fish Restoration Program (WSFR). We reviewed 17 grants that were open during the State fiscal years (SFYs) that ended June 30, 2020, and June 30, 2021. We also reviewed license revenue during the same period. The audit included grant expenditures of \$1.3 million and related transactions. In addition, we reviewed historical records for the acquisition, condition, management, and disposal of real property and equipment purchased with either license revenue or WSFR grant funds.

Because of the COVID-19 pandemic, we could not complete our audit onsite. We gathered data remotely and communicated with Department personnel via email and telephone. As a result, we could not perform normal audit procedures for (1) determining adherence to policies and procedures for license revenues, (2) equipment verification, (3) observing grant projects specific to construction and restoration work, and (4) subawards to subrecipients. Therefore, the audit team relied on alternative evidence provided by Department personnel that was determined to be sufficient and appropriate to support our conclusions.

Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We assessed whether internal control was significant to the audit objectives. We determined that the State's control activities and the following related principles were significant to the audit objectives.

- Management should design control activities to achieve objectives and respond to risks
- Management should design the entity's information system and related control activities to achieve objectives and respond to risks.
- Management should implement control activities through policies.

We tested the operation and reliability of internal control over activities related to our audit objective. Our tests and procedures included:

- Examining the evidence that supports selected expenditures charged to the grants by the Department.
- Reviewing transactions related to purchases, direct costs, drawdowns of reimbursements, and in-kind contributions.
- Interviewing Department employees.
- Inspecting equipment and other property.
- Determining whether the Department used fishing license revenue for the administration of fish and wildlife program activities.
- Determining whether the State passed required legislation assenting to the provisions of the Dingell-Johnson Sport Fish Restoration Act.
- Evaluating State policies and procedures for assessing risk and monitoring subawards.
- Reviewing sites throughout the State (see Appendix 2 for a list of sites reviewed).

We found deficiencies in internal control resulting in our two findings on subawards.

Based on the results of our initial assessments, we assigned a level of risk and selected a judgmental sample of transactions for testing. We used auditor judgment and considered risk levels relative to other audit work performed to determine the degree of testing performed in each area. Our sample selections were not generated using statistical sampling, and therefore we did not project the results of our tests to the total population of transactions.

This audit supplements, but does not replace, the audits required by the Single Audit Act Amendments of 1996. Single audit reports address controls over Statewide financial reporting, with emphasis on major programs. Our report focuses on the administration of the Mississippi fish and wildlife agency, and that agency's management of WSFR resources and license revenue.

The Department provided computer-generated data from its official accounting system and from informal management information and reporting systems. We tested the data by sampling expenditures and verifying them against WSFR reports and source documents such as purchase orders, invoices, and payroll documentation. While we assessed the accuracy of the transactions tested, we did not assess the reliability of the accounting system as a whole.

Prior Audit Coverage

OIG Audit Reports

We reviewed our last two audits of costs claimed by the Department on WSFR grants.⁹ We followed up on five recommendations from these reports and considered all five recommendations as resolved and implemented. For resolved and implemented recommendations, we verified the State has taken the appropriate corrective actions to resolve these recommendations.

State Audit Reports

We reviewed the single audit reports for SFYs 2019 and 2020 to identify control deficiencies or other reportable conditions that affect WSFR. In those reports, the Schedule of Expenditures of Federal Awards indicated \$2.5 million (combined) in Federal expenditures related to WSFR, but did not include any findings directly related to WSFR, which was not deemed a major program for Statewide audit purposes. Neither of these reports contained any findings that would directly affect the Program grants.

We also reviewed the Department's own annual financial audits on certain funds completed by Clifton Larson Allen LLP for SFY 2019 and 2020. In 2020, the auditors did note a deficiency in internal control, that they deemed a material weakness, but it was for a fund that does not affect the WSFR grants.

⁹ *U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Mississippi, Department of Marine Resources From July 1, 2014, through June 30, 2016* (Report No. 2017-EXT-003), issued September 2017.

U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Mississippi, Department of Marine Resources from July 1, 2009, through June 30, 2011 (Report No. R-GR-FWS-0007-2012), issued August 2012.

Appendix 2: Sites Reviewed

Headquarters

Biloxi

Appendix 3: Responses to Draft Report

The U.S. Fish and Wildlife Service's response to our draft report follows on page 14. The Mississippi Department of Marine Resources' response to our draft report follows on page 15.



United States Department of the Interior



FISH AND WILDLIFE SERVICE

1875 Century Blvd
Atlanta, Georgia 30345
September 7, 2022

IN REPLY REFER TO:
FWS/R2/R4/WSFR

Patrick O'Boyle, Acting Regional Manager, Eastern Region
U.S. Department of the Interior
Office of Inspector General
381 Elden Street, Suite 3000
Herndon, VA 20170

Re: Draft Audit Report – *U.S. Fish and Wildlife Service Grants Awarded to the State of Mississippi, Department of Marine Resources, From July 1, 2019, Through June 30, 2021, Under the Wildlife and Sport Fish Restoration Program*
Report No. 2022-ER-001

Dear Mr. O'Boyle:

The enclosed response to the draft audit report referenced above was developed by the State of Mississippi, Department of Marine Resources, in cooperation with the U.S. Fish and Wildlife Service South Atlantic - Gulf and Mississippi Basin Unified Regions Wildlife and Sport Fish Restoration Program.

If you have any questions or need additional information, please contact Alex Coley at



Sincerely,

Digitally signed by
PAUL WILKES
Date: 2022.09.07
14:16:24 -04'00'

Paul A. Wilkes, Regional Manager
Wildlife and Sport Fish Restoration

Enclosure

Cc: Ord Bargerstock, Shuwen Cheung
Division of Financial Assistance Support and Oversight

Response to Draft Report

**U.S. FISH AND WILDLIFE SERVICE
WILDLIFE AND SPORT FISH RESTORATION PROGRAM
Grants Awarded to the State of Mississippi, Department of Marine Resources
From July 1, 2019, Through June 30, 2021
Draft Report No. 2022-ER-001, Issued August 4, 2022**

Auditor Recommendation 1

The auditors recommend that the FWS require the Department to develop and implement detailed guidance for making subrecipient versus contractor determinations for Federal awards to include requiring justifications for determinations.

Agency Response

Management concurs with the finding.

Please see the Grants Management Bureau Compliance Manual. All procedures are currently in place.

Service Response

The Service concurs with the auditor's finding.

Auditor Recommendation 2

The auditors recommend that the FWS require the Department to ensure staff are trained on how to make determinations using the newly developed guidance.

Agency Response

Please see attached memo regarding training session May 17, 2022.

Service Response

The Service concurs with the auditor's finding.

Auditor Recommendation 3

The auditors recommend that the FWS require the Department to develop and implement procedures to ensure compliance with Federal Funding Accountability and Transparency Act requirements for the proper reporting of subawards.

Agency Response

Management concurs with the finding.

Please see the Grants Management Bureau Compliance Manual. All procedures are currently in place.

Service Response

The Service concurs with the auditor's finding.

Auditor Recommendation 4

The auditors recommend that the FWS require the Department to develop and implement policies and procedures for evaluating each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward.

Agency Response

Management concurs with the finding.

Please see the Grants Management Bureau Compliance Manual. All procedures are currently in place.

Service Response

The Service concurs with the auditor's finding.

Auditor Recommendation 5

The auditors recommend that the FWS require the Department to develop and implement a process for monitoring subrecipient activities.

Agency Response

Management concurs with the finding.

Please see the Grants Management Bureau Compliance Manual. All procedures are currently in place.

Service Response

The Service concurs with the auditor's finding.

Auditor Recommendation 6

The auditors recommend that the FWS require the Department to ensure accounting professionals who calculate these rates and provide related support follow instructions on the Schedule G form, attend appropriate training, and can demonstrate their understanding of the process as well as the key components used in calculating the 3-percent limitation.

Agency Response

Management concurs with the finding.

In January 2022, prior to submitting our FY2021 Indirect Cost Rate Proposal, we worked with the audit team to correct our Schedule G and our base amount to calculate our 3% limitation correctly.

The grants department, finance department and I also virtually attended training through Management Concepts on May 25th & 26th titled Developing & Monitoring Indirect/F&A Cost Rate Proposals Under 2 CFR 200 to further our understanding.

Service Response

The Service concurs with the auditor's finding.

Appendix 4: Status of Recommendations

Recommendation	Status	Action Required
1-6	Resolved and implemented	No action is required.



REPORT FRAUD, WASTE, ABUSE, AND MISMANAGEMENT

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How Does it Help?

Every day, DOI employees and non-employees alike contact the OIG, and the information they share can lead to reviews and investigations that result in accountability and positive change for the DOI, its employees, and the public.

Who Is Protected?

Anyone may request confidentiality. The Privacy Act, the Inspector General Act, and other applicable laws protect complainants. Section 7(b) of the Inspector General Act of 1978 states that the Inspector General shall not disclose the identity of a DOI employee who reports an allegation or provides information without the employee's consent, unless the Inspector General determines that disclosure is unavoidable during the course of the investigation. By law, Federal employees may not take or threaten to take a personnel action because of whistleblowing or the exercise of a lawful appeal, complaint, or grievance right. Non-DOI employees who report allegations may also specifically request confidentiality.