



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

**U.S. FISH AND WILDLIFE SERVICE WILDLIFE AND
SPORT FISH RESTORATION PROGRAM**

Issues Identified with State Land Reconciliation for Wildlife and
Sport Fish Restoration Program Grants



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Memorandum

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

From: Melanie L. Sorenson *Melanie L. Sorenson*
Deputy Assistant Inspector General
Office of Audits, Inspections, and Evaluations

Subject: Management Advisory – *Issues Identified with State Land Reconciliation for Wildlife and Sport Fish Restoration Program Grants*
Report No. 2019-CR-015

The U.S. Fish and Wildlife Service (FWS) annually awards approximately \$1 billion in grants to State fish and wildlife agencies through its Wildlife and Sport Fish Restoration Program, under the provisions of the Pittman-Robertson Wildlife Restoration Act and the Dingell-Johnson Sport Fish Restoration Act.¹ Under the Program, States are required to maintain control of all assets and report the status of real property to the FWS at least every 5 years. According to FWS guidance, the States should reconcile their land records with the FWS to ensure that the States' databases of real property purchased with Program funds are accurate and complete.

During our audits of the grants awarded under the Program, we identified numerous instances in which the States had not completed the required land reconciliation as of October 2019.² These States cannot ensure that the lands acquired under the Program are being used for their intended purposes (e.g., hunting and fishing) until they reconcile their records with the FWS' land records.

We identified 15 States that have not reconciled their real property records with the FWS' records as required (see attached list).³ Federal regulation, 50 C.F.R. § 80.90(f), requires that the State maintains control of all assets acquired under Program grants to ensure that they serve the purpose for which they were acquired throughout their useful life. Further, 2 C.F.R. § 200.329 states that if the Federal interest in real property extends 15 years or longer, the State must report

¹ In this report, we use the term "State" to refer generally to any of the primary funding recipients, to include States, Commonwealths, Territories, or the District of Columbia.

² The Wildlife and Sport Fish Restoration Programs Improvement Act of 2000 requires that recipients of Program grants be audited once every 5 years. We have an interagency agreement with the FWS to audit States receiving Program grants. We typically conduct more than 60 audits of Program grants during a 5-year period per this agreement.

³ Real property means land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment according to 2 C.F.R. § 200.85.

the status of the property to the FWS at least every 5 years. According to information the FWS provided, 11 States have not completed a reconciliation in the past 5 years. Additionally, nine States have open recommendations on incomplete land reconciliations.

The States must ensure that their databases of real property acquired with Program grant funds are accurate, complete, and reconciled with land records the FWS maintains. Otherwise, lands may be at risk of impacts such as encroachment or trespass from nearby landowners, or loss of control to other State agencies (e.g., another State division using the land for recreation rather than fish and wildlife purposes).

Some of the States that do not have a current completed land reconciliation indicated that they have provided information to the FWS, but FWS has not completed its review. For the remaining States, both the FWS and the States need to finish additional work to complete the land reconciliation. States cannot ensure that lands are being used appropriately if they are not aware of or do not have concurrence from the FWS on which real property must be used to support the Program.

We recommend the FWS:

1. Develop and implement an action plan to require States that have not reconciled their records of lands purchased with Program funds for more than 5 years to do so by a specific date
2. Establish and implement controls and timelines to ensure real property records are reconciled in a timely manner

Please provide us with your written response by May 8, 2020. The response should provide information on the actions you have taken or planned to address the recommendations, as well as target dates and titles of the officials responsible for implementing these actions. Please send your response to aie_reports@doioig.gov.

The information in this management advisory will be included in our semiannual report to Congress and posted on our website no later than 3 days from the date we issue it to you. Please contact Amy Billings at 303-236-9243, or me at 202-208-5745, if you have any questions.

Attachment

Attachment: States Without Reconciled Real Property Records

State	Reconciliation Older Than 5 Years	Open Recommendations
Colorado*		Yes
Connecticut	Yes	
Illinois	Yes	
Kansas*		Yes
Minnesota	Yes	Yes
Missouri	Yes	
Montana*		Yes
Nebraska	Yes	Yes
New York*		Yes
Rhode Island	Yes	
South Dakota	Yes	Yes
Utah	Yes	Yes
West Virginia	Yes	
Wisconsin	Yes	
Wyoming	Yes	Yes
Total	11	9

*The U.S. Fish and Wildlife Service told us that these States completed their inventory. We, however, have no record of these States completing the inventory in the past 5 years. We determined that the States do not currently have a completed land reconciliation and still have open recommendations.

Source: U.S. Fish and Wildlife Service and Office of Inspector General records.

