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Audit




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Memorandum

MAY 02 2025

To: Paul Souza
Director, U.S. Fish and Wildlife Service

From: Colleen Kotzmoyer 
Director, Contract and Grant Audit Division

Subject: Final Audit Report – *Wildlife and Sport Fish Restoration Grants Awarded to the State of Oregon by the U.S. Fish and Wildlife Service*
Report No. 2024-CGD-028

This report presents the results of our audit of costs claimed by Oregon's Department of Fish and Wildlife (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 FWS. FWS concurred with the two recommendations and will work with the Department to implement corrective actions. The full responses from FWS and the Department are included in Appendix 3. In this report, we summarize the FWS and Department responses to our recommendations, as well as our comments on their responses. We list the status of the recommendations in Appendix 4.

We will track open recommendations for resolution and implementation. 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 aie_reports@doioig.gov.

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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 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 Oregon Department of Fish and Wildlife (Department) used grant funds and State hunting and fishing license revenue for allowable fish and wildlife activities and complied with applicable laws and regulations, FWS guidelines, and grant agreements. The scope of our audit was State fiscal years (SFYs) ending June 30, 2022, and June 30, 2023.

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

Background

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 In general, the Acts and related Federal regulations allow 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. The reimbursement amount is called the Federal share and the portion the States must match with their own funds is called the State share. To meet the State-share requirement, the Department used general license revenues, third-party matches, and in-kind contributions.³ 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 License revenues are from the sale of hunting and fishing licenses or permits; third-party match are non-cash contributions, such as donated equipment or volunteer services; and in-kind contributions may be volunteer hours recorded in place of payroll expenses.

Results of Audit

We determined that the Department generally ensured that grant funds and State hunting and fishing license revenue were used for allowable fish and wildlife activities and complied with applicable laws and regulations, FWS guidelines, and grant agreements. However, we noted issues surrounding subaward management.

Inconsistent Management of Subawards

The Code of Federal Regulations (C.F.R.) requires the State to evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring.⁴ This evaluation may consider factors such as (1) the subrecipient's prior experience with the same or similar subawards, (2) the results of the previous audits of the subrecipient, (3) whether the subrecipient has new personnel or new or substantially changed systems, and (4) the extent and results of the Federal awarding agency's monitoring of the subrecipient. Subrecipient monitoring is necessary to ensure that the subaward is used for authorized purposes and performance goals are achieved.⁵

States are also required to report each subaward action that obligates \$30,000 or more in Federal funds to the Federal Funding Accountability and Transparency Act Subaward Reporting System (fsrs.gov).⁶ This information is then posted to USAspending.gov, a Federal website intended to promote transparency.

State policy within the Oregon Accounting Manual further requires that monitoring include: (1) reviewing financial and programmatic reports required by the contributing agency; (2) following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient; and (3) issuing management decisions for audit findings pertaining to the Federal award provided to the subrecipient.⁷

We found that the Department did not consistently document its monitoring activities for subrecipients. We reviewed eight subawards issued by the Department using WSFR grants and found that while the Department completed a risk assessment for its subrecipients, it did not document monitoring activities based on the assessed risk level. Specifically, five subawards, valued at \$1,764,160, did not include any evidence of subrecipient monitoring. Without documentation, it is difficult to determine if monitoring occurred according to the Federal regulations.

We also found that, during the audit period, the Department did not report 7 of the 14 subawards (see Figure 1) funded through WSFR grants to fsrs.gov, which posts information on USAspending.gov for public viewing.

⁴ 2 C.F.R. § 200.332(b)

⁵ 2 C.F.R. § 200.332(d)

⁶ 2 C.F.R. § 170, Appendix A(a)

⁷ [Oregon Accounting Manual 30.40.00](#), Paragraph 107(c)

Figure 1: Unreported Subawards

Grant No.	Amount
F22AF00383	\$293,996
F22AF00820	\$156,930
F21AF01362	\$1,000,000
F21AF03808	\$30,000
F21AF02507	\$45,000
F22AF03467	\$40,000
F22AF03467	\$49,288
Total	\$ 1,615,214

We identified similar issues in our last report of the Department⁸ and the Department issued a corrective action plan indicating that it had resolved the noncompliance. The Department's corrective action plan included developing and implementing policies and procedures to ensure compliance with the C.F.R and State Accounting Manual guidance regarding subaward monitoring. We reviewed the policy and confirmed it contained a requirement to monitor subrecipients based on the assessed risk level. However, several Department personnel responsible for subaward management stated that they were not aware of the policy and had never received training on subaward requirements. We also noted that the Department's policy does not mention the C.F.R requirement to post subawards over the \$30,000 threshold to [fsrs.gov](https://www.fsrs.gov).

Inadequate subrecipient monitoring could result in inappropriate use of Federal funds. Additionally, reporting requirements for subawards over a specific dollar threshold are in place to provide transparency to the public on how Federal money is spent. In this case, \$1,615,214 in Federal funds went unreported.

Recommendations

We recommend that FWS require the Department to:

1. Develop an internal mechanism to ensure that all subawards with Federal funding over \$30,000 are reported through [fsrs.gov](https://www.fsrs.gov), as required in the Code of Federal Regulations.
2. Provide training regarding subaward monitoring and public reporting requirements to all grant managers and others responsible for the administration of subawards to ensure policies and procedures are being followed in compliance with the Code of Federal Regulations and State policy.

⁸ U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Oregon, Department of Fish and Wildlife, From July 1, 2015, Through June 30, 2017 (Report No. 2018-WR-038), issued December 2019.

Recommendations Summary

We provided a draft of this report to FWS and the Department for review. FWS concurred with the two recommendations. We consider both recommendations resolved. Below we summarize FWS's and the Department's responses to our recommendations, as well as our comments on their responses. See Appendix 3 for the full text of the FWS and Department responses; Appendix 4 lists the status of each recommendation.

We recommend that FWS require the Department to:

1. Develop an internal mechanism to ensure that all subawards over \$30,000 are reported through fhrs.gov, as required in the Code of Federal Regulations.

FWS Response: FWS concurred with the recommendation and will work with Department staff to develop and implement corrective actions.

Department Response: The Department reported that all subawards are now being submitted through fhrs.gov. In addition, the Department has taken the following actions to ensure future reporting: (1) staff training on the fhrs.gov transition; (2) updated desk manuals for Federal Funding Accountability and Transparency Act reporting roles; (3) automated notifications for subaward execution; and (4) the correction of an outdated subaward template in a specific program area. The target implementation date is July 14, 2025.

OIG Response: Based on FWS' and the Department's responses, we consider this recommendation resolved. We will consider this recommendation implemented once we obtain and review documentation supporting the actions taken by the Department.

2. Provide training regarding subaward monitoring and public reporting requirements to all grant managers and others responsible for the administration of subawards to ensure policies and procedures are being followed in compliance with the Code of Federal Regulations and State policy.

FWS Response: FWS concurred with the recommendation and will work with Department staff to develop and implement corrective actions.

Department Response: The Department stated it has begun to implement a plan that includes finalizing draft policy and tools for risk assessment and monitoring, as well as developing and presenting training. The target implementation date is September 30, 2025.

OIG Response: Based on FWS' and the Department's responses, we consider this recommendation resolved. We will consider this recommendation implemented once we obtain and review documentation supporting that all grant managers have received training to ensure compliance with subaward monitoring and public reporting requirements.

Appendix 1: Scope and Methodology

Scope

We audited the Oregon Department of Fish and Wildlife (Department's) use of grant funds awarded by the U.S. Fish and Wildlife Service (FWS) under the Wildlife and Sport Fish Restoration Program (WSFR). We reviewed 11 grants that were open during the State fiscal years (SFYs) ending June 30, 2022, and June 30, 2023. During the audit period, there were 205 grants that claimed \$53.7 million in Federal expenditure reimbursement. We reviewed 11 grants with \$14 million in Federal expenditures (approximately 26 percent of Federal expenditures made during the audit period). We also reviewed license revenue during the audit period. In addition, we reviewed historical records for the acquisition, management, and disposal of equipment purchased with either license revenue or WSFR grant funds.

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 following related principles were significant to the audit objectives:

- Management should design control activities to achieve objectives and respond to risk.
- Management should implement control activities through policies.
- Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

We tested the design, implementation, and operating effectiveness of internal control over activities related to our audit objective. Our tests and procedures included:

- Examining the evidence that supports selected expenditures that the Department charged to the grants.
- Reviewing transactions related to payroll, drawdowns of reimbursements, in-kind contributions, and program income.
- Interviewing Department personnel.
- Inspecting equipment and other property.
- Reviewing equipment inventory and disposal records.
- Determining whether the Department used hunting and 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 Acts.
- Evaluating State policies and procedures for assessing risk and monitoring subawards.

- Determining whether the Department charged the State's unfunded pension liabilities to WSFR grants. Department officials stated that it did not have unfunded pension liabilities, and our review of the general ledger confirmed that unfunded pension liabilities were not charged to WSFR grants.
- Reviewing the fringe benefits charged during the payroll process to understand the coding for payroll deductions and to determine whether the fringe benefit codes are allowable, allocable, and reasonable.
- Reviewing payroll ledgers to assess the reasonableness of payroll allocations to each WSFR grant.
- Visiting sites throughout the State (see Appendix 2 for a list of sites visited).

We found an internal control deficiency that we discussed in the "Results of Audit" section of our report and made recommendations to address the issue.

Based on the results of our initial assessments, we assigned a level of risk and selected a judgmental sample of 11 out of 205 grants with activity during our audit period. This included grants for the operations and maintenance of game lands, wildlife management, fisheries investigations, hatchery operations, and hunter education.

Our review of these grants included assessments on the following:

- Actual costs incurred.
- Grant claims and corresponding drawdowns.
- Application of the negotiated indirect cost rate agreement.
- Payroll allocations.
- Management of equipment.
- Recognition and application of potential program income.
- Progress of agreed-upon grant objectives.

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 Oregon 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 assessed the reliability of data by performing electronic testing, reviewing existing information about the data and the system that produced them, and interviewing Department personnel knowledgeable about the data. While we assessed the completeness and accuracy of the data, 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 the Department claimed on WSFR grants.⁹ We followed up on 17 recommendations from the 2019 report and 13 recommendations from the 2013 report. We reviewed the Department's corrective actions and found all recommendations to be implemented.

State Audit Reports

We reviewed the single audit reports for SFYs 2022 and 2023 to identify control deficiencies or other reportable conditions that affect WSFR. In those reports, the Schedule of Expenditures of Federal Awards indicated about \$55 million (combined) in Federal expenditures related to WSFR. The SFY 2023 Single Audit included two findings related to land inventory and monitoring and cash handling; however, the Department has since completed corrective actions to address the findings.

⁹ U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Oregon, Department of Fish and Wildlife, From July 1, 2015, Through June 30, 2017 (Report No. 2018-WR-038), issued December 2019.

U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Oregon, Department of Fish and Wildlife, From July 1, 2010, Through June 30, 2012 (Report No. R-GR-FWS-0005-2013), issued July 2013.

Appendix 2: Sites Visited

Headquarters	Salem, OR
Fish Hatcheries	Oak Springs Hatchery Roaring River Hatchery
Boating Access	Cedaroak Boat Ramp
Shooting Ranges	Redmond Gun Club Tioga Sports Park
Wildlife Management Areas	Elkhorn WMA Sauvie Island WMA White River WMA

Appendix 3: Responses to Draft Report

The U.S. Fish and Wildlife Service and the Oregon Department of Fish and Wildlife responses to our draft report follow on page 10.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



In Reply Refer To:
FWS/AWSFR/FASO/082413

Memorandum

To: Regional Director, Region 1

From: Assistant Director, Office of Conservation Investment MATTHEW FILSINGER

Subject: Draft Corrective Action Plan for Draft Audit Report No. 2024-CGD-028, for the State of Oregon, Department of Fish and Wildlife, From July 1, 2021, Through June 30, 2023

Digitally signed by MATTHEW
FILSINGER
Date: 2025.04.07 12:20:04 -04'00'

The Headquarters Office, Division of Financial Assistance Support and Oversight has reviewed the draft Corrective Action Plan (CAP) for the above referenced report. Based on our review of the information provided by Region 1, we conclude that the proposed corrective actions adequately address and resolve each recommendation. In accordance with USFWS Service Manual Chapters, 417 FW 1, and our review, we concur with this CAP.

Please finalize the CAP and submit a PDF copy to AIE_Reports@doioig.gov, Attn: Colleen Kotzmoyer, Director, Contract and Grant Audit Division, and include a copy of this letter and your own transmittal letter in the CAP submission. Please copy Ord Bargerstock, Compliance Lead, Division of Financial Assistance Support and Oversight, on your CAP transmission.

If you have any questions concerning this matter or require further information, please contact Ord Bargerstock at (703) 358-1841.

Attachment



In Reply Refer To:
FWS/R1/CI

United States Department of the Interior

FISH AND WILDLIFE SERVICE
911 N.E. 11th Avenue
Portland, Oregon 97232-4181



Memorandum

March 11, 2025

To: Headquarters Office, Division of Financial Assistance Support and Oversight
Attn: Ord Bargerstock, Team Lead, Branch of Policy, and Compliance

From: David Teuscher, Regional Manager,
Office of Conservation Investment, Region 1

Subject: Corrective Action Plan for the U.S. Fish and Wildlife Service Office of
Conservation Investment Grants Awarded to the Oregon Department of Fish and
Wildlife, from July 1, 2021, through June 30, 2023 (No. 2024-CGD-028)

Attached for your approval is the Draft Corrective Action that was prepared collaboratively by the U.S. Fish and Wildlife Service, Region 1, Office of Conservation Investment and the Oregon Department of Fish and Wildlife (ODFW).

If you have any questions about the Corrective Action Plan, please contact Kelly Sliger, Grants Fiscal Officer, at Kelly_Sliger@fws.gov.

Digitally signed by
DAVID TEUSCHER
Date: 2025.03.11
10:15:22 -07'00'

Attachment

cc: Jean Kvaniska, Chief, Branch of Policy and Compliance, FASO

CORRECTIVE ACTION PLAN

U.S. Department of the Interior (DOI)
Office of Inspector General's (OIG) Audit Report

U.S. Fish & Wildlife Service
Wildlife and Sport Fish Restoration Program Grants

Awarded to the
State of Oregon,
Department of Fish and Wildlife
From July 1, 2021-June 30, 2023

Report No. 2024-CGD-028
Dated March 3, 2025

State of Oregon
Department of Fish and Wildlife
Audit Report on the U.S. Fish and Wildlife Service
Wildlife and Sport Fish Restoration Program Grants
Report No. 2024-CGD-028

Auditors Findings and Recommendations:

Inconsistent Management of Subawards

The auditors found that the Oregon Department of Fish and Wildlife (Department) did not consistently document its monitoring activities for subrecipients based on the assessed risk level. They also found that the Department did not report 7 of the 14 subawards funded through the Wildlife and Sport Fish Restoration grants to fhrs.gov. The auditor recommends that the US Fish and Wildlife Service (Service) work with the Department to:

1. Develop an internal mechanism to ensure that all subawards with Federal funding over \$30,000 are reported in fhrs.gov, as required in the Code of Federal Regulations.
2. Provide training regarding subaward monitoring and public reporting requirements to all grant managers and others responsible for the administration of subawards to ensure policies and procedures are being followed in compliance with the Code of Federal Regulations and State Policy.

Service Determination:

The Service concurs with the auditors' findings and recommendations.

Corrective Action:

1. The Department will develop an internal mechanism to ensure that all subawards with Federal funding over \$30,000 are reported in fhrs.gov.

The responsible individual for resolving this issue is: James Spencer

State Submission Date for Implementation: March 21, 2025

Regional Submission Date: May 30, 2025

HQ Submission Date: June 30, 2025

Target Date: July 14, 2025

2. The Department will provide training regarding subaward monitoring and public reporting requirements to all grant managers and others responsible for the administration of subawards.

The responsible individual for resolving this issue is: James Spencer

State Submission Date for Implementation: September 30, 2025

Regional Submission Date: November 28, 2025

HQ Submission Date: December 31, 2025

Target Date: January 16, 2026

Resolution:

1. The Service considers this corrective action resolved but not implemented. Upon receipt, review, and acceptance of the procedure for an internal mechanism to ensure all subawards with Federal funding over \$30,000 are reported through fsrs.gov, the Service will consider this finding resolved and implemented.
2. The Service considers this corrective action resolved but not yet implemented. Upon receipt, review, acceptance of a copy of the updated policy and procedures for monitoring subawards, a copy of the agenda and a copy of a list of attendees for training provided to grant managers and others responsible for the administration of subawards, the Service will consider this finding resolved and implemented.



Oregon

Tina Kotek, Governor

Oregon Department of Fish and Wildlife

Director's Office

4034 Fairview Industrial Dr SE

Salem, OR 97302

503-947-6044

FAX: 503-947-6042

dfw.state.or.us

March 18, 2025

U.S. Fish and Wildlife Service
Pacific Region
Attention: Kelly Sliger
911 NE 11th Ave
Portland, OR 97232

Dear Kelly Sliger:

Below is Oregon Department of Fish and Wildlife's response to the recommendations in the Department of Interior Office of Inspector General draft audit titled *Wildlife and Sport Fish Restoration Grants Awarded to the state of Oregon by the U.S. Fish and Wildlife Service* dated March 2025.

1. *Develop an internal mechanism to ensure that all subawards with Federal funding over \$30,000 are reported through FSRS.gov, as required in the Code of Federal Regulations.*

Management agrees, and all subawards are now being reported in FSRS.gov. In addition, management has taken the following actions to implement the recommendation:

- a) Three Contract Services staff attended "FSRS Transitioning to Subaward Reporting in SAM.gov" on 2/27/25.
- b) Updated documentation in desk manual for position (Procurement and Contract Assistant) responsible for FFATA reports.
- c) Added automated notification in subsystem when subaward or subcontract (new or amended) is executed. This notification is received by the Procurement and Contract Assistant, who then completes the FFATA report for the executed subaward or subcontract (or amendment) if it meets the combined total \$30,000 threshold.
- d) Identified specific program area that was not collecting FFATA data due to an outdated subaward template; finalized updated subaward template with Oregon Department of Justice.

Timeline for completion: Completed. Numbered attachments (1.a.-1.d.) include documentation confirming the actions are complete.

2. *Provide training regarding subaward monitoring and public reporting requirements to all grant managers and others responsible for the administration of subawards to ensure*

policies and procedures are being followed in compliance with the Code of Federal Regulations and State policy.

Management agrees. The following plan of implementation is underway:

- a) Finalize draft policy
- b) Finalize draft procedure
- c) Finalize draft supporting tools to support risk assessment and monitoring (including updated Subrecipient vs. Contractor Determination Form, Subrecipient Risk Assessment and Monitoring Plan, and Subrecipient Monitoring Record Template)
- d) Develop internal website with above resources
- e) Develop training
- f) Present training

Timeline for completion: September 30, 2025

Please contact James Spencer at james.j.spencer@odfw.oregon.gov or Kari Guy at kari.e.guy@odfw.oregon.gov with any questions.

Sincerely,



Ken Loffink
Chief Operating Officer
Oregon Department of Fish and Wildlife

Email Attachments:

- 1.a. Training FSRS Transitioning to Subaward Reporting in SAM.pdf
- 1.b. Procurement and Contract Assistant Desk Manual excerpt.pdf
- 1.c. Smartsheet Automation for Notification to Submit FFATA Report.pdf
- 1.d. Shooting Range – Federal Subaward Template 20250314_DOJ reviewed.pdf

Appendix 4: Status of Recommendations

Recommendation	Status	Action Required
2024-CGD-028-01 We recommend that the U.S. Fish and Wildlife Service (FWS) require Oregon Department of Fish and Wildlife (ODFW) to develop an internal mechanism to ensure that all subawards with Federal funding over \$30,000 are reported through fsrs.gov , as required in the Code of Federal Regulations.	Resolved	We will track implementation.
2024-CGD-028-02 We recommend that FWS require ODFW to provide training regarding subaward monitoring and public reporting requirements to all grant managers and others responsible for the administration of subawards to ensure policies and procedures are being followed in compliance with the Code of Federal Regulations and State policy.		



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or call OIG's toll-free hotline number: **1-800-424-5081**