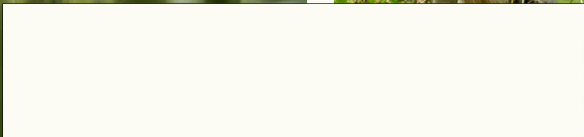
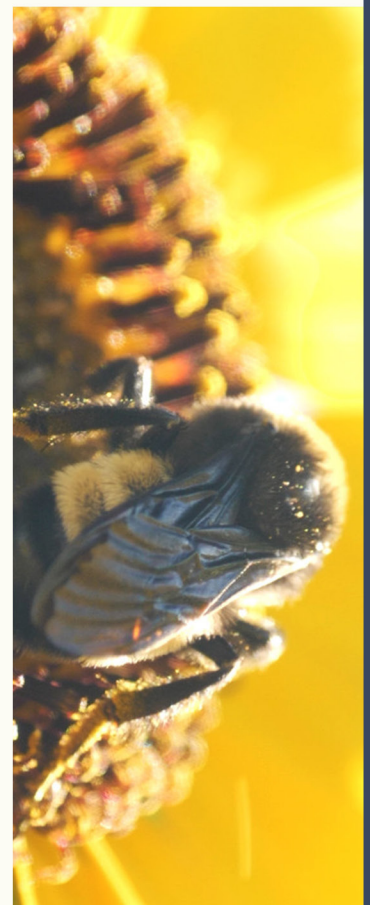
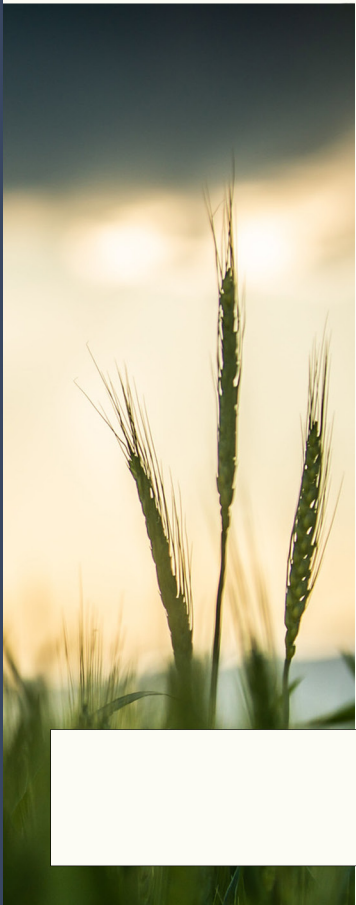




U.S. Department of Agriculture Office of Inspector General



Animal and Plant Health Inspection Service Wildlife Services' Role in Administering the Mexican Wolf Recovery Program

Inspection Report 33801-0001-31

We reviewed the Animal and Plant Health Inspection Service Wildlife Services' investigations of livestock deaths by Mexican gray wolves.

OBJECTIVE

Our objective was to determine whether Wildlife Services used a consistent approach for its depredation reports that attributed livestock deaths to Mexican gray wolves, and whether it also used consistent support for those reports.

WHAT OIG FOUND

We found that although Wildlife Services used a consistent approach for its depredation reports that attributed livestock deaths to Mexican gray wolves, investigators did not always use consistent support for those reports. Specifically, investigators did not always include photographs to document evidence found at depredation scenes, such as tracks, scat, or hair.

REVIEWED

We reviewed 207 depredation reports of confirmed and probable Mexican gray wolf kills; 78 were from Arizona and 129 were from New Mexico. We also reviewed laws and Departmental guidance, and we interviewed personnel from Wildlife Services and other agencies in support of the Mexican Wolf Recovery Program.

Although the interagency standard operating procedure requires photographing the carcass and surrounding area when conducting an investigation, it did not explicitly state that photographs needed to be attached to the depredation reports. Such formal photograph requirements would ensure consistency in the agency's depredation reports.

APHIS agreed with our recommendations, and we accepted management decision for the three recommendations.

RECOMMENDS

We recommend that Wildlife Services (1) develop a policy to clearly communicate the requirement for photographic evidence in depredation reports, (2) train investigators and reviewers on that policy, and (3) request that the Mexican Wolf Executive Committee review and make any applicable updates to its procedures.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: October 19, 2023

INSPECTION

NUMBER: 33801-0001-31

TO: Michael T. Watson, Ph.D.
Acting Administrator
Animal and Plant Health Inspection Service

ATTN: Robert Huttenlocker
Deputy Administrator
Marketing and Regulatory Programs Business Services

FROM: Janet Sorensen
Assistant Inspector General for Audit

SUBJECT: Animal and Plant Health Inspection Service Wildlife Services' Role in Administering the Mexican Wolf Recovery Program

This report presents the results of the subject review. Your written response to the official draft is included in its entirety at the end of the report. We have incorporated excerpts from your response, and the Office of Inspector General's (OIG) position, into the relevant sections of the report. Based on your written response, we are accepting management decision for all 3 recommendations in the report, and no further response to this office is necessary. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer (OCFO).

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. For agencies other than OCFO, please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciate the courtesies and cooperation extended to us by members of your staff during our fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<https://usdaoig.oversight.gov>) in the near future.

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Background and Objectives

Background

Wildlife Services, a component of the United States Department of Agriculture's (USDA) Animal and Plant Health Inspection Service, helps to resolve conflicts between people and wildlife so that both can coexist. Wildlife Services program professionals apply a collaborative and partnership-based approach to manage wildlife damage. Given its mission, Wildlife Services participates in the Mexican Wolf Recovery Program. The Mexican gray wolf (also referred to as Mexican wolf) has been protected as an endangered subspecies of gray wolf since 1976, under the Endangered Species Act of 1973.¹

Figure 1: A Mexican Gray Wolf Specimen. (Photograph by OIG)



Following the Mexican gray wolves' near extinction due to predator eradication efforts, the Department of the Interior's Fish and Wildlife Service, along with other partner agencies, began efforts to re-establish Mexican gray wolves into the wild in the United States (U.S.) in 1998. The Mexican Wolf Recovery Program consists of two interrelated components: 1) recovery of the Mexican wolf, and 2) monitoring and management of the reintroduced Mexican wolf population in the Mexican Wolf Experimental Population Area.²

In 2019, Wildlife Services entered into a memorandum of understanding (MOU)³ with other agencies and cooperating entities (referred to as signatories). The MOU established a framework

¹ 16 U.S.C. § 1531 et seq. (as amended).

² An area in Arizona and New Mexico that lies south of Interstate 40 to the international border with Mexico.

³ Multiple Lead Agencies and Cooperating Entities, *Memorandum of Understanding for Mexican Wolf Recovery and Management* (June 24, 2019).

to implement a scientifically based program to reestablish a viable population of Mexican wolves within the area. The objectives of the MOU include efforts to:

- (1) ensure Mexican wolf recovery efforts are productively integrated with, and appropriately balanced by, programs that prevent, reduce, or mitigate the negative impacts that Mexican wolf reintroduction and management might have on lawful uses of Federal, state, private, and participating Tribal Trust Lands; and
- (2) foster cooperation that improves the science-based foundation for Mexican wolf recovery by conducting or facilitating research necessary to achieve recovery criteria and developing standard operating procedures (SOPs) to guide the management of the experimental population.

The MOU also established roles and responsibilities for all signatory agencies and cooperating entities, including Wildlife Services. Each signatory provides representatives at different levels of activities for the Mexican Wolf Recovery Program.⁴ Wildlife Services provides wildlife damage management specialists to the Interagency Field Team.⁵ These specialists are responsible for taking the following actions:

- (1) investigate suspected wolf depredations⁶ on deceased and injured livestock and provide depredation investigation reports to livestock producers;
- (2) investigate human safety, nuisance, or other reported wolf conflicts;
- (3) serve as the lead agency for removal of wolves involved in depredations or nuisance, as authorized by the Fish and Wildlife Service; and
- (4) provide assistance and input on Interagency Field Team issues and priorities.

⁴ The signatory of each agency, or their designee, serves as a member of the Executive Committee to assist with the actions and resources necessary for the reintroduction and management of the Mexican wolves.

⁵ The Interagency Field Team consists of employees of agencies who have regulatory jurisdiction and management authority over Mexican wolves, or regulatory jurisdiction and management over the lands that Mexican wolves occupy in Arizona and New Mexico.

⁶ *Depredation* is the confirmed killing or wounding of domestic animals.

Figure 2: Agencies Participating in the Mexican Wolf Recovery and Management MOU. (Graphic by OIG)



The Wildlife Services’ specialists use an SOP (referred to as SOP 11)⁷ developed for the Interagency Field Team to investigate depredations. SOP 11 establishes requirements for the first Interagency Field Team member (e.g., a wildlife specialist) to arrive at the depredation scene, including photographing the carcass (position, wounds, etc.) and the surrounding area, looking for signs of wolves and other predators in the area, and noting the presence of other livestock or pets in the area. SOP 11 also establishes criteria for the investigators to consider at the depredation scene to make a cause of death determination.⁸ Criteria include subcutaneous

⁷ U.S. Department of the Interior Fish and Wildlife Service SOP, *Mexican Wolf Blue Range Reintroduction Project Adaptive Management Oversight Committee Standard Operating Procedure: Depredation on Domestic Livestock and Pets*, MW SOP 11 (Apr. 2005).

⁸ Investigators classify cause of death determination in reports of wolf-caused livestock depredations as confirmed or probable wolf kill or wolf injured.

hemorrhaging, canine spread, attack points,⁹ size and extent of bones chewed, tracks/scat¹⁰/hair, disturbed vegetation or blood, and presence or history of wolves or other predators in the area.

To document the results of each investigation, investigators use a standardized depredation reporting template. This template includes sections to identify the livestock owner, describe the site and evidence at the scene, and add photographs. Wildlife Services provides a copy of the completed depredation report to the livestock producer who suffered the livestock depredation loss.

The livestock producer may use these reports to seek compensation through various Federal and State entities. For example, USDA Farm Service Agency's Livestock Indemnity Program compensates livestock producers 75 percent of livestock fair market value for Mexican gray wolf-related losses.¹¹ For calendar years 2019 through 2021, Farm Service Agency data showed more than \$1.6 million in payments for these livestock-related losses.¹²

On April 13, 2021, USDA OIG received a U.S. Senator's request to conduct an objective analysis of depredation reports produced by Wildlife Services within the Mexican gray wolf recovery area.¹³ In response, on March 17, 2022, OIG initiated this inspection to evaluate consistency in the approach and support used by Wildlife Services for depredation reports.

Objectives

Our objective was to review the Animal and Plant Health Inspection Service Wildlife Services' investigations of livestock deaths in relation to Mexican gray wolves. Specifically, we addressed the following question: Did the agency use a consistent approach and support for depredation reports that attribute livestock deaths to Mexican gray wolves?

⁹ Subcutaneous hemorrhaging is bleeding below the skin. Canine spread is the measured distance between the canine teeth of a bite. Attack points are areas on the carcass where predators typically attack.

¹⁰ Scat is animal fecal droppings.

¹¹ Wildlife Services does not compensate livestock producers for these losses.

¹² The objective of this inspection did not include evaluating Farm Service Agency's Livestock Indemnity Program. OIG did not fully assess the accuracy of this data.

¹³ Heinrich, The Honorable Martin, Letter to the Honorable Phyllis K. Fong from the United States Senate (Apr. 13, 2021).

Objective Part 1: Did the Agency Use a Consistent Approach for Depredation Reports that Attribute Livestock Deaths to Mexican Gray Wolves?

We determined that Wildlife Services used a consistent approach for its depredation reports that attributed livestock deaths to Mexican gray wolves. The agency's investigators used standard procedures to investigate Mexican gray wolf-related livestock depredations. Further, all the investigators completed a standardized depredation report form to document these investigations.

Objective Part 2: Did the Agency Use Consistent Support for Depredation Reports that Attribute Livestock Deaths to Mexican Gray Wolves?

We found that Wildlife Services did not use consistent support for depredation reports that attributed livestock deaths to Mexican gray wolves. Specifically, in 22 (more than 10 percent) of the 207 depredation reports we reviewed, Wildlife Services investigators did not include photograph support for specific elements in the standardized depredation report template. This occurred because the SOP the agency investigators used to conduct and report depredation investigations results¹⁴ did not clearly describe photograph support requirements for Mexican gray wolf depredation reports to ensure consistency. Inconsistency in the support that investigators include in these reports to support livestock cause of death determinations could expose Wildlife Services to credibility challenges for the determinations.

SOP 11 requires responses to reports of depredation to be consistent. The SOP also describes procedures and requirements for investigating depredation scenes, such as photographing the carcass' position and wounds and the surrounding area, and considering the tracks, scat, and hair at the scene when making a depredation determination. Further, SOP 11 requires investigators to complete a depredation report form as a part of their response to reported depredation.

To determine if Wildlife Services used consistent support for its depredation reports that attributed livestock deaths to Mexican gray wolves, OIG reviewed 207 confirmed and probable Mexican gray wolf kill depredation reports that Wildlife Services completed in fiscal year 2021 through March 31, 2022, as well as the photographs that the agency investigators used to support their determination. OIG found that Wildlife Services' investigators did not consistently include support for specific elements in the standardized depredation report form. For example, in 22 of the 207 (more than 10 percent)¹⁵ confirmed and probable depredation reports we reviewed, the investigators did not provide photograph support of both the carcass and the surrounding area, or of the tracks, scat, and hair these investigators indicated were present at the depredation scenes.

¹⁴ The SOP document included the standardized depredation reporting template that investigators used to document investigations.

¹⁵ This included 5.8 percent of reports that did not include a photo of both the carcass and the surrounding area, and 5.3 percent of reports that did not provide photo support for indications that tracks, scat, or hair were present during the investigation. Out of the 22 reports, 1 report had both exceptions.

Figure 3: Photograph Example of a Carcass and Surrounding Area. (Photograph by OIG)



When we asked Wildlife Services about requirements for investigators to provide photograph support for depredation reports, agency personnel mentioned there was no written requirement to include photographs. In addition, we did not identify requirements (in our review of SOP 11) for the type of support that should be attached to the depredation report form to ensure consistency. Although SOP 11 requires photographing the carcass and the surrounding area, it does not explicitly state whether this photograph should be included or attached to the depredation report form. However, Wildlife Services informed OIG that there is a verbal requirement for investigators to attach photograph support to the reports. Consequently, we conclude that Wildlife Services does not have formal photograph support requirements to ensure consistency in its reporting process for depredation reports that attribute livestock deaths to Mexican gray wolves.

In discussion with OIG, Wildlife Services' officials agreed there is a need for clear photograph support requirements for its reports that attribute livestock deaths to Mexican gray wolves, but an official informed OIG that the agency does not have the authority to update SOP 11 since it is not an agency policy. However, Wildlife Services can make a request to the Mexican Wolf Executive Committee to update the SOP.¹⁶ Wildlife Services further informed OIG that the agency is developing its own standards for its Mexican gray wolf-related depredation reports, and that these standards will include photograph support requirements.

Without clear guidance or requirements for the type of support to include in Mexican gray wolf-related depredation reports to support the determination, Wildlife Services is unable to ensure consistency in the support its investigators attach to these reports and ultimately its response to reported depredations. This also exposes Wildlife Services to credibility challenges for its determinations that Mexican gray wolves were the cause of death. Therefore, we recommend

¹⁶ The Mexican Wolf Executive Committee is responsible for updating SOP 11.

Wildlife Services develop and implement agency policy that clearly describes photograph support requirements for Mexican gray wolf-related depredation reports. We also recommend that Wildlife Services establish and provide training to depredation investigators and reviewers on the agency policy that includes detailed photograph requirements to help ensure consistency. In addition, although Wildlife Services does not have authority to update SOP 11, it can make recommendations to update the procedures for depredation investigations. Therefore, we recommend that Wildlife Services submit a formal request to the Mexican Wolf Executive Committee to review and make any applicable updates to the SOP.

Recommendation 1

Develop and implement agency policy that clearly describes photograph support requirements for depredation reports.

Agency Response

APHIS agrees with this recommendation. APHIS will develop and implement an Agency policy clearly describing the requirements for photograph support for depredation reports to include both the content and the specific order of photographs included in reports.

OIG Position

We accept management decision for this recommendation.

Recommendation 2

Establish and provide training to depredation investigators and reviewers on the agency policy that includes the detailed photograph requirements.

Agency Response

APHIS agrees with this recommendation. APHIS will establish and provide training to depredation investigators and reviewers on the policy stated above including detailed photograph requirements. Training will be conducted in-person with investigators and virtually with reviewers to meet the established deadline.

OIG Position

We accept management decision for this recommendation.

Recommendation 3

Submit a formal request to the Mexican Wolf Executive Committee to review and make any applicable updates to the SOP.

Agency Response

APHIS agrees with this recommendation. APHIS submitted a formal request to the Mexican Wolf Executive Committee to review and make applicable updates to our SOP on September 11, 2023.

OIG Position

We accept management decision for this recommendation.

Scope and Methodology

We conducted an inspection of Wildlife Services' role in administering the Mexican Wolf Recovery Program. Specifically, we evaluated Wildlife Services' investigations of livestock deaths in relation to Mexican gray wolves. The scope of our work covered activities from fiscal year 2021 through March 31, 2022, and included depredation investigation observations conducted in fall 2022.¹⁷ We conducted site visits at the Arizona State office in Phoenix, the New Mexico State office in Albuquerque, the Fish and Wildlife Service office in Albuquerque, and various remote sites in the two States. The team also conducted interviews through videoconferencing. We performed fieldwork from April 2022 through August 2023.

We selected all 207 confirmed and probable Mexican gray wolf kill depredation reports for review (78 from Arizona and 129 from New Mexico). These reports represented livestock depredation investigations completed from October 1, 2020, through March 31, 2022. We also obtained and reviewed all seven depredation reports from the investigations we observed to verify that the information reported was consistent with what was observed and supported with photographs.

To accomplish our objective, we:

- Reviewed applicable laws and other relevant Department documentation;
- Interviewed Wildlife Services' regional office official to obtain an understanding of Wildlife Services' role in administering the Mexican Wolf Recovery Program;
- Interviewed Wildlife Services' Arizona and New Mexico State office officials and wildlife specialists to gain an understanding of the investigation procedures for Mexican gray wolf livestock depredations;
- Interviewed the Fish and Wildlife Service and Arizona Game and Fish Department Mexican gray wolf coordinators;
- Interviewed Farm Service Agency officials to obtain an understanding of the USDA funding used to compensate livestock producers in Arizona and New Mexico for livestock losses due to Mexican gray wolf predation; and
- Reviewed the 207 depredation reports and supporting evidence (photographs) to assess consistency.

During the inspection, we obtained data from the agency for the 207 depredation reports.¹⁸ To assess the reliability of this data, we observed a Wildlife Services official manually recreate the data pull from the agency server, and we compared the data to the information provided. OIG did not identify any discrepancies.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.¹⁹ These standards

¹⁷ The team observed seven depredation investigations: six in Arizona and one in New Mexico.

¹⁸ The data was from a shared folder on the Wildlife Services' server system.

¹⁹ Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation* (Dec. 2020).

require that we obtain sufficient and relevant evidence to provide a reasonable basis for our findings, conclusions, and recommendations based on our inspection objective. We believe that the evidence obtained provides a reasonable basis for our conclusions and recommendations based on our inspection objective. We discussed our conclusions with agency officials and included their responses, as appropriate.

Abbreviations

MOU	Memorandum of Understanding
OIG.....	Office of Inspector General
SOP	Standard Operating Procedure
U.S.....	United States
USDA	United States Department of Agriculture

Exhibit A: Sites Visited

Name	Location
Wildlife Services Arizona State Office	Phoenix, AZ
Wildlife Services New Mexico State Office	Albuquerque, NM
U.S. Department of the Interior Fish and Wildlife Service's Southwest Regional Office	Albuquerque, NM

**APHIS'
Response to Inspection Report**



United States
Department of
Agriculture

Marketing and
Regulatory
Programs

Washington, DC
20250

TO: Janet Sorenson
Assistant Inspector General for Audit
USDA Office of the Inspector General

FROM: Michael T. Watson, Ph.D.
Acting Administrator /S/
Animal and Plant Health Inspection Service

SUBJECT: Animal and Plant Health Inspection Service's Response and Request for Management Decisions on the Office of the Inspector General's Report, "Animal and Plant Health Inspection Service Wildlife Services' Role in Administering the Mexican Wolf Recovery Program" (33801-0001-31)

Thank you for the opportunity for the Animal and Plant Health Inspection Service (APHIS) to provide comments on this report. APHIS agrees with all the Office of the Inspector General (OIG) recommendations and will initiate the steps outlined below to implement the necessary program changes.

Objective Part 1: Did the Agency Use a Consistent Approach for Depredation Reports that Attribute Livestock Deaths to Mexican Gray Wolves?

OIG determined that Wildlife Services (WS) used a consistent approach for its depredation reports that attributed livestock deaths to Mexican gray wolves. The Agency's investigators used standard procedures to investigate Mexican gray wolf-related livestock depredations. Further, all the investigators completed a standardized depredation report form to document these investigations.

No recommendations provided by OIG.

Objective Part 2: Did the Agency Use Consistent Support for Depredation Reports that Attribute Livestock Deaths to Mexican Gray Wolves?

OIG found that WS did not use consistent support for depredation reports that attributed livestock deaths to Mexican gray wolves. Specifically, in 22 (more than 10 percent) of the 207 depredation reports we reviewed; WS investigators did not include photograph support for specific elements in the standardized depredation report template.

Recommendation 1: Develop and implement agency policy that clearly describes photograph support requirements for depredation reports.

APHIS Response: APHIS agrees with this recommendation. APHIS will develop and implement an Agency policy clearly describing the requirements for photograph support for depredation reports to include both the content and the specific order of photographs included in reports.

Estimated Completion Date: December 31, 2023.

Recommendation 2: Establish and provide training to depredation investigators and reviewers on the agency policy that includes the detailed photograph requirements.

APHIS Response: APHIS agrees with this recommendation. APHIS will establish and provide training to depredation investigators and reviewers on the policy stated above including detailed photograph requirements. Training will be conducted in-person with investigators and virtually with reviewers to meet the established deadline.

Estimated Completion Date: December 31, 2023.

Recommendation 3: Submit a formal request to the Mexican Wolf Executive Committee to review and make any applicable updates to the Standard Operating Procedure (SOP).

APHIS Response: APHIS agrees with this recommendation. APHIS submitted a formal request to the Mexican Wolf Executive Committee to review and make applicable updates to our SOP on September 11, 2023. APHIS' formal request is attached.

Estimated Completion Date: Completed on September 11, 2023.

Attachment:

-APHIS SOP formal request

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