



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

**RECOMMENDATIONS 2 AND 4  
FOR THE MANAGEMENT ADVISORY  
TITLED *THE BUREAU OF LAND  
MANAGEMENT'S WILD HORSE AND  
BURRO PROGRAM IS NOT  
MAXIMIZING EFFICIENCIES OR  
COMPLYING WITH FEDERAL  
REGULATIONS (2016-WR-027)***

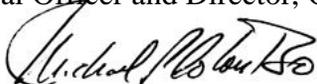


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MAR 31 2020

Memorandum

To: Tonya Johnson  
Deputy Chief Financial Officer and Director, Office of Financial Management

From: Michael P. Colombo   
Western Regional Manager for Audits, Inspections, and Evaluations

Subject: Verification Review – Recommendations 2 and 4 for the Management Advisory  
Titled *The Bureau of Land Management's Wild Horse and Burro Program Is Not  
Maximizing Efficiencies or Complying With Federal Regulations* (2016-WR-027)  
Report No. 2020-WR-015

The Office of Inspector General has completed a verification review of Recommendations 2 and 4 presented in the subject report. Our objective was to determine whether the Bureau of Land Management (BLM) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. In two emails dated October 4, 2017, and September 27, 2018, the PFM reported to us that it had closed these two recommendations. Based on our review, we concur that Recommendations 2 and 4 have been resolved and implemented.

## Background

Our October 2016 management advisory, *The Bureau of Land Management's Wild Horse and Burro Program Is Not Maximizing Efficiencies or Complying With Federal Regulations*, made four recommendations to help the BLM maximize the cost-effectiveness of its off-range wild horse and burro holding facilities and ensure that it is complying with applicable Federal laws and regulations.

On December 2, 2016, the BLM Director responded to the management advisory, partially concurring with Recommendation 1 and concurring with Recommendations 2 – 4 and detailing the BLM's plans to implement them. Based on the response, we considered Recommendation 1 resolved and implemented. In a December 21, 2016 memorandum, we referred the remaining three recommendations to the Assistant Secretary for Policy, Management and Budget to track their implementation.

## Scope and Methodology

We limited the scope of this review to determining whether the BLM took sufficient action to implement Recommendations 2 and 4. The BLM is working to implement Recommendation 3. To accomplish our objective, we reviewed the PFM's documentation

supporting its closure of the two recommendations, as well as additional documentation that the BLM provided to us upon request.

We did not test internal controls, perform any site visits, or conduct fieldwork to determine whether the BLM had corrected the underlying deficiencies that were initially identified. As a result, this review was not conducted in accordance with Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States or the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency.

## **Results of Review**

We found that the BLM implemented Recommendations 2 and 4.

**Recommendation 2:** Develop and implement a plan to maximize the transition of wild horses and burros from short-term corral facilities to long-term pasture facilities.

**Action Taken:** In its response to the management advisory, the BLM noted that housing a horse or burro in a corral can be twice as expensive as maintaining one on a contracted pasture. The BLM said it had taken steps to shift animals from short-term corrals to long-term pastures and noted that these steps were already yielding significant cost savings.

The BLM assembled a team of wild horse and burro specialists, grants management officers, contracting specialists, and procurement analysts to develop guidance on maximizing the cost-effectiveness of its off-range holding facilities and the management of the wild horse and burro population. In April 2017, the BLM issued Instruction Memorandum (IM) 2017-068 titled *Transition of Wild Horses and Burros from Off-Range Corrals to Off-Range Pastures*, outlining new policy to maximize the safe and efficient transfer of wild horses and burros with low chance of adoption from off-range corrals to off-range pastures for cost reduction. IM 2017-068 requires the national shipping coordinator to collaborate with the off-range pasture contracting officer's representative in decision-making and to consider animal criteria (e.g., wild horses 6 years old or older, wild horses that possess undesirable characteristics for adoption, and pregnant mares 5 years old or older) and the following four factors: (1) space availability, (2) transportation, (3) weather, and (4) contractor readiness.

A BLM official provided us with documentation showing the shipments of animals from off-range corrals to off-range pastures from October 2016 to January 2020.

**Recommendation 4:** Comply with existing Federal laws and regulations to ensure all correctional institution programs are functioning under appropriate financial instruments.

**Action Taken:** In 2016, the BLM conducted an internal control and management review of all current agreements related to the use of correctional institutions as off-range corrals. As a result of that review, the BLM determined that it would adjust its correctional facility procurement instruments as they expire. In addition, the BLM stated that its field-based grants management officers will collaborate with its Washington, DC procurement office to ensure that

all financial instruments used to acquire corrals and pastures comply with Federal laws and regulations and are in the best interest of the Government and taxpayers.

A September 27, 2018 email from the PFM that closed this recommendation explains that the BLM issued IM 2018-059 titled *Financial Assistance Standards and Review*, which promotes more efficient management of financial assistance programs. In addition, the BLM closed cooperative agreements with Arizona, Nevada, New Mexico, and Wyoming and in June 2018 converted the cooperative agreements for these States into a wild horse public off-range facilities contract. We reviewed the supporting documentation showing that the BLM converted these cooperative agreements into a contract.

## **Conclusion**

We conclude that Recommendations 2 and 4 are resolved and implemented.

We informed BLM officials of the results of this review on March 2, 2020.

If you have any questions about this verification review, please contact me at 916-978-6199.

cc: Andrea Brandon, Deputy Assistant Secretary for Policy, Management and Budget  
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the Director, Bureau of Land Management  
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