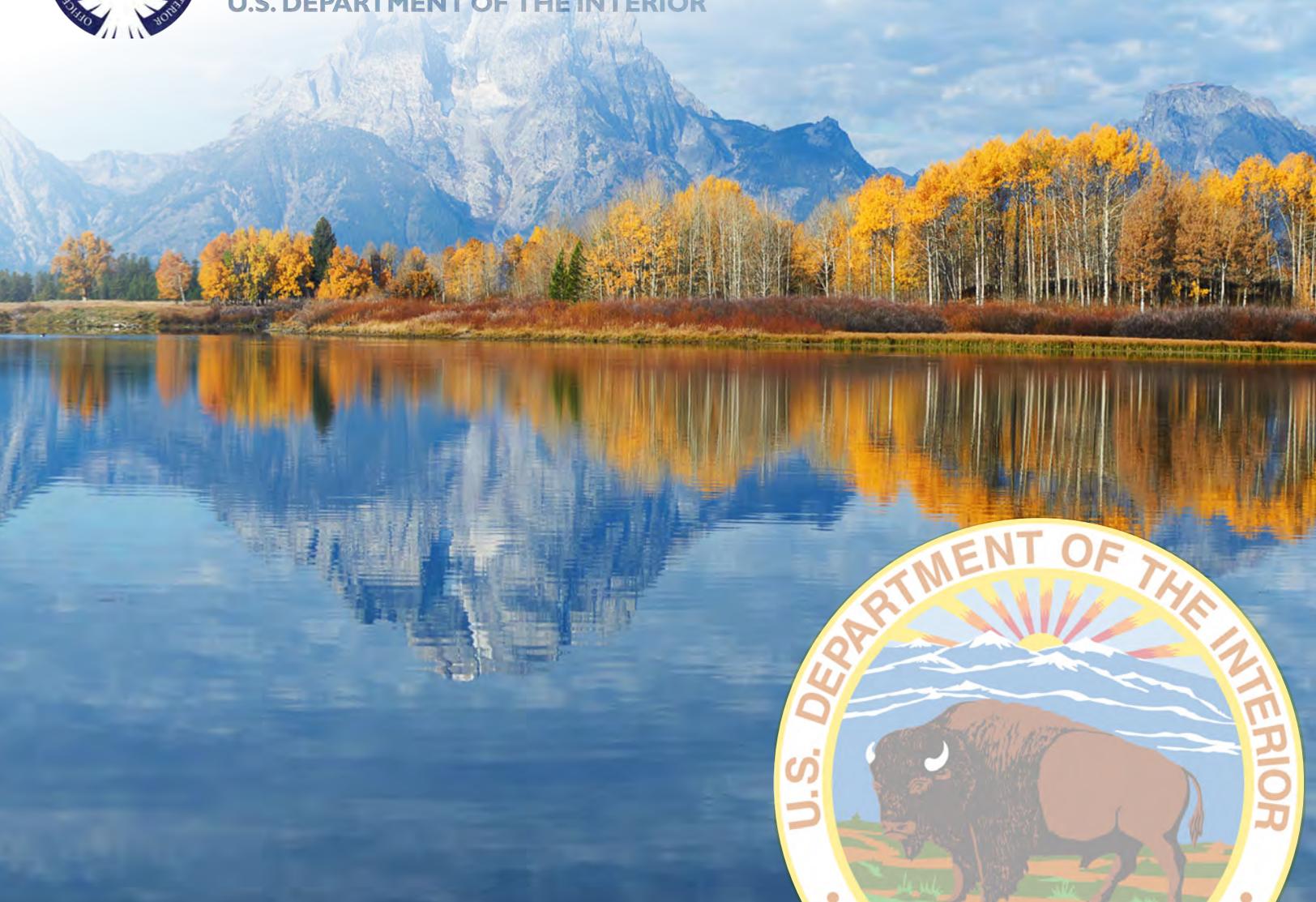




OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR



# Audit

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

**MAR 27 2026**

Memorandum

To: Brian Nesvik  
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 Illinois by the U.S. Fish and Wildlife Service*  
Report No. 2023-CGD-033

This report presents the results of our audit of costs claimed by the Illinois Department of Natural 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 FWS. FWS concurred with all five recommendations and will work with the Department to implement corrective actions. The full responses from FWS and the Department are included in Appendix 4. 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 5.

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, please contact me at [aie\\_reports@doioig.gov](mailto: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 Illinois Department of Natural Resources (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, 2021, and June 30, 2022.

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

## Background

FWS provides grants to States<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup> 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.

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<sup>1</sup> 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).

<sup>2</sup> 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.

<sup>3</sup> 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.

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# Results of Audit

We determined that although the Department generally ensured that grant funds and State hunting and fishing license revenue were used for allowable activities and complied with applicable laws and regulations, FWS guidelines, and grant agreements, the Department's administration of Federal awards included significant control deficiencies related to expenditure tracking and reimbursement requests.

See Appendix 3 for additional information on the Department's underreporting of actual costs.

## Lack of Effective Administration of Federal Funds

Federal regulations state that the non-Federal entity is "responsible for the efficient and effective administration of the Federal award through sound management practices."<sup>4</sup> In this case, the State's "financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by the terms and conditions; and tracking expenditures to establish that funds have been used in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award."<sup>5</sup>

The State must also maintain "records that sufficiently identify the amount, source, and expenditure of Federal funds for Federal awards. These records must contain information necessary to identify Federal awards, authorizations, financial obligations, unobligated balances, as well as assets, expenditures, income, and interest. All records must be supported by source documentation."<sup>6</sup> Specifically, compensation for labor and fringe benefits must be (1) reasonable; (2) in accordance with the non-Federal entity's laws and/or rules or written policies and meet the requirements of Federal statute, where applicable; and (3) supported.<sup>7</sup> According to the Federal standards for documentation of personnel expenses, "Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed," and these records must be "supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated."<sup>8</sup>

Furthermore, the "State must minimize the time between the drawdown of Federal funds from the Federal government and their disbursement for Federal program purposes. . . . The timing and amount of funds transfers must be as close as is administratively feasible to a State's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs."<sup>9</sup>

We found that, for SFYs 2021 and 2022, the Department was unable to demonstrate that its requests for reimbursement—totaling \$3,891,199 (7 percent of the total amount reimbursed during the audit scope)—were supported with allowable expenditures at the time reimbursement was requested. Specifically, for the four reimbursement requests we reviewed, the Department did not have adequate supporting documentation to validate that its drawdowns were consistently based on immediate cash needs and fully supported by incurred, allowable costs at the time of the request.

In February 2024, we requested that the Department provide revised support for the four drawdowns. We asked the Department to use its current process for preparing drawdowns to determine (1) the correct draw amounts, (2) if the amounts were supported by underlying system data, and (3) if there was an overdraw or underdraw compared to the original draw amounts. Despite multiple followup discussions, it took the

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<sup>4</sup> 2 C.F.R. § 200.400(a).

<sup>5</sup> 2 C.F.R. § 200.302(a).

<sup>6</sup> 2 C.F.R. § 200.302(b)(3).

<sup>7</sup> 2 C.F.R. § 200.430(a).

<sup>8</sup> 2 C.F.R. § 200.430(g)(1)(i).

<sup>9</sup> 31 C.F.R. 205.33(a) as cited under 2 C.F.R. § 200.305(a).

Department nearly five months to provide the requested documentation—records that, in accordance with Federal regulations, should have been readily available at the time of the original reimbursement requests.

While the Department was ultimately able to provide support for the allowability of costs totaling the WSFR grant award amounts, its process for capturing, reconciling, and verifying these costs at the time it submitted reimbursement requests was inadequate. Additionally, the drawdown records did not provide an adequate method or audit trail to identify expenditures applied to the drawdowns in the Department's general ledger. We did not review additional drawdowns because the significant findings from the four drawdown transactions indicate systemic issues across all the Department's WSFR grants.

For example, we identified instances in which the Department did not use its actual costs as the basis for its drawdown records. Instead, the Department used a percentage-based estimate to develop a rate for both labor and fringe benefits. To allocate employee labor and fringe costs, the Fiscal Officer calculated an hourly rate for each employee working on WSFR grants based on the employee's salary and hours worked in a year. However, according to other Department personnel, the Fiscal Officer used an incorrect fringe rate (66.86 percent instead of 90 percent) and an incorrect number of hours worked in a year (1,920 instead of 1,967.5) at the instruction of the former Chief Fiscal Officer. Department personnel acknowledged that these rate errors affected funds drawn in SFYs 2021 and 2022 for all of its 34 WSFR operational grants<sup>10</sup> totaling \$41,036,904. Similarly, we identified instances where the Department could not support its other direct costs that it was reporting in its drawdown records.

We compared the Department's drawdown records to the actual costs incurred on the four WSFR grants we reviewed. We found that, because of the Department's inadequate drawdown process, it incurred \$7.6 million more in total expenditures than it reported in its drawdown records. See Appendix 3 for a detailed comparison.

Furthermore, we determined that the Department was not timely and consistent in its approach to grant reimbursement. In SFYs 2021 and 2022, the Department had a total of 214 WSFR grant drawdowns for its 112 active WSFR grants. This averaged to about one drawdown per grant per year, which conflicts with the requirement to minimize the time between the drawdown of Federal funds and the disbursement for Federal program purposes.<sup>11</sup> Department personnel acknowledged that drawdowns should ideally be performed monthly or quarterly. Additionally, the documentation supporting the Department's drawdowns was not consistent. For example, the drawdown support for Grant No. F18AF00920 did not have any supporting documentation for its grant expenditures for its two-year draw period, including labor and other direct costs. However, the drawdown support for Grant No. F20AF10044 included some documentation for payroll and other direct costs for its one-year draw period. The same individual prepared the drawdown documentation for both grants. In March 2024, Department personnel confirmed that the Department had not prepared drawdown supporting documentation for its WSFR operational grants for the current grant reporting period. Therefore, timely drawdowns were not occurring well after the audit period.

The lack of timeliness and consistency in the Department's approach to grant reimbursement is further illustrated by an overdrawn grant that we reviewed. In December 2020, the grant administrator tasked with performing drawdowns overdrawed funds for Grant No. F18AF00920. The grant administrator requested \$3,970,740, which Department personnel believed to be the entire grant award balance. The Department subsequently acknowledged the overdraw and refunded \$1,198,358 to FWS. According to the Department, this refund was \$1,025,466 more than what was necessary based on total grant expenditures.

We confirmed that after the Department issued the refund, it ultimately drew down the full award amount of \$7,978,070—meaning it did not exceed the total amount awarded. We also confirmed that the grant was closed after the refund was issued. Although the Department provided us some documentation, it was not clear how it arrived at the amount initially drawn and the amount refunded.

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<sup>10</sup> Operational grants are grants that are managed by the Department and not passed on to another entity.

<sup>11</sup> 31 C.F.R. § 205.33(a) as cited under 2 C.F.R. § 200.305(a).

## **Contributing Factors to the Department's Grant Administration Challenges**

These issues occurred because the Department had inadequate processes for allocating and tracking its grant expenditures; lacked written policies, procedures, and defined job responsibilities; and had internal breakdowns in communication, as well as an inability to access relevant financial information.

### **Inadequate Processes for Allocating and Tracking Grant Expenditures**

The Department did not have adequate processes in place to allocate program funds and track expenditures. According to Department personnel, in December 2019, the State of Illinois removed the Department's legacy accounting system without a suitable replacement for matching and allocating payroll expenses to WSFR grants. Department personnel informed us that it took around 18 months for the Department to develop a new, semi-manual process to allocate its payroll expenses. Namely, the process required personnel to upload payroll and timekeeping files into a database for each pay period. However, Department personnel communicated to us that the Department was not approving timesheets timely due to lacking guidance on timesheet submission timeframes. This—in conjunction with the 18 months it took the Department to develop its updated process—created a backlog of unaccounted payroll costs allocated to WSFR grants from SFY 2020 through February 2024, which ultimately impeded the Department's ability to accurately capture program payroll costs.<sup>12</sup> As a result of this backlog, the Fiscal Officer preparing the drawdown support developed their own percentage-based estimates for payroll allocation, as there was no alternative to track grant payroll activity.

Department personnel also noted that the Department did not pay vendor invoices on time, which created a significant backlog of unaccounted other direct costs for WSFR that were tied to these unpaid invoices. According to Department personnel, the Department did not pay these vendors timely because the individual responsible for ensuring payments created an electronic inbox for invoices without informing others. This individual was the only employee monitoring the inbox, and when they left in summer 2023, the Department was not aware of the inbox and did not provide personnel with guidance on how to track paid and unpaid invoices. As a result, the Department did not record costs to WSFR grants until the Department paid the respective vendors for their services. As of March 2024, the Department did not have a mechanism to track unpaid invoices and the length of time it took to pay its vendors. Timely vendor payments are crucial for complying with Federal regulations and collecting proper documentation for cost allocation to WSFR grants before initiating a drawdown.<sup>13</sup>

### **Lack of Written Policies, Procedures, and Defined Job Responsibilities**

The Department did not have documented policies, procedures, and clearly defined job responsibilities. In particular, the Department did not have written policies, procedures, or guidance establishing its processes for proper drawdowns for operational WSFR grants, payroll cost allocation, vendor invoice processing, timesheet processing and approval, supervisory review responsibilities, adequate segregation of duties, appropriate drawdown frequency, and documentation requirements for expenditures that tie the draw request for reimbursement of funds and Federal Financial Reports.

Additionally, the Department did not clearly define its job responsibilities for overseeing its WSFR grants, including preparing support for drawdowns. During our audit period, the Department was not able to provide evidence that supervisory review of WSFR grant drawdowns took place. However, when we raised this concern, the Department acknowledged that the process should include a grant administrator responsible for preparing the drawdown support and a fiscal officer responsible for reviewing the support.

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<sup>12</sup> According to Department personnel, Department employees were still paid on time throughout this period. We note that there is no specific legislation or requirement that the Department submit its timekeeping records prior to payroll processing and payment to Department personnel.

<sup>13</sup> 2 C.F.R. § 200.302(b)(3).

## Communication and Information Access Concerns

The Department's issues budgeting and tracing expenditures were caused, in part, by internal breakdowns in communication and issues accessing relevant financial information. Key WSFR grant stakeholders within the Department (e.g., project managers, division leadership, and field personnel) were left out of critical processes and did not receive the information and cross-training needed to perform their jobs effectively. Department personnel also expressed concerns about a lack of financial transparency as it relates to WSFR grant activity and noted that it led to an inability to manage budgets, track actual costs, and plan for resources. For instance, a project manager on one of the 13 grants with underused Federal funding informed us that they prepared the grant proposal budget based on the best estimates available at the time. However, the project manager did not have access to actual costs from the prior grant or knowledge of the required work. Department personnel also noted that they had not received access to payroll data, which is necessary to administer and prioritize WSFR planning. Personnel further explained that, in the past, they had the ability to track procurement status, purchase requests, and payments through an internal drive. However, internal processes changed and the personnel were no longer able to access this essential information.

In addition to the lack of access to information, Department personnel expressed that they did not receive communications about the expenditure rate of their budget or about delays in the procurement process. For instance, once field personnel submit a purchase request, control over the procurement process shifts from field personnel to headquarters; however, the field personnel do not receive status updates on the request. Furthermore, Department personnel informed us that, in the past, an individual provided quarterly updates for managing grants, which included financial information necessary to spend grant funds appropriately and on schedule. However, Department personnel explained that these quarterly updates are no longer provided.

## Impact of Grant Administration Challenges

Without adequate systems and consistent, clear processes for allocating and tracking grant expenditures, the Department is unable to properly identify costs associated with Federal awards. Ultimately, in this instance, the Department underused \$7.6 million in available Federal funding for four of its WSFR grants in SFYs 2021 and 2022. Had the Department known the actual costs incurred on these grants and had adequate processes in place, it could have allocated resources to conservation activities related to other WSFR grant objectives.

This is further illustrated by the Department's inability to use the full grant amounts awarded within the period of performance. We identified 13 WSFR grants for which FWS deobligated a total of \$4.3 million prior to grant closure. The initial total grant award for these 13 grants decreased by more than 25 percent when compared to the final award amount; the average decrease was 42 percent.

Inconsistent processes can also affect the Department's ability to work with outside entities. According to Department personnel, local contractors (particularly those specializing in environmental stewardship projects) have hesitated to participate in Statewide contracts due to payment delays that can range from 42 days to two years. This reluctance limits the Department's ability to work with local small businesses<sup>14</sup> and complete WSFR grant work effectively.

In addition, the absence of documented policies, procedures, and defined job responsibilities led to inconsistency in the Department's drawdown processes. The inconsistent frequency of drawdowns may also result in the Department's inability to timely receive reimbursement for its WSFR grant expenditures. For example, although it was primarily due to budgeting issues noted above, we noted an instance in which FWS deobligated \$1,428,151 because the Department did not use the full grant amount within the period of performance. The likelihood of additional deobligated WSFR funds increases when the Department is unable to perform drawdowns consistently and timely.

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<sup>14</sup> According to the [State of Illinois Goods and Services Disparity Study 2022](#), slow payments significantly impact all firms, especially small businesses with limited cashflow and financing options. This discourages small businesses from bidding on projects due to fears of "cash crunches" and the responsibility of paying subcontractors.

Furthermore, internal communication breakdowns and lack of access to important information may affect the Department's ability to complete WSFR program work timely and accomplish its mission. For example, Department personnel require access to detailed financial information to effectively oversee and guide grant-funded work, preventing overspending in some areas and underspending in others. Access to this information is essential for planning budgets, tracking expenditures, and ensuring funds are allocated appropriately. Department personnel noted that budget planning has been challenging without this access and that the ability to access payroll information would be beneficial for long-term planning and WSFR grant prioritization. In addition, tracking expenditures only at the local level can hinder efficient spending. Providing access to necessary financial information would improve internal accountability and prevent misallocation of funds. This transparency is crucial for ensuring funds are used for intended purposes, particularly in programs supported by license revenue.

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# Recommendations

We provided a draft of this report to FWS and the Department for review. Both FWS and the Department concurred with the recommendations outlined in this report, and we consider all five recommendations resolved. Below we summarize the FWS and Department responses to our recommendations, as well as our comments on their responses. See Appendix 4 for the full text of the FWS and Department responses; Appendix 5 lists the status of each recommendation.

The issuance of this report was delayed, in part, because of the lapse in the U.S. Department of the Interior's (DOI's) FY 2026 appropriations. We acknowledge the Department's general response regarding a "prolonged audit process" and note that, in addition to the lapse in DOI appropriations, the audit team faced delays in receiving documentation that should have been readily available to support grant expenditures. Further, the pressing need to alert<sup>15</sup> other DOI offices and bureaus awarding the Illinois Department of Natural Resources with Federal grant funding of the significant weaknesses identified in both the July 2023 Illinois Auditor General report<sup>16</sup> as well as in our own work (discussed in this report) contributed to the timing of our final report.

While we recognize the Department's assertion that it has "made substantial favorable progress toward implementing" our recommendations, we note that the issues we identified regarding the Department's controls over payroll and timekeeping were reported as recently as June 2025 in the State compliance examination of the Department issued by the Illinois Auditor General,<sup>17</sup> which reviewed SFYs 2023 and 2024—the two years following our audit scope.

We recommend that FWS require the Department to:

1. Implement a standardized process to address the payroll report backlog so that payroll costs can be properly allocated and WSFR grant drawdowns can occur timely.

**FWS Response:** FWS concurred with the recommendation and will ensure the actions taken by the Department fully address the issues identified in the audit report.

**Department Response:** The Department concurred with the recommendation and stated that it has already started implementing several corrective actions, such as clearing its payroll backlog for SFY 2020 through February 2024 and implementing a standard operating procedure for allocation of time and effort records. The Department identified several other actions it intends to take to implement this recommendation. For example, the Department said it plans to distribute a timekeeping memorandum mandating timely submission and approval and will implement monthly reconciliation reviews and quarterly checks. The target implementation date is March 9, 2027.

**OIG Comment:** Based on FWS' and the Department's responses, we consider this recommendation resolved. We will consider it implemented when FWS provides documentation to support that the Department has completed the actions outlined in its corrective action plan to implement a standardized process to ensure payroll costs can be properly allocated and WSFR grant drawdowns can occur timely.

2. Develop a process to ensure all invoices impacting WSFR grants are tracked and paid timely.

**FWS Response:** FWS concurred with the recommendation and will ensure the actions taken by the Department fully address the issues identified in the audit report.

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<sup>15</sup> *Risks Identified for U.S. Department of the Interior Grants Awarded to the Illinois Department of Natural Resources* (Report No. 2024-CGD-030), issued February 2025.

<sup>16</sup> *State of Illinois Department of Natural Resources State Compliance Examination for the Two Years Ended June 30, 2022*, released in July 2023.

<sup>17</sup> *State of Illinois Department of Natural Resources State Compliance Examination for the Two Years Ended June 30, 2024*, released in June 2025.

**Department Response:** The Department concurred with the recommendation and stated that it has already started implementing corrective actions to ensure invoices impacting WSFR grants are tracked and paid timely. For instance, the Department stated that it has developed a “process to track invoices within the Office of Resource Conservation” and has also automated workflows for invoice approvals and payments, among other things. The Department also said it intends to train personnel “on invoice tracking and system integration.” The target implementation date is March 9, 2027.

**OIG Comment:** Based on FWS’ and the Department’s responses, we consider this recommendation resolved. We will consider it implemented when FWS provides documentation to support that the Department has completed the actions outlined in its corrective action plan to ensure invoices impacting WSFR grants are tracked and paid timely.

3. Develop and implement written procedures, clear job responsibilities, and a process for supervisory review for all key aspects of the financial management and oversight of the Department’s WSFR grants, including drawdown preparation that ensures accurate reporting and allocation of grant costs.

**FWS Response:** FWS concurred with the recommendation and will ensure the actions taken by the Department fully address the issues identified in the audit report.

**Department Response:** The Department concurred with the recommendation and stated that it has already started implementing corrective actions, such as implementing a standard operating procedure for the allocation of time and effort records as well as defining job responsibilities for payroll allocation and timesheet approval. The Department said it plans to take additional actions, to include finalizing and implementing its drawdown procedure and incorporating supervisory review checklists into the drawdown process. The target implementation date is March 9, 2027.

**OIG Comment:** Based on FWS’ and the Department’s responses, we consider this recommendation resolved. We will consider it implemented when FWS provides documentation to support that the Department has completed the actions outlined in its corrective action plan, to include implementing written procedures, clarifying job responsibilities, and implementing a supervisory review process for all key aspects of the financial management and oversight of the Department’s WSFR grants to ensure accurate reporting and allocation of grant costs.

4. Provide project managers, division leaders, and other key stakeholders in the WSFR grant management process with timely access and cross-training on all areas needed to perform effective administration of the grants, including budget execution to manage grant projects effectively.

**FWS Response:** FWS concurred with the recommendation and will ensure the actions taken by the Department fully address the issues identified in the audit report.

**Department Response:** The Department concurred with the recommendation and stated that it has already started implementing corrective actions to ensure relevant personnel are provided timely access and cross-training on effective WSFR grant administration. For example, the Department stated that personnel can request access to view budgets and project information and that all staff have completed training related to Federal requirements for grants. The Department said it plans to take additional actions, to include creating tutorials on system navigation and developing a “cross-training plan for project managers and division leaders.” The target implementation date is March 9, 2027.

**OIG Comment:** Based on FWS’ and the Department’s responses, we consider this recommendation resolved. We will consider it implemented when FWS provides documentation to support that the Department has completed the actions outlined in its corrective action plan to provide relevant personnel in the WSFR grant management process with timely system access and cross-training needed to perform effective administration of grants.

5. Develop a strategy to enhance communication within the Department to ensure that both headquarters and field personnel receive prompt and adequate support to accomplish their WSFR grant missions effectively.

**FWS Response:** FWS concurred with the recommendation and will ensure the actions taken by the Department fully address the issues identified in the audit report.

**Department Response:** The Department concurred with the recommendation and stated that it has already started implementing corrective actions to enhance communication within the Department for WSFR grant missions. For example, the Department stated it has implemented quarterly meetings with all personnel, as well as “monthly Office of Resource Conservation management team meetings.” The Department said it plans to take additional actions, to include developing “communication protocol for WSFR grant administration” and “implementing guidance and procedure documents . . . on grant and fiscal processes.” The target implementation date is March 9, 2027.

**OIG Comment:** Based on FWS’ and the Department’s responses, we consider this recommendation resolved. We will consider it implemented when FWS provides documentation to support that the Department has completed the actions outlined in its corrective action plan to ensure enhanced communication for all relevant personnel to receive prompt, adequate support to accomplish WSFR grant missions.

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# Appendix 1: Scope and Methodology

## Audit Environment

In July 2023, shortly after we started our audit, the Illinois Auditor General issued a report<sup>18</sup> on the Illinois Department of Natural Resources that covered the same State fiscal years as our audit scope—SFYs ending June 30, 2021, and June 30, 2022. The report identified 37 findings, including 10 that were material weaknesses and 27 that were significant deficiencies, which highlighted deficiencies in the Department’s management of its State awards and grants, payroll, and the enterprise resource planning system. We determined that a significant number of the issues directly impact WSFR grants and funds; however, the dollar impact of the findings was not reported. We used the findings from the report as a basis for our risk assessment and not as the basis for the conclusions in our audit report.

Although some of these findings overlapped with our WSFR audit, we ultimately determined—in coordination with FWS—to continue with our audit as planned with a focus on the Illinois Auditor General’s findings as they relate to the Department’s WSFR grants where possible. FWS added that its primary concerns were to determine whether the State completed its grant projects as proposed and whether it allocated payroll properly to WSFR grants. As such, we revised our audit approach to more closely align with FWS’ concerns.

## Scope

We audited the Department’s use of WSFR grant funds awarded by FWS. The audit included expenditures of \$57 million covering 112 grants with activity and related transactions during the SFYs ending June 30, 2021, and June 30, 2022. Of these grants, we selected four high-dollar grants with significant drawdown activity to assess whether the Department could demonstrate program performance and provide sufficient, appropriate documentation to support the associated costs. We also evaluated how the Department accounted for its grant expenditures and managed its drawdown process for reimbursement of funds. For each of the four selected grants, we reviewed one drawdown and requested supporting documentation to verify the allowability and accuracy of the claimed costs. In addition, we reviewed records related to a real property acquisition and conducted an onsite observation to assess the condition and management of real property and 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 risks.
- Management should implement control activities through policies.
- Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

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<sup>18</sup> *State of Illinois Department of Natural Resources State Compliance Examination for the Two Years Ended June 30, 2022*, released in July 2023.

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

- Reviewing drawdown transactions for reimbursement by selecting four grants with significant high-dollar activity during the audit period. This encompassed:
  - Examining evidence supporting Department grant expenditures used as the basis for four drawdowns.<sup>19</sup>
  - Verifying the evidence of the Department’s WSFR grant performance and accomplishments.
- Gaining an understanding of the Department’s process for preparing and requesting drawdowns for its WSFR grants, as well as its grant proposal budgeting process.
- Retrieving and examining grant documentation, such as Federal Financial Reports (SF-425s) and FWS WSFR grant award agreements, to determine whether the drawdown amounts and the cost composition were consistent with the agreements.
- Reviewing the Department’s performance progress reports, Applications for Federal Assistance (SF-424s), and other supporting documentation to evaluate the progress of performance objectives.
- Interviewing Department leadership and employees across the organization, focusing on the Department’s accounting system, human resources, procurement, internal controls, and grant management.
- Inspecting equipment and other property that the Department used in its performance of WSFR grant activity and determining whether the Department used equipment funded by hunting and fishing license revenue for the administration of fish and wildlife program activities.
- Determining whether the Department charged the State’s unfunded pension liabilities 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.
- Reviewing other direct cost records to assess whether the costs are allowable, allocable, and reasonable.
- Determining whether the State passed required legislation assenting to the provisions of the Pittman-Robertson Wildlife Restoration Act and the Dingell-Johnson Sport Fish Restoration Act.
- Visiting sites throughout the State (see Appendix 2 for a list of sites visited).
- Observing the Department’s accommodations related to the Americans with Disabilities Act at sites visited.

We found deficiencies in internal control resulting in our finding relating to lack of effective administration of Federal funds that we discussed in the “Results of Audit” section of our report and made recommendations to address the issues.

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.

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<sup>19</sup> As noted in the “Background” section above, we reviewed initial supporting documentation and determined it to be inadequate. We later received revised support that demonstrated the Department’s total expenditures incurred on the four WSFR grants.

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 Illinois 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 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 four audits of costs the Department claimed on WSFR grants.<sup>20</sup> The recommendations in our 2006 and 2010 reports were related to questioned costs associated with activities that were not authorized under grant agreements, labor charges based on estimated hours instead of actual hours worked, land purchased with program income funds, and unsupported in-kind contributions. We determined that these recommendations have been implemented. Our 2013 audit report identified no findings. In our 2019 audit report, we questioned costs related to unsupported program income and license revenue, potential diversion of license revenue and fees, no standard operating procedures to identify license fee-eligible activities for the World Shooting and Recreation Complex, and unreported barter transactions. We determined that the Department took appropriate corrective actions, and we consider all recommendations implemented.

### **State Single Audit Reports**

We reviewed the Single Audit reports for the SFYs ending from 2016 through 2022 to identify control deficiencies or other reportable conditions that affect WSFR. In those reports, the Schedule of Expenditures of Federal Awards indicated \$126 million (combined) in Federal expenditures related to WSFR but did not include any direct findings related to WSFR, which was not deemed a major program for Statewide audit purposes.

### **Illinois Auditor General Audit Report**

We reviewed the State of Illinois Auditor General Office's compliance audit report on the Department. See the "Audit Environment" section above for more detailed information on our consideration of this report.

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<sup>20</sup> U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Illinois, Department of Natural Resources, From July 1, 2015, Through June 30, 2017 (Report No. 2018-CR-012), issued August 2019.

U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Illinois, Department of Natural Resources, From July 1, 2010, Through June 30, 2012 (Report No. R-GR-FWS-0004-2013), issued March 2013.

U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Grants Awarded to the State of Illinois, Department of Natural Resources, From July 1, 2007, Through June 30, 2009 (Report No. R-GR-FWS-0003-2010), issued July 2010.

U.S. Fish and Wildlife Service Federal Assistance Grants Administered by the State of Illinois, Department of Natural Resources, From July 1, 2002, Through June 30, 2004 (Report No. R-GR-FWS-0004-2005), issued March 2006.

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## Appendix 2: Sites Visited

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|  |   |
|--|---|
| Headquarters   | Springfield, IL                                   |
| Fish Hatchery  | Jake Wolf Memorial                                |
| State Fish and Wildlife Areas<br>With Boating Access | Kaskaskia River<br>Shelbyville<br>Snakeden Hollow |

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## Appendix 3: Underreporting of Actual Costs

We reviewed four grants with activity during the SFYs ending June 30, 2021, and June 30, 2022. We found a systemic underreporting of actual costs. Specifically, the Illinois Department of Natural Resources expended significantly more of its own State funds than was necessary, resulting in underreported actual costs of at least \$7,633,448. Within this amount, we found \$151,207 in overreported actual costs under Grant No. F20AF10010. However, we determined that the Department is receiving reimbursement for only what it is entitled to per its FWS grant agreement.

### Underreporting of Actual Costs

| <b>Grant No.</b> | <b>Drawdown Records</b> | <b>Actual Costs</b> | <b>Underreported Actual Cost Impact<sup>21</sup></b> |
|------------------|-------------------------|---------------------|--|
| F18AF00920       | \$4,074,203             | \$10,950,267        | \$6,876,064  |
| F20AF10044       | \$4,591,624             | \$5,476,874         | \$885,251  |
| F20AF10010       | \$5,154,792             | \$5,003,585         | (\$151,207)  |
| F21AF01453       | \$5,281,174             | \$5,304,514         | \$23,340   |
| <b>Total</b>     |                         |                     | <b>\$7,633,448</b>                                   |

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<sup>21</sup> The impact of underreported actual costs includes both the Federal and State share of grant expenditures.

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# Appendix 4: Responses to Draft Report

FWS' and the Department's responses to our draft report follow on page 16.



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Washington D.C. 20240



In Reply Refer To:  
FWS/ADCI/083916

Memorandum

To: Acting Midwest Assistant Regional Director, Office of Conservation Investment

From: Acting Assistant Director, Office of Conservation Investment MATTHEW  
FILSINGER

Digitally signed by MATTHEW  
FILSINGER  
Date: 2026.03.05 11:59:51 -05'00'

Subject: Draft Corrective Action Plan for DOI OIG Audit Report – Wildlife and Sport Fish  
Restoration Grants Awarded to the State of Illinois by the U.S. Fish and Wildlife  
Service, Report No. 2023-CGD-033, Issued January 21, 2026

The Headquarters Office, Division of Financial Assistance Support and Oversight (FASO) has reviewed the above-referenced Corrective Action Plan (CAP) and determined that the proposed corrective actions adequately address and resolve each of the auditors' recommendations.

In accordance with USFWS Service Manual Chapter 417 FW 1, we hereby concur with the CAP and will forward it, along with this signed memo, to the Office of Inspector General, U.S. Department of the Interior, by the March 9, 2026 due date.

If you have any questions concerning this matter or require further information, please contact Sherry Martin, FASO Compliance Branch Accountant, at 404-960-0927 or by email at [sherry\\_martin@fws.gov](mailto:sherry_martin@fws.gov).

Attachments



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Washington D.C. 20240



In Reply Refer To:  
FWS/R3/FASO

March 3, 2026

Memorandum

To: Acting Manager, FA Support and Oversight

From: Acting Midwest Assistant Regional Director, Conservation Investment **KAREN HERRINGTON**

Subject: Draft Corrective Action Plan for DOI OIG Audit Report – Wildlife and Sport Fish Restoration Grants Awarded to the State of Illinois by the U.S. Fish and Wildlife Service, Report No. 2023-CGD-033, Issued January 21, 2026

Digitally signed by  
KAREN HERRINGTON  
Date: 2026.03.03  
13:50:50 -06'00'

Attached for your review and approval is a draft Corrective Action Plan (CAP) prepared in response to the subject audit report. The CAP was collaboratively developed by the U.S. Fish and Wildlife Service, Region 3, and the Illinois Department of Natural Resources.

If you have any questions or need additional information, please contact me at 763-234-4705 or [karen\\_herrington@fws.gov](mailto:karen_herrington@fws.gov).

Attachments

**Corrective Action Plan**  
**Audit Report No. 2023-CGD-033**  
**Grants Awarded to the Illinois Department of Natural Resources (IDNR)**  
**From 07/01/2020 through 06/30/2022**  
**Wildlife and Sport Fish Restoration Program**

**General Response from the Agency**

The Illinois Department of Natural Resources (IDNR) generally concurs with the recommendations in the report. The audit period (SFYs 2021 and 2022) reflects a time of significant challenges, including high staff turnover, slow hiring, and loss of institutional knowledge within key offices. These issues were compounded by the State's simultaneous implementation of major changes: the Grants Accountability and Transparency Act (GATA), a new procurement system (BidBuy), a new grant management system (Amplifund), and a new accounting system (SAP). These transitions created an environment where efficient federal grant management was difficult to achieve.

It is important to note that IDNR received the original Notice of Potential Finding and Recommendations for this audit on 3/27/2024. The prolonged audit process – compounded by federal administration changes, staff realignments, and a government shutdown – has subjected IDNR's federal aid management to sustained scrutiny from elected officials, the press, and the public. We are deeply concerned that those same stakeholders may see the final audit report two years later and believe it is a newer audit identifying the same issues.

In fact, during the time that has elapsed since this audit began, IDNR has made substantial favorable progress toward implementing the OIG recommendations. A new executive team and key leadership positions have been established, including a Chief Fiscal Officer, Chief Internal Auditor, Chief Accountability Officer, and Director of the Office of Resource Conservation. Staffing levels have improved, fiscal professionals have been added across the agency, and staff have completed training in all systems. Processes for invoice management, timekeeping, and legacy grant handling have been documented and implemented, resulting in stronger compliance and operational efficiency.

For each of the recommendations below, we have noted steps already taken to implement the OIG recommendations. We will work diligently and responsively with FWS to ensure the new processes are sufficiently documented, that they address all the concerns raised in the audit report, and that they are consistently followed over time.

**Corrective Actions and Resolution of Recommendations**

**Recommendation #1:** We recommend that FWS require the Department to implement a standardized process to address the payroll report backlog so that payroll costs can be properly allocated and WSFR grant drawdowns can occur timely.

**FWS Response:** FWS concurs with the recommendation.

**Agency Response:** IDNR concurs with the recommendation and will implement a standardized process to address the payroll backlog. IDNR has already begun implementing corrective actions as follows:

**Actions Taken:**

- Payroll backlog cleared for SFY 2020–Feb 2024.
- Implemented Standard Operating Procedures (SOP) for Allocation of Time and Effort Records.
- Issued Policy Statement on Charging Personnel Costs to WSFR Grants.
- Training offered to all staff on changes to the updated timekeeping system

**Actions Planned:**

- Distribute Timekeeping Memo mandating timely submission and approval.
- Conduct staff training on new policy and SOP.
- Implement monthly reconciliation reviews and quarterly checks.
- Establish and publish drawdown schedule aligned with monthly/quarterly requirements.

**Status:** FWS considers this recommendation resolved but not yet implemented. We will review documentation submitted by IDNR to determine if the corrective actions taken fully address the issues described in the audit report and that those actions are well documented and consistently followed. Once we are confident of both, we will consider the recommendation implemented and will recommend that the OIG close the finding.

**Additional Information:**

Individuals at the agency responsible for resolving this issue:

- Ellen King, Chief Fiscal Officer
- Eric Michael, Acting Grants Fiscal Officer
- HR – IDNR

**Key Dates**

- 1. Target Implementation Date:** Tuesday, March 9, 2027  
(When IDNR will have fully implemented corrective actions and submitted evidence to FWS Regional Office for review.)
- 2. FWS Regional Office Review Completed:** Friday, May 7, 2027  
(When RO has completed review and, if in concurrence, forwarded the documentation along with a memo to the HQ Compliance Branch.)
- 3. HQ Compliance Branch Review Completed:** Friday, June 4, 2027  
(When HQ has completed review and, if in concurrence, forwarded the documentation along with a memo to PERMA.)
- 4. PERMA Review Completed:** Friday, June 4, 2027

(When PERMA has completed review, and if in concurrence, forwarded the documentation to OIG and requested that the finding be closed.)

**Recommendation #2:** We recommend that FWS require the Department to develop a process to ensure all invoices impacting WSFR grants are tracked and paid timely.

**FWS Response:** FWS concurs with the recommendation.

**Agency Response:** IDNR concurs with the recommendation and will develop a process to ensure invoices impacting WSFR grants are tracked and paid timely. IDNR has already begun implementing corrective actions as follows:

**Actions Taken:**

- Developed process to track invoices within the Office of Resource Conservation.
- Invoice payment status tracked in SAP.
- Automated workflows in SAP for invoice approvals and payments.
- Implemented monthly monitoring reports to verify timely invoice processing.

**Actions Planned:**

- Conduct staff training on invoice tracking and system integration.

**Status:** FWS considers this recommendation resolved but not yet implemented. We will review documentation submitted by IDNR to determine if the corrective actions taken fully address the issues described in the audit report and that those actions are well documented and consistently followed. Once we are confident of both, we will consider the recommendation implemented and will recommend that the OIG close the finding.

**Additional Information:**

Individuals at the agency responsible for resolving this issue:

- Nathan Grider, Director, Office of Resource Conservation
- Ellen King, Chief Fiscal Officer
- Eric Michael, Acting Grants Fiscal Officer

**Key Dates**

**1. Target Implementation Date:** Tuesday, March 9, 2027

(When IDNR will have fully implemented corrective actions and submitted evidence to FWS Regional Office for review.)

**2. FWS Regional Office Review Completed:** Friday, May 7, 2027

(When RO has completed review and, if in concurrence, forwarded the documentation along with a memo to the HQ Compliance Branch.)

**3. HQ Compliance Branch Review Completed:** Friday, June 4, 2027

(When HQ has completed review and, if in concurrence, forwarded the documentation along with a memo to PERMA.)

**4. PERMA Review Completed:** Friday, June 4, 2027

(When PERMA has completed review, and if in concurrence, forwarded the documentation to OIG and requested that the finding be closed.)

**Recommendation #3:** We recommend that FWS require the Department to develop and implement written procedures, clear job responsibilities, and a process for supervisory review for all key aspects of the financial management and oversight of the IDNR's WSFR grants, including drawdown preparation that ensures accurate reporting and allocation of grant costs.

**FWS Response:** FWS concurs with the recommendation.

**Agency Response:** IDNR concurs with the recommendation and will develop and implement as described. IDNR has already begun implementing corrective actions as follows:

Actions Taken:

- Implemented Policy Statement on Charging Personnel Costs.
- Implemented SOP for Allocation of Time and Effort Records.
- Defined job responsibilities for payroll allocation and timesheet approval.

Actions Planned:

- Finalize and implement Drawdown Procedure currently in draft.
- Issue Timekeeping Memo for timely submission and approval.
- Incorporate supervisory review checklists into drawdown process.
- Conduct training for fiscal staff and grant administrators on new procedures
- Provide clarification on position responsibilities within grant administration.

**Status:** FWS considers this recommendation resolved but not yet implemented. We will review documentation submitted by IDNR to determine if the corrective actions taken fully address the issues described in the audit report and that those actions are well documented and consistently followed. Once we are confident of both, we will consider the recommendation implemented and will recommend that the OIG close the finding.

**Additional Information:**

Individuals at the agency responsible for resolving this issue:

- Ellen King, Chief Fiscal Officer
- Eric Michael, Acting Grants Fiscal Officer
- Jennifer Wellman, Federal Aid Coordinator

**Key Dates**

1. **Target Implementation Date:** Tuesday, March 9, 2027

(When IDNR will have fully implemented corrective actions and submitted evidence to FWS Regional Office for review.)

**2. FWS Regional Office Review Completed:** Friday, May 7, 2027

(When RO has completed review and, if in concurrence, forwarded the documentation along with a memo to the HQ Compliance Branch.)

**3. HQ Compliance Branch Review Completed:** Friday, June 4, 2027

(When HQ has completed review and, if in concurrence, forwarded the documentation along with a memo to PERMA.)

**4. PERMA Review Completed:** Friday, June 4, 2027

(When PERMA has completed review, and if in concurrence, forwarded the documentation to OIG and requested that the finding be closed.)

**Recommendation #4:** We recommend that FWS require the Department to provide project managers, division leaders, and other key stakeholders in the WSFR grant management process with timely access and cross-training on all areas needed to perform effective administration of the grants, including budget execution to manage grant projects effectively.

**FWS Response:** FWS concurs with the recommendation.

**Agency Response:** IDNR concurs with the recommendation and will provide timely access and cross-training on effective WSFR grant administration. IDNR has already begun implementing corrective actions as follows:

**Actions Taken:**

- IDNR personnel can request access to Amplifund to view budgets and project information.
- Staff completed 2 CFR 200 training (certificates available).
- Grants staff provide ongoing support for Amplifund access requests.

**Actions Planned:**

- Create video tutorials for Amplifund navigation and grant information access.
- Schedule refresher training sessions on WSFR-specific processes.
- Develop cross-training plan for project managers and division leaders.

**Status:** FWS considers this recommendation resolved but not yet implemented. We will review documentation submitted by IDNR to determine if the corrective actions taken fully address the issues described in the audit report and that those actions are well documented and consistently followed. Once we are confident of both, we will consider the recommendation implemented and will recommend that the OIG close the finding.

**Additional Information:**

Individuals at the agency responsible for resolving this issue:

- Jennifer Wellman, Federal Aid Coordinator
- Ellen King, Chief Fiscal Officer
- Eric Michael, Acting Fiscal Officer
- HR – IDNR

### **Key Dates**

- 1. Target Implementation Date:** Tuesday, March 9, 2027  
(When IDNR will have fully implemented corrective actions and submitted evidence to FWS Regional Office for review.)
- 2. FWS Regional Office Review Completed:** Friday, May 7, 2027  
(When RO has completed review and, if in concurrence, forwarded the documentation along with a memo to the HQ Compliance Branch.)
- 3. HQ Compliance Branch Review Completed:** Friday, June 4, 2027  
(When HQ has completed review and, if in concurrence, forwarded the documentation along with a memo to PERMA.)
- 4. PERMA Review Completed:** Friday, June 4, 2027  
(When PERMA has completed review, and if in concurrence, forwarded the documentation to OIG and requested that the finding be closed.)

**Recommendation #5:** We recommend that FWS require the Department to develop a strategy to enhance communication within the IDNR to ensure that both headquarters and field personnel receive prompt and adequate support to accomplish their WSFR grant missions effectively.

**FWS Response:** FWS concurs with the recommendation.

**Agency Response:** IDNR (“the agency”) concurs with the recommendation and will develop a strategy to enhance communication within the agency for WSFR grant missions. IDNR has already begun implementing corrective actions as follows:

#### Actions Taken:

- Implemented quarterly all-staff sessions called Straight Talk Tuesdays.
- Implemented monthly Office of Resource Conservation management team meetings.
- Transitioning to SharePoint and Teams for centralized communication among functional programmatic areas within the agency.
- Development of policies and procedures has provided staff with clearer expectations and guidance on who to contact and when.
- Conducted monthly federal aid draw meetings to ensure all stakeholders were aware of what draws were occurring and what draws were expected to occur to ensure all documentation was completed.

#### Actions Planned:

- Continue quarterly Straight Talk Tuesday sessions and publish summaries.

- Expand SharePoint and Teams use for WSFR-related updates.
- Develop communication protocol for WSFR grant administration.
- Continue implementing guidance and procedure documents for staff on grant and fiscal processes.

**Status:** FWS considers this recommendation resolved but not yet implemented. We will review documentation submitted by IDNR to determine if the corrective actions taken fully address the issues described in the audit report and that those actions are well documented and consistently followed. Once we are confident of both, we will consider the recommendation implemented and will recommend that the OIG close the finding.

**Additional Information:**

Individuals at the agency responsible for resolving this issue:

- Natalie Finnie, Director
- Samuel Strain, Chief of Staff
- Nathan Grider, Director, Office of Resource Conservation

**Key Dates**

- 1. Target Implementation Date:** Tuesday, March 9, 2027  
(When IDNR will have fully implemented corrective actions and submitted evidence to FWS Regional Office for review.)
- 2. FWS Regional Office Review Completed:** Friday, May 7, 2027  
(When RO has completed review and, if in concurrence, forwarded the documentation along with a memo to the HQ Compliance Branch.)
- 3. HQ Compliance Branch Review Completed:** Friday, June 4, 2027  
(When HQ has completed review and, if in concurrence, forwarded the documentation along with a memo to PERMA.)
- 4. PERMA Review Completed:** Friday, June 4, 2027  
(When PERMA has completed review, and if in concurrence, forwarded the documentation to OIG and requested that the finding be closed.)

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# Appendix 5: Status of Recommendations

| Recommendation  | Status   | Action Required               |
|---|--|-------------------------------|
| <b>2023-CGD-033-01</b><br>We recommend that FWS require the Department to implement a standardized process to address the payroll report backlog so that payroll costs can be properly allocated and WSFR grant drawdowns can occur timely.   |  |                               |
| <b>2023-CGD-033-02</b><br>We recommend that FWS require the Department to develop a process to ensure all invoices impacting WSFR grants are tracked and paid timely.   |  |                               |
| <b>2023-CGD-033-03</b><br>We recommend that FWS require the Department to develop and implement written procedures, clear job responsibilities, and a process for supervisory review for all key aspects of the financial management and oversight of the Department's WSFR grants, including drawdown preparation that ensures accurate reporting and allocation of grant costs. | <b>Resolved:</b> FWS regional officials concurred with the recommendations and will work with personnel from the Illinois Department of Natural Resources to implement corrective actions. | We will track implementation. |
| <b>2023-CGD-033-04</b><br>We recommend that FWS require the Department to provide project managers, division leaders, and other key stakeholders in the WSFR grant management process with timely access and cross-training on all areas needed to perform effective administration of the grants, including budget execution to manage grant projects effectively.               |  |                               |
| <b>2023-CGD-033-05</b><br>We recommend that FWS require the Department to develop a strategy to enhance communication within the Department to ensure that both headquarters and field personnel receive prompt and adequate support to accomplish their WSFR grant missions effectively.   |  |                               |

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

## **REPORT FRAUD, WASTE, ABUSE, AND MISMANAGEMENT**

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