



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

# **The National Park Service Should Increase Monitoring and Oversight To Protect the Integrity and Recreational Value of the Land and Water Conservation Fund State Side Program**

**This is a revised version of the report prepared for public release.**



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

DEC 04 2023

Memorandum

To: Charles F. Sams III  
Director, National Park Service

From: Kathleen Sedney   
Assistant Inspector General for Audits, Inspections, and Evaluations

Subject: Final Evaluation Report – *The National Park Service Should Increase Monitoring and Oversight To Protect the Integrity and Recreational Value of the Land and Water Conservation Fund State Side Program*  
Report No. 2021–ER–026

This memorandum transmits our evaluation report on the National Park Service’s (NPS’) Land and Water Conservation Fund State Side program for fiscal years 2017 through 2020.

We will track open recommendations for resolution and implementation. In our report, we request that the NPS provide us with missing or revised target implementation dates for six recommendations. If the revised dates provided are more than 1 year from this report’s issuance date, the NPS should establish mitigating measures until the recommendations are fully implemented.<sup>1</sup> 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 about this report, please contact me at [aie\\_reports@doioig.gov](mailto:aie_reports@doioig.gov).

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<sup>1</sup> The Good Accounting Obligation in Government Act, Pub. L. No. 115–414, 132 Stat. 5430 (2019), requires that all recommendations that are not implemented and have been open more than 1 year be reported in the annual budget justification submitted to Congress.

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# Contents

Results in Brief ..... 1

Introduction..... 3

    Objectives..... 3

    Background ..... 3

        NPS LWCF Grant Program..... 4

        LWCF Grant Program Requirements ..... 6

        NPS SLAD Roles and Responsibilities ..... 6

Results of Evaluation ..... 8

    The NPS Did Not Monitor States’ Administration of LWCF Funds ..... 8

        The NPS Did Not Maintain an Accurate and Complete LWCF Real Property Listing and  
        Did Not Ensure States Conducted Post-Completion Inspections ..... 9

        The NPS Did Not Conduct Required Program Reviews..... 13

        The NPS Did Not Collect and Analyze Mandatory Financial and Performance Reports..... 15

        The NPS Regional Offices Did Not Track the States’ Eligibility To Receive LWCF  
        Funds ..... 16

        The NPS Did Not Ensure Land Appraisal Requirements Were Met ..... 18

    The NPS Lacks Policy for Grant Award Processes and Timelines, Leading to Award  
    Delays..... 20

        The NPS Did Not Meet Informal Targets for Awarding LWCF Formula Funds ..... 20

        The NPS Did Not Meet Informal Targets for Awarding LWCF Competitive ORLP  
        Funds ..... 23

        The NPS Lacks a Policy for Grant Award Timelines ..... 25

Conclusion and Recommendations..... 27

    Conclusion..... 27

    Recommendations Summary..... 27

Appendix 1: Scope and Methodology..... 36

Appendix 2: Monetary Impact ..... 38

Appendix 3: List of Abbreviations ..... 39

Appendix 4: Response to Draft Report..... 40

Appendix 5: Status of Recommendations..... 49

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# Results in Brief

## What We Evaluated

Congress enacted the Land and Water Conservation Fund (LWCF) Act in 1964 to conserve lands and water resources for increased and improved outdoor recreation opportunities throughout the United States.<sup>1</sup> All LWCF sites must be maintained for outdoor recreation in perpetuity for present and future generations. We evaluated the National Park Service's (NPS') LWCF State Side program—which provides grants to State Governments to create and expand outdoor recreation—for fiscal years (FYs) 2017 through 2020. We reviewed the extent to which the NPS monitored the program to ensure States adhered to the Act, U.S. Department of the Interior (DOI) policies, the LWCF Manual,<sup>2</sup> and other relevant Federal regulations. We also reviewed the grant award process to determine whether the NPS awarded and distributed LWCF grants in accordance with the LWCF Manual and the Notice of Funding Opportunity guidelines.

## What We Found

We found that the NPS did not adequately monitor States' administration of LWCF funds. Notwithstanding policies and regulations requiring the States to provide such information to the DOI on a regular basis, the NPS did not maintain an accurate or complete LWCF real property listing to account for LWCF project sites in all 56 States, territories, and the District of Columbia<sup>3</sup> or ensure that States completed post-completion inspection reports to verify LWCF sites were used in accordance with the Act. The NPS also failed to conduct program reviews, did not collect and analyze financial and performance reports in some cases, and did not track the States' eligibility to receive funds. Additionally, we found the NPS did not ensure that States complied with the requirements for land acquisition, causing us to question \$454,500 (\$227,250 Federal share) spent on a noncompliant appraisal as an unallowable cost. NPS officials stated that these deficiencies occurred due to an inaccurate real property database, lack of staff and funding, and inoperable reporting systems.

In addition, we found that the NPS did not have written policies defining the amount of time it should take to award project grants to recipients and did not track informally established targets. As a result, the NPS missed its own informal grant application approval target dates by as many as 515 days. According to State officials with whom we spoke, the NPS' delays in approving LWCF grant applications limited States' access to LWCF funds and created State program inefficiencies, such as construction project delays; inflated project costs; and, in some instances, the cancellation of potential projects.

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<sup>1</sup> Land and Water Conservation Fund Act of 1965, 54 U.S.C. §§ 200301–200310.

<sup>2</sup> NPS, *Land and Water Conservation Fund State Assistance Program, Federal Financial Assistance Manual*, Vol. 69, effective October 1, 2008.

<sup>3</sup> For reporting purposes, our reference to “States” includes the 50 States, American Samoa, Guam, Northern Mariana Islands, Virgin Islands, Puerto Rico, and the District of Columbia.

## **Why This Matters**

LWCF State Side funding levels have significantly increased from \$110 million in FY 2017 to \$258 million in FY 2020 to \$443 million in FY 2021. While these increases present opportunities to further the impact of the State Side program, they also amplify the importance of monitoring LWCF real property to avoid loss of property and to reduce the potential for ineligible costs and mismanagement of LWCF funds, which could threaten the success of the program.

## **What We Recommend**

We make 13 recommendations that, if implemented, will improve the NPS' performance of administrative, oversight, and monitoring responsibilities for the LWCF State Side program.

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# Introduction

## Objectives

Our objectives were to determine whether:

1. The National Park Service (NPS) monitored the Land and Water Conservation Fund (LWCF) State Side program to ensure States adhered to the LWCF Act, the LWCF Manual, U.S. Department of the Interior (DOI) policies, and other relevant Federal regulations.
2. The NPS awarded and distributed LWCF grants in accordance with the LWCF Manual and the Notice of Funding Opportunity guidelines.

See Appendix 1 for our audit scope and methodology, Appendix 2 for a summary of the monetary impact, and Appendix 3 for a list of abbreviations.

## Background

Congress enacted the LWCF Act, hereafter referred to as the Act, in 1964 to preserve, develop, and assure access to outdoor recreation, thereby increasing participation in outdoor recreation and aiming to strengthen the health and vitality of American citizens.<sup>4</sup> The Act authorized the LWCF for a 25-year period. It was then extended for another 25 years and expired on September 30, 2015. On March 12, 2019, the John D. Dingell Jr. Conservation, Management, and Recreation Act permanently authorized the LWCF.<sup>5</sup>

The LWCF is funded by the Federal motorboat fuel tax and surplus property sales, oil and gas leases on the Outer Continental Shelf, and the Gulf of Mexico Energy Security Act of 2006.<sup>6</sup> From fiscal years (FYs) 1966 through 1977, annual appropriations for the LWCF were authorized to increase from \$100 million to \$300 million. In 1977, an amendment to the Act increased the program's annual authorization from \$300 million to \$900 million.<sup>7</sup> Since then, however, Congress has funded the full amount only once—in FY 1998 (see Figure 1). The Great American Outdoors Act, which Congress enacted on August 4, 2020, authorized the LWCF to receive the full \$900 million annually.<sup>8</sup>

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<sup>4</sup> Land and Water Conservation Fund Act of 1965, 54 U.S.C. §§ 200301–200310.

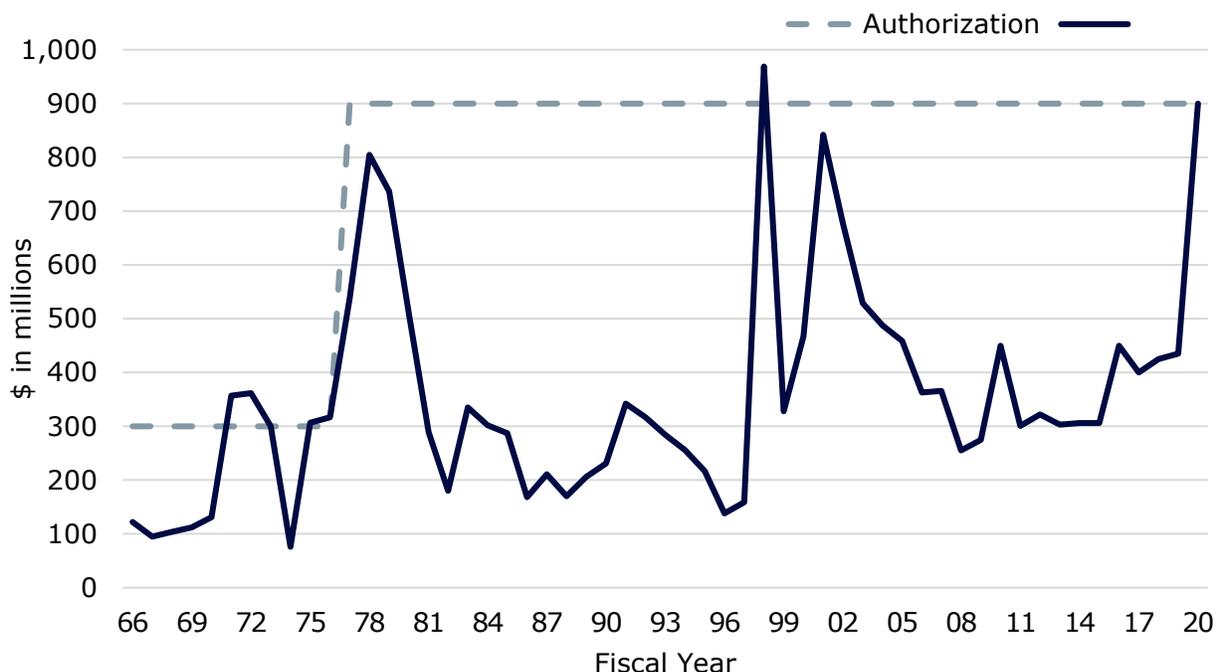
<sup>5</sup> John D. Dingell, Jr. Conservation, Management, and Recreation Act, Pub. L. No. 116–9, 133 Stat. 580, 754–55 (2019).

<sup>6</sup> Gulf of Mexico Energy Security Act of 2006, Pub. L. No. 109–432, 120 Stat. 2922, 3000–04 (2006).

<sup>7</sup> 54 U.S.C. § 200302(c)(1).

<sup>8</sup> For FY 2020 and each fiscal year thereafter, the LWCF is authorized to receive full funding of the \$900 million annotated in 54 U.S.C. § 200302(c)(1).

**Figure 1: LWCF Authorization vs. Actual Funding FYs 1966 to 2020<sup>9</sup>**



Source: Congressional Research Service.

### **NPS LWCF Grant Program**

The NPS LWCF program has two primary purposes—the “Federal Side” focuses on the Federal acquisition of lands, waters, and interests for recreation management objectives, and the “State Side” provides grants to State and local governments. The NPS State and Local Assistance Programs Division (SLAD) within the Washington Support Office works with the Midwest and Southeast Regions to administer the LWCF State Side program. The State Side program offers two types of State assistance grants—formula grants and Outdoor Recreation Legacy Partnership (ORLP) program grants.

Since the Act went into effect in January 1965, formula grants are apportioned to States each fiscal year according to a formula contained in the Act. To receive formula grants, States must submit project applications to the NPS, which then obligates apportioned funds for use on approved projects. In 2014, Congress appropriated and designated supplemental LWCF funds for a nationally competitive grant program to provide grants to economically disadvantaged urban communities with limited or no access to nearby outdoor recreation. The NPS created the ORLP grants program in direct response to Congress’ directive. For ORLP grant selection, States submit project proposals for the NPS to screen for eligibility and rank through a technical review and merit panel process.

<sup>9</sup> FY 1998 was the first year LWCF appropriations exceeded the authorized amount of the \$900 million. The total of \$969 million included \$270 million in annual funding, \$627 million to acquire Headwaters Forest in California and New World Mine near Yellowstone National Park, and \$72 million for other purposes.

The SLAD distributes both formula and ORLP grants on a matching<sup>10</sup> basis for up to 50 percent of allowable project costs to the 56 States, territories, and the District of Columbia.<sup>11</sup> LWCF grants are used for planning,<sup>12</sup> acquiring lands and waters, and developing facilities for outdoor recreation. Outdoor recreation projects include parks, sports complexes, trails, pools, sport fields, playgrounds, and dog parks. For example, the Wai’anapanapa Boardwalk LWCF site received \$500,000 in LWCF funds from FY 2016 through 2017 (see Figure 2).

**Figure 2: Photo of Wai’anapanapa Boardwalk LWCF Site in Maui, HI**



Source: NPS.

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<sup>10</sup> Matching is a cost-sharing concept that requires States to contribute a specified portion of the total grant. For example, for most LWCF grants, the Federal Government provides 50 percent of a grant’s project costs, and the respective State provides the other 50 percent.

<sup>11</sup> Pursuant to 48 U.S.C. § 1469a(d), “Congressional declaration of policy respecting ‘Insular Areas,’” LWCF grants to eligible territories may receive 100-percent assistance.

<sup>12</sup> Planning pertains to developing and updating the required Statewide Comprehensive Outdoor Recreation Plan or Open Project Selection Process. This use is authorized only for formula grants.

## **LWCF Grant Program Requirements**

States participating in the LWCF must comply with the Act, Federal regulations, applicable Federal laws, and terms and conditions of grants. The LWCF Manual sets forth administrative procedures and requirements of the Act and serves as a basic reference for those administering, managing, and overseeing the LWCF State Side program.<sup>13</sup>

To participate in the LWCF State Side program, States must complete a Statewide Comprehensive Outdoor Recreation Plan (SCORP)<sup>14</sup> and update it at least once every 5 years.<sup>15</sup> States must agree to manage, operate, and maintain LWCF-assisted sites for public outdoor recreation in perpetuity. The SCORP identifies and prioritizes a State's public outdoor recreation needs. States must also develop an Open Project Selection Process (OPSP) to provide objective criteria and standards for grant selection of projects identified in the State's SCORP.<sup>16</sup> To maintain eligibility in the program, the NPS must approve a State's SCORP before the State's current SCORP expires. The LWCF Manual requires the State's Governor to approve the SCORP and certify that ample opportunity for public participation took place in the plan's development.<sup>17</sup>

The State's Governor must also appoint a State liaison officer. The State liaison officer is responsible for complying with and enforcing the LWCF Manual requirements, including implementing and maintaining a SCORP; evaluating and selecting projects in accordance with the State's OPSP; preparing and submitting applications for LWCF funding; managing apportioned LWCF funds and individual grant awards; and inspecting project sites to ensure proper completion, operation, maintenance, and stewardship of LWCF-assisted areas.<sup>18</sup>

## **NPS SLAD Roles and Responsibilities**

The NPS Washington Support Office's SLAD monitors and provides direction for the LWCF program, manages LWCF grant funds, tracks States' funding, and establishes grant award project accounts. The NPS' Midwest Region located in Omaha, Nebraska, and Southeast Region located in Atlanta, Georgia, work directly with the States. They are responsible for reviewing SCORP and related OPSP projects, processing grants, conducting program reviews, and providing oversight over grants and post-award requirements to ensure compliance with Federal, State, and

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<sup>13</sup> The LWCF Manual in effect during our review was NPS *Land and Water Conservation Fund State Assistance Program, Federal Financial Assistance Manual*, Vol. 69, effective October 1, 2008. The NPS has since updated the LWCF Manual to Vol. 71, effective March 11, 2021. Unless otherwise noted, all discussions of the LWCF Manual in this report refer to the procedures set forth in Vol. 69.

<sup>14</sup> 54 U.S.C. § 200305(d).

<sup>15</sup> LWCF Manual, Vol. 69, Chapter 1-2(5), "State planning and project selection requirements."

<sup>16</sup> *Id.*

<sup>17</sup> *Id.* at Chapter 2-3(6), "Submission of plan documentation."

<sup>18</sup> *Id.* at Chapter 1-3(8), "Program administration."

local environmental requirements.<sup>19</sup> Each region employs grant agreement officers, grant managers, program officers, and compliance officers to administer the LWCF State Side program and grants.

During our evaluation, we reviewed five States from the NPS’ Midwest Region and five States from the NPS’ Southeast Region (see Figure 3). We also reviewed five State grants (see Appendix 1).

**Figure 3: States Reviewed FY 2017 through FY 2020**

<b>Region</b>	<b>State</b>	<b>No. Active Grants</b>	<b>Active Grant Amounts (\$)</b>	<b>No. LWCF Sites (Estimates)</b>
Midwest	California	26	30,325,672	1,500
	Illinois	28	13,367,274	1,000
	Minnesota	45	11,523,906	920
	Nebraska	51	6,161,927	400
	Wisconsin	38	13,463,513	1,826
Southeast	Connecticut	12	4,652,741	347
	Florida	64	145,025,483	725
	Massachusetts	35	10,587,410	550
	New York	32	38,713,306	1,400
	West Virginia	53	4,813,511	350

<sup>19</sup> The National Environmental Policy Act of 1969 (42 U.S.C. § 4321 *et seq.*), also referred to as NEPA, requires Federal agencies to assess the environmental impact of their proposed actions on the human environment, including decisions on adopting Federal land management actions. For LWCF project proposals, the NPS coordinates NEPA compliance with Federal, State, and local environmental requirements.

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## Results of Evaluation

We found that the NPS did not adequately monitor States' administration of LWCF funds. Federal regulations, DOI policies, and the LWCF Manual set forth numerous monitoring requirements that the NPS did not implement or follow. For example, the NPS did not maintain an accurate or complete listing of LWCF project sites or ensure that required post-completion inspections were conducted. The NPS also failed to conduct required State program reviews, did not collect and analyze financial and performance reports in some cases, and did not track the States' eligibility to receive funds. Additionally, we found the NPS did not ensure that States complied with the requirements for land acquisition, causing us to question \$454,500 (\$227,250 Federal share) spent on a noncompliant appraisal as an unallowable cost. NPS officials stated that these deficiencies occurred due to an inaccurate real property database, lack of staff and funding, and inoperable reporting systems. Furthermore, the NPS did not have written policies defining the amount of time it should take to award project grants to recipients and did not track informally established targets. As a result, the NPS missed its informal grant award target dates for both formula and ORLP grants by as many as 515 days.

Regardless of the reasons for these deficiencies, as a result, there is no assurance that LWCF State Side program goals and objectives are being achieved. Further, without the NPS' effective oversight and monitoring, the LWCF State Side program is at an increased risk of loss of property and mismanagement of funds.

### **The NPS Did Not Monitor States' Administration of LWCF Funds**

We found that the NPS did not monitor the States' administration of LWCF funds in accordance with the Act, the LWCF Manual, and other relevant Federal regulations. Specifically, the NPS did not:

- Maintain an accurate and complete real property listing to account for LWCF project sites. Without a property listing, the NPS cannot determine whether LWCF sites were continuously used for outdoor recreation purposes as required. Further, because the NPS did not maintain this list, it did not ensure States conducted required post-completion inspections.
- Conduct required program reviews to assess the States' effectiveness in administering LWCF grants.
- Gather and analyze the required financial and performance reports for active grants in some States to ensure each State met the 50-percent matching requirement and achieved grant project performance goals.
- Track States' eligibility to receive LWCF funds.

- Review LWCF appraisals for compliance unless conducting a “spot check.” As a result, we questioned as unallowable \$454,500 (\$227,250 Federal share) associated with an appraisal that did not comply with applicable standards. See Appendix 2 for a summary of the monetary impact.

## **The NPS Did Not Maintain an Accurate and Complete LWCF Real Property Listing and Did Not Ensure States Conducted Post-Completion Inspections**

The NPS and States are both responsible for complying with and enforcing the Act. Section 6(f)(3) of the Act requires all property acquired, improved, or developed with LWCF funds to be perpetually maintained and operated for public outdoor recreation use.<sup>20</sup> Regardless of the funding amount, the Federal Government retains a lifetime interest (also referred to as Federal interest<sup>21</sup>) in all LWCF project sites. In 2019, the DOI started requiring that States submit a Federal interest Real Property Status Report to the NPS Financial Assistance Officer at least every 5 years. States must use the U.S. Office of Management and Budget’s (OMB’s) Real Property Status Report Standard Form to report the status of land or the Federal interest in land.<sup>22</sup> Furthermore, according to DOI policy, the NPS must maintain a record of land acquired with LWCF funds.<sup>23</sup> At a minimum, the record must include the Federal award identifier number and information sufficient to document interest, authorized purpose, legal description, location, and size of the land parcel. The combination of these criteria requires States to report on the status of real property associated with the LWCF and for the NPS to maintain that information to facilitate monitoring all LWCF sites for compliance with the Act.

### *Inaccurate and Incomplete LWCF Real Property List*

Notwithstanding these requirements, we found the NPS has not maintained an accurate or complete LWCF real property listing to adequately account for all LWCF project sites, with some sites dating back to 1965 when the program was initiated. When we requested this information during our evaluation, the NPS generated a real property list from its grant database but stated that this database does not accurately report LWCF sites. NPS officials explained that the grant-generated list was inaccurate because the system created duplicates when a site received more than one LWCF grant and underreported sites that were part of a general grant, such as a grant to repair all bathrooms or playgrounds at LWCF sites within a district. Additionally, the database the NPS used to generate its real property listing did not satisfy Federal real property record reporting requirements, which must include information sufficient to

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<sup>20</sup> 54 U.S.C. § 200305(d).

<sup>21</sup> Federal interest is the Federal Government’s share in a property, such as land or building, based on Federal funding that went toward acquiring or upgrading the real property.

<sup>22</sup> If the interest in the land will be held for 15 years or more, 2 C.F.R. § 1402.329(d) requires recipients to submit an OMB Standard Form–429 Attachment A (General Reporting) within 1 year of the period of performance end date of the award and then, at a minimum, every 5 years thereafter. This requirement was effective October 29, 2019, and included awards issued prior to that date.

<sup>23</sup> DOI–PGM–POL, Reference No. 0003, Version No. 1, *DOI Requirements for Land Purchased through Financial Assistance Actions*, dated December 31, 2019.

document the Federal interest, authorized purpose, legal description, location, and size of land parcel.<sup>24</sup>

Without the required LWCF real property listing, the NPS is unable to account for all LWCF real property to ensure sites are perpetually used to promote public outdoor recreation in accordance with the Act. Maintaining an accurate LWCF real property listing is also necessary to track and identify all LWCF sites to prevent loss and unauthorized conversions and ensure all sites comply with the requirements in the Act.

### *Lack of Post-Completion Inspection Reports*

In addition to maintaining LWCF real property, the LWCF Manual requires States to submit a post-completion inspection report on property acquired and developed with LWCF funds every 5 years to ensure the property is not converted to uses other than public outdoor recreation without NPS approval.<sup>25</sup> The first post-completion inspection report is due within 5 years of the final reimbursement of the project. The LWCF Manual further details post-completion and perpetual stewardship responsibilities for maintaining and operating LWCF-funded sites.<sup>26</sup> These responsibilities include, but are not limited to:

- Maintaining sites to appear attractive and inviting to the public.
- Providing sanitation and sanitary facilities.
- Ensuring accessibility and safety for public use.
- Posting an LWCF acknowledgement sign at each site.

Following these requirements, States design their own post-completion inspection report forms to conduct onsite post-completion inspections.<sup>27</sup>

However, we found that the NPS did not ensure States completed post-completion inspections. States we reviewed did not fully complete required post-completion inspection reports, and the NPS did not enforce the States' post-completion inspection reporting requirements. Specifically, the NPS did not track whether the States submitted the post-completion inspection reports. In addition, 7 of the 10 States in our sample reported they did not complete the required post-completion inspections (see Figure 4 for the explanations the States provided).

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<sup>24</sup> DOI-PGM-POL Reference No. 0003.

<sup>25</sup> LWCF Manual, Vol. 69, Chapter 8-16(M), "Post-Completion Inspections."

<sup>26</sup> *Id.*

<sup>27</sup> For sites States deemed noncompliant involving civil rights violations, gross operations, maintenance deficiencies, significant change of use, conversion, or nondevelopment, States are required to provide the NPS with a post-completion inspection report within 90 days of inspection. For compliant sites, States are required to retain post-completion inspection reports in a file and report only project site numbers and inspection dates. By September 30 each year, States must submit a listing of all sites inspected within that year to the NPS.

**Figure 4: State Explanations for Not Performing Post-Completion Inspections**

<b>State</b>	<b>Explanation</b>
California	<i>COVID-19 restrictions and inaccessible sites:</i> The State said COVID-19 travel restrictions and remote sites that were inaccessible due to weather or were condemned due to wildfires hindered fulfilling post-completion inspection requirements. The State represented that it has approximately 1,500 LWCF sites.
Connecticut	<i>Limited workforce:</i> The State said that it is partnering with subrecipients to complete post-completion inspection requirements. In the past, the State hired temporary seasonal staff to inspect its 350+ LWCF sites.
Florida	<i>Limited workforce:</i> The State reported that it is “trying its best” and that it has only 3 team members to complete post-completion inspection requirements for more than 700 LWCF sites.
Illinois	<i>Limited workforce and lack of training:</i> The State employee who worked on the LWCF program for more than 2 years reported being unaware of the State’s responsibility to annually report all LWCF post-completion inspection project site numbers and inspection dates to the NPS. The State employee said the State was likely not up to date on its 5-year post-completion inspections but represented that it was a priority the State planned to address after hiring more staff. The State represented that it currently has less than 1 full-time employee to monitor approximately 1,000 LWCF sites but is recruiting 3 new staff positions; each new position will dedicate 25 percent of work time to the LWCF.
Nebraska	<i>Limited workforce:</i> The State had 1 staff member who devoted approximately 50 to 70 percent of time to the LWCF program, and State officials estimated the State had conducted onsite post-completion inspections for 10 percent of its approximately 300 to 400 LWCF sites. <sup>28</sup> In 2008, the State hired one additional employee specifically to conduct all its onsite post-completion inspections; that process took 6 to 7 months to complete. The State reported that, since 2008, the majority of LWCF sites have not been inspected, the NPS had not contacted State officials regarding post-completion inspection reports. The State also said that post-completion inspections were “a lower priority” for the State.
New York	<i>COVID-19 restrictions:</i> The State said it has 60 to 70 percent of its post-completion inspections completed and strives to reach 80 percent; however, the COVID-19 pandemic delayed this goal.
Wisconsin	<i>COVID-19 restrictions:</i> The State said that COVID-19 restrictions did not allow the State to conduct post-completion inspections in 2020; however, the State resumed inspections 2021. The State said it has 1,826 LWCF sites.

<sup>28</sup> The State of Nebraska estimated its LWCF inventory count as 300 to 400 because the State did not have a preexisting list of its LWCF inventory.

Some State officials said that in the past they hired temporary seasonal staff, contracted services, and allowed subrecipients to self-report—a practice the NPS acknowledged could create validity issues—to fulfill post-completion and perpetual stewardship requirements.<sup>29</sup>

In the past, the NPS provided States with a central data collection reporting system to submit post-completion inspection reports. The electronic reporting system allowed States to upload onsite post-completion inspection reports into the database and provided a reporting feature that tracked when sites were due for post-completion inspections. However, the NPS said it decommissioned this reporting system in 2019 because it was antiquated and posed security vulnerabilities.

The NPS has not implemented a new post-completion inspection report tracking mechanism since decommissioning this system. One of the two NPS regional managers said States can still send post-completion inspection reports to NPS regional offices by email or mail, but this individual reported that the NPS region did not enforce the option because, according to the regional manager, the manual system was “a lot of paperwork and it got cumbersome.” That is, although the NPS no longer requests reports, it does not reject reports if States choose to send them.

Without a complete and accurate real property listing and a system for tracking post-completion inspections, the NPS cannot ensure States are submitting all required post-completion inspection reports. The NPS should use these inspection reports to ensure States continuously operate, maintain, and safeguard property acquired or developed with LWCF funds solely for public outdoor recreation in accordance with the Act requirements.

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<sup>29</sup> On October 14, 2022, we issued a management advisory, *Availability of Administrative Funds for Land and Water Conservation Fund State Side Grants* (Report No. 2021–ER–026–A). We reported that the NPS did not provide funding to support program administrative costs, such as salaries and expenses for State employees with responsibility for administering grants, monitoring projects, and visiting sites to confirm the property still serves LWCF purposes. We recommended the NPS consult with the Office of the Solicitor to clarify the NPS’ authority to provide States with administrative assistance. Instead, the NPS sought an update to 54 U.S.C. § 200305 to include language authorizing the NPS to provide States with LWCF administrative grants. On December 19, 2022, under the Fiscal Year 2023 Omnibus Bill (Pub. L. No. 117–328, § 121), the NPS received explicit authority to retain up to 7 percent of the State Conservation Grants program to provide States with LWCF grants to support State program administrative costs, and the NPS stated its intention to provide States with LWCF administrative grants.

## Recommendations

We recommend that the National Park Service:

1. Comply with DOI-PGM-POL Reference No. 0003, which requires the National Park Service to maintain a record, such as a list, of Land and Water Conservation Fund Federal interest properties. At a minimum, the record must include the Federal award identifier number and information sufficient to document interest, authorized purpose, legal description, location, and size of the land parcel.
2. Determine the number of Land and Water Conservation Fund sites that are overdue for post-completion inspection reporting and require that States conduct inspections to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).
3. Develop and implement a process to ensure and verify that States submit mandatory post-completion inspection reports to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).

### The NPS Did Not Conduct Required Program Reviews

According to the NPS, it serves as the Federal steward of the LWCF State Side program and is responsible for continuously monitoring the States' effectiveness in administering the program in accordance with various laws, regulations, and DOI policies.<sup>30</sup> The LWCF Manual in use at the time of our review required the NPS to complete a program review of each State every 3 years and each territory every 3 to 5 years.<sup>31</sup> According to the LWCF Manual, "[t]he state program reviews provide an opportunity to improve program accountability and lessen vulnerability to waste, fraud and abuse." State program reviews consist of weeklong, fact-finding site visits at State offices to assess the status of each State's LWCF program administration. After completing a site visit, the NPS must prepare a final report on the status of previous recommendations, noncompliance issues, major problems, new recommendations, and NPS followup actions. The NPS distributes the final report to the State's Governor and to the NPS SLAD. The LWCF Manual in use at the time of our review stated that "[t]he Region may opt to conduct mini-reviews as needed or during periods of low or no funding" but does not provide further explanation of what a "mini-review" entails and does not clarify "low funding."<sup>32</sup>

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<sup>30</sup> 54 U.S.C. § 200305(g); 54 U.S.C. § 200305(h); and LWCF Manual, Vol. 69, Chapter 1-5(C), "Program Review of State LWCF Program Administration."

<sup>31</sup> The updated March 2021 LWCF Manual requires the program review of State LWCF program administration to occur every 5 years instead of every 3 to 5 years.

<sup>32</sup> The updated March 2021 LWCF Manual no longer includes the "mini-review" option. This reference was in place, however, at the time of our fieldwork.

We found the NPS has not conducted State program reviews as required by its own policies, which it developed to carry out the statutory requirement to monitor each State’s effectiveness in administering the LWCF program. From FYs 2017 through 2020 (a time span of 4 years), the NPS conducted and completed program reviews for only 2 of the 56 States and territories. In particular, the NPS completed program reviews for the States of Connecticut and Kentucky in FY 2018. The NPS conducted site visits in nine other States but drafted only two reports that it neither completed nor distributed (see Figure 5). We found no evidence that the NPS completed any mini-reviews during this time.

**Figure 5: NPS Program Reviews FYs 2017 Through 2020**

<b>State</b>	<b>Site Visit (Y/N)</b>	<b>Draft Report (Y/N)</b>	<b>Final Report (Y/N)</b>
Connecticut	Y	Y	Y
Kentucky	Y	Y	Y
Maine	Y	Y	N
Tennessee	Y	Y	N
Arkansas	Y	N	N
Colorado	Y	N	N
Minnesota	Y	N	N
Montana	Y	N	N
New Mexico	Y	N	N
Ohio	Y	N	N
Utah	Y	N	N

Source: OIG analysis of NPS information.

NPS officials stated that the NPS did not consistently conduct program reviews during the period at issue because of low and fluctuating funding levels that did not provide the resources to do so. Our analysis of NPS administrative budgets determined that, from FYs 2017 through 2021, administrative funding levels increased from \$4 million to \$15.5 million. Officials stated they were in the process of expanding the LWCF State Side program due to this additional funding, including recruiting staff to conduct the LWCF State program reviews. However, we confirmed that, as of November 10, 2022, the NPS still had not conducted additional State program reviews. We estimated the NPS would have to complete at least 16 State program reviews every year to achieve the program review requirement.

Because the NPS did not conduct the required State program reviews, it cannot ensure that States comply with the Act, NPS policies, and grant stipulations. Further, because of the failure to conduct compliance reviews as well as the failure to inspect project sites, the States and the NPS could miss opportunities to improve the program and reduce waste, fraud, and abuse.

## Recommendations

We recommend that the National Park Service:

4. Conduct the required program review for all States in accordance with the National Park Service Land and Water Conservation Fund Manual and complete and distribute the required report to the National Park Service headquarters and State Governors in a timely manner.
5. Update the National Park Service Land and Water Conservation Fund Manual to define the concept of a "mini-review" and provide further information on when a mini-review is appropriate and what it entails.

### **The NPS Did Not Collect and Analyze Mandatory Financial and Performance Reports**

The NPS is responsible for collecting LWCF grants' financial and performance information from States.<sup>33</sup> To do so, the NPS uses the required Federal Financial Report, also known as SF-425,<sup>34</sup> to capture and track LWCF grant expenditures and the States' share of expenditures charged against grants. The LWCF Manual does not specify a particular form for the States to use to report their performance, but it does require that performance reports demonstrate grant activity and, at a minimum, include the percentage of work completed and costs billed; the status on meeting milestones for specific projects; an analysis and explanation of cost overruns, delays, and other issues and their expected impact on the grant; and the State liaison officer's certification that the information is correct and complete and that all expenditures comply with grant terms.<sup>35</sup>

Although Federal regulations require States to submit these reports at least annually, the States did not consistently provide them to the NPS, and the NPS did not consistently collect the reports or analyze those that it received. When we asked the States' officials whether they had submitted current financial and performance reports, officials from 5 of the 10 States we reviewed said they did not submit reports as required by the grant agreements. For example, a State official said that, due to staff turnover, the State had a difficult time locating its SF-425s, and that, since 2019, the NPS had not contacted the State regarding missing SF-425s. The State official said the State was trying to remedy the issue and has since conducted weekly meetings to review the State's grant inventory to identify missing financial reports.

NPS officials advised us that, for FYs 2017 through 2020, the NPS did not have a system in place to receive required financial and performance reports and sometimes did not have trained staff to analyze and address reporting issues. NPS regional managers also noted that some States

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<sup>33</sup> 2 C.F.R. § 200.329(b).

<sup>34</sup> The LWCF Manual requires States or their subrecipients to provide 50 percent of the total LWCF grant project cost with non-Federal funds and track the cumulative amount on the SF-425.

<sup>35</sup> LWCF Manual, Vol. 69, Chapter 7(D), "Performance/Financial Management and Reporting."

were better than others in meeting these reporting requirements and that some States were also challenged by low staffing levels and lack of LWCF training.

Without timely LWCF financial and performance reports, the NPS cannot ensure that the States satisfactorily met the LWCF 50-percent grant matching requirement and achieved grant performance goals. In FY 2021, the NPS implemented a new software platform, which States can now access to upload financial and performance information. However, the newly implemented system does not resolve financial and performance reporting issues we identified during FYs 2017 through 2020.

### **Recommendations**

We recommend that the National Park Service:

6. Conduct an assessment of all open State Side grants to determine which are missing financial and performance reports from FYs 2017 through 2022.
7. Require States to submit all missing financial and performance reports and verify submission for open State Side grants.

### **The NPS Regional Offices Did Not Track the States' Eligibility To Receive LWCF Funds**

To receive LWCF funds, the Act requires States to update their SCORP every 5 years. The SCORP sets forth a State's demand for and supply of outdoor resources and facilities. The SCORP also provides the basis for determining each State's LWCF eligibility to participate in the program. During our review period, the NPS regional offices granted 6-month to 1-year SCORP extensions. However, the extension provision was not annotated in the LWCF Manual or standardized in the two NPS regions that administer the program. We found the NPS regional offices did not track the States' eligibility to receive LWCF funds or notify States when a SCORP was due to expire. Of the 10 States we reviewed, 3 had SCORPs that had lapsed (see Figure 6 more details).

**Figure 6: Timeline of Lapsed SCORPs**

Wisconsin	December 31, 2016	The SCORP expires.
	April 13, 2017	The State requests an NPS extension.
	September 28, 2017	The NPS grants a 1-year extension; however, the State operated without a SCORP for more than 9 months.
Illinois	November 6, 2019	The State requests an NPS extension due to internal capacity issues (60 days before the SCORP is set to expire).
	December 31, 2019	The SCORP expires.
	March 5, 2020	The NPS grants a 1-year extension; however, the State operated without an approved SCORP or extension for more than 60 days.
California	June 15, 2020	The State requests an NPS extension due to COVID-19 and other issues (15 days before SCORP is set to expire).
	June 30, 2020	The SCORP expires.
	July 10, 2020	The NPS grants a 6-month extension through December 31, 2020.
	December 31, 2020	The SCORP extension expires.
	March 1, 2021	The State issues its 2021-2025 SCORP; however, the State operated without a SCORP for 60 days.

These lapses occurred because the NPS regional offices relied on States to alert them when their SCORPs were due for updates through extension request letters.

The failure to timely update SCORPs not only violates the requirements of the Act but it could also interrupt the LWCF program in States by suspending their eligibility to access apportioned formula grant funds and impeding their ability to compete for ORLP funds.

## Recommendations

We recommend that the National Park Service:

8. Standardize the Statewide Comprehensive Outdoor Recreation Plan extension provision across regions.
9. Consistently monitor and notify States when Statewide Comprehensive Outdoor Recreation Plans are nearing expiration and ensure each State's eligibility to receive Land and Water Conservation Funds.

### The NPS Did Not Ensure Land Appraisal Requirements Were Met

For grants awarded to purchase land, the appraisal of that land is the most significant factor that determines the cost to the taxpayer. As a result, the monitoring steps taken to ensure compliance with the *Uniform Appraisal Standards for Federal Land Acquisitions (UASFLA)*<sup>36</sup>—the relevant appraisal standards—are the most significant opportunity to prevent waste. Our office has published several reports detailing issues in grant programs that provide funds for land acquisition, and these reports identified more than \$25 million in questioned costs associated with appraisals that did not comply with the *UASFLA* as well as issues with ongoing monitoring of these purchases.<sup>37</sup>

*UASFLA*-compliant appraisals are required by Federal regulations<sup>38</sup> for all land purchased using DOI grant funding. Additionally, the LWCF Manual requires the use of *UASFLA*-compliant appraisals for land purchased with LWCF grants. However, based on our judgmental sample of State projects and discussions with program staff, we reviewed a land acquisition in Massachusetts and found that the NPS awarded a \$454,500 (\$227,250 Federal share) LWCF grant without ensuring the appraisal complied with the appropriate standards.

Specifically, in April 2018, the NPS awarded a grant to Massachusetts to procure 20 acres of land for a public park in the town of Middleborough (Grant No. P18AP00130), which served as the subrecipient of the grant. We found that the subrecipient did not obtain an *UASFLA* appraisal. Instead, the appraisal was conducted following only *Uniform Standards of*

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<sup>36</sup> Interagency Land Acquisition Conference, *Uniform Appraisal Standards for Federal Land Acquisitions*.

<sup>37</sup> *Management of the Coastal Impact Assistance Program, State of Mississippi* (Report No. ER-IN-MOA-0013-2011), issued June 26, 2013.

*Management of the Coastal Impact Assistance Program in the State of Louisiana* (Report No. ER-IN-FWS-0010-2013), issued September 29, 2014.

*Investigation of an Appraisal and Land Transactions Related to a Federal Grant Awarded to Livingston Parish in Louisiana Through the Coastal Impact Assistance Program*, issued March 29, 2016.

*PAM's Misinterpretation of Federal Regulations Resulted in PAM Disagreeing With Recommendations To Track Data for Land Purchases Made With Grant Funds* (Report No. 2016-ER-016-A), issued September 24, 2017.

<sup>38</sup> 2 C.F.R. §1402.329(b)(1).

*Professional Appraisal Practice (USPAP)*.<sup>39</sup> Although the *USAFLA* builds on the *USPAP*, the *USPAP* itself is less rigorous than the *UASFLA*'s requirements (for example, the *UASFLA* is designed specifically to protect both parties in transactions with Federal funding). The subrecipient's representative explained that this was the first time she had applied for an LWCF grant and stated that she was confused, even though the grant application specifically identified the requirement. The State, unaware of the subrecipient's error, then took the typical step of procuring a review appraisal as required by the *UASFLA*. In the course of that review appraisal, the reviewing appraiser identified that the appraisal was not conducted using the *UASFLA* and assisted the original appraiser in revising the report in an effort to conform with the *UASFLA*. Massachusetts used the revised version of the original appraisal and review appraisal to support the grant application. At our request, the DOI's Appraisal and Valuation Services Office (AVSO)—part of the DOI's Office of Policy, Management, and Budget—reviewed the revised appraisal. Notwithstanding the reviewing appraiser's efforts to conform to the *UASFLA*, AVSO concluded that the revised appraisal did not in fact comply with these standards as required by grant terms and conditions.

We found that the NPS had previously identified concerns regarding *UASFLA* compliance with appraisals for LWCF projects in Massachusetts. In 2016, the NPS began working with Massachusetts to correct these problems and requested that AVSO review selected appraisals for compliance, leading to updated practices in Massachusetts. Not all appraisals, though, were provided to AVSO, and, in 2018, when Massachusetts was awarded the Middleborough grant, it was subject only to the LWCF Manual's regular requirement that recipients certify that they have obtained a *UASFLA* appraisal. Because of Massachusetts' history, NPS officials conducted their own "spot check" of the appraisal document.<sup>40</sup> Despite requesting and reviewing the appraisal, NPS staff did not identify any deficiencies during the spot check of the appraisal, and the application was approved. Because the appraisal was not compliant with the *UASFLA* according to the AVSO review, we question the \$227,250 Federal portion of the \$454,500 award as unallowable costs for Grant No. P18AP00130.

During the period of our review, the NPS did not review LWCF appraisals for *UASFLA* compliance unless conducting a "spot check," and AVSO is not involved unless there are known issues with a particular appraisal or recipient, as was the case with Massachusetts in 2016; even then, AVSO is not always consulted, as in the Massachusetts example. We note that, in 2019, the Financial Assistance Interior Regulation<sup>41</sup> was enacted and provided for a larger role for AVSO oversight in grant programs, stating that "[w]here appraisals are required to support federally assisted land acquisitions, AVSO has oversight responsibilities for these appraisals . . . AVSO will coordinate with grant programs to conduct periodic internal control review of appraisal and appraisal review reports prepared in conjunction with grant applications for land acquisition."<sup>42</sup> AVSO's internal control review of appraisals could give the NPS an opportunity to work closely

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<sup>39</sup> The Appraisal Foundation, *Uniform Standards of Professional Appraisal Practice*.

<sup>40</sup> According to the LWCF Manual, spot checks are conducted as needed "to assure compliance with the LWCF requirements and federal appraisal standards."

<sup>41</sup> 2 C.F.R. part 1402.

<sup>42</sup> 2 C.F.R. § 1402.329(b)(1).

with AVSO to strengthen its internal controls to ensure spot checks are effective and to determine whether additional controls are necessary.

### **Recommendations**

We recommend that the National Park Service:

10. In coordination with the Appraisal and Valuation Services Office, develop and implement a process to ensure appraisals comply with the *Uniform Appraisal Standards for Federal Land Acquisitions* in accordance with 2 C.F.R. part 1402.
11. Resolve the \$227,250 in questioned costs associated with Grant No. P18AP00130.

## **The NPS Lacks Policy for Grant Award Processes and Timelines, Leading to Award Delays**

Each year, the NPS is responsible for awarding hundreds of millions in LWCF project grant funds to State and local governments. Although the NPS had established informal target dates that ranged from 29 to 54 days for awarding formula funds, according to States we reviewed, the NPS may not have consistently met these target dates. In addition, the NPS awarded ORLP funds 6 to 18 months after informal target dates and, in some cases, years after States submitted applications. This occurred because the NPS did not have written policies dictating the amount of time it should take for it to award project grants to recipients and because the NPS did not track the informally established targets. The failure to award LWCF grants in a timely manner may limit States' ability to use both LWCF formula and ORLP grant funds and thus to carry out the goals of the LWCF.

### **The NPS Did Not Meet Informal Targets for Awarding LWCF Formula Funds**

Each of the 56 States, territories, and the District of Columbia have different processes for identifying potential LWCF formula fund projects. The project application for non-construction assistance consists of Federal standard forms,<sup>43</sup> a project agreement,<sup>44</sup> and a description and notification form.<sup>45</sup> For acquisition and development grants, States are responsible for prioritizing and selecting projects for LWCF assistance through grant selection criteria and standards established in each State-designed OPSP; States must submit Federal standard forms, a

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<sup>43</sup> Based on the type of application proposal (non-construction, acquisition, and development), Federal standard forms can include SF-424, Application for Federal Assistance; supplemental SF-424A, Budget Information for Non-construction Programs; SF-424B, Statement of Assurances for Non-construction Programs; SF-424C, Budget Information for Construction Programs; or SF-424D, Statement of Assurances for Construction Programs.

<sup>44</sup> A project agreement form, also known as NPS 10-902, is also used for planning grants. It narrates the objectives of the grant, planning elements, and the general approach; it also includes a discussion on personnel, organizations, or outside consultants that may be used to implement the project.

<sup>45</sup> The description and notification form describe the scope of the project, including what is to be done and how it will be accomplished.

description and notification form, a proposal description and environmental screening form,<sup>46</sup> and a related LWCF boundary map. According to the LWCF Manual, States should submit project applications or proposals at least 60 days in advance of the target date for acquisition or the beginning of construction.<sup>47</sup>

The NPS' grant processing begins with an initial screening of a State's grant application package to determine if the package is complete. The NPS then assesses if the grant package is actionable, which includes a review to determine whether the proposal:

- Meets the requirements of the State's SCORP;
- Meets the selection criteria as outlined in the OPSP;
- Complies with environmental laws; and
- Includes a project site that is acceptable under the provisions of the Act.

When the NPS deemed an application actionable, the assigned NPS financial assistance awarding officer finalized a grant award by signing a grant agreement and forwarding a copy of the signed grant agreement to the State.<sup>48</sup>

In 2016, the NPS changed the grant project application process for its formula grants from an open application process that accepted applications between December and mid-August each year to three 60-day application windows: December/January, March/April, and June/July. NPS officials stated that the process was changed because 75 percent of LWCF grant applications would be submitted in August, and it did not have the resources to process the influx of grant applications at the same time.

According to the NPS, grant project approval targets were March 1 for the December/January application window, June 1 for the March/April application window, and September 23 for the June/July application window. Based on the NPS' target dates, the NPS should have taken 29 to 54 days from the close of an application window to award project agreements (see Figure 7).

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<sup>46</sup> The proposal description (PD) portion of the PD/Environmental Screening Form (ESF) identifies and describes the proposal to the Federal decision maker. The ESF portion of the PD/ESF should administratively document (1) a Categorical Exclusion recommendation or (2) the necessity of further environmental review through an Environmental Assessment or Environmental Impact Statement as necessary.

<sup>47</sup> LWCF Manual, Vol. 69, Chapter 6-1(B), "Application Process."

<sup>48</sup> The NPS' grant process changed in FY 2021, and a newly implemented software platform now generates grant agreements.

**Figure 7: NPS Formula Grant Application Target Dates**

<b>NPS Application Window</b>	<b>NPS Grant Approval Target Date</b>	<b>Target Timeframe</b>
December/January	March 1	29 days
March/April	June 1	32 days
June/July	September 23	54 days

According to State officials with whom we spoke, the NPS routinely took longer than 54 days (the longest target timeframe) to approve formula grant applications and in some cases took 2 to 3 years to approve applications. Several State officials reported that, when the NPS implemented the new application window process, grant approval slowed down. One State said the lengthy application process deterred subrecipients from applying for LWCF grants. Two other States said they missed the opportune time for completing construction projects (especially in cases when State weather conditions limited outdoor work); one also stated that the delay resulted in unexpected supply issues.

Additionally, the National Association of State Outdoor Recreational Liaison Officers (NASORLO)<sup>49</sup> stated that since the NPS updated its grant award process, the NPS has been slow in awarding LWCF project grants, offering several examples related to the State of Nevada.<sup>50</sup> Specifically, in July 2021, Nevada submitted seven applications for grant projects. According to the NPS' records, the seven proposed projects were delayed for environmental compliance issues; the State and the NPS resolved these compliance issues for six of the seven applications—three in November 2021, two in March 2022, and one in May 2022 (the seventh application was canceled). After the compliance issues were resolved for the six applications, rendering them complete and ready for grant agreements, the NPS' internal processes took 102 to 298 days rather than the target timeframe of 29 to 54 days (see Figure 8 for additional details).<sup>51</sup>

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<sup>49</sup> NASORLO is a nonprofit LWCF advocacy organization made up of Governor-appointed State liaison officers. NASORLO serves as an LWCF liaison to the NPS by providing training for States and collecting data and preparing reports for the DOI, Congress, NASORLO members, partners, and communities who benefit from the LWCF program to use.

<sup>50</sup> Nevada was not a part of our State review sample, but at our request, the NPS provided Nevada's July 2021 application submission, which demonstrated the NPS' grant agreement delays. We independently verified the information provided through analysis of NPS records.

<sup>51</sup> Two projects were canceled. One was canceled due to unresolved environmental compliance issues. The other was canceled because, according to Nevada, the subrecipient declined the LWCF grant award because its grant matching funds for the project were expiring and it found alternative funds to pay for the project.

**Figure 8: Nevada LWCF Grant Agreement Application Delays**

<b>Date of Compliant Application</b>	<b>Project Agreement Date</b>	<b>Days From Compliant Application to Project Award</b>
11/15/2021	09/08/2022	297 days
03/04/2022	09/20/2022	200 days
11/30/2021	09/08/2022	282 days
11/15/2021	09/09/2022	298 days
03/03/2022	09/08/2022	189 days
05/29/2022	09/08/2022	102 days

Source: OIG analysis of the NPS’ July 2021 Nevada formula grants information.

**The NPS Did Not Meet Informal Targets for Awarding LWCF Competitive ORLP Funds**

From the initiation of the ORLP grant program in 2014 to the present, Congress appropriated a total of \$323 million for the program. The ORLP is a competitive grant program through which the NPS distributes funds through “rounds”<sup>52</sup> that are announced through a Notice of Funding Opportunity (NOFO). The NOFO informs prospective applicants of application and submission deadlines. All ORLP grant applications undergo a technical review and merit panel process. Each NOFO delineates NPS target dates for (1) the States’ preapplication and project proposal, (2) the NPS’ preliminary selection of projects, (3) the States’ final application, and (4) the NPS’ grant award agreement.

Since the inception of ORLP, the NPS has conducted six ORLP rounds, as shown in Figure 9.

<sup>52</sup> A grant round is a cycle that starts with a Notice of Funding Opportunity announcing the availability of grant funds and the acceptance of new applications and ends with the disbursement of grant awards from funds available for the grant cycle.

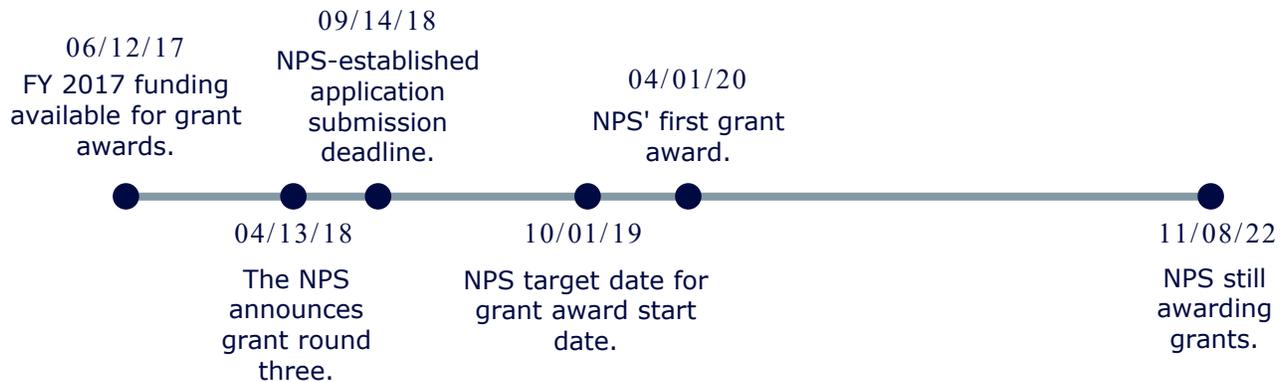
**Figure 9: ORLP Grant Round Summary<sup>53</sup>**

<b>ORLP Round</b>	<b>Open Date</b>	<b>Close Date</b>	<b>Total Funding Amount</b>	<b>Target Date</b>
1	06/13/2014	08/15/2014	\$3,000,000	
2	03/09/2016	05/20/2016	\$15,000,000	
3	04/13/2018	09/14/2018	\$13,300,000	10/01/2019
4	01/31/2020	07/10/2020	\$40,000,000	03/01/2021
5	05/10/2021	09/24/2021	\$150,000,000	10/01/2022
6	07/29/2022	05/31/2023	\$192,000,000	01/01/2024

Source: OIG analysis of NPS information.

We reviewed grant rounds three and four, which were conducted during the scope of our review (2017 through 2020). The FY 2017 appropriation was available to the NPS on June 12, 2017. The NPS announced grant round three on April 13, 2018.<sup>54</sup> According to the NOFO, the application submission deadline was September 14, 2018, and the NPS target for grant start date was October 1, 2019. The NPS awarded the earliest round three grant on April 1, 2020; and, as of November 8, 2022, the NPS was still awarding grants from round three. That is, the NPS had taken almost 3 years to use available funds and missed its October 1, 2019, target date to award grants by 184 days (more than 6 months) for applications still awaiting grant award agreements (see Figure 10).

**Figure 10: Grant Round Three Timeline**



<sup>53</sup> The NPS offered a total of \$413.3 million in grant funds for grant rounds one through six. However, the amounts at issue in the grant round funding may overall exceed the \$323 million Congress appropriated during FYs 2014 through 2022 because grant rounds often included unused funds from prior grants rounds.

<sup>54</sup> For grant round three, the NPS offered \$13.3 million in grants—\$12 million from the FY 2017 appropriation and \$1.3 million in unused funds from the FY 2016 appropriation. States submitted 51 applications requesting a total of \$34.2 million.

The FY 2018 and 2019 appropriations were available to the NPS on April 26, 2018, and April 2, 2019, respectively. The NPS announced grant round four on January 31, 2020.<sup>55</sup> According to the NOFO, the application submission deadline was July 10, 2020. The NOFO allowed for flexibility but stated, “for the purposes of the competition, sponsors should use a grant start date of March 1, 2021.” The NPS, however, awarded the earliest round four grant on July 29, 2022. That is, the NPS had taken more than 4 years to use available 2018 appropriations and more than 3 years to use 2019 appropriations. Further, the NPS missed its target date to award grants by more than 515 days (more than 18 months) for applications still awaiting grant award agreements (see Figure 11).

**Figure 11: Grant Round Four Timeline**



Citing the length of the grant application approval process, States said they experienced project construction delays, inflated project cost, and, in some instances, the cancellation of potential projects. For example, a State’s subrecipient declined an NPS ORLP grant award in the amount of \$750,000 on April 30, 2020, because of NPS grant award delays. The subrecipient noted that the cost estimates in September 2018 when it had submitted the preliminary application had significantly increased by the time the final application was due in December 2019, a timespan of 469 days (16 months). Due to increased costs and the onset of the COVID–19 pandemic, the State’s subrecipient was no longer able to undertake the project. A State official wrote, “I think that if the application and award process had not taken so long, and if perhaps the grant was awarded in 2019 [prior to the pandemic], that the project would have been successfully executed.”

**The NPS Lacks a Policy for Grant Award Timelines**

The NPS stated that SLAD’s delays in awarding both formula and ORLP grant funds were due to a limited workforce and focus on other priorities—such as updating the LWCF Manual,

<sup>55</sup> For grant round four, the NPS offered \$40 million in grants—\$20 million from the FY 2018 appropriation and \$20 million from FY 2019 appropriation. States submitted 38 applications requesting a total of \$29.5 million.

migrating to a new software platform, and updating the LWCF programs. NPS officials also said it was a priority to put ORLP grant rounds on a consistent annual cycle to allow the States to better plan for these grants. NPS officials stated that they did not meet formula grant award timelines because States may have submitted incomplete grant applications or because the applications had compliance issues such as Tribal and boundary requirements.<sup>56</sup>

According to the U.S. Government Accountability Office’s *Standards for Internal Control in the Federal Government*, “[m]anagement periodically reviews policies, procedures and related control activities for continued relevance and effectiveness in achieving the entity’s objectives or addressing related risks.”<sup>57</sup> Furthermore, “[m]anagement documents in policies for each unit its responsibility for an operational process’s objective and related risks, and control activity design, implementation, and operating effectiveness.”<sup>58</sup> We found that, although the NPS set informal target dates, the NPS did not formalize and document a policy defining the LWCF grant award process timeframes for both formula and ORLP grants. Without a formalized grant award policy, the NPS SLAD is unable to assess and track whether it is effectively meeting its main operational objective, which is to award millions of dollars in LWCF project grants to State and local governments annually.

As LWCF funding increases under the Great American Outdoors Act, States may continue to underutilize funds if the NPS does not develop and implement a consistent and efficient grant approval process to facilitate State and subrecipient project timelines.

## **Recommendations**

We recommend that the National Park Service:

12. Assess its grant awarding processes for both formula and Outdoor Recreation Legacy Partnership grants to determine the appropriate milestones and targets.
13. Establish policies for effective implementation of the grant awarding milestones and targets.

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<sup>56</sup> According to the LWCF Manual, “Section 106 of NHPA [National Historic Preservation Act of 1966 or 54 U.S.C. § 300101] requires federal agencies to consider the effects of their proposals on historic properties, and to provide State Historic Preservation Officers (SHPO), Tribal Historic Preservation Officers (THPO), and as necessary, the Advisory Council on Historic Preservation a reasonable opportunity to review and comment on these actions.”

<sup>57</sup> Principle 12.05, “Periodic Review of Control Activities.”

<sup>58</sup> Principle 12.03, “Documentation of Responsibilities through Policies.”

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# Conclusion and Recommendations

## Conclusion

The NPS did not adequately monitor the LWCF State Side program because it did not maintain an accurate and complete listing to account for all LWCF project sites or ensure that States completed post-completion inspections. The NPS also failed to conduct program reviews to assess States' effectiveness in administering LWCF funds, did not collect and analyze State financial and performance reports in some cases to determine whether active projects met grant financial and performance goals, and did not track States' eligibility to receive LWCF funds. Additionally, we found the NPS did not ensure that States complied with the requirements for land acquisition, causing us to question \$454,500 (\$227,250 Federal share) spent on a noncompliant appraisal as an unallowable cost. Finally, the NPS did not have written policies defining the amount of time it should take to award project grants to recipients and did not track informally established targets; it exceeded its own informal grant approval target dates by as many as 515 days, thereby limiting States' access to LWCF funds.

As a result, the NPS cannot account for all LWCF sites or ensure properties acquired or developed with LWCF funds were continuously operated and maintained solely for public outdoor recreation in accordance with the Act, LWCF Manual, DOI policies, and LWCF grant agreements. The NPS' failure to enforce LWCF requirements and address State challenges also provides no assurance that States and territories efficiently administered the LWCF program. In addition, without adequate oversight and monitoring, LWCF funds may be subject to mismanagement, which threatens the success of the program.

## Recommendations Summary

We provided a draft of this report to the NPS for review. The NPS concurred with 11 recommendations, partially concurred with 1 recommendation, and did not concur with 1 recommendation. We consider Recommendations 1 through 4, 6 through 9, and 11 through 13 resolved; Recommendation 10 unresolved; and Recommendation 5 implemented. Below we summarize the NPS' response to our recommendations, as well as our comments on its response. See Appendix 4 for the full text of the NPS' response; Appendix 5 lists the status of each recommendation.

We recommend that the National Park Service:

1. Comply with DOI-PGM-POL Reference No. 0003, which requires the National Park Service to maintain a record, such as a list, of Land and Water Conservation Fund Federal interest properties. At a minimum, the record must include the Federal award identifier number and information sufficient to document interest, authorized purpose, legal description, location, and size of the land parcel.

**NPS Response:** The NPS concurred with Recommendation 1. It described a number of challenges that it faces, including, for example, the decommissioning of the "legacy

LWCF database in 2015.” The NPS also represented that, when the DOI “migrated all Bureaus to the new Financial and Business Management System (FBMS), it resulted in the loss of important existing systems and functionality, without the ability within FBMS” to replace what had been lost. The NPS stated that it is “working with NPS’s Enterprise Development Services (EDS) Branch to develop a third-generation reporting system for all LWCF-assisted sites.” The NPS stated, “the new system [Recreation Assistance Programs Information Data System (RAPIDS)] will be able to serve as the platform to integrate the site and grant data to fully comply. The NPS will also need to further invest in new staff to dedicate to support these tasks in coordination with State partners.” In addition, the NPS stated that “further adaptation of the data model will be needed to capture all the required information and it will take time to get this data added for all grant records (approximately 50,000).” Finally, the NPS acknowledged that it will need to “reinforce with staff that they confirm during the close-out process than an SF-429 was submitted for each acquisition or combination grant.” The target implementation date for the launch of RAPIDS is December 31, 2024.

**OIG Comment:** Based on the NPS response, we consider Recommendation 1 resolved. We will consider this recommendation implemented when the NPS provides documentation demonstrating that it has complied with DOI-PGM-POL Reference No. 0003 by maintaining a list of all LWCF interest properties with the required Federal award identifier number and information sufficient to document interest, authorized purpose, legal description, location, and size of the land parcels.

2. Determine the number of Land and Water Conservation Fund sites that are overdue for post-completion inspection reporting and require that States conduct inspections to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).

**NPS Response:** The NPS partially concurred with Recommendation 2 and stated, “Maintaining and implementing a site [post-completion] inspection schedule is primarily the responsibility of the State partners.” It also stated that, “[a]s the LWCF grantee, each State should have its own tracking capability for sites that have received grant[s] in that State, and many do.” As with its response to Recommendation 1, though, the NPS emphasized the loss of the legacy LWCF database and stated the NPS accordingly “lost its capacity to provide meaningful support to State partners in this effort as the database had included a tool for inspection tracking.” The NPS stated, “The new data system described in Response 1 will include a module for and interface to capture and track State inspection information like the last [legacy] database did, however, that tool will not be available at the time of the initial launch.” The NPS also stated:

[T]he NPS needs to initially focus its efforts on ensuring State partners have a robust inspection program and active practices in place that support a 5-year park [post-completion] inspection cycle. However, as part of an assessment effort to understand the status of each State partner’s [post-completion] inspection program, the NPS will work to identify an estimate of sites overdue for [post-completion] inspections. The ability to

generate a truly accurate number of sites needing [post-completion] inspection at any point will only be possible after the NPS and State partners have validated the list of LWCF-assisted sites in each State, Territory, and DC.

The target implementation date for adding a post-completion inspection tracking tool to RAPIDS is December 31, 2025.

**OIG Comment:** Based on the NPS response, we consider Recommendation 2 resolved. We agree that State partners are responsible for maintaining and implementing site inspection schedules; however, as noted in the report itself, the NPS is the Federal agency responsible for enforcing the LWCF Act section 6(f)(3) provision by ensuring that all LWCF sites are retained and maintained solely for outdoor recreation in perpetuity. Given this role, the NPS should ensure that State partners are consistently conducting post-completion inspections to verify that sites are being operated and maintained for public outdoor recreation and to correct infractions at noncompliant sites. We note that the NPS' target implementation date for this recommendation is more than 1 year from this report's issuance date. Accordingly, the NPS should provide a revised target implementation date or establish mitigating measures until the recommendation is fully implemented. We will consider this recommendation implemented when the NPS provides documentation demonstrating it has determined the number of LWCF sites overdue for post-completion inspections and requires that States conduct the inspections and provide reports.

3. Develop and implement a process to ensure and verify that States submit mandatory post-completion inspection reports to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).

**NPS Response:** The NPS concurred with Recommendation 3 and stated:

The NPS has an Inspection Agreement with each State partner that outlines the State's methods and process to meet grant and stewardship obligations. In FY 2022, the NPS initiated a review of these agreements . . . The NPS will need to resume that effort and work closely with State partners to establish common requirements and processes to capture core inspection data and other information that will need to be developed.

The NPS also stated, "once State partners are on track to restore implementation of a 5-year inspection cycle, NPS emphasis will shift to ensuring that the new [RAPIDS] data system has adequate tools to support proper monitoring and reporting, as well as appropriate accountability practices, to ensure there is little to no backlog on an annual basis." It also stated that it "will need to boost its current capacity in the areas of data management, technical assistance to partners, and compliance to address post project compliance issues that will undoubtedly be revealed due to the focused efforts. The NPS

will need to further invest in dedicated data system staff.” The target implementation date is December 31, 2025.

**OIG Comment:** Based on the NPS response, we consider Recommendation 3 resolved. The NPS’ target implementation date for this recommendation is more than 1 year from this report’s issuance date. Accordingly, the NPS should provide a revised target implementation date or establish mitigating measures until the recommendation is fully implemented. We will consider this recommendation implemented when the NPS provides documentation demonstrating it has developed and implemented a process to ensure and verify States submit mandatory post-completion inspection reports.

4. Conduct the required program review for all States in accordance with the National Park Service Land and Water Conservation Fund Manual and complete and distribute the required report to the National Park Service headquarters and State Governors in a timely manner.

**NPS Response:** The NPS concurred with Recommendation 4 and stated that its “staffing expansion plan established after the Great American Outdoors Act was enacted already included the creation of a new program evaluation lead position. Responsibilities will include coordinating and managing the review process, ensuring that an overall review schedule is established and maintained and that there is follow-through on each State review.” The target implementation date to hire the individual who will fulfill this role is December 31, 2024.

**OIG Comment:** Based on the NPS response, we consider Recommendation 4 resolved. We will consider it implemented when the NPS provides documentation demonstrating it has conducted required program reviews and has completed and distributed program review reports in accordance with the LWCF Manual.

5. Update the National Park Service Land and Water Conservation Fund Manual to define the concept of a “mini-review” and provide further information on when a mini-review is appropriate and what it entails.

**NPS Response:** The NPS did not concur with Recommendation 5 and stated, “The NPS eliminated the reference to the ‘mini-review’ in the 2021 update to the LWCF Manual. As described in the previous 2008 Manual, this concept was tied to the circumstance of the program receiving low or no funding, and thus not having resources to conduct reviews. This is no longer a concern so full State reviews should be the standard practice.”

**OIG Comment:** Based on the NPS response, we consider Recommendation 5 implemented. We reviewed the NPS LWCF Manual, Vol. 71, effective March 11, 2021, and confirmed that there is no reference to a “mini-review.” Therefore, we require no further NPS action.

6. Conduct an assessment of all open State Side grants to determine which are missing financial and performance reports from FYs 2017 through 2022.

**NPS Response:** The NPS concurred with Recommendation 6. It acknowledged that “missing financial and performance reports [reduce] the program’s ability to effectively monitor States’ progress on projects.” It stated that its new software platform “has a report that the NPS can use to help inventory [financial and performance] reports for active grants to get a sense of which ones are missing.” However, the software does not capture financial and performance reports for grants issued prior to FY 2021. The NPS also stated that “any [financial and performance] reports submitted [prior to FY 2021] were mailed or emailed directly to program officers. Most of these reports had not been added to the electronic grant files, although good progress has been made in FY 2023.” The NPS added that, in FY 2024, it “hopes to hire five grants management specialists” to help comply with financial and performance reporting requirements. It also stated, “The missing reports inventory will be conducted in the first quarter, checking to the extent possible, [other systems], hard copy files, and emails. After uploading any found reports to [the new software platform], State recipients will be contacted to provide a list of reports that appear to be missing.” The target implementation date is December 31, 2024.

**OIG Comment:** Based on the NPS response, we consider Recommendation 6 resolved. We will consider it implemented when the NPS provides documentation demonstrating that it has identified missing financial and performance reports from FYs 2017 through 2022.

7. Require States to submit all missing financial and performance reports and verify submission for open State Side grants.

**NPS Response:** The NPS concurred with Recommendation 7 and stated, “Based on the inventory effort described in the response to Recommendation 6, and building on that response, State partners will be directed to submit missing reports to [the new software platform] by no later than the end of the next report submission period.” The NPS also stated it plans to develop a “technical assistance document for State partners on reporting requirements” and to include the new software platform activity log feature and State risk assessments to encourage compliance. The NPS further explained that it will consider additional remedies for noncompliance as set forth in the relevant regulations, “including 2 CFR 200.339(e), withholding further Federal awards for the project or program until all existing awards are in reporting compliance.” The target implementation date is December 31, 2024.

**OIG Comment:** Based on the NPS response, we consider Recommendation 7 resolved. We will consider it implemented when the NPS provides documentation showing that it has required submission of all missing reports and that it has received all such missing State financial and performance reports.

8. Standardize the Statewide Comprehensive Outdoor Recreation Plan extension provision across regions.

**NPS Response:** The NPS concurred with Recommendation 8. It represented that it has already established policy and internal guidance for Statewide Comprehensive Outdoor Recreation Plan (SCORP) extensions. It also stated, though, that it “can review its SCORP extension guidance and reissue as appropriate and work to integrate the information into the LWCF Manual for better staff and State partner awareness.” The target implementation date is December 31, 2024.

**OIG Comment:** Based on the NPS response, we consider Recommendation 8 resolved. We will consider this recommendation implemented when the NPS provides documentation demonstrating that it has standardized SCORP extension guidance across its regions.

9. Consistently monitor and notify States when Statewide Comprehensive Outdoor Recreation Plans are nearing expiration and ensure each State’s eligibility to receive Land and Water Conservation Funds.

**NPS Response:** The NPS concurred with Recommendation 9. It explained that its State and Local Assistance (SLA) Program office in Washington, DC, and its regional offices already track SCORPs. It acknowledged, though, that “because of limited capacity,” it was “not always able to timely remind State partners that their SCORPs were due to expire.” In response to this concern, it stated that it “changed its practice to try to remind States two (2) years before plan expiration instead of just one (1) year, to ensure State partners would have time to start development of their next SCORP and/or to apply for a planning grant if needed.” In addition, the NPS stated that it plans to hire a “new SCORP team: a national SCORP program coordinator and a planning specialist in each regional office, who will provide technical assistance to State partners, review draft SCORP plans, monitor plan status and communicate with partners ahead of their SCORP expiration, and generally help track the States’ eligibility.” The NPS represented that implementation is “Complete.”

**OIG Comment:** Based on the NPS response, we consider Recommendation 9 resolved. As set forth in the report, the LWCF Act requires States to have an NPS-approved SCORP to receive LWCF funds. As the Federal steward of the LWCF State Side program, the NPS must consistently track States’ eligibility to receive LWCF funds by ensuring States update their SCORPs every 5 years. Although we understand that the NPS is attempting to remind States of expiration dates, as set forth in the report itself, we identified instances in which SCORPs expired without an assurance of eligibility. Accordingly, we do not consider Recommendation 9 to be implemented. The NPS should provide a target implementation date for corrective actions. If the date is more than 1 year from this report’s issuance date, the NPS should establish and report mitigating steps it will undertake until the recommendation is fully implemented. We will consider Recommendation 9 implemented when the NPS provides support to show it consistently

monitored and communicated with States regarding expiring SCORPs to ensure each State's eligibility to receive LWCF funds.

10. In coordination with the Appraisal and Valuation Services Office, develop and implement a process to ensure internal appraisal reviews comply with the *Uniform Appraisal Standards for Federal Land Acquisitions* in accordance with 2 C.F.R. part 1402.

**NPS Response:** The NPS concurred with Recommendation 10 and stated, "the NPS is open to continuing to work with AVSO to revisit and reevaluate existing practices and explore other methods to complement the existing requirements outlined in the LWCF Manual, to try to improve State compliance with these long-standing obligations." The target implementation date is December 31, 2025.

**OIG Comment:** Based on the NPS response, we consider Recommendation 10 unresolved because the NPS said it would revisit and reevaluate existing practices but did not commit to developing and implementing a process. We also note that the NPS' target implementation date for this recommendation is more than 1 year from this report's issuance date. Accordingly, the NPS should provide a revised target implementation date or establish mitigating measures until the recommendation is fully implemented. We will consider this recommendation resolved when the NPS provides documentation demonstrating it has coordinated with AVSO to develop a process to ensure appraisals are compliant with the *Uniform Appraisal Standards for Federal Land Acquisitions* in accordance with 2 C.F.R. part 1402. We will consider it implemented when the NPS provides documentation demonstrating that it has implemented the new process.

11. Resolve the \$227,250 in questioned costs associated with Grant No. P18AP00130.

**NPS Response:** The NPS concurred with Recommendation 11 and stated, "The NPS was not aware of the AVSO review before this report was shared and has not received a copy. The NPS will follow up with AVSO. The NPS notes that even when an appraisal is not prepared in full conformity to the Federal standards, it does not necessarily mean that the resulting valuation is incorrect." The target implementation date is December 31, 2023.

**OIG Comment:** Based on the NPS response, we consider Recommendation 11 resolved. We note that the validity of the valuation depends on the appraisal's conformance to *Uniform Appraisal Standards for Federal Land Acquisitions*. We will consider this recommendation implemented when the NPS provides documentation demonstrating that it has resolved the questioned costs related to Grant No. P18AP00130.

12. Assess its grant awarding processes for both formula and Outdoor Recreation Legacy Partnership grants to determine the appropriate milestones and targets.

**NPS Response:** The NPS concurred with Recommendation 12 and stated, "Existing NPS process target timelines were set in 2016 before program funding started to increase and

when the volume of grant applications and amendments was about half of what it is today (250-300 actions a year instead of 500-700).” The NPS also stated:

Appropriate milestones and targets are dependent on several factors. NPS capacity to review and complete required compliance in a timely fashion requires adequate staffing levels and complete submitted applications. . . . NPS still lacks staffing across all the teams needed to support the financial assistance review and award process. The complicated nature of construction and acquisition financial assistance projects are inherently challenging for project sponsors to gather and/or prepare the required documentation that comprises a complete and compliant application. Further, the NPS is required to review the application to meet all mandatory environmental and financial assistance laws, regulations, and policies.

The SLA Program has been hiring additional program and compliance officers throughout FY 2023 and is on track to decrease the number of States assigned to each program officer from three to five States to the target of two States. . . . The NPS plans to evaluate [or assess] the [grant application] submission calendar to better space out the workload with the addition of administrative grants and the Readiness + Recreation grant program.

The target implementation date is December 31, 2025.<sup>59</sup>

Additionally, in the NPS response to Recommendation 13 below, it stated, “As noted in the response to recommendation 12, any awarding targets need to be appropriate for the level of staffing and work. Once the NPS is closer to achieving the desired staffing levels, it will be better positioned to set realistic policies and targets.”

**OIG Comment:** Based on the NPS response, we consider Recommendation 12 resolved. The NPS’ target implementation date for this recommendation, however, is more than 1 year from this report’s issuance date. Accordingly, the NPS should provide a revised target implementation date or establish mitigating measures until the recommendation is fully implemented. We will consider this recommendation implemented when the NPS provides documentation demonstrating it has assessed grant awarding processes for both formula and Outdoor Recreation Legacy Partnership grants to determine appropriate milestones and targets.

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<sup>59</sup> There appeared to be a discrepancy between the target implementation dates the NPS provided for Recommendations 12 and 13. Specifically, implementation of Recommendation 12 is required before Recommendation 13; however, the December 31, 2025 target implementation date for Recommendation 12 is a full year after the December 31, 2024 target implementation date provided for Recommendation 13. We contacted the NPS to clarify target implementation dates for Recommendations 12 and 13, and the NPS responded that the target implementation dates for both Recommendations 12 and 13 should be designated as December 31, 2025.

13. Establish policies for effective implementation of the grant awarding milestones and targets.

**NPS Response:** The NPS concurred with Recommendation 13 but stated that “any awarding targets need to be appropriate for the level of staffing and work. Once the NPS is closer to achieving the desired staffing levels, it will be better positioned to set realistic policies and targets.” The NPS also stated it “will develop and publish milestones and completion targets for each milestone.” The target implementation date is December 31, 2025.

**OIG Comment:** Based on the NPS response, we consider Recommendation 13 resolved. The NPS’ target implementation date for this recommendation, however, is more than 1 year from this report’s issuance date. Accordingly, the NPS should provide a revised target implementation date or establish mitigating measures until the recommendation is fully implemented. We will consider this recommendation implemented when the NPS provides documentation demonstrating it has developed and established policies for effective implementation of grant awarding milestones and targets.

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# Appendix 1: Scope and Methodology

## Scope

We evaluated the National Park Service’s (NPS’) Land and Water Conservation Fund (LWCF) State Side program for fiscal years (FYs) 2017 through 2020 and other periods as deemed necessary.<sup>60</sup> The NPS’ lack of a complete and accurate LWCF site listing and a central grant repository<sup>61</sup> limited our ability to analyze certain elements of the LWCF State Side program, including the total number of LWCF sites, grants, and related dollars the NPS awarded since the inception of the program in 1965.

## Methodology

We conducted our evaluation in accordance with the *Quality Standards for Inspection and Evaluation* as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions and recommendations. To meet our objectives, we:

- Reviewed the LWCF Act, the LWCF Manual (Vol. 69, effective October 2008 to January 2021), U.S. Department of the Interior policies, and other Federal regulations.
- Interviewed NPS, State, nonprofit, and National Association of State Outdoor Recreation Liaison Officers officials to understand the LWCF program and processes.
- Selected a judgmental sample of 10 States for review: 5 States from the NPS’ Southeast Region (Connecticut, Florida, Massachusetts, New York, and West Virginia) and 5 from the NPS’ Midwest Region (California, Illinois, Minnesota, Nebraska, and Wisconsin).
- Designed an evaluation checklist to facilitate a high-level review of each of the 10 States in our sample. The checklist included steps to assess States’ compliance with applicable laws and regulations, such as the Act; LWCF Manual; LWCF grant stipulations; 2 C.F.R. part 200, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards”; Cost Principles (U.S. Office of Management and Budget Circular A–87); and other grant requirements.

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<sup>60</sup> We extended our analysis outside the defined scope of FYs 2017 through 2020 (October 1, 2016, through September 30, 2020) when processes for a particular review remained incomplete past October 30, 2020. Specifically, the NPS initiated Outdoor Recreation Legacy Partnership grant rounds three and four during the scope review period, but, in this report, we discuss delayed applications and awarded project agreements beyond FY 2020. We also went beyond October 30, 2020, for California’s 2020 Statewide Comprehensive Outdoor Recreation Plan update extensions and Nevada’s July 2021 formula grant applications that were originally intended to be submitted in FY 2020.

<sup>61</sup> The NPS’ State and Local Assistance Programs Division told us that it could not readily furnish the total number and dollar amounts of LWCF State Side grants issued since the inception of the LWCF because it lost the capability to report these statistics when its legacy grant database became obsolete.

- Collected and analyzed NPS data, such as the State and Local Assistance Programs Division organizational chart, LWCF active grant listing, Statewide Comprehensive Outdoor Recreation Plan (SCORP) tracking report, Outdoor Recreation Legacy Partnership (ORLP) program grant documented processes, LWCF budgets, and program review reports.
- Collected and analyzed State data, such as SCORPs, Open Project Selection Processes (OPSPs), active and open grant listings, LWCF real property listings, comprehensive LWCF site listings, grant performance reports, financial reports, site inspection reports, and Federal appraisal reports.
- Selected a judgmental sample of five grant projects (one acquisition and four development grant projects): one grant project from each of the five Southeast Region States. For the five LWCF grants reviewed, we determined if grant projects were (1) eligible to receive LWCF grants and (2) compliant with respective grant agreements. To accomplish this, we obtained and reviewed State SCORPs, OPSPs, appraisals, grant award letters, amendments to award letters, SF-425s, annual grant performance reports, onsite inspection reports (to include pre-award, progress, and final inspections), and environmental forms.

**FY 2017 Through FY 2020 Open and Active State LWCF Grant Projects Reviewed**

<b>State</b>	<b>Grant No.</b>	<b>Grant Name</b>	<b>Type of Grant</b>	<b>Project Type</b>	<b>Grant Amount (\$)</b>
Connecticut	P15AP00412	Johnson Oak Park	ORLP	Development	375,000
Florida	P17AP00374	Essex Park	Formula	Development	200,000
Massachusetts	P18AP00130	Ja Mar Farm	Formula	Acquisition	227,250
New York	P19AP00501	Jones Beach	Formula	Development	1,250,000
West Virginia	P17AP00547	Benwood	Formula	Development	585,675

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## Appendix 2: Monetary Impact

<b>Description</b>	<b>Unallowable Questioned Costs (\$)</b>
Noncompliant appraisal	454,500 (227,250 Federal share)
<b>Total</b>	<b>\$454,500 (\$227,250 Federal share)</b>

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## Appendix 3: List of Abbreviations

<b>Abbrev.</b>	<b>Full Name</b>
AVSO	U.S. Department of the Interior’s Appraisal and Valuation Services Office
DOI	U.S. Department of the Interior
EDS	Enterprise Development Services
FAIR	Financial Assistance Interior Regulation
FBMS	Financial and Business Management System
FY	Fiscal Year
LWCF	Land and Water Conservation Fund
NASORLO	National Association of State Outdoor Recreational Liaison Officers
NOFO	Notice of Funding Opportunity
NPS	National Park Service
OMB	U.S. Office of Management and Budget
OPSP	Open Project Selection Process
ORLP	Outdoor Recreation Legacy Partnership
RAPIDS	Recreation Assistance Programs Information Data System
SCORP	Statewide Comprehensive Outdoor Recreation Plan
SLA/SLAD	State and Local Assistance Programs Division
<i>UASFLA</i>	<i>Uniform Standards for Federal Land Acquisitions</i>
<i>USPAP</i>	<i>Uniform Standards of Professional Appraisal Practice</i>

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## **Appendix 4: Response to Draft Report**

The National Park Service's response to our draft report follows on page 41.



# United States Department of the Interior

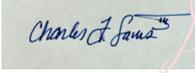
NATIONAL PARK SERVICE

1849 C Street, NW

Washington, DC 20240

10.10.A.(2225)

To: Assistant Inspector General for Audits, Inspections and Evaluation

From: Director  Digitally signed by  
CHARLES SAMS  
Date: 2023.08.22  
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Subject: Draft Evaluation Report – The National Park Service Should Increase Monitoring and Oversight to Protect the Integrity and Recreational Value of the Land and Water Conservation Fund State Side Project (Report No. 2021-ER-026)

This memorandum transmits the National Park Service (NPS) management's response to each of the audit recommendations, general plans for corrective actions, and documentation of corrective actions taken. NPS management is committed to the State and Local Assistance (SLA) Program, improving our oversight, and ensuring compliance with applicable laws, Federal regulations, and NPS guidance. Our responses are listed below:

**Recommendation 1:** Comply with DOI-PGM-POL Reference No. 0003, which requires the National Park Service to maintain a record, such as a list, of Land and Water Conservation Fund Federal interest properties. At a minimum, the record must include the Federal award identifier number and information sufficient to document interest, authorized purpose, legal description, location, and size of the land parcel.

**Response:** Concur. The NPS already has some capacity to comply with this requirement, using the legacy Land and Water Conservation Fund (LWCF) database. However, as the SLA Program has been in existence since 1965, the data on file does not fully align with the reporting requirements set by the Department of the Interior (DOI) in 2019. Further, the legacy LWCF database had to be largely decommissioned around 2015 in part because it was integrated with NPS's old financial system. When DOI migrated all Bureaus to the new Financial and Business Management System (FBMS), it resulted in the loss of important existing systems and functionality, without the ability within FBMS to replace all the integrated systems and functionality that was lost.

Consequently, the NPS has been working with NPS's Enterprise Development Services (EDS) Branch to develop a third-generation data and reporting system for all LWCF-assisted sites and grant and assisted site information, which will restore the lost capacity and allow for compliance with this requirement. However, as this effort precedes DOI's real property status requirements, further adaptation of the data model will be needed to capture all the required information and it will take time to get this data added for all grant records (approximately 50,000). We anticipate the new system, RAPIDS, being operational in fiscal year (FY) 2024. Ultimately, the new system will be able to serve as the platform to integrate the site and grant data to fully comply. The NPS will also need to further invest in new staff to dedicate to support these tasks in coordination with State partners.

In terms of addressing the deficiencies with the legacy data, the NPS has informed its State partners about the Real Property Status Report requirements (2 CFR § 200.330 and the FAIR - 2 CFR § 1400.329(d)) on multiple occasions and added the requirements in the 2021 LWCF Manual update. The requirement also appears in the terms and conditions attached to each new grant. Although the FAIR was written to apply the requirements only to land acquisition grants, the NPS needs to include development grants as well, as they are subject to the same LWCF Act requirements. Currently, the LWCF Manual recommends use of the SF-429 for reporting on development projects also. The LWCF conversion regulations at 36 CFR Part 59 and the LWCF Manual already made State partners responsible for post-grant completion compliance and inspections of all LWCF-assisted sites on a 5-year cycle and the Manual further directs States to, within 90 days of completion of an on-site inspection, submit the SF-429 and a copy of the post-completion on-site inspection report to the NPS. The existing inspection requirements can be adapted to capture the additional information required to complete the SF-429 (some of which is already being collected on their on-site inspection reports). The NPS will need to reinforce with staff that they confirm during the close-out process that an SF-429 was submitted for each acquisition or combination grant.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2024, for the official launch of RAPIDS

**Recommendation 2:** Determine the number of Land and Water Conservation Fund sites that are overdue for post-inspection reporting and require that States conduct inspections to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).

**Response:** Partially Concur. Maintaining and implementing a site inspection schedule is primarily the responsibility of the State partners. As the LWCF grantee, each State should have its own tracking capability for sites that have received grant in that State, and many do. However, again due to the loss of the legacy LWCF database resulting from the transition to FBMS described in the response to recommendation 1, the NPS lost its capacity to provide meaningful support to State partners in this effort as the database had included a tool for inspection tracking, although it was by grant, not by site. The new data system described in Response 1 will include a module for and interface to capture and track State inspection information like the last database did, however, that tool will not be available at the time of the initial launch.

As described further in the response to recommendation 3, the NPS needs to initially focus its efforts on ensuring State partners have a robust inspection program and active practices in place that support a 5-year park inspection cycle. However, as part of an assessment effort to understand the status of each State partner's inspection program, the NPS will work to identify an estimate of sites overdue for inspections. The ability to generate a truly accurate number of sites needing inspection at any point will only be possible after the NPS and State partners have validated the list of LWCF-assisted sites in each State, Territory, and DC.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2025, to add inspection tracking tool to RAPIDS

**Recommendation 3:** Develop and implement a process to ensure and verify that States submit mandatory post-completion inspection reports to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).

**Response:** Concur. The LWCF Manual (chapter 8) outlines the requirements and process for States to conduct the required 5-year on-site inspection. The NPS has an Inspection Agreement with each State partner that outlines the State's methods and process to meet grant and stewardship obligations. In FY 2022 the NPS initiated a review of these agreements, in part to assess their conformity with the SF-429 reporting requirements. The NPS will need to resume that effort and work closely with State partners to establish common requirements and processes to capture core inspection data and other information that will need to be developed, before starting to work individually with each partner to ensure their agreement is current and lay out steps to address any inspection backlog. This will undoubtedly take time. While some partners have made significant investments in their site inspection programs, others will need to adapt and expand their current efforts, which could require considerable time and resources. This responsibility was a major justification for the new administrative grant program and the NPS is hopeful that these grants will provide the needed resources to support this State obligation.

Nevertheless, once State partners are on track to restore implementation of a 5-year inspection cycle, NPS emphasis will shift to ensuring that the new data system has adequate tools to support proper monitoring and reporting, as well as appropriate accountability practices, to ensure there is little to no backlog on an annual basis. As with the State partners, NPS will need to boost its current capacity in the areas of data management, technical assistance to partners, and compliance to address post project compliance issues that will undoubtedly be revealed due to the focused efforts. The NPS will need to further invest in dedicated data system staff to create these linkages in its system and support these tasks in conjunction with state partners, to ensure timely attention to the backlog.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2025

**Recommendation 4:** Conduct the required program review for all States in accordance with the National Park Service Land and Water Conservation Fund Manual and complete and distribute the required report to the National Park Service headquarters and State Governors in a timely manner.

**Response:** Concur. The NPS already recognized the importance of the State program review and was aware of the challenges the regional offices were having to keep this activity on track. For these reasons, the NPS's staffing expansion plan established after the Great American Outdoors Act was enacted already included the creation of a new program evaluation lead position. Responsibilities will include coordinating and managing the review process, ensuring that an overall review schedule is established and maintained and that there is follow-through on each State review.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2024, for hire of new staff position.

**Recommendation 5:** Update the National Park Service Land and Water Conservation Fund Manual to define the concept of a “mini-review” and provide further information on when a mini-review is appropriate and what it entails.

**Response:** Non-concur. The NPS eliminated the reference to the “mini-review” in the 2021 update to the LWCF Manual. As described in the previous 2008 Manual, this concept was tied to the circumstance of the program receiving low or no funding, and thus not having resources to conduct reviews. This is no longer a concern so full State reviews should be the standard practice.

Responsible Officials: None

Target Date: Complete

**Recommendation 6:** Conduct an assessment of all open State Side grants to determine those that are missing financial and performance reports from FYs 2017 through 2022.

**Response:** Concur. The NPS recognizes that missing financial and performance reports reduces the program’s ability to effectively monitor States’ progress on projects. To help assure better adherence to and remedy known issues with grant compliance, a new program lead for financial assistance position was created and filled earlier in FY 2023 and the NPS’s organization expansion plan included a new grant management specialist position. In the meantime, GrantSolutions.gov has a report that the NPS can use to help inventory reports for active grants to get a sense of which ones are missing. However, grants issued prior to FY 2021 were created in DOI’s first electronic grants management system, PRISM, which did not have an interface allowing grantees to directly submit reports, and in any event, the DOI standard for grant file of record was a paper file. As a result, prior to and during the transition from PRISM to Grantsolutions.gov, any reports submitted were mailed or emailed directly to program officers. Most of these reports had not been added to the electronic grant files, although good progress has been made in FY 2023.

During FY 2024, the program hopes to hire five grants management specialists who will work under the FA program lead and help provide more capacity to ensure NPS and state partner compliance with 2 CFR 200 requirements, including reporting. The missing reports inventory will be conducted in the first quarter, checking to the extent possible, GrantSolutions, PRISM, hard copy files, and emails. After uploading any found reports to GrantSolutions, State recipients will be contacted to provide a list of reports that appear to be missing.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2024

**Recommendation 7:** Require States to submit all missing financial and performance reports and verify submission for open State Side grants.

**Response:** Concur. Based on the inventory effort described in the response to Recommendation 6, and building on that response, State partners will be directed to submit missing reports to GrantSolutions by no later than the end of the next report submission period. GrantSolutions.gov allows for late reports to be submitted at any time. Further, prior to closeout of any grant, the program officer, with grants management specialist assistance, will be required to find and or collect all outstanding reports from States to complete the grant record.

Additionally, the NPS is developing a technical assistance document for State partners on reporting requirements and will try to make reporting easier through a greater emphasis on using milestones and measures to track progress and standardize the reporting effort. GrantSolutions.gov provides an activity log documenting the dates reports were submitted, so all late reports will be noted as such. The annual risk assessment for each State will address the level of missing reports. The risk assessment determines the level of oversight of the State by the NPS. If a recipient remains out of compliance on reporting, either with missing or consistently late reports, other remedies will be considered, including requiring more frequent reporting. Additional remedies will be considered as outlined in 2 CFR 200.339 for non-compliance, including 2 CFR 200.339(e), withholding further Federal awards for the project or program until all existing awards are in reporting compliance.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2024

**Recommendation 8:** Standardize the Statewide Comprehensive Outdoor Recreation Plan extension provision across regions.

**Response:** Concur. The NPS already has established policy and internal guidelines for Statewide Comprehensive Outdoor Recreation Plan (SCORP) extensions not to exceed one (1) year from the expiration of the current SCORP, which States can request prior to their SCORP's expiration or during the 90-day grace period after a SCORP expires. The latter may be needed particularly if the NPS determines a SCORP submission is not approvable. The NPS tries to avoid lapses and the Manual clearly articulates in Chapter 2, section A.9 what actions are and are not allowed for a State when they are in an ineligible status. However, NPS can review its SCORP extension guidance and reissue as appropriate and work to integrate the information into the LWCF Manual for better staff and State partner awareness.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2024

**Recommendation 9:** Consistently monitor and notify States when Statewide Comprehensive Outdoor Recreation Plans are nearing expiration and ensure each State’s eligibility to receive Land and Water Conservation Funds.

**Response:** Concur. The SLA Program office in Washington, DC already tracks SCORPs, as do the regional offices. However, because of limited capacity the NPS was not always able to timely remind State partners that their SCORPs were due to expire. As a result, in the last few years the NPS changed its practice to try to remind States two (2) years before plan expiration instead of just one (1) year, to ensure State partners would have time to start development of their next SCORP and/or to apply for a planning grant if needed in case they had forgotten to keep track of this long-standing responsibility themselves. Again, as a result of NPS’s own assessment of staff needs, the organization expansion plan includes a new SCORP team: a national SCORP program coordinator and a planning specialist in each regional office, who will provide technical assistance to State partners, review draft SCORP plans, monitor plan status and communicate with partners ahead of their SCORP expiration, and generally help track the States’ eligibility.

Responsible Officials: None.

Target Date: Complete.

**Recommendation 10:** In coordination with the Appraisal and Valuation Services Office, develop and implement a process to ensure appraisals comply with the Uniform Appraisal Standards for Federal Land Acquisitions in accordance with 2 C.F.R. part 1402.

**Response:** Concur. The NPS takes seriously the obligation to ensure appraisals for LWCF projects meet Federal standards and has worked collaboratively with the Appraisal and Valuation Services Office (AVSO)—or its predecessors—for many years, such as to develop the LWCF Manual language regarding appraisal requirements, provide technical assistance to State partners through sessions at LWCF trainings, an FAQs document, or when it suspects a problem with an appraisal or a State’s appraisal program. The LWCF Program already has a policy that all appraisals are required to be reviewed by State-certified reviewer appraisers to confirm they meet the Federal appraisal standards. Nonetheless, the NPS is open to continuing to work with AVSO to revisit and reevaluate existing practices and explore other methods to complement the existing requirements outlined in the LWCF Manual, to try to improve State compliance with these long-standing obligations.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2025

**Recommendation 11:** Resolve the \$227,250 in questioned costs associated with Grant No. P18AP00130.

**Response:** Concur. The NPS was not aware of the AVSO review before this report was shared and has not received a copy. The NPS will follow up with AVSO. The NPS notes that even when an

appraisal is not prepared in full conformity to the Federal standards, it does not necessarily mean that the resulting valuation is incorrect.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2023

**Recommendation 12:** Assess its grant awarding processes for both formula and Outdoor Recreation Legacy Partnership grants to determine the appropriate milestones and targets.

**Response:** Concur. Existing NPS process target timelines were set in 2016 before program funding started to increase and when the volume of grant applications and amendments was about half of what it is today (250-300 actions a year instead of 500-700). Besides setting the grant application windows to try to manage the overall workflow, the NPS has instituted policies and procedures to require submittal of drafts of applications before the Grants.gov submission windows, as well as NPS approval to enter an application into Grants.gov, to try to ensure that submitted applications are complete and compliant and therefore actually actionable for award. If applications were not awarded for extended periods, it is likely that in many cases this was due to problems with the application that prevented award.

Appropriate milestones and targets are dependent on several factors. NPS capacity to review and complete required compliance in a timely fashion requires adequate staffing levels and complete submitted applications. Although NPS has been working diligently to try to scale up the SLA operation to match the funding increases of the last 5 years, NPS still lacks staffing across all the teams needed to support the financial assistance review and award process. The complicated nature of construction and acquisition financial assistance projects are inherently challenging for project sponsors to gather and/or prepare the required documentation that comprises a complete and compliant application. Further, the NPS is required to review the application to meet all mandatory environmental and financial assistance laws, regulations, and policies.

The SLA Program has been hiring additional program and compliance officers throughout FY 2023 and is on track to decrease the number of States assigned to each program officer from three to five States to the target of two States. The addition of grant management specialists will also add capacity for application processing, allowing program officers to spend more time working with States on application development. The NPS plans to evaluate the submission calendar to better space out the workload with the addition of administrative grants and the Readiness + Recreation grant program. Further, the NPS believes that by providing administrative grants, State partners will gain more capacity and will more often be able to submit complete and compliant applications that can be awarded more quickly after required NPS review. When full staffing is achieved by both NPS and the States, the NPS believes that it will be better able to assist State partners, and State partners will be better able to assist project sponsors, to submit complete and compliant applications that are ready for the required Federal reviews.

For the ORLP program specifically, it is important to clarify that for rounds 1 through 5, the NPS required only a limited “pre-application” to try to reduce the time, effort, and cost for prospective

applicants to participate in the competition. As a result, the competition resulted only in a selection for the projects that would be invited to submit a complete and final application. The NPS does not dispute the time periods after the initial announcement to award, but this timeframe was largely driven by how long it took the State partner and project sponsor to prepare and submit an actionable application. The NPS did not have actual applications for these projects for the full time described.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships & Civic Engagement  
TBD, Deputy Associate Director, Partnerships & Civic Engagement

Target Date: December 31, 2025

**Recommendation 13:** Establish policies for effective implementation of the grant awarding milestones and targets.

**Response:** Concur. As noted in the response to recommendation 12, any awarding targets need to be appropriate for the level of staffing and work. Once the NPS is closer to achieving the desired staffing levels, it will be better positioned to set realistic policies and targets. Supplementing the response to recommendation 12, the NPS previously identified major issues that increase time between application submission and award and/or require substantive revision to applications. Documented causes of delays after application submission that would preclude award include incomplete or inadequate application materials that support the substance of the grant request; incomplete environmental compliance; and/or control and tenure problems that would preclude eligible construction within the project area. The NPS will work with States to provide additional training on the grant process to improve submissions. In addition, the NPS will develop and publish milestones and completion targets for each milestone.

Responsible Official: Lauren Imgrund, Associate Director, Partnerships and Civic Engagement  
TBD, Deputy Associate Director, Partnerships and Civic Engagement

Target Date: December 31, 2024

If you should have any questions or need additional information, please contact Vera Washington, NPS Audit Liaison Officer, at [REDACTED]@nps.gov.

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## Appendix 5: Status of Recommendations

Recommendation	Status	Action Required
<p><b>2021-ER-026-01</b> We recommend that the National Park Service comply with DOI-PGM-POL Reference No. 0003, which requires the National Park Service to maintain a record, such as a list, of Land and Water Conservation Fund Federal interest properties. At a minimum, the record must include the Federal award identifier number and information sufficient to document interest, authorized purpose, legal description, location, and size of the land parcel.</p>		
<p><b>2021-ER-026-02</b> We recommend that the National Park Service determine the number of Land and Water Conservation Fund sites that are overdue for post-completion inspection reporting and require that States conduct inspections to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).</p>	<b>Resolved</b>	We will track implementation.
<p><b>2021-ER-026-03</b> We recommend that the National Park Service develop and implement a process to ensure and verify that States submit mandatory post-completion inspection reports to ensure Land and Water Conservation Fund sites are operated and maintained for public outdoor recreation as required by the Land and Water Conservation Fund Act section 6(f)(3).</p>		
<p><b>2021-ER-026-04</b> We recommend that the National Park Service conduct the required program review for all States in accordance with the National Park Service Land and Water Conservation Fund Manual and complete and distribute the required report to the National Park Service headquarters and State Governors in a timely manner.</p>		

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Recommendation	Status	Action Required
<p><b>2021-ER-026-05</b> We recommend that the National Park Service update the National Park Service Land and Water Conservation Fund Manual to define the concept of a “mini-review” and provide further information on when a mini-review is appropriate and what it entails.</p>	<b>Implemented</b>	No action is required.
<p><b>2021-ER-026-06</b> We recommend that the National Park Service conduct an assessment of all open State Side grants to determine which are missing financial and performance reports from FYs 2017 through 2022.</p>		
<p><b>2021-ER-026-07</b> We recommend that the National Park Service require States to submit all missing financial and performance reports and verify submission for open State Side grants.</p>		
<p><b>2021-ER-026-08</b> We recommend that the National Park Service standardize the Statewide Comprehensive Outdoor Recreation Plan extension provision across regions.</p>	<b>Resolved</b>	We will track implementation.
<p><b>2021-ER-026-09</b> We recommend that the National Park Service consistently monitor and notify States when Statewide Comprehensive Outdoor Recreation Plans are nearing expiration and ensure each State’s eligibility to receive Land and Water Conservation Funds.</p>		
<p><b>2021-ER-026-10</b> We recommend that the National Park Service, in coordination with the Appraisal and Valuation Services Office, develop and implement a process to ensure appraisals comply with the <i>Uniform Appraisal Standards for Federal Land Acquisitions</i> in accordance with 2 C.F.R. part 1402.</p>	<b>Unresolved</b>	We will meet with the National Park Service to further discuss resolution of this recommendation.
<p><b>2021-ER-026-11</b> We recommend that the National Park Service resolve the \$227,250 in questioned costs associated with Grant No. P18AP00130.</p>	<b>Resolved</b>	We will track implementation.

Recommendation	Status	Action Required
<p><b>2021-ER-026-12</b>            We recommend that the National Park Service assess its grant awarding processes for both formula and Outdoor Recreation Legacy Partnership grants to determine the appropriate milestones and targets.</p>	<b>Resolved</b>	We will track implementation.
<p><b>2021-ER-026-13</b>            We recommend that the National Park Service establish policies for effective implementation of the grant awarding milestones and targets.</p>		



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