

A Comprehensive Review of the Tracking and Reporting Actions for the Conservation of Species (TRACS) System

Prepared for the Association of Fish and Wildlife Agencies

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Executive Summary

For almost 80 years, a significant portion of conservation funding in the United States has been provided by an excise tax on firearms, ammunition, archery, and fishing equipment. More recently recreational boaters also have contributed to conservation funding through fuel and electric motor taxes. Collectively, the Pittman-Robertson Wildlife Restoration Act (PR), the Dingell-Johnson Sport Fish Restoration Act (DJ), the Wallop-Breaux Amendment (WB) to DJ, and the State Wildlife Grant (SWG) Program are managed by the United States Fish and Wildlife Service (FWS) through the Wildlife and Sport Fish Restoration (WSFR) Program. This program has cumulatively provided more than \$19.7 billion to states for fish and wildlife conservation since 1937.

To continue to sustain and enhance these conservation revenue streams to the states, it is critical that the WSFR Program establish rigorous performance metrics to effectively communicate the conservation and recreational achievements of its partners. Quantitatively measuring performance for grants is required by federal regulation, and expected by Congress, the outdoor recreational industry, and the American people.

Over the past decade, the FWS has worked with its state partners to develop a system to collect, compile, and report performance measures for the WSFR Program. The Tracking and Reporting Actions for the Conservation of Species (TRACS) is the newly-designed system tasked to replace a component of the now-defunct Federal Aid Information Management System (FAIMS) database as the instrument for collecting performance-reporting data and license certification data for the WSFR program.

While the enabling legislation of the WSFR Program does not specifically indicate an expectation of performance, these grant programs are subject to the Government Performance and Results Act (GPRA, Pub. Law 103-62) which requires agencies to report annually on their performance. There is a requirement to demonstrate performance delineated in the Wildlife Conservation and Restoration Program (WCRP) section of PR. This particular requirement for performance metrics has been reiterated for the SWG program in Congressional appropriation bills and report language through the annual budget process since 2001. Within the Code of Federal Regulations (CFR), the *Administrative Requirements, Pittman-Robertson Wildlife Restoration and Dingell-Johnson Sport Fish Restoration Acts* (50 CFR 80) generally addresses the grant approval process, reporting requirements, compliance with federal laws and regulations, and terms and conditions of a grant, all of which indicate the role of FWS in administering the program to the State Fish and Wildlife agencies. This grantor/grantee relationship provides the FWS with the authority to collect performance metrics as a part of the grant process. Government-wide requirements for grant performance reporting are found in the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (2 CFR 200), which is a regulation promulgated by the Office of Management and Budget (OMB). This regulation specifically requires the federal awarding agency to require performance measures as related to outcomes to be achieved by the federal agency program. The regulation

also requires that metrics must be aligned with the federal agency strategic goals, objectives, and performance.

The initial start-up for TRACS has not accomplished all the potential uses for such a system, nor has there been universal agreement on which potential uses should drive its primary purpose and goals. However, WSFR partners should strive to reach consensus that it is in the best interest of state, regional, and national level conservation for the program to have understandable, scalable, and efficient outcome-level reporting for grants. Because performance reporting is mandatory under 2 CFR 200, the implementation of a modern grant management system such as TRACS is critical to maintain and enhance the WSFR Program by accurately reporting conservation successes.

In its final form, TRACS should provide state and federal grant managers the ability to efficiently and effectively develop, manage, and report on WSFR-funded projects. It should also meet the regulatory requirements and the desires of OMB and Congress to demonstrate the accomplishments and strategic performance of the WSFR Program. TRACS should provide the public a view of successful conservation projects nationwide as well as provide managers with a tool to more easily share information about projects, facilitate multi-state collaboration, and promote learning. Finally, TRACS should help meet the requests from excise-tax and fuel and engine tax paying industries regarding the accomplishments of WSFR expenditures.

This review, conducted by Wildlife Management Institute (WMI) at the request of the Joint Federal/State Task Force on Federal Assistance Policy (WSFR-JTF), identified several challenges to the continued development and implementation of TRACS. The challenges include:

1. Developing a communications plan for the WSFR Program.
2. Developing and memorializing a process for amending TRACS.
3. Integrating strategies and objectives into TRACS reporting.
4. Defining the level of detail for TRACS reporting.
5. Resolving outcome-reporting issues in TRACS and its impacts on WSFR grants.
6. Determining ability for non-state entities to access TRACS data.
7. Resolving workload issues caused by duplicative components of TRACS.
8. Various technical challenges.

As the result of this review, WMI has made several specific recommendations that the WSFR-JTF and WSFR partners can adopt that will resolve these challenges. WMI believes that the acceptance of the recommendations contained within this report by the Association of Fish and Wildlife Agencies (AFWA) and the FWS, the propagation and implementation of these recommendations by the partners, and an effective communications plan for the WSFR program will ultimately result in a system of measuring conservation performance that will continue to demonstrate the mission-critical nature of using product excise taxes and fuel and engine taxes to fund wildlife conservation across our country.

Scope of Work

To review the purpose, function, and implementation of the TRACS performance-reporting database for the AFWA and FWS-WSFR Program. In this review document, WMI addresses the following aspects:

- Review and summarize the development and implementation of the TRACS performance-reporting database.
- Examine and summarize the legal, administrative, and congressional authority for performance reporting requirements by the WSFR Program.
- Coordinate an independent needs analysis for TRACS with select FWS staff and AFWA members in advance of a joint Meeting of the Parties (MoP).
- Challenge applicable parties to objectively and critically review and evaluate their collective, essential needs as well as their ultimate wants prior to a joint MoP.
- Coordinate with federal and state leadership in developing a joint MoP.
- Convene a two-day, facilitated, joint MoP among state fish and wildlife agency Directors or their representatives, FWS WSFR leadership, and state and federal staff, as appropriate, who have background in TRACS development.
- Through pre-meeting information and meeting presentations, establish a common baseline among meeting participants to enable productive discussions.
- Through facilitated discussion, accomplish the desired outcome of a common vision and shared purpose and goals for a national performance-reporting database for the WSFR Program, such that continued development and implementation of TRACS may proceed efficiently and with a high likelihood achieving its common vision.

Timeline for the TRACS Review

Activity	Expected Completion Date
Initial Interviews & Document Collection	July 15, 2016
Document Review	July 15, 2016
Establish Approved Logistics for MoP	July 15, 2016
Review and Summarize Development and Implementation of TRACS	August 1, 2016
Develop Agenda for MoP	August 15, 2016
Perform Needs Analyses with AFWA & FWS (Small Group)	August 15, 2016
<ul style="list-style-type: none"> • Meeting with Designated State & Federal Officials • Meeting with OMB and/or Congressional Staff 	
Evaluate and Compile Results from Needs Analyses	August 30, 2016
Coordinate and Host MoP	September 30, 2016
<ul style="list-style-type: none"> • Background Materials • Presentation Coordination • Facilitation Services • Minutes and Notes 	
Review and Analysis of Meeting Outputs	October 15, 2016
Draft Document Analysis and Review (Internal - WMI)	November 1, 2016
Draft Document to WSFR-JTF	November 22, 2016
Incorporation of Document Edits from WSFR-JTF	December 5, 2016
Final Product to AFWA and FWS	December 5, 2016

Acronyms and Definitions

Acronym	Definition
Act(s)	The Pittman-Robertson Wildlife Restoration Act and/or the Dingell-Johnson Sport Fish Restoration Act(s)
AFWA	Association of Fish and Wildlife Agencies
ASAP	Automated Standard Application for Payment
BIG	Boating Infrastructure Grant Program
CFR	Code of Federal Regulations
CHM	Conservation Heritage Measures
CHSP	Conservation Heritage Strategic Plan
CIAP	Coastal Impact Assistance Program
CMS	Comprehensive Management System
CVA	Clean Vessel Act
DJ	Dingell-Johnson Sport Fish Restoration Act. (16 U.S.C. 777-777n)
DO	Director's Order
DOI	United States Department of Interior
EM	Effectiveness Measures
ESA	Endangered Species Act
FAC	Federal Aid Coordinator
FAC-WG	FAC Working Group
FAIMS	Federal Aid Information Management System
FBMS	Financial and Business Management System
FOIA	Freedom of Information Act
FWS	United States Fish and Wildlife Service
GAO	Government Accountability Office
GPRA	Government Performance and Results Act
LIP	Landowner Incentive Program
MoP	Meeting of Parties
MOU	Memorandum of Understanding
MSCG	Multistate Conservation Grant Program
NCW	National Coastal Wetland Conservation Grant Program
NGO	Non-Governmental Organization
NOFO	Notice of Funding Opportunity
OIG	Office of the Inspector General
OMB	Office of Management and Budget
PART	Program Assessment Rating Tool
Parties	The FWS and State Fish and Wildlife Agencies, collectively
PR	Pittman-Robertson Wildlife Restoration Act. (16 U.S.C. 669-669k)
Secretary	The Secretary of the United States Department of Interior
SEIS	Supplemental Environmental Impact Statement
SF	Standard Form, primarily the SF-424 Family

SFR	Sport Fish Restoration Program
SI	Stewardship Investments
SMART	Specific, Measurable - with measurement, Achievable, Relevant, and Time-oriented
State(s)	The collective or individual states, commonwealths, and territories of the United States
State Director(s)	Administrative head of a state fish and wildlife agency
SWAP	State Wildlife Action Plan
SWG	State Wildlife Grants Program
TRACS	Tracking and Reporting Actions for the Conservation of Species
TRACS-GC	TRACS Guidance Committee
TRACS-PAG	TRACS Project Advisory Group
TRACS-WG	TRACS Working Group
TWG	Tribal Wildlife Grants Program
U.S.C.	United States Code
WB	Wallop-Breaux Amendment to the DJ Act
WCRP	Wildlife Conservation and Restoration Program of the PR Act
WMI	Wildlife Management Institute
WR	Wildlife Restoration Program
WSFR	Wildlife and Sport Fish Restoration Program
WSFR-AD	WSFR Assistant Director
WSFR-ARD	WSFR Assistant Regional Director
WSFR-HQ	WSFR Headquarters
WSFR-JTF	Joint Federal/State Task Force on Federal Assistance Policy
WSFR TRACS-RR	WSFR TRACS Regional Representative
2 CFR 200	Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
50 CFR 80	Administrative Requirements, Pittman-Robertson Wildlife Restoration and Dingell-Johnson Sport Fish Restoration Acts

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Introduction

For almost 80 years, a significant portion of conservation funding in the United States has been provided by an excise tax on firearms, ammunition, archery, and fishing equipment, and more recently recreational boaters also have contributed with fuel and electric motor taxes. From the passage of the Pittman-Robertson Wildlife Restoration Act (PR) in 1937 and the Dingell-Johnson Sport Fish Restoration Act (DJ) in 1950, more than \$18.6 billion has passed through the United States Fish and Wildlife Service (FWS) Wildlife and Sport Fish Restoration (WSFR) Program to the states for critical conservation needs. In 2002, the State Wildlife Grants (SWG) Program was created within the WSFR Program, and since that time has brought almost \$1.1 billion in additional funds to the states for wildlife diversity conservation funding.

To continue to sustain and enhance these conservation revenue streams to the states, the WSFR Program must establish rigorous performance metrics and effectively communicate the conservation and recreational achievements for the grants it administers. Quantitatively measuring performance for grants is required by federal regulation, and expected by Congress, the outdoor recreational industry, and the American people. Communication of successes and accomplishments of this scale requires technology, training, ingenuity, capacity, capability, and most importantly, dependable partnerships, to report state, regional, and national-level performance metrics at both the project and programmatic levels.

Over the past decade, the FWS has worked with its state partners to develop a system to collect, compile, and report performance measures for the WSFR Program and the grants that it administers. The Tracking and Reporting Actions for the Conservation of Species (TRACS) is the newly-designed system tasked to replace a component of the now-defunct Federal Aid Information Management System (FAIMS) database as the instrument for collecting performance data and license certification data for the WSFR program.

For its thirteen-year lifespan, FAIMS was the repository for financial and performance reporting and the mechanism for reporting license certification, as well as other grant-related functions. Under this system, states entered license and financial data directly and submitted to the FWS written performance reports for each individual grant. FWS staff reviewed these written reports, extracted the most relevant performance metrics, and entered that data into FAIMS on behalf of the states – potentially creating reporting errors due to transcription issues, workload capacity, and a lack of the detailed understanding needed to accurately and effectively report on performance by the states. By 2012, FAIMS had exceeded its useful lifespan, and the United States Department of Interior (DOI) ordered it to be de-commissioned and replaced by the Federal Business Management System (FBMS). Additionally, a federal website (grants.gov) was developed to streamline and simplify grant applications.

Unlike FAIMS, the purpose of FBMS is to capture and report financial grant data. It does not have the capacity to collect license data or grant performance metrics. Thus, it was critical that the FWS develop a system to collect and report on these vital components of the granting process and thus meet their regulatory obligations. The current version of TRACS, first available for FWS data entry in 2013, and then available for State use in 2014, collects basic grant performance outputs, similar to FAIMS, but it does not currently collect performance outcomes either in a quantitative or narrative format. The enhanced or upgraded version of TRACS slated for 2018 will collect and report quantitative, standardized performance metrics as well as the information necessary for license certification, which is another regulatory obligation of the WSFR Program and, in part, drives the formula-based apportionment of PR and DJ funds to the states.

Over the past several years, the FWS has converted massive amounts of legacy data and reports from the WSFR Program that were provided through the FAIMS system by the states. These data and reports now reside within the TRACS database. Beginning in the fall of 2016, most states are expected to assume primary responsibility for entering WSFR grant report information into the TRACS system. The WSFR programs that will require performance reporting in TRACS include:

- *Wildlife Restoration Program (WR)* – Provides grants for the restoration, conservation, management, and enhancement of wild birds and mammals and their habitats. This program also provides grants to enhance public use and access to wildlife resources, as well as the *Hunter Education Program*, which provides funds for the education of hunters and development of shooting ranges.
- *Sport Fish Restoration Program (SFR)* – Provides grants for the restoration and management of fish species of material value for sport fishing and recreation. This Program includes the *Boating Access Program*, which provides grants for facilities that create or add to public access for recreational boating, and the *Aquatic Resource Program*, which provides grants for aquatic education to increase the public's understanding of water resources and associated aquatic life.
- *Boating Infrastructure Grants (BIG)* – Provides funding to construct, renovate, or maintain tie-up facilities for transient vessels twenty-six feet or more in length.
- *Clean Vessel Act (CVA)* – Provides grants for pump-out stations and waste reception facilities to safely dispose of recreational boater sewage.
- *National Coastal Wetland Conservation Grant Program (NCW)* – Provides funding for long-term conservation of coastal wetland ecosystems by helping states to protect, restore and enhance coastal habitats.
- *State Wildlife Grants (SWG)* – Provides funds for development and implementation of programs that benefit sensitive and imperiled wildlife and their habitats, especially species not hunted or fished (referred to as “species of greatest conservation need”).
- *Tribal Wildlife Grants (TWG)* – Provides funding to federally recognized Tribes for development and implementation of programs that benefit wildlife and their habitat,

including species of tribal culture or traditional importance and those that are not hunted or fished.

- *Multistate Conservation Grants (MSCG)* – Provides funding for wildlife and sport fish restoration projects identified as priority projects by AFWA, to address regional or national level priorities of state fish and wildlife agencies.

The initial start-up for TRACS has not accomplished all the potential uses for such a system, nor has there been universal agreement on which potential uses should drive its primary purpose and goals. With the assistance of a TRACS Working Group (TRACS-WG), established by and inclusive of both federal and state partners, substantial discussion has already occurred concerning the future of TRACS. Nonetheless, as the first wave of substantial updates and revisions to TRACS is on the horizon, it is critical that the time and resource investments in the system reflect a common vision for both state fish and wildlife agencies and the FWS.

The Joint Federal/State Task Force on Federal Assistance Policy (WSFR-JTF) has been instrumental in the development and review of TRACS since its inception. In past meetings, the WSFR-JTF has provided input, reviewed milestones, and resolved conflicts over performance reporting requirements in general and TRACS specifically. The WSFR-JTF, through the Association of Fish and Wildlife Agencies (AFWA), requested the Wildlife Management Institute (WMI) to perform this review to provide an independent analysis of the TRACS system, including its history, legal mandates, the needs of participants and audience, and program development, review, and implementation.

Critical issues regarding TRACS that need to be addressed include: carefully identifying the intended audience(s) including the states, the FWS, and industry partners; the intended purpose of a WSFR performance reporting system; and the required level of informational accountability. The resolution of these issues should ensure that the scope and detail of TRACS is sufficient to meet its intended purpose, while also avoiding unnecessary reporting time and effort on the part of the states and the FWS.

In its final form, TRACS should:

- Provide state and federal grant managers the ability to efficiently and effectively develop, manage, and report on WSFR-funded projects.
- Meet the regulatory requirements and the desires of Office of Management and Budget (OMB) and Congress to demonstrate the accomplishments and strategic performance of the WSFR Program.
- Provide the public a view of successful conservation projects nationwide.
- Provide managers with a tool to more easily share information about projects, facilitate multi-state collaboration, and promote learning.
- Help meet the requests from excise-tax paying industries regarding the accomplishments of WSFR expenditures.

Methodology

Background Research

WMI conducted an extensive review of background materials related to TRACS, including its origins, history, and the evolution of performance reporting for the WSFR program (Appendix IV). To evaluate the legal authority of the FWS to require performance reporting by the states, we examined documents including the PR and DJ Acts and their amendments, Directives from OMB, the Code of Federal Regulations (CFR), FWS Policy Manual Chapters, FWS Director's Orders (DO), and other guidance. We also reviewed the meeting minutes from the WSFR-JTF from 2006 to present to gain a better understanding of how TRACS has been presented, reviewed, modified, and approved by the WSFR-JTF. We examined various PowerPoint presentations that were presented on TRACS at relevant venues, including the AFWA annual conferences, to determine how the TRACS system was rolled out to the larger conservation community. We also reviewed the meeting and conference call notes of the various groups that have been established to facilitate TRACS guidance, development, and implementation, including: TRACS-WG, TRACS Project Advisory Group (TRACS-PAG); TRACS Guidance Committee (TRACS-GC), and the WSFR TRACS Regional Representatives (WSFR TRACS-RR).

Interviews

WMI conducted interviews with the leadership of the WSFR Program to gain a better perspective on how they envisioned the ongoing TRACS development, rollout, and implementation. This interview specifically focused on the planned the handoff of TRACS reporting to the states in October of 2016, how the upcoming revisions to TRACS were proceeding, and when those revisions might be implemented. During the interview process, we also discussed potential challenges to the TRACS system and its rollout and implementation. WMI conducted similar interviews with AFWA staff leadership to gauge the state perspective on how the TRACS implementation was progressing. We also discussed potential challenges to the ultimate success of TRACS as a grants management system. WMI also participated in a FWS briefing with the OMB examiner to further investigate the presence of mandates or directives regarding performance metrics for the WSFR program.

Workgroup Review

A workgroup of ten FWS and state representatives (five from each group) was convened by the co-chairs of the WSFR-JTF and charged with evaluating challenges associated with the continued implementation and revision of the TRACS system. Their task was to evaluate challenges and concerns of the state and FWS partners, determine and evaluate any new challenges not previously identified, delineate facts associated with those challenges, and identify possible solutions or pathways forward. They were also asked to assist with determining which of the challenges were "Adaptive" in nature, and which were more "Technical". Adaptive Challenges are those that require significant thought, discussion, facilitation, compromise, and leadership to arrive at an acceptable solution. Adaptive Challenges should involve agency leadership, policy makers, and subject matter experts

working in cooperation to achieve mutually desired outcomes. Technical Challenges, on the other hand, are more simplistic in nature and often are easily addressed by small groups of subject matter experts. Finally, the workgroup was asked to identify possible subject matter experts to address the challenges, and to determine any opportunities or benefits associated with resolving each of the challenges.

The workgroup convened on August 11, 2016 in AFWA's Washington, DC office to evaluate the challenges developed during the background research and interviews conducted for this review. Using emails and phone calls, they provided subsequent review and revision to the work product developed at the August 11 meeting leading up to the Meeting of Parties (MoP) in September 2016.

Meeting of the Parties

The MoP was convened by invitation of the WSFR-JTF co-chairs at the Rocky Mountain Arsenal National Wildlife Refuge in Denver, CO on September 29-30, 2016. This meeting was facilitated by WMI as a part of this TRACS review with the purpose of providing further insight and discussion of solutions to the challenges facing TRACS. The MoP was specifically tasked with addressing those challenges identified as adaptive by the on-going review process. The Parties were initially briefed on the purpose, approach, and process of the meeting; the status of the TRACS system and desired direction from the WSFR-JTF co-chairs; an overview of the upcoming TRACS enhancement; and proposed pathways forward. Three teams were then formed to independently review and evaluate the challenges to TRACS implementation and to develop and refine possible solutions to these challenges. Finally, the teams reassembled to review and reconcile the outputs developed from the breakout sessions, to discuss an overall communication strategy for the WSFR program, and to discuss efforts to avoid duplication of performance reporting by increasing efficiencies.

Approval by Responsible Parties

Upon completion of the MoP review and the evaluation of the information developed from that process, WMI revised the initial challenges identified to include perspectives and insights from the larger state and federal audience. This information was condensed into a draft Memorandum of Understanding (MOU) designed to address the challenges to TRACS that accompanied this review (Appendix I). Collectively, this information, along with supporting documentation, was forwarded to the WSFR-JTF for review and approval at their November 2016 meeting. Once approved, WSFR-JTF changes were incorporated, and the final product was passed back to the FWS and AFWA in December of 2016 for final acceptance and approval.

Legal Authority for Performance Reporting Requirements

Background

State fish and wildlife agencies receive most of their conservation funding through the sale of hunting licenses, fishing licenses, and associated permits, as well as federal excise taxes on firearms and ammunition, archery equipment, and fishing equipment. License and permit revenue and the associated federal excise tax remains the single largest source of revenue to state agencies, averaging more than 70 percent of their annual budgets.

PR was incorporated into the United States Code (16 U.S.C. 669-669k) in 1937. The Act redirected an 11 percent excise tax on firearms and ammunition (10 percent on pistols and revolvers) from the general treasury to the FWS, with a further directive that these funds be apportioned to the states to provide funding for wildlife restoration. The DJ Act (16 U.S.C. 777-777n) passed in 1950, provided similar support for game fish restoration and management by an assessing excise tax or import duty on most angling and boating equipment (at rates varying from 1 to 10 percent). In 1984, DJ was amended by the Wallop-Breaux Amendment (WB) to include a percentage of the national fuel tax to provide funding for the development and maintenance of recreational boat access.

Congress established the Wildlife Conservation and Restoration Program (WCRP) within PR in 2001 to provide funding for wildlife diversity conservation, but funding was only appropriated for the first year with funding from offshore oil and gas tax and directed to the states to meet conservation objectives for species of greatest conservation need. From this initial effort, the SWG program was formed. SWG has been in place since 2002, with annual appropriations as low \$58 million (2013) and high as \$90 million (2010). Because SWG is appropriated annually during the budget making process of Congress, states are not provided with the stability and consistency of funding needed to support long-term conservation initiatives for species of greatest conservation need.

Collectively, PR, DJ, WB, and SWG are managed by the FWS through the WSFR Program. This program has cumulatively provided more than \$19.7 billion to states for fish and wildlife conservation since 1937 (Figure 1). The WSFR Program is charged with the administration of the funds accumulated and appropriated through PR, DJ, WB, SWG, and several others. Like all Federal programs, these grant programs are subject to the Government Performance and Results Act (GPRA, Pub. Law 103-62) which requires agencies to report annually on their performance. While the WSFR Program's authority, requirements, funding stream, and overall processes are established in the Acts themselves, more specific requirements, including those addressing grant applications, approval, accounting, monitoring, reporting, and eligibility are addressed in the Code of Federal Regulations (CFR), primarily *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (2 CFR 200) and *Administrative Requirements, Pittman-Robertson Wildlife Restoration and Dingell-Johnson Sport Fish Restoration Acts* (50 CFR 80). Further guidance and interpretation of the Acts and associated regulations is provided in the FWS Policy Manual and through Director's Orders (DO). Table 1 summarizes the legal authority for the collection of performance measures for the

WSFR Program. Appendix II consists of the relevant textual summary of legal authority, with reviewer's emphasis noted, of the language found within the Acts, the Code of Federal Regulations, FWS Policy Manual Chapters, and other guidance.

Figure 1. Funding for Wildlife Restoration Program (1937), Sport Fish Restoration Program (1950), and State Wildlife Grants (2001), since inception.

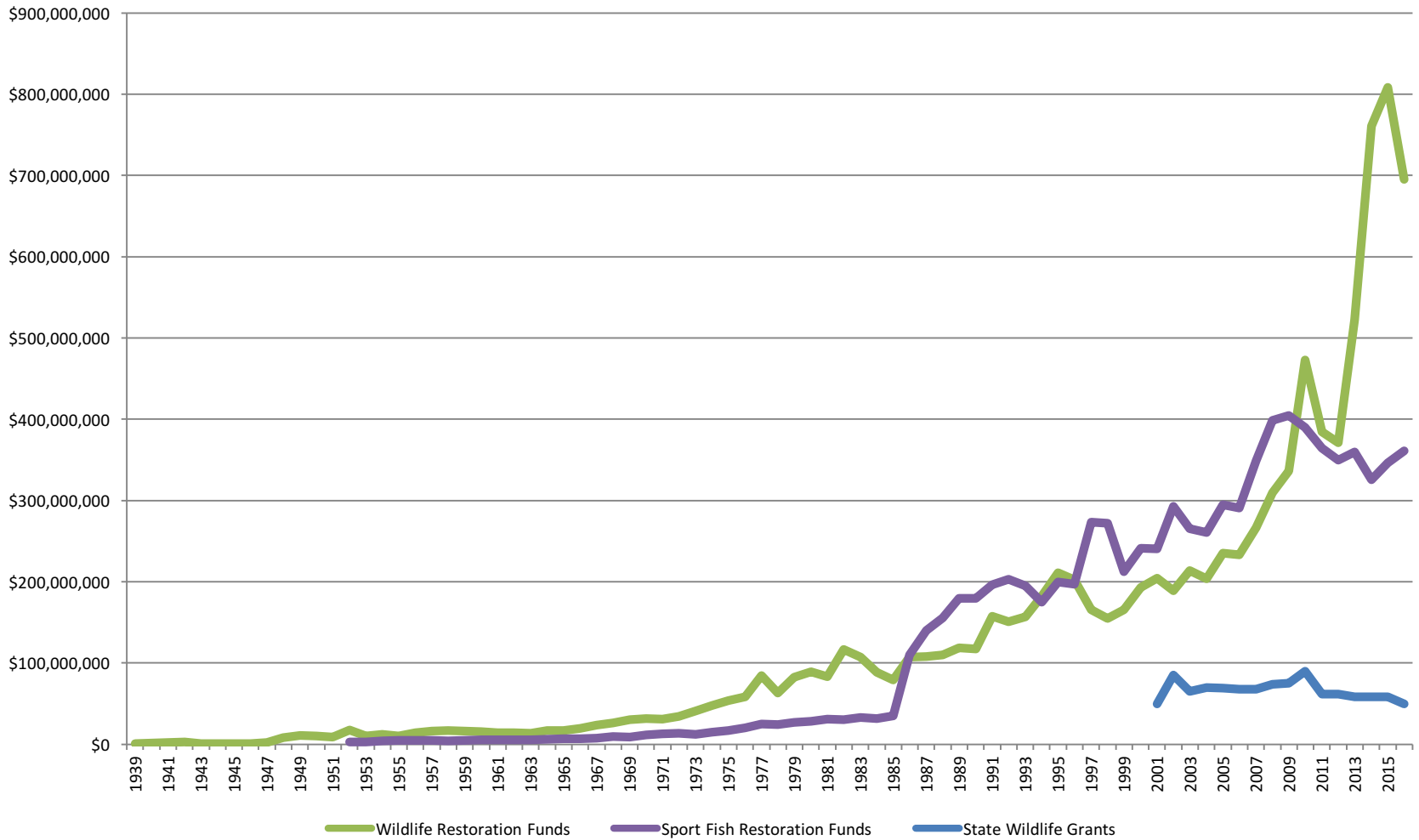


Table 1. Summary of legal references indicative of authority for the WSFR Program to require performance reporting.

Title/Source	Reference	Subject
Pittman-Robertson Wildlife Restoration Act	16 U.S.C. 669c	<ul style="list-style-type: none"> Requires monitoring of effectiveness of conservation actions for WCRP.
	16 U.S.C. 669e	<ul style="list-style-type: none"> Indicates that plans/projects meet standards set by DOI Secretary, who has approval authority. Indicates that plans/projects must be substantial in character and design.
	16 U.S.C. 669f	<ul style="list-style-type: none"> Indicates that plans/projects must be in compliance for payment to states to occur.
	16 U.S.C. 669i	<ul style="list-style-type: none"> Authorizes DOI Secretary to make rules and regulations.
Dingell-Johnson Sport Fish Restoration Act	16 U.S.C. 777e	<ul style="list-style-type: none"> Indicates that plans/projects meet standards set by DOI Secretary, who has approval authority. Indicates that plans/projects must be substantial in character and design.
	16 U.S.C. 777f	<ul style="list-style-type: none"> Indicates that plans/projects must be in compliance for payment to states to occur.
	16 U.S.C. 777i	<ul style="list-style-type: none"> Authorizes DOI Secretary to make rules and regulations.
State Wildlife Grants	Annual Appropriations Bill	<ul style="list-style-type: none"> Can vary from year to year but typically has language similar to 16 U.S.C. 699c requiring monitoring of effectiveness of conservation actions.
Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards	2 CFR 200.210	<ul style="list-style-type: none"> Requires the federal awarding agency to include in the award, an indication of the timing and scope of expected performance by the recipient as related to outcomes to be achieved by the program. Allows the federal awarding agency to include specific performance goals, indicators, milestones, or expected outcomes in the award. Requires reporting requirements to be clearly articulated such that, where

		<p>appropriate, performance during the execution of the federal award has a standard against which non-federal entity performance can be measured.</p> <ul style="list-style-type: none"> • Allows the federal awarding agency to include program-specific requirements, as applicable, which must be aligned with federal agency strategic goals, strategic objectives, or performance goals that are relevant to the program.
	2 CFR 200.301	<ul style="list-style-type: none"> • The federal awarding agency, when appropriate, must require the recipient to relate financial data to performance accomplishments of the federal award. • Requires the recipient, when appropriate, to provide cost information to demonstrate cost-effective practices (e.g., through unit cost data). • Performance reporting frequency and content should be established to not only allow the federal awarding agency to understand the recipient progress but also to facilitate identification of promising practices among recipients and build the evidence upon which the federal awarding agency’s program and performance decisions are made.
	2 CFR 200.328	<ul style="list-style-type: none"> • Requires the recipient to assure compliance with applicable federal requirements and that performance expectations are being achieved. • Requires the recipient to submit performance reports at the interval required by the federal awarding agency. • Requires recipient to submit performance reports using OMB approved government-wide standard information collections when providing performance information. • Requires a comparison of actual accomplishments to the objectives of the federal award established for the period to be reported by the recipient, as appropriate. • Recommends that the federal awarding agency require performance trend data and analysis when it would be informative to the federal awarding agency program. • Allows the federal reporting agency to require a computation of the cost (for example, related to units of accomplishment) when the accomplishments of the federal award can be quantified.
Administrative Requirements, Pittman-Robertson	50 CFR 80.11	<ol style="list-style-type: none"> 1. A state becomes ineligible to receive the benefits of the Acts if it fails materially to comply with any law, regulation, or term of a grant as it relates to acceptance and use of funds under the Acts.

Wildlife Restoration and Dingell-Johnson Sport Fish Restoration Acts	50 CFR 80.81	<ol style="list-style-type: none"> 2. Requires Comprehensive Management System (CMS) states to provide supporting documentation explaining how the proposed work complies with the Acts, the provisions of 50 CFR 80, and other applicable laws and regulations. 3. Requires CMS states to determine actual, projected, and desired resource and asset status; and identify management problems, issues, needs, and opportunities.
	50 CFR 80.82	<ol style="list-style-type: none"> 1. Requires project-by-project states to provide a project purpose, which defines the desired outcome of the proposed project broadly, and the objectives, which define the desired outcome of the proposed project in terms that are specific and quantified. 2. Requires project-by-project states to provide costs by project and subaccount with additional information sufficient to show that the project is cost effective. 3. Requires project-by-project states to provide a timeline, describing significant milestones in completing the project, and any accomplishments to date.
	50 CFR 80.90	<ul style="list-style-type: none"> • Requires state compliance with all applicable federal, state, and local laws and regulations. • Requires states to submit complete and accurate federal financial reports and performance reports by the due dates in the terms and conditions of the grant. • Provides for reasonable access by the federal agency for the purpose of monitoring progress, conducting audits, or other reviews of grant-funded projects. • Specifies that the closeout of an award does not affect the grantee's responsibilities described in this section. • Terms and conditions of a grant – A state accepts the terms and conditions of the grant in one of the following ways: <ul style="list-style-type: none"> • Starts work on the grant-funded project by placing an order, entering into a contract, awarding a sub-grant, receiving goods or services, or otherwise incurring allowable costs during the grant period that will require payment immediately or in the future; • Draws down funds for an allowable activity under the grant; or • Sends the Regional Director a letter, fax, or e-mail accepting the terms and conditions of the grant.
	50 CFR 80.91	<ul style="list-style-type: none"> • Terms and conditions of a grant – A state accepts the terms and conditions of the grant in one of the following ways:

		<ul style="list-style-type: none"> • Starts work on the grant-funded project by placing an order, entering into a contract, awarding a sub-grant, receiving goods or services, or otherwise incurring allowable costs during the grant period that will require payment immediately or in the future; • Draws down funds for an allowable activity under the grant; or • Sends the Regional Director a letter, fax, or e-mail accepting the terms and conditions of the grant.
	50 CFR 80.95	<ul style="list-style-type: none"> • The Regional Director may withhold payments pending receipt of all required reports or documentation for the project.
	50 CFR 80.160	<ul style="list-style-type: none"> • Requires a state to certify that it will comply with the laws, regulations, and policies applicable to non-construction projects, construction projects, or both. • Requires a state to provide a project statement that describes the need, purpose and objectives, results or benefits expected, approach, geographic location, explanation of costs, and other information that demonstrates that the project is eligible under the Acts and meets the requirements of the Federal Cost Principles and the laws, regulations, and policies applicable to the grant. • Requires grantee to report on progress in completing the grant-funded project.

Summary

A review of the enabling legislation (PR, DJ) on which the WSFR Program is based broadly indicates an expectation of performance reporting. Both PR and DJ give authority to the Secretary of the Interior by: 1) granting the Secretary regulatory or rule-making authority for PR and DJ grants, 2) granting the Secretary approval authority over projects, both generally, and based on substantiality in character and design, and 3) requiring that projects be in compliance before payment to states can be made. This expectation of performance is further delineated in the amendment creating the WCRP section of PR (16 U.S.C. 669c) in 2001. While only funded once, the requirement of performance metrics has been reiterated for its successor, the SWG program, in Congressional funding and report language through its annual budget since 2001.

The primary governing regulation for the WSFR Program is 50 CFR 80. Numerous sections within this regulation generally address the grant approval process, reporting requirements, compliance with federal laws and regulations, and terms and conditions of a grant, all of which indicate the role of FWS in administering the program to the State Fish and Wildlife agencies. This grantor/grantee relationship provides the FWS with the authority to collect performance metrics as a part of the grant process.

Government-wide requirements for grant performance reporting are found in the 2 CFR 200, which is a regulation promulgated by OMB (effective December 2014). This regulation specifically requires the following from federal grantors and non-federal grantees:

Grantor (FWS)

1. Requires grantor to include in the award an indication of timing and scope of performance of the grant as related to outcomes to be achieved by the program.
2. Allows grantor to require specific performance goals, indicators, milestones, or outcomes in the award.
3. Requires clear articulation of reporting requirements by the grantor, when appropriate, so that a standard is established by which the grantee's performance can be measured.
4. Allows grantor to include program-specific requirements in the award, as applicable, which must be aligned with agency strategic goals, objectives, and performance.
5. Allows grantor to require reporting of financial data, e.g., a computation of cost related to units of accomplishment, in relation to performance.
6. Recommends that grantor require performance trend data and analysis when it would be informative to the grantor.

Grantee (States and others)

1. Requires grantee, when appropriate, to report cost data to ensure cost-effectiveness.
2. Requires grantee to comply with all federal requirements and demonstrate that performance expectations are being achieved.
3. Requires grantee to submit performance reports at interval set by grantor.
4. Requires grantee to submit performance reports using OMB-approved methods.
5. Requires comparison of actual accomplishments to those established in the award, as appropriate.

Performance Reporting and the WSFR-JTF

History of the WSFR-JTF

The WSFR-JTF was originally chartered in 2002 to review operational policies and administrative issues of national significance for the WSFR Program. Its membership is comprised of two co-chairs, one from the FWS - Office of the Director, and one state fish and wildlife agency Director designated by AFWA. Members include six WSFR Program employees designated by the FWS and six state fish and wildlife agency employees designated by AFWA. At the direction of the co-chairs, working groups are established and/or appropriate legal counsel is enlisted to assist the WSFR-JTF in developing its recommendations.

In 2004, the WSFR-JTF charter was amended to include the SWG Program and the Landowner Incentive Program (LIP). Amendments #2 and #3, in 2011 and 2014 respectively, reflected the name change of AFWA, updated the membership list, and indicated that any further membership updates would be reflected on the WSFR website and not within the charter itself.

The WSFR-JTF was established to provide a process for the FWS and state fish and wildlife agencies to cooperatively identify programmatic issues and jointly develop recommendations for resolving those issues. WSFR-JTF efforts have resulted in the issuance of numerous policy recommendations and the resulting guidance via DOs, FWS Policy Manual chapters, and amendments to applicable regulations (specifically 50 CFR 80). In cooperation with many state and FWS personnel, the WSFR-JTF also assisted in the development of the Conservation Heritage Strategic Plan (CHSP) and Conservation Heritage Measures (CHM) for the WSFR Program. Performance reporting has been a central discussion topic of the WSFR-JTF since 2006. In the decade that followed, there have been numerous discussions and debates over the merits, authority, cost, and technical aspects of performance reporting for the WSFR program.

2005 OMB Program Assessment Rating Tool (PART)

In 2005, the OMB conducted a Program Assessment Rating Tool (PART) review of the WSFR Program. Unfortunately, that review found that the FWS was unable to clearly demonstrate results from the WSFR Program. Specifically, they found that 1) while the program had a clear purpose and design, it needed to develop long-term outcome and annual output-oriented performance goals and measures in conjunction with partners; 2) components of the program had been reviewed by outside organizations, but there were no regularly scheduled non-biased, independent evaluations of the entire program; and 3) the program did not have a strong accountability system.

The OMB-PART review specifically noted that the program should emphasize outcome goals that reflect the improvement of fish and wildlife resources. They also noted that the Government Accountability Office (GAO) had looked at the use of administrative funds and the management of the program, but not the effectiveness of the entire program. Finally, they commented that some partners were held to cost, schedule, and performance results through

agreements, while others were not. Similarly, while Senior Executive Service level managers had performance goals in their performance plans, other managers typically did not.

In response to the OMB-PART review, the FWS agreed to take the following actions to improve program performance:

1. Develop long-term outcome and annual output performance goals with partners through the Supplemental Environmental Impact Statement (SEIS) update process.
2. Implement regularly scheduled non-biased, independent program evaluations.
3. Revise individual employee performance plans and, when appropriate, partner agreements to include specific, measureable annual and long-term goals.

Response of the WSFR-JTF to the OMB-PART Review

The FWS brought this issue to the WSFR-JTF for the first time in 2006 with the need to expand upon the proposed actions to the OMB-PART review in cooperation with their primary partners (the states). The FWS explained their concern that, in the absence of better performance metrics, the program would be unable to satisfy the Government Performance and Results Act (GPRA) and the OMB-PART findings of 2005 and subsequent reviews.

Over the last decade, the WSFR-JTF has reviewed and discussed both the development and implementation of the CHSP as well as the step down of that strategic plan into the CHM as an operational plan, including the reporting of performance measures, that would ensure that Congress, OMB, industry, and the American public are fully informed about the successes of the WSFR Program and its relevance to the conservation of our nation's fish and wildlife resources (Table 2). What follows in Table 2 and the associated Appendix III is a summarized history of the discussions and deliberations of the WSFR-JTF as they relate to the development of the CHSP, the development of the CHM, and the delineation of quantifiable performance measures (Strategies and Objectives) to support the goals and objectives of the program.

WMI emphasizes that the content in Table 2 and the associated narrative in Appendix III contains opinions expressed by members of the WSFR-JTF, their invited presenters, and guests. These opinions are extracted and reported to provide context for the issues related to TRACS development and implementation as it was discussed by the WSFR-JTF.

Table 2. Summary of TRACS-related discussions at the WSFR-JTF Meetings (2006-2016).

Year	Location	Description/Action
2006	Charleston, SC	<ul style="list-style-type: none"> FWS advised the WSFR-JTF that the FWS must start collecting performance and outcome measures to satisfy GRPA and OMB-PART requirements.
	Wichita, KS	<ul style="list-style-type: none"> FWS reported that they had developed interim reporting codes for FAIMS that would ultimately be replaced by a reporting system (now called TRACS) that would evolve from the WSFR strategic planning process. FWS reported that OMB was requiring the WSFR program to complete a strategic plan to meet PART requirements and to remove the program’s “performance not demonstrated” designation.
2007	Sonoma, CA	<ul style="list-style-type: none"> States indicated that many metrics being considered for the WSFR strategic plan were already being collected and could be used for measuring performance. FWS indicated that WSFR ultimately would use these metrics as an educational tool for the program. FWS explained that the WSFR Program was governed by specific statutory language. In developing a strategic plan, the FWS could not make programmatic changes to the WSFR Program. FWS indicated that the strategic plan and performance metrics developed either separately or comprehensively, should be created in partnership with the states. States suggested that the WSFR-JTF develop SWG metrics based on the AFWA Effectiveness Measures (EM) efforts.
	Roscommon, MI	<ul style="list-style-type: none"> Extensive review of the CHSP by the WSFR-JTF. Plan is becoming more general in nature with two specific operation plans (for PR/DJ and SWG). Plan should be finalized by early 2009.
2008	Arlington, VA	<ul style="list-style-type: none"> Draft CHSP and Draft CHM were discussed. FWS explained the CHM would not be designated as an “operation plan” due to the fear of increasing workload burden on FWS regional staff. WSFR-JTF agreed that specific measures for industry could be provided separately and did not need to be a part of this plan.
	Albuquerque, NM	<ul style="list-style-type: none"> Discussed the need for further WSFR-JTF review of CHM, before they are finalized - especially regarding the measures selected and how needed infrastructure would be addressed.

2009	Washington DC	<ul style="list-style-type: none"> • WSFR-JTF co-chairs provided background information on the CHM developed in response to OMB's request for performance measures. • FWS began modifying FAIMS to obtain the measures for 2010 and expressed their desire to begin discussion with states about getting the required information through their grant reports. • WSFR-JTF was reminded that the performance measures were adaptable and could be modified to suit the needs of the grant programs and states. • FWS recommended to the WSFR-JTF that they partner in collecting program and accomplishment information suitable for distribution to the public from a national-level standpoint.
2010	Broomfield, CO	<ul style="list-style-type: none"> • FWS provided background and overview of the new <i>Tracking, Reporting, and Decision Support System</i> that was being cooperatively developed by WSFR and several state agencies. • The need for this system stemmed from the lack of an adequate program reporting and accomplishment database, and the fact that the FAIMS database would be obsolete after 2012.
	Portland, OR	<ul style="list-style-type: none"> • FWS reported that they had been tasked by Congress to develop a geospatial program reporting system that would enhance the tracking of grant projects and display progress in SWG projects related to "species of greatest need". • This system would allow WSFR to 1) track projects funded by its programs, 2) spatially locate and group its projects, 3) report outcomes to Congress, 4) report on implementation of State Wildlife Action Plans (SWAPs), and 5) strategically implement grant programs in cooperation with states.
2011	Lexington, KY	<ul style="list-style-type: none"> • FWS indicated that several of the critical components of FAIMS, such as safety margins and apportionment calculations, would not be supported by FBMS and would eventually have to be incorporated into the new TRACS system.
	San Francisco, CA	<ul style="list-style-type: none"> • FWS reported that the development of TRACS would capture all the features of FAIMS with improvements for all WSFR grant programs. • While the TRACS system was focused on the SWG Program, it ultimately would be used as a method to capture and report performance metrics for PR and DJ grants. • States expressed several concerns regarding the new system including the sensitivity of state data that would be available to the public, the increase in the workload to state Federal Aid Coordinators (FACs), and the appropriateness of the use of PR/DJ funding for TRACS.
2012	Denver, CO	<ul style="list-style-type: none"> • FWS reported that all state data entered into Data TRACS for federal aid compliance would be in

		<p>federal custody and fully accessible by FWS staff. As such, the data would be subject to FOIA requests.</p> <ul style="list-style-type: none"> • Auxiliary project data managed in this fashion would not be subject to Freedom of Information Act (FOIA) requests. • FWS was currently taking the existing budget for FAIMS and transferring it over to TRACS. Funding source was WSFR PR/DJ funds, Coastal Impact Assessment Program (CIAP), and SWG, and the FWS would begin reprogramming existing funds from one system to another.
	Alyeska, AK	<ul style="list-style-type: none"> • FWS informed the WSFR-JTF that applicants should be aware of and should be willing to comply with the requirement to use TRACS. • FWS plans to draft a memorandum for the Director to send to WSFR Regional Offices instructing them to include specific language on the requirement to use TRACS in all Requests for Applications and grant awards for 2013 funding. • These notices and award conditions will implement TRACS requirements until a final rule is published. • WSFR-JTF co-chairs drafted a letter to the Director of FWS and President of AFWA outlining the general agreements and advantages of Data TRACS and Public TRACS.
	Denver, CO	<ul style="list-style-type: none"> • FWS reported that the Conservation Measures Partnerships developed an Open Standards for the Practice of Conservation, which has worldwide use by conservation entities. • Performance measures for SWG have been developed using the AFWA “Effectiveness Measures” Report. • PR/DJ grant accomplishments would always need to be separate from SWG accomplishments. • FBMS information would be downloaded daily into TRACS. This would be limited information received from FBMS (mostly financial information). • Performance reporting would be met by the official submission of data into TRACS by the states. • Effectiveness measures would be added to the database for SWG projects starting after calendar year 2012.
2013	Minneapolis, MN	<ul style="list-style-type: none"> • FWS reported that they were now in the normal phase of Automated Standard Application for Payments (ASAP) and FBMS and that grant delays from the rollout had been resolved. • The beta version of TRACS was released in March, and all WSFR staff had been trained. • FWS reported that the production version of TRACS would be released later in May 2013. The TRACS-GC has drafted a system guidance document for TRACS with questions and answers.

		<ul style="list-style-type: none"> • The WSFR-JTF pointed out that it would be important to document the agreement made regarding the state’s ability to determine what information goes into public TRACS.
2014	Denver, CO	<ul style="list-style-type: none"> • FWS reported that each state was asked to provide a TRACS system administrator, and 33 states had responded.
	Denver, CO	<ul style="list-style-type: none"> • FWS reported that TRACS had been released for federal use in March of 2013 and for state use in April of 2014. • The number of system users at this time was reported at 458 (101 registered WSFR users and 357 registered state users). Also, 55 states and U.S. Territories had appointed TRACS administrators. • FWS reported that, while TRACS has been available to the states for seven months, CMS states still were not accommodated by the current structure. • They also reported that 30% of the data entry was being performed by states and that the template format of data entry would help reduce workload to the states as the system evolved.
2015	Denver, CO	<ul style="list-style-type: none"> • FWS reported that acceptance of system purpose and data collection requirements continue to improve, with 38 states having now input at least one project. • EMs for SWG are based on principles of results-based outcomes. Most data required for SWG are already collected in TRACS, including objectives, actions, strategies, and activities. • FWS suggested that a realignment of the data structure to support program outcomes might reduce overall reporting burden. • The WSFR-JTF was encouraged to endorse the TRACS-WG strategy for expediting the full implementation of TRACS by developing and implementing individual state strategies designed to address the obstacles to implementation as identified by each state and by establishing a date by which responsibility for entering projects into TRACS would transfer from WSFR to the individual states, with a recommended date of no later than September 30, 2016. • There was significant concern among the FAC Working Group (FAC-WG) members regarding the rejection of grant proposals due to a lack of SMART (Specific, Measureable-with measurement, Achievable, Relevant, and Time-oriented) Objectives. • States stressed that there should not be result-based outcomes for this program due to increased workloads on state staff. • FWS commented that the TRACS-WG was currently proposing a TRACS enhancement, and that it needs a group to identify goals for the program.

	Edgefield, SC	<ul style="list-style-type: none"> • FWS discussed the report on measuring effectiveness of state wildlife grants used a results-based framework. FWS planned to use this same framework for all WSFR programs. Revisions to TRACS would begin in early 2016 and would eventually culminate in TRACS version 2.0. • TRACS is intended to measure outcomes for WSFR program in general as well as WSFR-funded projects in TRACS. • States indicated they should be the ones to determine the EMs. The states expressed caution about transferring SWG EMs to the WSFR program. • TRACS would operate at a much higher level as a reporting system. The states would input the data, so the states would be setting the goals. • The TRACS-WG completed an assessment of the readiness of states to begin implementing TRACS in July. • Outputs/outcomes were being designed for all WSFR-funded projects using methodology developed by AFWA for SWG. The FWS was currently in testing for application to all WSFR-funded projects. • States expressed concerns that the identification of the common strategies should have come back to the WSFR-JTF for review. • WSFR-JTF small group was assigned to draft an MOU to clarify the JTF's position regarding reporting of outputs vs. outcomes into TRACS.
2016	Las Vegas, NV	<ul style="list-style-type: none"> • Members requested more clarification on the performance measurements section of 2 CFR 200. • Further guidance was requested by states regarding the continued development of standardized objectives. • States expressed concern over information in TRACS and if the information collected would be auditable. • The recommended hand-off date from the FWS to the states is October 1, 2016 (with flexibility) for the states to enter their own data into TRACS. • The effectiveness measures (Strategies and Objectives) will be in the TRACS enhancement for fall 2017 (maybe 2018).

Conservation Heritage Strategic Plan

The CHSP was developed by the FWS in cooperation with the WSFR-JTF as a response to the OMB-PART review that occurred in 2005. It was designed to serve as an overarching guidance document to define the purpose and goals of the WSFR Program. From 2006 through 2009, the WSFR-JTF discussed, reviewed, and modified the CHSP to define the purpose of the WSFR Program to the larger WSFR community (states, FWS, industry, and the public).

The **Mission** of the CHSP was defined as “Working through partnerships to conserve and manage fish and wildlife and their habitats for the use and enjoyment of current and future generations.” The **Vision** was defined as “Healthy, diverse, and accessible fish and wildlife populations that offer recreation, economic activity, and other societal benefits, in addition to sustainable ecological functions.” Finally, the **Guiding Principle** was identified as “Society benefits from conservation-based management of fish and wildlife and their habitats and opportunities to use and enjoy them.”

The CHSP also delineated several **Core Values** for the WSFR Program. These included:

- *Managing Fish and Wildlife as Public Trust Resources.* Stewardship of these and other natural resources is in the long-term public interest.
- *Supporting Traditions.* The Program embraces the traditions of hunting, fishing, boating, trapping, recreational shooting, and enjoying the outdoors.
- *Recognizing the Contributions of Sportsmen and Sportswomen.* State and federal partners appreciate the important conservation contributions of purchasers of hunting and fishing licenses; hunting, fishing, and shooting equipment; and motorboat fuel.
- *Recognizing the Contributions of Industry.* State and federal partners appreciate the important conservation contributions of industry partners through excise tax payments.
- *Striving for Sustainable Resources.* Sustainable populations of fish and wildlife resources and habitats are key to conservation and essential to provide for public use and enjoyment.
- *Being Accountable.* State and federal partners assure that Program funds are used only for the purposes specified in applicable state and federal legislation, and that Program results are sufficiently demonstrated.
- *Using Sound Science.* Sound science and the ability to improve management by adaptively improving scientific knowledge through biological planning, conservation design and delivery, research, and monitoring are the foundations of Program success.
- *Recognizing the Value of Partnerships.* State and federal partners encourage the cooperation and involvement of all entities and individuals in the management and conservation of fish and wildlife.
- *Connecting People with Nature.* Grant activities provide people opportunities to establish a closer connection with hunting, fishing, and the outdoors.

The **Intended Outcomes** for the WSFR Program as identified in the CHSP, were divided into a conservation component and an administrative component. The **Fish and Wildlife Conservation Outcomes** were defined as:

- *Utilization of fish, wildlife, and their habitats.* The Program will maintain and support the rich heritage associated with fish and wildlife uses, such as hunting, fishing, boating, trapping, shooting, wildlife observation and photography, and conservation education.
- *Management of fish, wildlife, and their habitats.* The Program will maintain and enhance sustainable, healthy populations of fish and wildlife and the habitats that support them.

The **Program Administration Outcomes** were defined as:

- A. *Efficient and consistent administration.* Ensure sound administration and oversight of funds and activities consistent with our mission, vision, guiding principles, core values, and applicable laws, policies, and regulations.
- B. *Effective communication.* The Program partners will communicate effectively with state, federal, and industry partners, as well as stakeholders, elected officials, other policy makers, and the public.

Conservation Heritage Measures

The CHM for WSFR were developed to build off the higher level CHSP and included operating principles that were: 1) grounded in the WSFR Program's core values and 2) designed to support the effective and efficient administration of the Program by both states and the FWS. It also contains examples of actions that could be taken to achieve the mission, vision, and intended outcomes described in the CHSP. Finally, the CHM includes measures that document Program performance in the two intended outcomes outlined in the CHSP: 1) Fish and Wildlife Conservation, and 2) Program Administration.

Operating Principles

The operating principles of the CHM are essential to provide a clear understanding of the roles and responsibilities of the WSFR Program for its partners. The laws and regulations are designed to ensure that funds are distributed equitably, used effectively, and not diverted for other purposes. The states must be assured of long-term, stable funding to perform the conservation actions that ultimately result in fulfilling the mission of the Program. The FWS is responsible for overall Program administration as well as ensuring the integrity and effectiveness of the Program through consistent application of laws, regulations, and policies. The following principles frame the relationship between the states and the FWS. Both Parties agree that:

1. State agencies provide an essential service to the nation through conservation-based management of fish, wildlife, and their habitats for the benefit of current and future generations.
2. State agencies have state-constitutionally conferred authority and responsibility to

manage most fish and wildlife species. State agencies set funding priorities within the legal constraints of the Program. The FWS will honor these state authorities while administering the Program.

3. The FWS jointly develops policy in consultation with state agencies to facilitate consistent Program interpretation and application.
4. State revenues from license fees paid by hunters and anglers, as well as excise-tax derived grant funds, are used exclusively for eligible administrative and operational activities by state fish and wildlife agencies.
5. State agencies and the FWS are committed to public accountability for federal grant and administrative funds and compliance with environmental and other regulatory requirements. Both state agency and FWS grant managers work cooperatively to meet these requirements as efficiently and effectively as possible.
6. State agency and FWS grant managers provide customer service through application of knowledge, science, teamwork, creativity, and problem solving.
7. The integrity and effectiveness of grant administration is maintained by (a) appropriate training for state agency and FWS grant managers, and (b) operating within an audit.

Performance Measure Data Collection and Reporting

The CHM outlined several commonly collected and proposed measures and actions to achieve outcomes that would help to quantify both the utilization of fish and wildlife populations (e.g. participation) and the status of fish and wildlife and their habitats (e.g. management and conservation activities). The CHM also outlined commonly collected and proposed measures and actions to achieve outcomes for WSFR Program administration that would help to quantify the efficient and consistent administration of the WSFR Program

The measures identified in the CHM, and perhaps more importantly, the process by which those measures were developed, was the genesis of creating agreed-upon performance metrics that the FWS initially captured in the FAIMS system and currently in the TRACS system. The proposed Strategies and Objectives identified in TRACS (Table 3) were developed from EMs delineated in AFWA's technical report: *Measuring Effectiveness of State Wildlife Grants – Final Report* and from the needs for quantifiable performance measures identified in the CHM.

5-Year Performance Report

The FWS has committed to using the products of the Strategies and Objectives reported in TRACS by the states to produce a 5-year performance report for the WSFR Program, which will be the principal mechanism of accountability that will report programmatic achievements and performance. The report will be designed to demonstrate measurable indicators to the American public, Congress, industry, states, and other WSFR partners so that they more fully understand and appreciate the program's national contributions to conservation and recreation. The report will also assist the FWS and the states in assessing the program's fidelity to overarching strategic goals with an opportunity for the partners to adjust the course of the program periodically to meet ecological and societal needs and demands.

Table 3. Proposed Strategies and Objectives for WSFR Grants.

Strategy	Objectives
Direct Habitat and Species Management	<ol style="list-style-type: none"> 1. As part of the project proposal process, priority management needs are identified. 2. Since receiving funding, management actions are being implemented as planned. 3. Since the start of the action, the desired threat or stress reduction/abatement is seen. 4. Key species and habitats are tracking with management objectives for viability or recreational opportunity.
Species Reintroduction and Stocking	<ol style="list-style-type: none"> 5. As part of the grant application, a need is described for an appropriate restoration/stocking plan. 6. If necessary, before restoration efforts start, sufficient animals have been propagated. 7. Target number of individuals/units have been introduced to area(s). 8. Take of stocked species within the site(s) is consistent with desired angling/hunting management objectives. 9. Since introduction, the restored population is meeting management objectives within the restoration site(s).
Real Property Acquisition and Management	<ol style="list-style-type: none"> 10. As part of the project proposal process, the need for specific properties is identified. 11. Prioritized lands purchased, leased or put in an easement within months/years of being identified. 12. Since being identified, good management and monitoring plans have been developed for the site. 13. The acquisition contributes to desired portfolio of well-managed property. 14. Property holdings are periodically reviewed and appropriately disposed of if deemed not needed.
Environmental Review	<ol style="list-style-type: none"> 15. Sufficient staff capacity and skills exist to complete necessary reviews. 16. Review(s) are completed in a timely, complete, and comprehensive fashion. 17. Following the review, relevant permitting entity(ies) or regulatory agency(ies) accept and incorporate recommendations into their review/permit process and documentation. 18. Following review, project implementers agree to accept recommendations. 19. Following review, recommendations are implemented into project plans or policy. 20. Since the adoption of the recommendations, impacts to sensitive places are avoided, minimized, or mitigated.
Planning	<ol style="list-style-type: none"> 21. As part of the project proposal process, compelling needs for planning are identified. 22. Key agencies and other stakeholders provided input into plan and/or are supportive of the plan (or at least not hostile).

	<p>23. A complete plan is developed that encompasses all required elements.</p> <p>24. Key agencies and other stakeholders receive the plan and incorporate relevant plan elements into their own work plans and resource them appropriately.</p> <p>25. Key agencies and other stakeholders follow through and implement key plan elements on a timely basis.</p>
Training/Education	<p>26. As part of the project proposal process, needed skills and priority trainees identified.</p> <p>27. As part of the project proposal process, priority individuals and appropriate education activities identified.</p> <p>28. Before the start of training courses, there are enough well trained instructors available to teach courses.</p> <p>29. Sufficient priority trainees have completed training.</p> <p>30. At the end of the training, trainees demonstrate adequate proficiency in the needed skills.</p> <p>31. At the end of the education activity, participants have evidence of positive experience.</p> <p>32. Since training, trainees successfully apply their new skills at least once to appropriate problems.</p> <p>33. Participants indicate they have a greater interest in desired outdoor activities as a result of participating in the program.</p> <p>34. Since the end of the training, sufficient numbers of trained individuals exist to meet program needs.</p> <p>35. Sufficient participants engage in desired outdoor activities to meet program needs.</p>
Technical Assistance	<p>36. As part of the project proposal process, needed skills, priority recipients and suitable TA type identified.</p> <p>37. At the end of the TA period, sufficient recipients receive appropriate TA so that identified needs can be met.</p> <p>38. Based on the TA, identified program needs are met.</p>
Data Collection & Analysis	<p>39. As part of the project proposal process, priority management information needs are identified.</p> <p>40. A good data collection plan exists or is being developed.</p> <p>41. By the end of the project/grant funding cycle, the data will provide answers to relevant questions for priority management needs.</p> <p>42. Good recommendations for action have been developed based on the data collection effort.</p> <p>43. Since the end of the data collection action, recommendations have been used to inform management actions / decisions.</p>

<p>Outreach and Communication</p>	<p>44. As part of the project proposal process, priority audiences, targeted message & appropriate channel(s) identified.</p> <p>45. As a result of the project, priority audiences receive the message.</p> <p>46. Since the project, there is a change in the target audiences' knowledge, attitudes and/or values consistent with the project desired results.</p> <p>47. There is evidence that all or some of the targeted audiences adopt or continue the desired behavior(s) on an ongoing basis.</p>
<p>Incentives</p>	<p>48. As part of the project proposal process, key stakeholders requiring specific incentives identified.</p> <p>49. Sufficient incentives are provided to get key stakeholders to participate in the program.</p> <p>50. Since receiving the incentive, targeted stakeholders are complying with their incentive agreement.</p> <p>51. After the end of the incentive, it is likely that the stakeholder will continue desired behavior(s) without incentive.</p>
<p>Stakeholder Involvement</p>	<p>52. Key stakeholders and priority need to engage them identified.</p> <p>53. Appropriate messaging to key stakeholders is developed.</p> <p>54. Key stakeholders agree to engage in desired activities.</p> <p>55. Key stakeholders who agreed to participate follow through on commitments.</p>
<p>Facilities Construction</p>	<p>56. As part of the project proposal process, priority facility needs and intended users are identified.</p>
<p>Facilities Operation and Maintenance</p>	<p>57. As part of the project proposal process, priority facility O&M needs and intended users are identified.</p> <p>58. Facilities exist in operational condition over its expected useful life.</p> <p>59. Facility is used by intended users and at expected levels over its expected useful life.</p> <p>60. Intended users derive benefit from facility use over its useful life.</p>
<p>Coordination and Administration</p>	<p>61. As part of the project proposal process, priority management needs are identified.</p> <p>62. Sufficient qualified coordination and administration staff are available over the relevant time period and sufficiently equipped.</p> <p>63. Effective coordination, administration and compliance with overall program.</p> <p>64. Good technical expertise is provided at the appropriate times.</p> <p>65. Grant funding program is well managed on an ongoing basis.</p> <p>66. All program responsibilities (e.g. grant approval, data collection, etc.) completed at an appropriate quality level and on a timely basis.</p>

Challenges to the Development and Implementation of TRACS

The Parties with a direct role in managing the WSFR grant programs (the states and FWS), as well as, many of the key stakeholders (industry and conservation groups) understand the need to effectively measure and communicate the results of WSFR programs. Opportunities to maintain and potentially expand the programs depend on communicating the results to policy-makers, industry, and the public. However, the Parties have not always agreed on the means to this end, hence the desire for explicit agreement on a forward-looking approach that addresses the need and is practical for the Parties to implement, focusing on TRACS as the primary reporting tool.

During this review process, WMI examined several perceived and real challenges that, if not addressed by the FWS and the states, will continue to adversely affect the ongoing implementation and revision of the TRACS system as well as the transfer of reporting responsibilities to the states. WMI gathered information directly from states, the FWS, and OMB staff, as well as background information provided by AFWA, the states individually, and the FWS. This information included: minutes from the WSFR-JTF from 2006 to 2016, communications, instructional and reference materials, notes from the defunct TRACS-PAG conference calls, notes from the defunct TRACS-GC meetings, and other documents (Appendix IV).

The challenges gathered from the background research were evaluated with a working group of federal and state staff chosen by the WSFR-JTF co-chairs, whose objective was to perform an analysis of the potential challenges, facts, and possible solutions for the successful implementation of TRACS. The resulting challenges likely represent the most significant issues related to the partnership between states and the FWS in the ongoing implementation of TRACS. This review identified a significant Communications Challenge, which likely has cascaded into misunderstandings and misinformation about the development and implementation of the TRACS system. It also identified a process deficiency (Process Challenge) in which the Parties failed to formally identify an *a priori* mechanism or process for the design, development, and implementation of TRACS. The review found five Adaptive Challenges (Challenges 1-5), which require significant thought, discussion, facilitation, and compromise to arrive at an acceptable solution. Finally, the review identified four challenges that are more technical in nature and will be addressed by small groups of subject matter experts with participants chosen by the WSFR-JTF co-chairs.

Communications Challenge – A Communications Plan for the WSFR Program

Background

There is a culture within the WSFR Program to cling to long-existing protocols for grant and project reporting. There also exists a communication breakdown between the partners (FWS and states) and their work groups (WSFR-JTF, FAC-WG, TRACS-WG, etc.). There is a need to specifically identify the barriers to effective communication among WSFR-associated entities and a need to improve communication between the WSFR-JTF, the FACs, FWS staff, and state Directors.

TRACS-specific communication strategies among partners and others that benefit from the system are likely the most significant unmet need for the Program. The WSFR Program, and therefore TRACS, does not currently have a dedicated communications strategy. Thus, the range of issues reaching near-crisis levels and debated between states and the FWS currently goes from the smallest technical aspects to high-level philosophical concepts of the program.

Finding of Facts

There have been significant breakdowns and miscommunications among the Parties over the design, development, and implementation of TRACS. These breakdowns in communication have been both inter-party (between states and the FWS) but equally important, within the state (FAC and state Directors) and federal (WSFR-HQ and WSFR regional staff) arenas.

Proposed Solution

The WSFR-JTF should cooperatively develop a communications plan for the WSFR Program that adopts the following steps to ensure sufficient awareness, understanding and participation of all Parties in the development, implementation, and modification of substantive components of the WSFR Program in general, and the TRACS system in particular:

1. Parties should strive to develop, implement, and promote a system of consistent and effective communications and outreach strategies to change the current WSFR culture (sample Communications Plan in Appendix V). They should also acknowledge that making and keeping commitments to each other is critical to success.
2. The role of the TRACS-WG and FAC-WG should be agreed upon and documented by the Parties. The FAC-WG should develop a closer working relationship with WSFR-JTF, including sending a representative to report at the WSFR-JTF meetings.
3. One or more technical liaison group(s) should be jointly established that meet the needs for ongoing communication about technical aspects of TRACS and performance reporting.
4. The Parties should consider putting a process in place to allow WSFR-JTF to have advance knowledge of any WSFR-related challenges. WSFR-JTF should use the AFWA

“Directors Line” and personal meetings with the AFWA President and Executive Director to communicate the presence and function of WSFR-JTF to Directors.

5. WSFR-JTF should identify specific barriers to effective communication, and information transfer should include all applicable state and federal WSFR staff, so that everyone recognizes their roles and responsibilities. There should also be increased internal communication between regions/states/other groups.
6. A “Roles and Responsibilities” document should be developed for the WSFR Program and circulated with necessary oversight responsibilities.
7. WSFR-JTF should evaluate the alignment of standing meetings (regionally and nationally) that are related to the WSFR Program so that information is transferred effectively and efficiently. The proposed National WSFR meeting and monthly national WSFR conference calls should strive to facilitate improved communications among the Parties.
8. Audiences for these discussions should remain professional and objective, and should separate the TRACS discussion and evaluation from other issues between the states and the FWS. Parties should not let the challenges associated with TRACS and performance reporting be held hostage by other unrelated issues.
9. Parties should better define their audiences and what the desired overall outcomes look like. TRACS should have four or five of high-level goals, perhaps defined by the CHSP and CHM, with several performance metrics within TRACS that can be rolled up to demonstrate the accomplishment of those goals.

Benefits or Opportunities

The WSFR-JTF becomes the collaborative problem-solving body for the WSFR Program that effectively addresses the needs of state and federal Parties.

Process Challenge – Develop and Memorialize a Process for Amending TRACS

Background

Communications on the development and revision of TRACS and how states might engage in the process have been lacking (see Communications Challenge). Largely relegated to the state members of the WSFR-JTF, the perception has been that TRACS development has proceeded over several years with little influence or input from most state Directors. Several work groups, committees, and other entities have been established to enhance collaboration between the FWS and the states on TRACS development including the TRACS-WG, TRACS-GC (no longer in existence), TRACS-PAG (no longer in existence), and FAC-WG. These groups have been involved with some aspects of TRACS, and each has state membership, but these groups largely consist of WSFR Program practitioners who may or may not have the ability to easily communicate updates, concerns, and challenges to their state agency leadership.

Finding of Facts

In 2008, the FWS and AFWA agreed (through the WSFR-JTF) on the CHSP for WSFR (encompassing PR, DJ, and SWG). The CHSP identified a mission, vision, guiding principle, core values, and intended outcomes. The step-down developed from the CHSP was the CHM, which not only provided operating principles for the WSFR Program, but also began to address performance metric data collection and reporting. The CHM addressed the need for performance metrics (Strategies and Objectives) in TRACS in a more specific manner. The collection of performance metrics using TRACS is a logical progression of the implementation of the CHSP and CHM.

State leadership has been largely unaware and/or disengaged from the process of TRACS development of Strategies and Objectives for many reasons, several of which include: lack of awareness that they were being developed, disconnects between state Directors and their FACs and other TRACS committee participants, lack of interest or knowledge in the TRACS development process, and most importantly, lack of a clearly defined process for engaging and participating in TRACS development.

Proposed Solution

Parties should agree on a process to approve changes in all substantive aspects of TRACS. The WSFR-JTF should take the lead to formalize the process by which TRACS is modified, amended, or revised. This could be done in several ways, including developing an MOU signed by the FWS and AFWA (example in Appendix I); using the grant Notice of Funding Opportunity (NOFO) to memorialize spirit and terms of the agreement; or codifying the agreement process into regulation using the normal rulemaking process.

The primary outcome should ensure that states have a role in the process of amending substantive TRACS components such as required reporting levels, changing data reporting requirements, changes in Strategies and Objectives, etc.

Steps that should be followed to ensure that both parties are not only aware of changes to the TRACS system, but also engaged as active participants include:

1. Assurance that all parties are consulted and asked to participate when any substantive changes may occur.
2. Consultation and participation should be encouraged early in the change process.
3. Solicitation of input should be as broad as possible – including all states, not just those represented on the WSFR-JTF.
4. Acknowledgement that everything cannot be measured – the focus should remain on critical data that the parties need to achieve effective conservation.
5. Consideration of data sources outside the grant reporting process to fill gaps.
6. Requiring that data to be reflective of the CHSP and CHM, where practicable.
7. Streamlining the process to maximize efficiency and minimizing duplication of effort.
8. Institutionalization of the commitment that reporting at the programmatic level is voluntary and should only be considered when in the best interest of all Parties.
9. Memorialization of assurances for current reporting levels and prohibition of financial auditing of cost information through TRACS.

Specifically, for the first round of TRACS revisions, the WSFR-JTF should focus on the following:

1. Thoroughly review and vet the draft Strategies and Objectives with the states (see Challenge 1).
2. Cooperatively develop and approve outcomes for current and new Strategies.
3. Clearly define the roles of existing working groups (TRACS-WG, FAC-WG, and others) and ensure that the correct participants are involved in future updates.
4. Make recommendations for a formal approval process to AFWA/FWS Directorate.
5. Establish a reasonable time frame for completion of revisions to allow states the necessary time to adjust, such as rewriting and reframing grants.

Benefits or Opportunities

The WSFR-JTF becomes a collaborative problem-solving body that effectively addresses the needs of state and federal Parties. States become more aware and engaged of the process and content requirements of the mandatory grant reporting system. Engaging all states more formally in the process will ensure that the appropriate Outcomes (when necessary), Strategies, and Objectives of grant-funded activities will be consistently captured and quantified, resulting in more effective and meaningful communication to audiences both within and outside the program.

Challenge 1 – Integration of Strategies for Reporting in TRACS

Background

The EMs developed by AFWA for performance reporting for the SWG program have been revised and are being integrated into all WSFR programs by the FWS (now designated Strategies). However, states are concerned that the 16 Strategies and associated Objectives, designed to standardize and quantify performance, may be difficult to implement. States have concerns that movement toward more standardized types of performance measures, while easier to roll up regionally or nationally, may not make sense operationally at the state level. States are concerned that the incorporation of Strategies, done with little state involvement (except for the TRACS-WG), may be difficult or impossible for them to collect and report with TRACS.

Finding of Facts

In 2008, the FWS and AFWA agreed (through the WSFR-JTF) on the CHSP for WSFR (encompassing PR, DJ, and SWG). The CHSP identified a mission, vision, guiding principle, core values, and intended outcomes. The step-down developed from the CHSP was the CHM, which not only provided operating principles for the WSFR Program, but also began to address performance metric data collection and reporting. The CHM addressed the need for performance metrics (Strategies and Objectives) in TRACS in a more specific manner. The collection of performance metrics using TRACS is a logical progression of the implementation of the CHSP and CHM.

FWS currently has drafted Strategies and Objectives for all grant programs using a deductive process that began with the grant program purpose as identified in founding program legislation and by modifying the AFWA-approved EMs to make them easier to implement and more appropriate for PR & DJ. They have also reformatted the EMs to make them more quantifiable in a roll-up, and standardized the type of assessments so that roll-up is meaningful and simple. Although the FWS is working to integrate the 16 Strategies into the reporting requirements for all WSFR programs, they are not in the current TRACS system. They will be included in the enhancement.

The current inclusive list of Strategies for TRACS reporting includes:

1. Direct Habitat and Species Management
2. Species Reintroduction and Stocking
3. Real Property Acquisitions and Management
4. Environmental Review
5. Planning
6. Training/Education
7. Technical Assistance
8. Data Collection & Analysis
9. Outreach and Communication
10. Incentives
11. Stakeholder Involvement

12. Facilities Construction
13. Facilities Operation and Maintenance
14. Coordination and Administration

Proposed Solution

The WSFR-JTF should consider the following steps to ensure sufficient awareness and/or participation in the development of performance metrics by the states:

- The WSFR-JTF should review and distribute to the states, the matrix consisting of the draft 14 Strategies and associated Objectives (to provide context) for approval by the states.
- The Strategies and Objectives matrix should also be distributed to the WSFR regional staff for review and comment, which should be returned to the WSFR-JTF for a final recommendation.
- WSFR-JTF should submit its final recommendation to the AFWA Executive Committee and FWS Director for approval.
- The WSFR-JTF recommendation should include explicit language that any future modifications to TRACS would have to go through a collaborative process involving the WSFR-JTF, with consideration given to the capacity of states to collect additional data (see Process Challenge).
- The WSFR-JTF should establish a process to formally review/approve metrics (see Process Challenge).
- AFWA and the WSFR-JTF should strongly encourage state Directors to use the WSFR-JTF process and to increase their involvement with their FACs and practitioners.

Benefits or Opportunities

Implementing the Strategies and Objectives will allow the Parties to focus on measuring grant-funded performance measures (activity/task level → output/project level → outcome/program level) resulting in more effective and meaningful communication of conservation successes to audiences both within and outside the program.

Challenge 2 – Increased Level of Detail for Reporting in TRACS

Background

States perceive that the FWS has changed the level at which they are required to report on performance in TRACS. Since each grant in TRACS will now have project-specific Objectives (for non-CMS states), each grant/project requires project-level effectiveness measures to be entered into TRACS. States are also concerned that program-level reporting in TRACS could become mandatory in the future, further increasing workload. Additionally, the requirement that states enter financial information into TRACS creates the potential for performance/efficiency audits based on TRACS reporting by the states.

States with CMS grants face unique challenges interfacing with TRACS since, by design, they operate at the program rather than project level. CMS states operate under grants based at the programmatic (i.e. Wildlife Restoration Program and Sport Fish Restoration program) level and may have difficulty reporting performance at a finer scale than the programmatic level.

Finding of Facts

Programmatic level reporting (Outcomes) will be optional in the TRACS enhancement. However, the reporting of performance metrics (Strategies and Objectives) will be required.

The FWS provides guidance to the Office of the Inspector General (OIG) on auditable components of WSFR grants through the contract that funds the audits and has amended that contract (for 2016-2021) to reflect that cost accounting information reported in TRACS is not auditable.

There are challenges to integrating CMS states with TRACS, but reporting is the same as a non-CMS state. However, each CMS state is different, and what works for one CMS state will not necessarily work for another CMS state.

Proposed Solution

The following guidance should be considered by the WSFR-JTF to ensure that the reporting needs are relevant and necessary, and that the states, as grantees, are fully aware of the reporting requirements and levels:

- Grant level costs that are imported from FBMS are currently satisfactory to meet the transparency needed for the grant (Appendix VI) and should continue to do so for the enhanced version of TRACS. Revisions to cost reporting and the level at which it is done should be cooperatively agreed to by the parties (see Process Challenge).
- Continued TRACS development should focus on performance metrics for the immediate future. Once those are resolved, finalized, and tested by the states, *then* the Parties should consider how financial reporting in TRACS might work and at what level it should be required.

- The WSFR-JTF should clearly define why programmatic/outcomes (voluntary) need to be reported and how they are critical to the integrity of the Program by helping to tell the conservation story. State directors should be encouraged to engage their practitioners to receive input on how to best report accomplishments and costs at the project/objective as well as program/outcome level. The states and FWS should cooperatively determine outcomes that are reasonable to report and tell the story of success of the WSFR Program.
- The WSFR-JTF should strongly encourage states to use the current TRACS system process of tagging (key words that are searchable and sortable) to demonstrate specific examples of performance and efficiency.
- FWS should work collaboratively with CMS states and develop an approach for them to report as consistently with other states as they can. The FWS may have to work with the five CMS states individually during the TRACS enhancement to develop efficient and effective processes that accommodates the CMS structure.

Benefits or Opportunities

The enhanced TRACS can provide a flexible, easy-to-use format for states to identify their own goals for conservation and public use, and their progress in meeting the goals, for use in communication and marketing about WSFR grant programs.

Program-level reporting by states in the enhanced TRACS system will help to meet OMB expectations for programmatic outcome reporting, and will provide meaningful high-level information for broader efforts to communicate conservation success stories and market the WSFR Program.

Challenge 3 – Outcome Reporting in TRACS and its Impacts on WSFR grants

Background

States are concerned that they may be required to report on outcomes after a grant is closed (in some cases, years afterward), potentially increasing their workload and costs for reporting. To report outcomes (longer term) vs. outputs (shorter term), states are concerned that reporting after grant closure may become required rather than optional.

States are concerned that FWS-derived outcome reporting may affect states' ability to design and implement projects to meet state-level needs. TRACS implementation has already been met with push back from the FWS regional staff on the way states are designing and implementing projects. Ultimately, states are concerned that outcome-based reporting via TRACS may provide the FWS with more control and influence on what projects the states develop, and that the FWS may begin refusing to approve projects that fail to contain outcomes that are a FWS priority or that align with the CHSP and CHM.

Finding of Facts

If projects are eligible under the Acts and substantial in character and design, the FWS has no authority to deny, influence, or direct WSFR projects based on the type of outcomes provided in the grant application or TRACS report for mandatory grant programs.

In 2008, the FWS and AFWA agreed (through the WSFR-JTF) on the CHSP for WSFR (encompassing PR, DJ, and SWG). The CHSP identified a mission, vision, guiding principle, core values, and intended outcomes. The step-down developed from the CHSP was the CHM, which not only provided operating principles for the WSFR Program, but also began to address performance metric data collection and reporting. The CHM addressed the need for performance metrics (Strategies and Objectives) in TRACS in a more specific manner. The collection of performance metrics using TRACS is a logical progression of the implementation of the CHSP and CHM.

Unless specified by the grant program, reporting on outcomes will not occur on a grant-by-grant basis but rather at the higher programmatic level. Reporting at the programmatic level would also be optional.

Proposed Solution

Partners should strive to reach consensus that it is in the best interest of state, regional, and national level conservation and the WSFR Program to have outcome-level reporting. Being able to report outcomes may help sustain the Program and increase future funding.

The following guidance should be considered by the WSFR-JTF to ensure that the states are aware that, although optional, the importance of outcome reporting in TRACS is relevant and necessary to the continued success of the WSFR Program and the model of excise tax-based funding that drives conservation across the country. The WSFR-JTF should work to:

1. Refocus the WSFR 5-year review team and expand their charge to cover overall achievements that may be relevant to conservation and not just a roll-up of five years of projects/programs.
2. First, determine *what* outcomes should be measured, and then decide *how* TRACS can be used to measure them. Determine if a broad number of outcomes or a limited number of outcomes are needed.
3. Maintain the “empty field” design for TRACS to allow for program outcome reporting in the future.
4. Ensure that outcome/programmatic reporting remains voluntary unless both Parties agree to make it mandatory (see Process Challenge), but emphasize that it is in the best interest of the Parties to report at the outcome level. Educate states that outcome reporting for WSFR may benefit the broad push for wildlife diversity conservation funding (Blue Ribbon Panel on Sustaining America’s Diverse Fish and Wildlife Resources) efforts.
5. Acknowledge that outcome reporting outside of the grant period is eligible for funding in a coordination grant and that there is already a requirement for long-term tracking in the system for projects such as a land acquisition grants.
6. Affirm that state conservation decisions are driven by states rather than FWS priorities.
7. Encourage innovative uses of external data sources, such as the *National Survey of Fishing, Hunting, and Wildlife-Associated Recreation*, *The State of the Birds* report, *Waterfowl Population Status* reports, and others that can be used in lieu of outcome reporting in TRACS. Parties should acknowledge that they cannot always link cause and effect to projects and may have to settle for external or indirect indicators.
8. Develop a process to periodically evaluate TRACS to determine if it is meeting the needs and expectations of the FWS and states.
9. FWS should communicate to regional WSFR staff their specific authority for denying or requesting revisions to a project based on proposed or actual outcomes in TRACS.
10. FWS should provide assurances that no new information will be required to be collected on grants post-closure and that reporting long-term outcomes will not be required unless it is an objective of the grant (This is a state decision when the grant application is made).

Benefits or Opportunities

The enhanced TRACS can provide a flexible, easy-to-use format for states to identify their own goals for conservation and public use, and their progress in meeting the goals, for use in communication and marketing about WSFR grant programs.

Program-level reporting by states in the enhanced TRACS system will help to meet OMB expectations for programmatic outcome reporting, and will provide meaningful high-level information for broader efforts to communicate conservation success stories and market the WSFR Program.

Challenge 4 – Access to TRACS Data for Non-State Entities

Background

Access to TRACS data by non-state users likely will remain an unmet need. Previously, FAIMS allowed access by outside entities to perform research and analyses on grant data. Industry desires to have data specific for their needs (i.e. user days, license data, user satisfaction, etc.) incorporated into the TRACS system.

Finding of Facts

Outcome-based performance data collected via TRACS includes some of the information that is useful to industry partners, researchers, and other non-state partners. Discussion on non-state/FWS access to TRACS data was ongoing during the early stages of TRACS development, but the status of access (Public TRACS) for non-state users is inadequate.

Data that demonstrates public use, acceptance, and support for WSFR-funded projects is especially important for both state and non-state partners. Industry understands the costs associated with collecting these data and does not wish to create a substantial financial or workload burden on either party to collect this information. However, they would like to see these types of data collected and made accessible for research to the extent feasible.

Proposed Solution

The WSFR-JTF should work to ensure sufficient access to TRACS data by non-state entities for the purposes of research and surveys designed to benefit the WSFR Program and its partners:

- Parties should acknowledge that viewing compiled and/or summarized data is not necessarily synonymous with data access and detailed analysis. States should ultimately determine and control who has access to data by acting individually as a sponsor for approved researchers, perhaps with individual contracts or similar agreements.
- WSFR-JTF should revisit data access needs by clearly identifying the legitimate needs of non-state parties (Non-Government Organizations, contractors, industry), along with assessing the negative potential of data release. WSFR-JTF should continue ongoing discussions with industry and other non-state partners regarding their data needs.
- Alternatively, a TRACS public viewer with integrated, high-quality search, reporting, and analytics tools may provide the research partners with the information they need to work with their state and federal partners. FWS should complete the state performance reporting system component of TRACS before making any state data public, then work to improve the quality of the public view of TRACS.

Benefits or Opportunities

Providing access for non-state and FWS users will allow for research and surveys that are essential for the continued evaluation and achievement of the goals and objectives of the WSFR program and the states.

Challenge 5 – Increasing Workload Due to Duplicative Components of TRACS

Background

States are concerned that they may be required to enter the same data, such as project narrative, budget information, and performance measures, in multiple systems. These types of data are required for the grant application in grants.gov and when the grant is entered into TRACS for performance reporting. States are unsure that TRACS meets the requirements for grant performance reporting. They often send a duplicate, written backup copies of reports that they create and maintain, causing a duplication of effort on the part of the states and FWS.

Finding of Facts

Both state interfaces for WSFR grants (grant.gov, TRACS) require common information that currently has similar elements that must be input separately. FBMS is currently automated to receive common information that is entered into grants.gov by the states. FBMS does not permit system-to-system connections beyond those that service all the DOI. States do not have access to the FBMS system. Grants.gov provides web services to transfer data from third-party systems (e.g. TRACS) into grants.gov. The services that provide data from grants.gov to other systems are much more limited.

Proposed Solution

The WSFR-JTF should work to eliminate duplication of data entry into TRACS, grants.gov, and other formats by considering the following guidance:

- The concept of modifying the TRACS interface to allow for a singular grant portal for states should be thoroughly evaluated for merit. This approach should include presenting the concept to the WSFR-JTF and soliciting wider input from the states on how well this concept would be accepted. WSFR-JTF should develop a list of pros and cons for using TRACS as a single-point grant management system.
- FWS should investigate the option to bypass grants.gov and use TRACS exclusively as the grant portal for states. The FWS should also evaluate the current utility of grants.gov for the WSFR program across regions. FWS staff should clearly delineate the technical limitations of grants.gov, (including the inability to amend grants once submitted) and investigate the technical requirements and costs for making TRACS into a single-point grant management system.
- FWS should pursue creating an automated notification system that electronically notifies the states when grant applications, reports, or other required information reach certain milestones in the system.

Benefits or Opportunities

Removing duplication of data entry, to the extent possible, will decrease the workload on both state and federal partners and will result in a more efficient and effective WSFR program.

Technical Challenges

WMI and the review participants identified several Technical Challenges in the TRACS review process. While Adaptive Challenges are those that require significant thought, discussion, facilitation, compromise, and leadership to arrive at an acceptable solution, Technical Challenges are more simplistic in nature and often are easily addressed by small groups of subject matter experts. Early in the process, the WSFR-JTF co-chairs agreed that the Technical Challenges identified in the TRACS review process should be set aside so more focus could be placed on the more complex and controversial Adaptive Challenges. The co-chairs directed WMI to simply delineate any Technical Challenges so that the WSFR-JTF could assign their review to small groups of subject matter experts.

Compliance with 2 CFR 200

The requirements of 2 CFR 200 and OMB may be difficult to meet without significantly increasing the workload for federal and state grant managers. This regulation requires the grantee to demonstrate the relationship of financial data to measures of performance. States are concerned about the level of detail necessary to meet the requirements of 2 CFR 200. They are also concerned about meeting the requirements and expectations of OMB for measuring performance with TRACS. Finally, states are concerned that specific standards for performance measures are not established in statute or regulation.

OMB requires performance measures in 2 CFR 200, but has indicated that it is up to grantor and grantee to determine what acceptable outcomes and outputs are. A letter from the WSFR Assistant Director (WSFR-AD) to the State Directors in February 2016 stated that TRACS is currently meeting the grant reporting needs of the WSFR Program (see letter from WSFR-AD in Appendix VI). However, OMB may change oversight and requirements for performance measures as agency and administrative priorities change. The TRACS enhancement will collect data that adequately satisfies all 2 CFR 200 and OMB expectations, while minimizing state and federal workload to the extent possible. Financial information input into TRACS from FBMS currently addresses the requirements of 2 CFR 200 for cost efficiency (Appendix VI).

Handoff of data entry for TRACS to states

The handoff of project data entry into TRACS is scheduled to transition from the FWS to the states in October of 2016. Significant updates to TRACS, via the enhancement, are scheduled to take effect in 2018. States are concerned that differences in the two versions will result in the inefficient use of state resources (via outdated training) if the update will be significantly different. States are concerned about how data be transferred from one version to the next and how will future updates be handled.

The FWS indicates that the TRACS update will be similar in substance (i.e. core data fields) to the initial version of TRACS. The look and feel of the TRACS update will make it simpler to use. There should not be a significant re-training issue for most, because the enhancement primarily changes software versions and some additional details. Online training will be available for the enhancement.

The FWS indicates that data from original TRACS to the enhancement will be cross-walked to the extent possible. There will be data gaps because the new version of TRACS will contain fields that the original version did not, and vice versa. Some gaps may not need to be filled – this may be at the discretion of the states. However, some existing projects may need to be revised to establish new baselines.

Grants are not reviewed/approved until entered into TRACS

States are concerned that the approval of new grants submitted via grants.gov or other appropriate mechanisms are not being reviewed or approved by the FWS until also loaded into TRACS. Although, the general grant submission process is addressed in 50 CFR 80, currently TRACS is not referenced in regulation. This creates authority and performance report acceptance issues. There is no real-time notification process when grants, reports, or other required information are accepted, approved, and closed.

Use of TRACS by entities with small numbers of grants

Some entities only work with a minimum number of grants each year. It is not cost-effective for them to maintain access to TRACS and the training needed to use the system. The FWS has proposed to develop a threshold of volume of grants before grantees must enter data in TRACS. Entities that fall below that threshold will not be responsible for entry into TRACS. The FWS will handle TRACS entries for these entities. The FWS has indicated that grant recipients with small numbers of WSFR grants will have the necessary access to TRACS even if they are not responsible for data entry. In some cases, these users may be willing to handle performance reporting, which would help to equalize the burden placed on the FWS by agreeing to manage reporting on grants by those entities.

Conclusions and Pathway Forward

WMI believes that the acceptance of the recommendations contained within this report by AFWA and the FWS, the propagation and implementation of these recommendations by the partners, and an effective communications plan for the WSFR program will ultimately result in a system of measuring conservation performance that will continue to demonstrate the mission-critical nature of using product excise taxes to fund wildlife conservation across our country.

While the enabling legislation of the WSFR Program doesn't specifically indicate an expectation of performance, the grant programs are subject to the Government Performance and Results Act (GPRA, Pub. Law 103-62) which requires agencies to report annually on their performance. The Secretary of the Interior is provided rule-making authority for the Acts that are the underpinning of the WSFR Program. In addition to the requirement that grant-funded projects be substantial in character and design, there is a requirement to demonstrate performance delineated in the WCRP section of PR. This particular requirement for performance metrics has been reiterated for the SWG program in Congressional appropriation bills and report language through the annual budget process since 2001. Within 50 CFR 80, sections generally address the grant approval process, reporting requirements, compliance with federal laws and regulations, and terms and conditions of a grant, all of which may be construed to provide FWS with the authority to collect performance metrics as a part of the grant process.

Government-wide requirements for grant performance reporting are found in 2 CFR 200, which is a regulation promulgated by OMB. This regulation specifically requires the grantor (FWS) to include in the award an indication of timing and scope of performance of the grant as related to outcomes to be achieved by the program; to require specific performance goals, indicators, milestones, or outcomes in the award to require clear articulation of reporting requirements so that a standard is established by which the grantee's performance can be measured; to include program-specific requirements in the award, which must be aligned with the federal agency strategic goals, objectives, and performance. It also allows the grantor to require reporting of financial data in relation to performance measures and to require performance trend data and analysis when it would be informative to the grantor. This regulation requires the grantee (States and other non-federal entities) to report cost data to ensure cost-effectiveness; to comply with all federal requirements and demonstrate that performance expectations are being achieved; to submit performance reports at interval set by grantor; to submit performance reports using OMB-approved methods; and to provide a comparison of actual accomplishments to those established in the award, as appropriate.

Recommendations of this Review

Develop a Communications Plan for the WSFR Program

- A. Develop, implement, and promote effective communications and outreach strategies.
- B. Define the role of various work groups and develop closer working relationships.
- C. Establish a technical liaison group to meet the needs of technical communication for TRACS.

- D. Establish process of advance notification to WSFR-JTF and state Directors for WSFR issues.
- E. Identify specific barriers to communications and information transfer – be inclusive.
- F. Develop and circulate a “Roles and Responsibilities” document with necessary oversight responsibilities clearly identified.
- G. Evaluate alignment of standing meetings that are relevant to the WSFR Program to promote information transfer.
- H. Encourage partners to remain professional and objective, separating TRACS issues from other non-related issues.
- I. Define goals clearly so that appropriate scalable metrics can be developed that demonstrate conservation successes of the WSFR Program.

Develop and memorialize a process for amending TRACS

Generally, and for future changes:

- A. Consult with states and encourage participation early in the change process.
- B. Solicit input broadly – include all states, not just those represented on the WSFR-JTF.
- C. Acknowledge that everything cannot be measured – the focus should remain on critical data that the Parties need to achieve and demonstrate effective conservation.
- D. Consider data from external sources to fill gaps.
- E. Require that data to be reflective of the CHSP and CHM, where practicable.
- F. Streamline the process to maximize efficiency and minimize duplication of effort.
- G. Institutionalize commitment that reporting at the program/outcome level is voluntary and will only be considered if it is in the best interest of the Parties.
- H. Memorialize assurances for current reporting levels and prohibit financial auditing of cost information in TRACS.

For current TRACS revision:

- A. Thoroughly review and vet the draft Strategies and Objectives with states.
- B. Cooperatively develop and approve voluntary outcomes for current and new Strategies.
- C. Clearly define the roles of existing working groups and ensure that the correct participants are involved.
- D. Make recommendations for a formal approval process to AFWA/FWS Directorate.
- E. Establish a reasonable time frame for completion of grant revisions.

Integrate Strategies and Objectives into TRACS reporting

- A. Review and distribute the matrix consisting of the draft 14 Strategies and associated Objectives (to provide context) for approval by the states.
- B. Distribute the matrix to the WSFR regional staff for review and comments, which should be returned to the WSFR-JTF for final recommendation.
- C. Submit recommended Strategies and Objectives to the AFWA Executive Committee and FWS Director for approval.

- D. Include language that future modifications to TRACS Strategies and Objectives will go through a collaborative process involving the WSFR-JTF, with consideration given to the capacity of states to collect additional data.
- E. Establish a process to formally review/approve metrics.
- F. Strongly encourage Directors to use the WSFR-JTF process and to increase their involvement with their FACs and practitioners.

Define the level of detail for TRACS reporting

- A. Ensure that revisions to cost reporting and the level at which it is done is cooperatively agreed to by the Parties.
- B. Focus on performance metrics for the immediate future. Once those are finalized, then consider how and at what level financial reporting in TRACS might work.
- C. Cooperatively define why voluntary programmatic/outcomes should be reported and how they are critical to the integrity of the WSFR Program
- D. Encourage states to engage their practitioners to receive input on how to best report project/output and program/outcome performance and cost metrics.
- E. Encourage states to use the current TRACS system process of tagging to demonstrate specific examples of performance and efficiency.
- F. Work with the five CMS states individually during TRACS enhancement to develop an efficient and effective process that accommodates the CMS structure.

Resolve Outcome reporting issues in TRACS and its impacts on WSFR grants

- A. Refocus the 5-year review and expand to cover overall conservation achievements rather than just a roll-up of five years of projects/programs.
- B. Determine what outcomes should be measured, and then decide how TRACS can be used to measure them.
- C. Determine if a broad number of outcomes or a limited number of outcomes are needed.
- D. Maintain the “empty field” design for TRACS to allow for future outcome reporting.
- E. Ensure that outcome reporting remains voluntary unless both Parties agree to make it mandatory.
- F. Emphasize that it is in the best interest of the Parties to report at the outcome level.
- G. Educate states that outcome reporting for WSFR may benefit the broad push for wildlife diversity conservation funding efforts.
- H. Educate that outcome reporting outside of the grant period is eligible in a coordination grant and that there is already a requirement for long-term tracking in the system for projects such a land acquisition grants.
- I. Affirm that state conservation decisions are driven by states rather than FWS priorities.
- J. Encourage innovative uses of external data sources, such as the National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, The State of the Birds report, Waterfowl Population Status reports, and others that can be used in lieu of outcome reporting in TRACS.
- K. Develop a periodic process to evaluate TRACS to determine if it is meeting the needs and expectations of the FWS and states.

- L. Communicate to regional WSFR staff their explicit authority on denying or requesting revisions to a project based on proposed or actual outcomes in TRACS.
- M. Provide assurances that no new information will be required to be collected on grants post-closure and that reporting long-term outcomes will not be required unless it is a state decision to do so.

Determine ability for non-state entities to access to TRACS data

- A. Acknowledge that viewing compiled and/or summarized data is not necessarily synonymous with data access and detailed analysis.
- B. Ensure that states ultimately determine and control who has access to sensitive data.
- C. Revisit data access needs by clearly identifying the legitimate needs of non-state parties along with assessing the negative potential of data release.
- D. Continue ongoing discussions with industry and other non-state partners regarding their data needs.
- E. Develop and refine the TRACS public viewer with integrated, high-quality search, reporting, and analytics tools to provide research partners.
- F. Complete the performance reporting component of TRACS before making any state data public, then work to improve the quality of the public view of TRACS.

Resolve workload issues caused by duplicative components of TRACS

- A. Evaluate the concept of modifying TRACS to allow for a singular grant portal for states.
- B. Seek wider input from the states on how well this concept would be accepted.
- C. Develop a pros/cons list for using TRACS as single-point grant management system.
- D. Investigate options to bypass grants.gov and use TRACS exclusively as the grants portal.
- E. Evaluate the current utility of grants.gov for the WSFR program across regions.
- F. Delineate the technical limitations of grants.gov and investigate the technical requirements and costs for making TRACS into a single-point grant management system.
- G. Create an automated notification system that electronically notifies the states when grant applications, reports, or other required information reach certain milestones in TRACS.

Technical Challenges

Technical challenges identified included concerns over compliance with 2 CFR 200, the upcoming handoff of TRACS data entry to states, the perception that grants are not being reviewed or approved until entered into TRACS and the use of TRACS by entities with small numbers of grants. Most of these can be easily resolved at the working group level. The WSFR-JTF should assign the resolution of these technical challenges to the appropriate working group of subject matter experts for resolution.

Appendix I - Draft Memorandum of Understanding

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding is hereby entered into by and between the United States Fish and Wildlife Service, hereinafter referred to as FWS, and the Association of Fish and Wildlife Agencies, hereinafter referred to as AFWA.

1. Purpose

This MOU affirms and continues a policy of cooperation and coordination among the parties for the continued implementation and proper function of a grants performance-reporting system, known as Tracking and Reporting Actions for the Conservation of Species (TRACS) for the Wildlife and Sport Fish Restoration (WSFR) Program of the FWS.

2. Parties

FWS is the United States Fish and Wildlife Service whose mission is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.

AFWA is the Association of Fish & Wildlife Agencies, which represents North America's state fish and wildlife agencies to advance sound, science-based management and conservation of fish and wildlife and their habitats in the public interest.

3. Background

Demonstration and reporting of grant performance is critical to the past and continued assurance that the model of using federal excise tax funds paid by industries that manufacture firearms, ammunition, archery, and angling equipment continues to support fish and wildlife conservation throughout our country.

Grant performance metrics have been provided for many years by the states through various reporting methods. The FWS and the states have been instrumental in ensuring that the substance of these reports has been reported accurately to Administration officials and to Congress. However, there is a need and an expectation by the American public for increased levels of accountability of funds at both the state and federal level.

There is a legal mandate for collecting performance metrics for grants outlined in the Pittman-Robertson Wildlife Restoration Act (PR) and the Dingell-Johnson Sport Fish Restoration Act (DJ). This requirement is codified generally in 50 CFR 80 and more specifically in 2 CFR 200.

In 2008, the FWS and AFWA agreed (through the Joint Federal/State Task Force on Federal Assistance Policy) on the *Conservation Heritage Strategic Plan* and stepped down *Conservation Heritage Measures* for the WSFR Program, which encompassed PR, DJ, and State Wildlife Grants (SWG). The Plan identified a mission, vision, guiding principle, core values, and intended outcomes for the WSFR Program.

Over the past several years, FWS has been developing a modern performance-reporting system (TRACS) to replace the now-defunct Federal Aid Information Management Systems (FAIMS) database as a means of collecting performance metrics for the WSFR program. WSFR grants over the last two years have been entered into the first iteration of the TRACS system, and most states are preparing to assume primary responsibility for entering grant information into the system by the end of 2016.

The Joint Federal/State Task Force on Federal Assistance Policy (WSFR-JTF) has been instrumental in the development and review of TRACS since its inception. In past meetings, the WSFR-JTF has provided input, reviewed milestones, and resolved conflicts over performance reporting requirements in general and TRACS specifically.

4. Mutual Agreement

In order to maintain the integrity of the WSFR Program and the conservation funding that it provides to states, the Parties agree that it is of critical importance to have a modern grant reporting system that is accurate, scalable, efficient, and transparent. The Parties further agree that:

- A. The Tracking and Reporting Actions for the Conservation of Species (TRACS) system is the grants management system, which includes the collection of grant performance metrics, and the computation of license certification for projects and programs managed within the WSFR Program.
- B. The WSFR-JTF will cooperatively develop an effective communications plan that will substantially improve dialogue, understanding, and participation of all the partners of the WSFR Program, including further TRACS development, implementation, and modification.
- C. The WSFR-JTF will cooperatively develop a process plan so that WSFR partners (grantor and grantees) will have the opportunity to actively engage in future substantive changes to the TRACS program or other grant reporting requirements.
- D. Specific TRACS Strategies, Objectives, SMART Objectives, and other performance measures will be mutually agreed upon by the Parties before implementation into the TRACS system.

- E. Program level outcomes will remain voluntary for states or other entities reporting in the TRACS system, unless that state or entity specifically includes outcome reporting in a grant, or the Parties mutually agree to require outcome reporting for all grants at a later date.
- F. Grantees (states or other non-federal recipients) will assume responsibility for report entry into the TRACS system by _____ (Date) _____, unless specifically exempted by the FWS. However, this in no way precludes state grantees from having access to the TRACS system, even if exempted from report entry into the system.
- G. Financial audits will be based on the information contained on the Federal Financial Report. TRACS is not and will not be the official financial system of record.
- H. The Parties will explore options to relieve duplication for grant application and reporting such as evaluating the use of TRACS as a single grants management system, which may include technically expanding the connection between TRACS, FBMS, grants.gov and other grant programs.
- I. While the various working groups involved with TRACS development and implementation, including the Federal Assistance Coordinators Work Group and the TRACS Working Group have all made valuable contributions to the current status of TRACS, the WSFR-JTF will explore and select the most effective technical working group to further facilitate the development and implementation of TRACS, thereby further eliminating additional duplication of effort and lessening the workload of both state and federal staff. The WSFR-JTF will further ensure that the selected work group has open and continuous communication with the WSFR-JTF and their state and federal partners by developing and providing guidance to set the mission and direction of that group.
- J. The WSFR-JTF may assign currently identified challenges to TRACS or those challenges that may arise in the future to the appropriate entity, which may include the WSFR-JTF, the above-selected work group, or any other entity constituted and/or selected by the WSFR-JTF.

Appendix II – Legal Authority for Performance Reporting Requirement

Pittman-Robertson Wildlife Restoration Act. 16 U.S.C. 669-669k.

Performance measures for grants are not explicitly addressed in the Pittman-Robertson Wildlife Restoration Act, as it primarily establishes overall authority, requirements for participation, revenue streams, and overarching processes. However, the Act does reference one specific requirement (16 U.S.C. 699c) for monitoring the effectiveness of conservation actions. It also includes several references that could be interpreted as generally establishing a framework where measuring grant performance might reasonably be expected. Specifically, the following sections (*emphasis added by authors of this review*) could be interpreted as the intent of Congress to require performance accountability by the states:

Wildlife conservation and restoration program. 16 U.S.C. 669c.

Specifies that a participating state will develop and begin implementation of a wildlife conservation strategy based upon the best available and appropriate scientific information and data that... provides for periodic monitoring of species identified under paragraph (1) and their habitats and the *effectiveness of the conservation actions* determined under paragraph (4)...

Submission and approval of plans and projects. 16 U.S.C. 669e.

Specifies that any state desiring to avail itself to the benefits of this chapter shall, by its state fish and game department, submit programs or projects for wildlife restoration in either of the following two ways:

- (1) The state shall prepare and submit to the Secretary of the Interior a comprehensive fish and wildlife resource management plan, which shall insure the perpetuation of these resources for the economic, scientific, and recreational enrichment of the people... If the Secretary of the Interior finds that *such plans conform to standards established by him and approves such plans*, he may finance up to 75 per centum of the cost of implementing segments of those plans...
- (2) A state may elect to avail itself of the benefits of this chapter by its state fish and game department submitting to the Secretary of the Interior full and detailed statements of any wildlife-restoration project proposed for that State. If the Secretary of the Interior finds that such project *meets with the standards set by him and approves said project*, the state fish and game department shall furnish to him such surveys, plans, specifications, and estimates therefore as he may require.

The Secretary of the Interior shall approve only such comprehensive plans or projects as may be substantial in character and design and the expenditure of funds hereby authorized shall be applied only to such approved comprehensive wildlife plans or projects...

Payment of funds to States; laws governing construction and labor. 16 U.S.C. 669f.

Specifies that when the Secretary of the Interior finds that any project approved by him has been completed or, if involving research relating to wildlife, is being conducted, *in compliance with said plans and specifications*, he shall cause to be paid to the proper authority of said state the amount set aside for said project.

Rules and regulations. 16 U.S.C. 669i.

Authorizes the Secretary of the Interior to *make rules and regulations* for carrying out the provisions of the chapter.

Dingell-Johnson Sport Fish Restoration Act. 16 U.S.C. 777-777n.

Performance measures for grants are not explicitly addressed in the Dingell-Johnson Sport Fish Restoration Act, as it primarily establishes overall authority, requirements for participation, revenue streams, and overarching processes. However, the Act does include several references that could be interpreted as generally establishing a framework where measuring grant performance might reasonably be expected. Specifically, the following sections (*emphasis added*) could be interpreted as the intent of Congress to require performance accountability by the states:

Submission and approval of plans and projects. 16 U.S.C. 777e.

Specifies that any State desiring to avail itself of the benefits of this chapter shall, by its state fish and game department, submit programs or projects for fish restoration in either of the following two ways:

- (1) The state shall prepare and submit to the Secretary of the Interior a comprehensive fish and wildlife resource management plan, which shall insure the perpetuation of these resources for the economic, scientific, and recreational enrichment of the people... If the Secretary of the Interior finds that *such plans conform to standards established by him and approves such plans*, he may finance up to 75 per centum of the cost of implementing segments of those plans...
- (2) A state may elect to avail itself of the benefits of this chapter by its state fish and game department submitting to the Secretary of the Interior full and detailed statements of any fish restoration and management project proposed for that state. If the Secretary of the Interior finds that such project *meets with the standards set by him and approves said project*, the state fish and game department shall furnish to him such surveys, plans, specifications, and estimates therefore as he may require.

The Secretary of the Interior shall approve only such comprehensive plans or projects as may be substantial in character and design and the expenditure of funds hereby authorized shall be applied only to such approved comprehensive fishery plan or projects...

Payments by United States. 16 U.S.C. 777f.

Specifies that when the Secretary of the Interior shall find that any project approved by him has been completed or, if involving research relating to fish, is being conducted, *in compliance with said plans and specifications*, he shall cause to be paid to the proper authority of said state the amount set aside for said project.

Rules and regulations. 16 U.S.C. 777i.

Authorizes the Secretary of the Interior to *make rules and regulations* for carrying out the provisions of this chapter.

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards – 2 CFR 200.

OMB has promulgated a specific regulation (2 CFR 200) that identifies both discretionary and mandatory information included in federal awards and in the subsequent reports by the non-federal grantee. Several sections in this regulation specifically address the requirement for performance and cost-effectiveness reporting for federal grants by non-federal grant recipients.

Information contained in a federal award. 2 CFR 200.210.

Federal Award Performance Goals. The federal awarding agency must include in the federal award an indication of the timing and scope of expected performance by the non-federal entity as related to the outcomes intended to be achieved by the program. In some instances, (e.g., discretionary research awards), this may be limited to the requirement to submit technical performance reports (to be evaluated in accordance with federal awarding agency policy). Where appropriate, the federal award may include specific performance goals, indicators, milestones, or expected outcomes (such as outputs, or services performed or public impacts of any of these) with an expected timeline for accomplishment. Reporting requirements must be clearly articulated such that, where appropriate, performance during the execution of the federal award has a standard against which non-federal entity performance can be measured. The federal awarding agency may include program-specific requirements, as applicable. These requirements should be aligned with agency strategic goals, strategic objectives, or performance goals that are relevant to the program.

Performance measurement. 2 CFR 200.301.

The federal awarding agency must require the recipient to use OMB-approved government-wide standard information collections when providing financial and performance information. *As appropriate and in accordance with above mentioned information collections, the federal awarding agency must require the recipient to relate financial data to performance accomplishments of the federal award. Also, in accordance with above mentioned government-wide standard information collections, and when applicable, recipients must also provide cost information to demonstrate cost effective practices (e.g., through unit cost data).* The recipient's performance should be measured in a way that will help the federal awarding agency and other non-Federal entities to improve program outcomes, share lessons learned, and spread the adoption of promising practices. The federal awarding agency should provide

recipients with clear performance goals, indicators, and milestones as described in 2 CFR 200.210 (Information contained in a federal award). Performance reporting frequency and content should be established to not only allow the federal awarding agency to understand the recipient progress, but also to facilitate identification of promising practices among recipients and build the evidence upon which the federal awarding agency's program and performance decisions are made.

Monitoring and reporting program performance. 2 CFR 200.328.

The non-federal entity is responsible for oversight of the operations of the federal award supported activities. The non-federal entity must monitor its activities under federal awards to *assure compliance with applicable federal requirements and performance expectations are being achieved*. Monitoring by the non-federal entity must cover each program, function or activity.

Non-construction performance reports - *The federal awarding agency must use standard, OMB-approved data elements for collection of performance information (including performance progress reports, Research Performance Progress Report, or such future collections as may be approved by OMB and listed on the OMB Web site).*

- (1) *The non-federal entity must submit performance reports at the interval required by the federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. Intervals must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances, for example where more frequent reporting is necessary for the effective monitoring of the federal award or could significantly affect program outcomes.*
- (2) *The non-federal entity must submit performance reports using OMB approved government-wide standard information collections when providing performance information.* As appropriate in accordance with above mentioned information collections, these reports will contain, for each Federal award, brief information on the following unless other collections are approved by OMB:
 - (i) *A comparison of actual accomplishments to the objectives of the federal award established for the period. Where the accomplishments of the federal award can be quantified, a computation of the cost (for example, related to units of accomplishment) may be required if that information will be useful. Where performance trend data and analysis would be informative to the federal awarding agency program, the federal awarding agency should include this as a performance-reporting requirement.*

Administrative Requirements, Pittman-Robertson Wildlife Restoration and Dingell-Johnson Sport Fish Restoration Acts – 50 CFR 80.

This regulation instructs states on how they may use revenues derived from state hunting and fishing licenses in compliance with the Acts; receive annual apportionments from the Federal Aid to Wildlife Restoration Fund (16 U.S.C. 669(b)), if authorized, and the Sport Fish Restoration and Boating Trust Fund (26 U.S.C 9504); receive financial assistance from the Wildlife Restoration program, the Basic Hunter Education and Safety subprogram, and the Enhanced Hunter Education and Safety grant program, if authorized; receive financial assistance from the Sport Fish Restoration program, the Recreational Boating Access subprogram, the Aquatic Resources Education subprogram, and the Outreach and Communications subprogram; and comply with the requirements of the Acts.

50 CFR 80.11. How does a State become ineligible to receive the benefits of the Acts? *A State becomes ineligible to receive the benefits of the Acts if it fails materially to comply with any law, regulation, or term of a grant as it relates to acceptance and use of funds under the Acts;*

50 CFR 80.81. What must an agency submit when applying for a comprehensive-management-system grant? A State fish and wildlife agency must submit the following documents when applying for a comprehensive-management system grant:

- (a) The standard form for an application for Federal assistance in a mandatory grant program.
- (b) The standard forms for assurances for non-construction programs and construction programs as applicable. Agencies may submit these standard forms for assurances annually to the Regional Director for use with all applications for Federal assistance in the programs and subprograms under the Acts.
- (c) A statement of cost estimates by subaccount. Agencies may obtain the subaccount numbers from the Service's Regional Division of Wildlife and Sport Fish Restoration.
- (d) *Supporting documentation explaining how the proposed work complies with the Acts, the provisions of this part, and other applicable laws and regulations.*
- (e) A statement of the agency's intent to carry out and fund part or all of its comprehensive management system through a grant.
- (f) A description of the agency's comprehensive management system including inventory, strategic plan, operational plan, and evaluation. "Inventory" refers to the process or processes that an agency uses to:
 - (1) *Determine actual, projected, and desired resource and asset status; and*
 - (2) *Identify management problems, issues, needs, and opportunities.*

(g) A description of the State fish and wildlife agency program covered by the comprehensive management system.

(h) Contact information for the State fish and wildlife agency employee who is directly responsible for the integrity and operation of the comprehensive management system.

(i) A description of how the public can take part in decision making for the comprehensive management system.

50 CFR 80.82. What must an agency submit when applying for a project-by-project grant? A State fish and wildlife agency must submit the following documents when applying for a project-by-project grant:

(a) The standard form for an application for Federal assistance in a mandatory grant program.

(b) The standard forms for assurances for non-construction programs and construction programs as applicable. Agencies may submit these standard forms for assurances annually to the Regional Director for use with all applications for Federal assistance in the programs and subprograms under the Acts.

(c) A project statement that describes each proposed project and provides the following information:

(1) Need. Explain why the project is necessary and how it fulfills the purposes of the relevant Act.

(2) *Purpose and Objectives.* State the purpose and objectives, and base them on the need. The purpose states the desired outcome of the proposed project in general or abstract terms. The objectives state the desired outcome of the proposed project in terms that are specific and quantified.

(3) Results or benefits expected.

(4) Approach. Describe the methods used to achieve the stated objectives.

(5) Useful life. Propose a useful life for each capital improvement, and reference the method used to determine the useful life of a capital improvement with a value greater than \$100,000.

(6) Geographic location.

(7) Principal investigator for research projects. Record the principal investigator's name, work address, and work telephone number.

(8) Program income.

(i) Estimate the amount of program income that the project is likely to generate.

(ii) Indicate the method or combination of methods (deduction, addition, or matching) of applying program income to Federal and non-Federal outlays.

(iii) Request the Regional Director's approval for the matching method. Describe how the agency proposes to use the program income and the expected results. Describe the essential need for using program income as match.

(iv) Indicate whether the agency wants to treat program income that it earns after the grant period as license revenue or additional funding for purposes consistent with the grant or program.

(v) Indicate whether the agency wants to treat program income that the subgrantee earns as license revenue, additional funding for the purposes consistent with the grant or subprogram, or income subject only to the terms of the subgrant agreement.

(9) Budget narrative. *Provide costs by project and subaccount with additional information sufficient to show that the project is cost effective.* Agencies may obtain the subaccount numbers from the Service's Regional Division of Wildlife and Sport Fish Restoration. Describe any item that requires the Service's approval and estimate its cost. Examples are pre-award costs and capital expenditures for land, buildings, and equipment. Include a schedule of payments to finish the project if an agency proposes to use funds from two or more annual apportionments.

(10) Multipurpose projects. Describe the method for allocating costs in multipurpose projects and facilities as described in §80.63 and 80.64.

(11) Relationship with other grants. Describe any relationship between this project and other work funded by Federal grants that is planned, anticipated, or underway.

(12) *Timeline. Describe significant milestones in completing the project and any accomplishments to date.*

(13) General. Provide information in the project statement that:

(i) Shows that the proposed activities are eligible for funding and substantial in character and design; and

(ii) Enables the Service to comply with the applicable requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 and 4331-4347), the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), the National Historic Preservation Act (16 U.S.C. 470s), and other laws, regulations, and policies.

50 CFR 80.90. What are the grantee's responsibilities? A State fish and wildlife agency as a grantee is responsible for all of the actions required by this section.

(a) *Compliance with all applicable Federal, State, and local laws and regulations.*

(b) Supervision to ensure that the work follows the terms of the grant, including:

(1) Proper and effective use of funds;

(2) Maintenance of records;

(3) *Submission of complete and accurate Federal financial reports and performance reports by the due dates in the terms and conditions of the grant;* and

(4) Regular inspection and monitoring of work in progress.

(c) Selection and supervision of personnel to ensure that:

- (1) Adequate and competent personnel are available to complete the grant-funded work on schedule; and
- (2) Project personnel meet time schedules, accomplish the proposed work, meet objectives, and submit the required reports.

(d) Settlement of all procurement-related contractual and administrative issues.

(e) Giving reasonable access to work sites and records by employees and contractual auditors of the Service, the Department of the Interior, and the Comptroller General of the United States.

(1) *Access is for the purpose of:*

(i) Monitoring progress, conducting audits, or other reviews of grant-funded projects; and

(ii) Monitoring the use of license revenue.

(2) Regulations on the uniform administrative requirements for grants awarded by the Department of the Interior describe the records that are subject to these access requirements.

(3) *The closeout of an award does not affect the grantee's responsibilities described in this section.*

(f) Control of all assets acquired under the grant to ensure that they serve the purpose for which acquired throughout their useful life.

50 CFR 80.91. What is a Federal obligation of funds and how does it occur? An obligation of funds is a legal liability to disburse funds immediately or at a later date as a result of a series of actions. All of these actions must occur to obligate funds for the formula-based grant programs authorized by the Acts:

(a) The Service sends an annual certificate of apportionment to a State fish and wildlife agency, which tells the agency how much funding is available according to formulas in the Acts.

(b) The agency sends the Regional Director an application for Federal assistance to use the funds available to it under the Acts and commits to provide the required match to carry out projects that are substantial in character and design.

(c) The Regional Director notifies the agency that he or she approves the application for Federal assistance *and states the terms and conditions of the grant.*

(d) *The agency accepts the terms and conditions of the grant in one of the following ways:*

(1) Starts work on the grant-funded project by placing an order, entering into a contract, awarding a sub-grant, receiving goods or services, or otherwise incurring allowable costs during the grant period that will require payment immediately or in the future;

(2) Draws down funds for an allowable activity under the grant; or

(3) Sends the Regional Director a letter, fax, or e-mail accepting the terms and conditions of the grant.

50 CFR 80.95. How does an agency receive Federal grant funds? *The Regional Director may withhold payments pending receipt of all required reports or documentation for the project.*

50 CFR 80.160. What are the information collection requirements of this part? This part requires each State fish and wildlife agency to provide the following information to the Service. The State agency must:

- Certify on a Governmentwide standard form that it will *comply with the laws, regulations, and policies applicable to non-construction projects, construction projects, or both* (OMB control numbers 4040-0007 and 4040-0009).
- *Provide a project statement that describes the need, purpose and objectives, results or benefits expected, approach, geographic location, explanation of costs, and other information that demonstrates that the project is eligible under the Acts and meets the requirements of the Federal Cost Principles and the laws, regulations, and policies applicable to the grant program* (OMB control number 1018-0109).
- *Report as a grantee on progress in completing the grant-funded project* (OMB control number 1018-0109).

FWS Policy Manual

The FWS Policy Manual chapters addressing the grant specifics of the WSFR Program are written to restate, clarify, and simplify existing laws and regulations. In most cases, these chapters are simply a “plain-text” version of the corresponding legal authority. However, in some cases, they may be construed to expand laws and regulations beyond Congressional intent. The WSFR-JTF periodically reviews FWS Policy Manual chapters and makes recommendations and/or updates on their continued applicability and usefulness. The chapters that address (either directly or peripherally) the requirement for performance metrics are:

- 516 FW 1 (Financial Reporting for Grant and Cooperative Agreement Awards)
- 516 FW 2 (Performance Reporting for Grant and Cooperative Agreement Awards)
- 518 FW 1 (Authorities and Responsibilities)
- 521 FW 1 (Eligibility Standards for Wildlife Restoration)
- 521 FW 2 (Eligibility Standards for Sport Fish Restoration)

The specific references to performance measures or performance metrics in these chapters are delineated below.

516 FW 1 (Financial Reporting for Grant and Cooperative Agreement Awards)

Objectives: For FWS staff to consistently communicate fiscal reporting requirements to applicants and award recipients and to make sure that these requirements are met.

Scope: Covers all FWS programs that award grants and cooperative agreements.

Actions: The FWS must clearly state federal financial reporting requirements in pre-award, award, and post-award notices. These notices must identify the required report formats, reporting frequency, and due dates and describe sanctions for noncompliance. We must obtain prior approval from OMB to:

- A. Collect information or documentation in addition to what is required on OMB-approved Standard Forms, or
- B. Use project-or program-specific reporting forms/formats.

The FWS may require recipients to report additional financial information specific to the awarding program as long as OMB has approved the requirements.

516 FW 2 (Performance Reporting for Grant and Cooperative Agreement Awards)

Objectives: For FWS staff to consistently communicate performance-reporting requirements to applicants and award recipients and to make sure that these requirements are met.

Scope: Covers all FWS programs that award grants and cooperative agreements.

Actions: The FWS program responsible for the administration of the awards must monitor the recipients' performance reporting. Monitoring includes, but is not limited to:

- (1) Tracking report due dates and report receipt dates in the Financial and Business Management System (FBMS) system through a Milestone Plan for each award,
- (2) Reviewing reports for completeness and accuracy,
- (3) Returning incomplete or inaccurate reports to the recipient within 30 calendar days of receipt with a clear written description of why the report is being returned,
- (4) Providing timely notice about and obtaining overdue reports with due concern for recipient rights and program needs,
- (5) Maintaining documentation generated while monitoring submission of performance reports in the official award file, and
- (6) Using complete and accurate reports to determine whether or not the recipient met award requirements.

The FWS must clearly state Federal performance reporting requirements in pre-award, award, and post-award notices. These notices must identify required report formats, reporting frequency, and due dates and describe sanctions for noncompliance.

2.8 What are the requirements for collecting information from applicants and recipients of financial assistance programs?

- A. The Paperwork Reduction Act requires that when a Federal agency collects information, those collections must minimize duplication and burden on the public, have practical utility, and support the proper performance of the agency's mission. OMB must review and approve the collection of the following types of information from applicants and recipients (see 5 CFR 1320):
- (1) Application project and budget narratives and any other required documentation other than that found on Governmentwide-approved application forms (Standard Form (SF) 424 "Family");
 - (2) Program-specific application forms;
 - (3) Recipient technical/progress/performance reporting;
 - (4) Any other program or project-specific reporting required other than the information on SF-425 (*Federal Financial Report*), SF 270 (*Request for Advance or Reimbursement*), and SF 271 (*Outlay Report and Request for Reimbursement for Construction Programs*); and
 - (5) Revisions to project and budget narratives and written requests required prior to award amendment other than that found on Governmentwide-approved application forms (SF 424 Family).
- B. The Service financial assistance programs that OMB has already approved are posted on www.reginfo.gov.
- C. Contact the Service Information Collection Clearance Officer in the Division of Policy and Directives Management for guidance on obtaining OMB approval to collect information from financial assistance applicants and recipients.

2.9 If a program does not have OMB information collection clearance, are the recipients exempt from submitting performance reports?

No. Regulations (43 CFR Part 12) require financial assistance recipients to submit performance and other types of award reporting. However, the Paperwork Reduction Act and OMB regulations state that we cannot penalize a recipient with the consequences listed in sections 2.18 to 2.21 if OMB has not approved the collection of information. It is important to immediately seek OMB approval for the collection of information associated with applications and recipient reporting requirements. A Service program that fails to obtain required performance reports from a recipient is violating this reporting policy and will have to develop an action plan to correct the violation.

2.10 Can the Service exempt a recipient from performance reporting if he or she is an individual who receives a grant or cooperative agreement award from the Service separate from a business or non-profit organization he/she may operate?

Yes, but only if the awarding program has another way of monitoring the award at least annually and documenting progress as part of the file. The program must enter a Milestone Plan in FBMS that reflects the program's monitoring schedule (see section 2.5B(1)).

2.11 What format does the Service require recipients to use for reporting performance?

Recipients may submit performance reports in paper or electronic format. We do not require that they use a Federal form. See section 2.8 for OMB requirements for information collection.

2.12 What information must we require recipients to include in performance reports?

We must require the following information in performance reports.

- A. A comparison of actual accomplishments to the goals and objectives established for the reporting period, the results/findings, or both;
- B. If the goals and objectives were not met, the reasons why;
- C. Other important information including, when appropriate, analysis and explanation of cost overruns or high unit costs compared to the benefit received to reach an objective; and
- D. Any additional requirements specified in program legislation.

2.13 What are the requirements for the frequency of performance reporting?

We require recipients to send us final reports for all awards no later than 90 calendar days after the award period or termination of award support, whichever comes first.

We require recipients to send us interim performance reports for awards that last longer than four full quarters (12 months). Depending on the awarding program, we may require recipients to submit these reports annually, semiannually, or quarterly.

Annually: The annual reporting period is dependent on the award's performance start date. We must receive annual interim performance reports no later than 90 calendar days after the annual interim report end date. Table 2-2 shows the schedule:

Semiannually: The semiannual interim reporting period always ends December 31, March 31, June 30, or September 30. We must receive semiannual interim performance reports no later than 30 calendar days after the last day of each semiannual interim reporting period. Table 2-3 shows the schedule:

Quarterly: The quarterly interim reporting period always ends December 31, March 31, June 30, or September 30. We must receive quarterly interim reports no later than 30 calendar days after the last day of each quarterly interim reporting period.

2.14 May the Service allow the recipient to use alternate due dates from those on the reporting schedules above?

Yes, we may allow the recipient to use alternate due dates if we obtain a valid justification for changing the date and make sure that the suggested date(s) allows for reporting progress at least annually. We must include the recipient's request in the award file and specify the approved new interim report date(s) in the notice of award.

2.15 May the Service require interim performance reports more frequently than quarterly?

A. Yes. We may require reports more frequently than quarterly if the recipient:

- (1) Has a history of poor performance,
- (2) Is not financially stable,
- (3) Has a management system that does not meet the standards that the regulations applicable to the award require,
- (4) Has not conformed to the terms and conditions of a previous award, or
- (5) Is not otherwise responsible.

B. Before we may require more frequent reports, we must notify the recipient by letter, fax, or email and explain the:

- (1) Nature of the additional requirements,
- (2) Reason for the additional requirements,
- (3) Nature of the corrective action needed,
- (4) Time allowed for completing the corrective action, and
- (5) Procedure for requesting reconsideration of the additional requirements.

C. As soon as a recipient corrects any condition(s) that require additional reporting, we must immediately remove the additional requirements and notify the recipient by letter, fax, or email.

2.16 Can the Service waive performance reporting requirements?

We may not waive final or interim performance reports for recipients unless they are exempt from providing performance reports (see section 2.10). Even if a performance report is for a multiyear award and there was no activity during the reporting period, we may not waive the report. Instead, the recipient should provide a brief annual interim performance report to document the inactivity and the reasons for it.

2.17 May the Service extend the due date of performance reports?

A. We may extend the due date of a performance report if we receive a request through a letter, fax, or email no later than 1 day before the original due date of the report. The request must identify:

- (1) The type of report for which the recipient requests an extension,
- (2) The requested revised due date, and
- (3) A justification for the extension.

B. The maximum extension we may approve is 90 days, unless a longer period is justified by a catastrophe that significantly impairs the recipient's operations.

C. We must notify the recipient by letter, fax, or email if we approve a request for extension of the due date of a report.

D. We must also keep extension requests and the final decision on these requests on file.

2.18 What happens if the Service does not receive a required performance report by the due date or agreed-upon extension date?

A. If we do not receive a required performance report by the due date or agreed-upon extension date, we must issue a letter, fax, or email notice of noncompliance (with appropriate return receipt) as soon as practical, but no later than 30 calendar days after the due date or agreed-upon extension date has passed. The noncompliance notice must state:

- (1) The recipient is noncompliant with the Federal performance reporting terms of the award;
- (2) Unless we receive the required report within the next 10 calendar days of the recipient's receipt of the overdue report notice, we will make no further obligations and payments on the award and we will suspend the award until we receive all reports;
- (3) We reserve the right, without further notice, to convert the suspension to a termination of the award if we do not receive the required report within 30 calendar days of the recipient's receipt of the suspension notice; and
- (4) We will withhold any other pending awards that the affected Service program would make to the recipient until we receive the overdue report.

B. If within 10 calendar days of the recipient's receipt of the overdue report notice we still do not receive the performance report or an acceptable explanation for its tardiness, we must:

- (1) Suspend payments and additional obligations for the financial assistance award for 30 calendar days, and
- (2) Send a suspension notice to the recipient of this action.

C. If within 30 calendar days of the recipient's receipt of the suspension notice we still do not receive the performance report or an acceptable explanation for its tardiness, we must:

- (1) Convert the suspension or sanction(s) to a termination,
- (2) Withhold any other pending awards that the affected Service program would make to the recipient until we receive all required reports, and
- (3) Send a termination notice to the recipient of this action.

518 FW 1 (Authorities and Responsibilities)

This chapter lays the foundation for the other chapters in Part 518 by describing the WSFR Program's mission, vision, and guiding principle; core values; intended outcomes; and grant programs.

The chapter also describes specific authorities for each WSFR-administered grant program and where employees can find information about how WSFR divides funds among eligible applicants in the mandatory (apportioned) programs and selects applications for funding in the discretionary (competitive) programs; general administrative authorities for Federal grants; and FWS responsibilities for managing grants.

This chapter further defines the mission, vision, and guiding principle, core values, and intended outcomes of the WSFR Program.

The mission, vision, and guiding principle of the WSFR Program includes:

- Mission - Working through partnerships to conserve and manage fish and wildlife and their habitats for the use and enjoyment of current and future generations.
- Vision - Healthy, diverse, and accessible fish and wildlife populations that offer recreation, economic activity, and other public benefits in addition to sustainable ecological functions.
- Guiding Principle - Society benefits from conservation-based management of fish and wildlife, their habitats, and opportunities to use and enjoy them.

The core values of the WSFR Program are as follows:

- (1) Manage Fish and Wildlife as Public Trust Resources. Stewardship of these and other natural resources is in the long-term public interest.
- (2) Support Traditions. The Program embraces the traditions of hunting, fishing, boating, trapping, recreational shooting, and enjoying the outdoors.
- (3) Recognize the Contributions of Hunters, Recreational Shooters and Archers, Anglers, and Boaters. State and Federal partners appreciate the important conservation contributions of all who buy:
 - a. Hunting and fishing licenses;
 - b. Hunting, fishing, shooting, and archery equipment; and
 - c. Motorboat fuel.
- (4) Recognize the Contributions of Industry. State and Federal partners appreciate the important conservation contributions of industry partners through excise tax payments.

- (5) Strive for Sustainable Resources. Sustainable populations of fish and wildlife resources and habitats are key to conservation and essential to provide for public use and enjoyment.
- (6) Be Accountable. State and Federal partners assure that we:
 - Use Program funds only for the purposes specified in applicable State and Federal legislation, and
 - Demonstrate results.
- (7) Use Sound Science. Sound science helps us improve management. We use biological planning, conservation design and delivery, research, and monitoring to improve scientific knowledge and achieve Program success.
- (8) Recognize the Value of Partnerships. State and Federal partners encourage the cooperation and involvement of organizations and individuals in the management and conservation of fish and wildlife.
- (9) Connect People with Nature. Grant activities provide opportunities for people to establish a closer connection with hunting, fishing, and the outdoors.

The intended outcomes of the WFSR Program are to work with partners to:

- Support the heritage associated with fish and wildlife uses, such as hunting, fishing, boating, trapping, shooting, wildlife observation and photography, and conservation education;
- Enhance sustainable, healthy populations of fish and wildlife and their habitats;
- Ensure sound administration and oversight of funds and activities consistent with our mission, vision, guiding principles, core values, and applicable laws, policies, and regulations; and
- Promote effective communication among State, Federal, and industry partners, as well as stakeholders, elected officials, other policy makers, and the public.

521 FW 1 (Eligibility Standards for Wildlife Restoration)

This chapter provides eligibility standards for the Federal Aid in Wildlife Restoration Program. Federal Aid in Wildlife Restoration Act of 1937, as amended, (16 U.S.C. 669-669i) authorizes the Secretary of the Interior ". . . to cooperate with the states, through their respective state fish and game departments, in wildlife-restoration projects as hereinafter set forth . . ." Section 1 concludes with ". . . all projects shall conform to the standards fixed by the Secretary of the Interior."

Grantees must comply with all applicable federal laws and regulations, as a condition of acceptance of federal funds [50 CFR 80.21]. In addition to the laws and regulations specific to the grant program, there are numerous other compliance requirements for federal grant programs. Those that are generally applicable to all federal grant programs are "assurances," since grantees must provide assurance that they will comply with applicable provisions.

521 FW 2 (Eligibility Standards for Sport Fish Restoration)

This chapter provides eligibility standards for the Federal Aid in Sport Fish Restoration Program.

Federal Aid in Sport Fish Restoration Act of 1950, as amended, (16 U.S.C. 777-777k). The Act directs the Secretary of the Interior ". . . to cooperate with the states through their respective State fish and game departments in fish restoration and management projects as hereinafter set forth . . ." Section 1(a) of the Act concludes with ". . . all projects shall conform to the standards fixed by the Secretary of the Interior."

Grantees must comply with all applicable federal laws and regulations, as a condition of acceptance of federal funds [50 CFR 80.21]. In addition to the laws and regulations specific to the grant program, there are numerous other compliance requirements for federal grant programs. Those that are generally applicable to all federal grant programs are "assurances," since grantees must provide assurance that they will comply with applicable provisions.

FWS Director's Orders and Other Guidance

No current Director's Orders or other guidance that are relevant to performance reporting within the WSFR Program were located during this review.

Appendix III – WSFR-JTF Discussions Regarding Performance Reporting

WMI emphasizes that content of the narrative in Appendix III (and the associated Table 2) contain opinions expressed by members of the WSFR-JTF, their invited presenters, and guests. These opinions are extracted and reported to provide context for the issues related to TRACS development and implementation as it was discussed by the WSFR-JTF.

Charleston, SC – May 2006

At the WSFR-JTF meeting in May 2006, the FWS advised the group that they must start collecting performance and outcome measures to satisfy GRPA and OMB-PART requirements, and the data collection would require participation by the states. They explained that the current system (FAIMS) was not equipped to quantitatively measure performance metrics in a manner that was satisfactory to meet governmental requirements. The FWS explained that they were in the process of revising the more than 300 performance accounting codes in FAIMS (that were largely going unused) down to 45 and would try to reduce that number to as few as 12. But the bottom line was that the FWS needed the states to help populate the performance data for WSFR grants. At the same time, the FWS informed the task force that new federal accounting standards required agencies to report Stewardship Investments (SI) which were now a part of the FWS financial audit, but that they had no approval from OMB to collect that information from the states and were reluctant to collect any state SI information that would make performance reports auditable.

At that meeting, states expressed concerns about the collection of SI information and that it might be auditable from a performance standpoint. They also expressed concerns that the collection of outputs and outcomes were duplicative of state processes in many cases and that expanding their collection to FWS reports might become unnecessarily burdensome. State representatives felt that FWS administration of the program is the most logical focus for PART and GPRA. Both groups recognized the nature of WSFR funds made the issue complicated.

The WSFR-JTF reviewed several options for collecting state data for inclusion in the FAIMS performance reporting system. Everyone agreed that data must be collected in a nationally consistent manner. There was concern by the FWS regional coordinators that many of the measures in FAIMS did not account for what was being done. They expressed concern that the data could reflect poorly on programs because the FAIMS system was not capturing what was really being accomplished.

The FWS informed the WSFR-JTF that they were in the process of getting clearance from OMB to write a jointly developed (by the WSFR-JTF) Strategic Plan for Federal Aid that identifies outcome and output measures. In their PART review, OMB indicated they wanted a revision of the programmatic SEIS to identify performance measures, which could take two years to develop and would entail an expensive, extensive public process.

Wichita, KS – November 2006

At the November WSFR-JTF meeting, the FWS reported that they had developed interim reporting codes for FAIMS that will be replaced by a reporting system that would evolve from the WSFR strategic planning process. FAIMS was fast becoming obsolete and would need to be replaced with a system designed to meet expanding needs.

John Frampton reported on a meeting between state Directors and OMB regarding the state's concern that they were being held accountable for reporting performance data under the federal PART process through the FWS. OMB was not receptive to an exemption from the PART process (because of the origin of the supporting funds), but agreed that that reported performance measures (outcomes and outputs) should not be unilaterally developed by the FWS. Additionally, OMB agreed that they would not question the states authority to ultimately decide the nature of the reported information, but that reporting would be required. In consultation with the FWS Director, the decision was made to meet this requirement through the WSFR-JTF.

The FWS reported that OMB was requiring the WSFR program to complete a strategic plan to meet PART requirements and to remove the "performance not demonstrated" designation now assigned to the program. There was concern that the GPRA process might conflict with the PART process, and how a strategic planning process could affect both processes. States pointed out that performance measures developed in concert with the FWS needed to feed into the strategic plan but were separate from the more specific elements of a strategic planning process. In addition, all aspects of this process should be subject to WSFR-JTF oversight and review.

The task force focused on how best to develop a strategic plan, finally settling on convening a team of state and federal experts. The kick-off meeting for the Strategic Planning/Performance Measures Working Group was scheduled for December 6-7 to initiate the process. The WSFR-JTF took several actions including asking the FWS to help them prepare representatives for the December meeting of a Strategic Planning/Performance Measures Working Group. Glen Salmon agreed to approach state Directors to engage state participation. The WSFR-JTF also agreed that it should develop sideboards for the group.

Sonoma, CA – April 2007

At the April 2007 meeting, the WSFR-JTF focused on the WSFR draft strategic plan. At this point, it was a concept document and many issues still need to be addressed, including outreach to stakeholders. Gerry Barnhart noted that it was important that the strategic plan be linked to the work of the National Survey Working Group (NSWG) as many of the metrics proposed were from the National Survey. Also, OMB made it clear that it was important that the plan have outcomes and not outputs. The group considered changing the term "non-game" to "species of concern". They also discussed matching metrics to actions and getting partner input to finalize metrics. Kelly Hepler noted that many of the metrics are already done by the states, and Glen Salmon clarified that the metrics, to the extent possible, will use existing state measurements. Rowan Gould stated that Federal Assistance will ultimately use these metrics as an educational

tool for the program, and that this document is more than just a strategic plan.

The WSFR-JTF met with the Regional Federal Assistance Chiefs and discussed the review of the draft strategic plan (emphasizing that it was a DRAFT). The Chiefs and state coordinators were encouraged to provide ideas and input and engage in the discussion. Christy Vigfusson (nee Kuczak) and Jay West led the discussion by explaining how a strategic plan would enhance consistency throughout the Federal Assistance enterprise as well as be a communication vehicle with policy makers. Christy Vigfusson (nee Kuczak) explained that the process began in December 2006, and was currently in the pre-first draft stage. The exact process for completion of the plan was still undetermined, but they were targeting a completion date of December 2007.

Several topics were discussed, including: 1) why the Strategic Plan was being developed, 2) the utility of FAIMS to collect and track metrics, 3) whether programs such as audits should be highlighted, 4) relative emphasis of PR/DJ programs versus SWG/LIP) structure of the plan regarding PR/DJ programs versus SWG/LIP programs, 5) whether the LIP program should be included, 6) the number and character of metrics, 7) industry involvement, including the boating community, and 8) public participation.

Jay West and Christy Vigfusson (nee Kuczak) underwent a section-by-section discussion of the Strategic Plan draft to gain input on each section. Two major concerns expressed were the decision to include LIP/SWG and non-appropriated funds in the plan, and the need to clarify OMB's requirements.

The FWS emphasized that the task force would neither write, nor be perceived as writing, a plan that unilaterally tells states what to do with their money – both for excise tax-driven and appropriated funds. Several other issues were discussed including the need to clarify the process and timeline and the need to address the OMB concerns first.

Larry Mellinger explained that WSFR programs were governed by specific statutory language. In developing a strategic plan for these programs, the FWS could not make programmatic changes. The plan would simply capture a snapshot of the work being done and the results from that work. The main task in the strategic plan was to define issues, what the best practice components were for these programs, and what were actions need to be taken to accomplish these best practices.

John Frampton and Gerry Barnhart indicated that OMB did not emphasize the need for a strategic plan, only that metrics be reported. OMB was focused on metrics and wanted outcomes versus outputs. The strategic plan idea came about after the conversation with OMB. Rowan Gould explained that OMB did highlight the need for both a strategic plan and outcomes/outputs in the PART review. Since the FWS had neither a strategic plan nor measurements, this document was considered a logical means to achieve both purposes. In any case, whether the plan and metrics were developed separately or together, they had to be developed in partnership.

Regarding metrics, Lisa Evans noted that metrics for SWG had already been developed by AFWA. Jim Greer noted that the PR/DJ programs also had metrics, but LIP and SWG may not have been addressed completely. Lisa Evans suggested that the WSFR-JTF develop SWG metrics based on the AFWA efforts.

In summary, the group agreed that they needed a product to take to OMB that addressed sustainable social benefits, sustainable wildlife, effectiveness, efficiency, and accountability. Under each of these should be developed some well-crafted outcome measures (no more than 20 total). A WSFR-JTF small group met and made significant changes to the draft Strategic Plan document and created an outline, which would be reviewed by writing team members, and reviewed by the WSFR-JTF. It would then go back to the writing team before it was provided to OMB.

The WSFR-JTF took the following actions: 1) Larry Mellinger and Carol Bambery would investigate if strategic plan must undergo NEPA compliance, 2) Rowan Gould agreed to work with Glen Salmon to build a list of topics to discuss with OMB, 3) the large group ratified the recommendation of the small group, which crafted the OMB document, and 4) WSFR-JTF would be briefed by conference call on the meeting with OMB, which may occur during the Farm Bill Fly In May 14-16.

Roscommon, MI – October 2007

At the October meeting, the FWS reported that a briefing document on the strategic plan was put together for OMB, but a meeting never materialized due to several schedule conflicts. Also, the decision to have a smaller strategic plan with separate operational plans made this meeting less critical. A meeting with OMB was still needed, especially regarding performance measures.

The WSFR-JTF underwent an extensive review process for the draft strategic plan. After incorporating the input from the April 2007 meeting, the plan had evolved to include a more general strategic plan with two specific operational plans (PR/DJ and SWG), which were discussed. Initially the plan was to be finalized by early 2009. The plan review included an extensive slide presentation that covered all aspects of the draft strategic plan, including mission and vision, outcomes, historical context, heritage, quotes, program names, contact information, questions, photos, review, operational plans, and process questions.

Arlington, VA – February 2008

At the February meeting, the WSFR-JTF discussed the Draft Strategic Plan and Draft Conservation Heritage Measures. Rowan Gould explained the Conservation Heritage Measures were ultimately not designated as an “operation plan” because it would add additional burden to the chiefs’ daily activities. The draft would be sent to the Federal Aid Coordinators to ensure there had not been any omissions. It would also be reviewed by state Directors and industry partners. The strategic plan would be sent to a writer/editor who had both experience editing but and familiarity with the programs.

Glen Salmon commented that during the edits of the strategic plan, the challenge related to funding was removed. He asked if a section regarding expanding/strengthening partnerships would be a better way to address this issue, which met with consensus by the group. In regard to measures for industry partners, the WSFR-JTF agreed that specific measures for industry could be provided separately and did not need to be a part of this document, which was targeted to OMB.

John Organ noted that for the first 50 years of the program there were bound volumes of accomplishments. For the past 10 years, the data were archived in FAIMS. To assemble this information, we would need to identify what data we want to highlight and what story we want to tell. The funds were likely being used for the same kinds of activities they initially supported, but perhaps for different reasons. A small team could use those archives and obtain the contemporary items from FAIMS. The FAIMS data were as current as the performance reports received from states and have been entered into the system.

Albuquerque, NM – August 2008

At the August WSFR-JTF meeting, the Conservation Heritage Strategic Plan/Performance Measures were reviewed and discussed. Christy Vigfusson (nee Kuczak) explained that any changes needed to be made ASAP because the copy would be going to the printer by late August to be printed in mid-September. Rowan Gould also mentioned the status of the Conservation Heritage Measures document, indicating that the WSFR-JTF needed to discuss it before it is finalized - especially regarding the measures selected and how the states and federal agencies would get the needed infrastructure in place.

The WSFR-JTF took several actions, including agreeing that all members would send comments on the Conservation Heritage Measures document to the co-chairs by September 12th. (No re-writing, just major edits/issues.). Christy Vigfusson (nee Kuczak) agreed to e-mail Conservation Heritage Measures document to the members.

Washington DC, February 2009

At the February meeting, the WSFR-JTF co-chairs provided some background information on the Conservation Heritage Measures, which were developed in response to OMB's request for performance measures. The document was currently under review by OMB and only minor revisions are anticipated. The FWS began modifying FAIMS to obtain the measures for 2010, and they anticipated that they would soon begin discussion with states about getting the required information through their grants accomplishment reporting. The WSFR-JTF was reminded that the performance measures were adaptable and could be modified to suit the needs of the grant programs and states.

One concern was that WSFR participates in management tasks that were broader than can be identified through Activity Based Costs (ABC) coding. These efforts included developing goals for GPRA, responding to OMB-PART reviews, and conducting workforce planning. In addition, WSFR responded to and developed corrective measures to findings in audits of the federal program in regional and national offices. Some specific factors contributing to the increased

FWS workload included new federal administrative and operational requirements such as GPRA and IT Security measures. The FWS recommended to the WSFR-JTF that they partner in collecting program and accomplishment information suitable for distribution to interested publics from a national program standpoint.

Broomfield, CO – April 2010

At the April meeting in Denver, the FWS provided background and overview of the new *Tracking, Reporting and Decision Support System* that was being cooperatively developed by WSFR and several state agencies (through use of SWG dollars). The need for this system stemmed from 1) the lack of an adequate program reporting and accomplishment database and 2) the FAIMS database would be obsolete once Department of Interior (DOI) mandated the transition to FBMS. A prototype of this new system would be presented at AFWA's annual meeting in Michigan in the fall and was being jointly tested by the FWS and Washington Department of Fish and Wildlife. Other states were poised to participate and include their State Wildlife Action Plans (SWAPs) in the database.

Portland, OR – September 2010

At the September meeting, the task force discussed the replacement of FAIMS (which was currently in a "no improvement stage") with FBMS. FBMS would allow states to complete grant reporting online and the FWS had detailed fulltime personnel to work out financial assistance issues during the transition. FBMS would be implemented in November of 2011, with a six-week conversion process (blackout) in which financial assistance documents would not be processed.

The FWS reported that they had been tasked by Congress to develop a geospatial program reporting system that would enhance the tracking of grant projects and display progress in SWG projects related to "species of greatest need". This system was solely for program reporting and would not replace the financial aspects of FAIMS. This system would allow WSFR to 1) track projects funded by its programs, 2) spatially locate and group its projects, 3) report outcomes to Congress, 4) report on implementation of SWAPs, and 5) strategically implement grant programs in cooperation with states. Each state would have their own portal where they could track projects and progress. This system would allow the states to 1) enhance reporting and tracking capabilities, 2) foster continued development and adaptation of SWAPs, 3) facilitate strategic decision making within state agencies, 4) promote conservation networking across state lines, and 5) help states identify key conservation issues.

Lexington, KY – February 2011

At the February 2011 meeting of the WSFR-JTF, several FAC members mentioned the need for a positive message from WSFR in regards to the transition to FBMS. The blackout period for transition to FBMS had states concerned, and they requested that WSFR investigate how states could draw a percentage of their funds ahead of the blackout period to fund programs and staff. The FWS agreed to determine if they had the legal authority to allow this.

The FWS discussed the upcoming transfer of WSFR grant fiscal functions to FBMS, and the development of an accomplishment reporting system (TRACS) to replace FAIMS. The latest FAIMS decommissioning date was set for October 1, 2011, but FWS staff had continued to work with the FBMS folks to be sure that no WSFR reporting functionality was lost. Several of the critical components of FAIMS such as safety margins and apportionment calculations would not be supported by FBMS and would eventually have to be incorporated into the new TRACS system. However, all fiscal and financial management components must have been transferred to the FBMS system. FAIMS could be extended for at least 6 months and perhaps a year past the October 1, 2011 deadline to allow for the development of TRACS. The FWS also reported on a state Project Advisory Group (PAG) that had been involved with the development of TRACS since its inception. The WSFR-JTF asked that the PAG membership list be distributed to the members. They further expressed concerns about data security, access, and the need to protect sensitive information.

San Francisco, CA – August 2011

At the August 2011 meeting, the FWS reported that the development of TRACS would capture all the features of FAIMS with improvements for all WSFR grant programs. While the TRACS system was focused on State Wildlife Grants (SWG), it ultimately would be used as a method to capture and report performance metrics for PR and DJ grants.

TRACS would be the new tracking and reporting data management tool of the WSFR. The system was divided into two components, Data TRACS - being developed by the Program and Accomplishments Reporting Branch and Public TRACS - being developed by a contractor (Paladin Data Systems). The TRACS system should be released in October 2012, and the PAG, with representatives from each state, would be updated on the progress of this new system. The PAG would also be responsible for helping to test the new system.

State JTF members expressed several concerns regarding the new system including the availability of state data that would be available to the public, the increase in the workload to State Federal Aid Coordinators, and the appropriateness of the use of PR/DJ funding for TRACS. The FWS agreed to draft a letter on behalf of WSFR-JTF and send it out with timelines for implementation, process, and metrics. There was some urgency associated with matter because FAIMS was scheduled for shut down in October 2012.

Denver CO – February 2012

At the January meeting, Dan Hogan provided an update on implementation of Wildlife TRACS, which was a replacement for FAIMS. It consisted of two systems: Public TRACS and Data TRACS, and was being created by Paladin Systems. Dan Hogan provided a development, training, and release schedule, with an ultimate production release of October 2012 for all grants.

Data TRACS was being designed to house WSFR grant program data entered by state and/or WSFR staff. Public TRACS *displays* WSFR grant program data and *houses* state auxiliary projects that have a conservation nexus to SGCN species or WSFR grant program projects. WSFR and State users could run reports and generate maps in both systems depending on the purpose

and intended audience. Public TRACS was a commercial product developed by Paladin Data Systems. WSFR was not responsible for the accuracy, integrity, or availability of state-owned data.

Data TRACS (Federal) would consist of WSFR project data that was managed by the states and WSFR. The system would be owned and operated by WSFR and configured by WSFR and the states. Public TRACS (Federal) would consist of state portals and auxiliary project data that was managed and owned by the states. The system would be operated by WSFR and configured by WSFR and the states. TRACS Plus (State) would consist of Auxiliary project data managed and owned by the states. The system would be operated by the states and configured by the states and Paladin Data.

Whether state data was subject to the Freedom of Information Act (FOIA) was determined by *custody* and *accessibility*. There were three general scenarios of data management within the Wildlife TRACS system (defined as the combination of Public and Data TRACS):

1. States enter project data for WSFR grant programs into Data TRACS; some or all of the data is, upon approval, displayed in Public TRACS for public viewing. In this scenario, all state data entered into Data TRACS for federal aid compliance is in federal custody and fully accessible by FWS staff. As such, the data is subject to FOIA requests.
2. *At their discretion*, States enter non-federal projects into an access-controlled Public TRACS portal for the exclusive use of their staff. None of the data is made available on the Public TRACS viewer or input into Data TRACS. The data is under exclusive state control; the FWS does not have access to or custody of the data. Auxiliary project data managed in this fashion is not subject to FOIA requests.
3. *At their discretion*, States allow some or all of the data otherwise exclusively housed in their assigned portals to be publically displayed in the Public TRACS viewer. Data released to Public TRACS for public viewing is in the custody of and accessible by the FWS. As such, the data is subject to FOIA requests. However, since the information is already public, it can be accessed without an actual FOIA request.

In addition, Cloud hosting was considered a great fit for Wildlife TRACS and in-line with Executive Order and DOI's "cloud first" policy. State data entry and user management would necessitate a Memorandum of Understanding (MOU) or service level agreement to address acceptable use, system availability, data accuracy, and data integrity. Changes in business processes related to grant management (e.g. FBMS, FAIMS, and Wildlife TRACS) would necessitate a new workflow for WSFR and States. This represented an opportunity to streamline the reporting process. The increasing availability of third-party data and map services posed new challenges related to accuracy and proper use. Spatial data was a common denominator across agencies, databases, and audiences alike. Solutions to data sensitivity issues were readily available. From a budget perspective, the FWS was currently taking the existing budget for FAIMS and transferring it over to TRACS. Funding source was WSFR PR/DJ funds, CIAP, SWG, etc. and the FWS would begin reprogramming existing funds from one

system to another.

The WSFR-JTF took the following action at this meeting: Dan Hogan and the TRACS Outreach Committee would give a presentation about TRACS during several AFWA committee meetings during the North American Wildlife and Natural Resources Conference in Atlanta, Georgia.

Alyeska, AK – June 2012

At the June meeting FWS provided an update on several aspects of TRACS. They proposed a new regulation (50 CFR 75) and interim measures to address WSFR grant program needs. The Data TRACS release was still on schedule, but full implementation had been delayed from October 2012 to January 2013. The FWS would be focusing on its training program for TRACS to aid in the implementation of public TRACS. The also planned to propose the use of Wildlife TRACS for performance reporting in all WSFR-administered grant programs effective January 1, 2013. The DOI had adopted FBMS, which replaced FAIMS for financial reporting, but FAIMS would remain active for performance reporting through December 31, 2012.

The reported process for TRACS implementation included:

- 1) OMB Information Collection – We currently have OMB approval for collection of information for performance reports. We will request approval for the additional information collection, such as State Wildlife Grant effectiveness measures and electronic reporting, to be collected using Wildlife TRACS. This process requires us to publish notices and request public comments in the Federal Register;
- 2) Rulemaking – We will eventually propose general administrative requirements at 50 CFR 75 for WSFR-administered grant programs. We plan to start this process in 2012 by addressing only the use of Wildlife TRACS for performance reports. The rulemaking process gives States the opportunity to review and comment on the draft rule before we publish a Final Rule; and
- 3) Director’s Memorandum/Request for Application and Grant Award Conditions – We want applicants to be aware, and grantees to comply with the requirements to use Wildlife TRACS. Currently, we plan to draft a memorandum for the Director to send to WSFR Regional Offices instructing them to include specific language in all Requests for Applications and grant awards for 2013 funding. These notices and award conditions will implement Wildlife TRACS requirements until we publish the final rule.

Issues associated with TRACS implementation included:

- 1) Burden: Some states had voiced concern that requiring information to be entered directly into Wildlife TRACS was a burden on their staff. FWS was confident that once they have the opportunity to train state staff, reporting would be more efficient for both federal and state employees. The performance information entered directly into TRACS by states was expected to replace hard copy performance reporting documents; and

- 2) **Waivers and Exemptions:** Small tribes and other entities may not have had the technological resources to access and support Wildlife TRACS. The proposed rule would authorize waivers for entities that could demonstrate their inability to use Wildlife TRACS effectively. The FWS would also draft the rule to exempt from Wildlife TRACS certain small grant programs or grantees that have minimal numbers of grants. They would do this if it is inefficient for the FWS to provide support and train entities for what will be a minimal need. Federal staff would manage Wildlife TRACS for those exempted from the requirement. The FWS discussed a proposed update to the timeline for TRACS implementation and addressed a number of questions raised by state partners from the first day's meeting.

The WSFR-JTF took a number of actions at this meeting including: Creating a letter from the co-chairs to the Director of FWS and President of AFWA outlining the general agreements and advantages of Data TRACS and Public TRACS (viewer); developing a statement to add to the TRACS website indicating that the information being presented is only to be used for grant reporting and that any other use was inappropriate or prohibited; determine how to help states monetize their biodiversity programs; facilitate further discussion among the states through AFWA on use of the two perpetual state licenses under the existing Paladin contract; and distribute materials (expanded version of the Q&As) to address these identified TRACS issues that reflects the WSFR-JTF discussion/FWS agreement.

Denver, CO – November 2012

At the November 2012 meeting, the WSFR-JTF discussed Effectiveness Measures (EMs) for the SWG Program. There was a need to communicate successes better with policy makers. The public also wants to hear of successes from the SWG Program. The Conservation Measures Partnerships developed an Open Standards for the Practice of Conservation. It drew on many fields and was an open source/common language standards.

To effectively measure conservation efforts for SWG, the FWS identified five steps: 1) define generic conservation actions, 2) use results chains to describe the theory of change, 3) identify a limited set of effectiveness measures, 4) develop & test data collection questionnaires, and 5) collect and analyze data.

The FWS defined seven criteria for effectiveness measures: 1) Linked - to key factors in results chain, 2) Measurable - both qualitative & quantitative, 3) Precise - defined the same by all, 4) Consistent - unlikely to change over time, 5) Sensitive - can measure change, 6) Overarching - can be measured at different stages, and 7) Achievable - not onerous to collect.

The next step for TRACS was to translate measure, review reports, and develop programmatic measures. The states would be able to make the determination of which are successful measures. These measures were developed for SWG but not for PR/DJ. TRACS would be developed as a two-performance measurement system. In addition to the typical outcome measures for traditional grants there would be extra questions in the system for the performance measures on SWG. These questions would not be applicable to other grant

programs. PR/DJ grant accomplishments would always need to be separate from SWG accomplishments.

FAIMS would be officially decommissioned on October 1 2012. Data information in FAIMS would be converted to Data TRACs on December 15th 2012. The FAIMs database would be archived on December 15th 2012 and would no longer be a live database. Data TRACS development and testing was in full swing, with the alpha version being tested in September 2012. There was significant amount of feedback received during the alpha testing (90 pieces of information on items to change/tweak). Beta system of TRACS would be made available in January 2013 to support training and testing. (Note: The difference between alpha and beta was that an alpha system was not ready for primetime while a beta system was stable).

The WSFR grant process for entry into data TRACS had three steps: 1) Application, 2) Implementation, and 3) Performance Reporting.

1. Grant Application: This was a plan that would be input into Data TRACS. This plan was optional. Would only be required for comprehensive management systems. It would contain project name, lead contact on the project, project goals, etc.
2. Implementation – “Project” – This was where high-level information on the project would be entered into data TRACS. This was what would be accomplished under the grant, not what had been accomplished.
3. Performance Reporting: An “Action” would be entered into TRACs when activities on the project have been completed or were being conducted. FWS was currently recommending to the states to create a draft action entry structure in TRACS for entering in performance reporting later.

Other briefing information on the TRACS system included:

- Project bundling in TRACs – This would essentially be completing a PDF bundle. States would be responsible for consolidating all projects within Data TRACs. The PDF would be submitted as an attachment through the grant application portal being used (i.e. grants.gov).
- FBMS – FBMS would not interface with TRACs until the grant was approved in the FBMS system. FBMS information would be downloaded daily into TRACs. There would be limited information received from FBMS (mostly financial information).
- Performance reporting could be met by the official submission of data into TRACS. This would be accomplished by entering data into TRACs on an action level.
- Supplementary performance information could also be an attachment. This could be research information/scientific publications, which do not have data fields in TRACs.
- Performance reporting timeline would be determined by the duration of the grant. Milestone plans for projects were in FBMS. Grant amendments, which would increase the duration of the project, would also reside within FBMS.
- Performance reporting approvals – States would need their own review process for performance reporting approval.

- Effectiveness measurement of performance: These measures were to be added to the database for SWG projects starting after calendar year 2012. States had the option to add active SWG projects prior to 2013 but were not required to.
- The FWS provided an upcoming schedule for Data TRACS, with state instruction beginning late 2013.

The WSFR-JTF took several actions at this meeting regarding TRACS, including agreeing to open discussions with industry to solicit their input on what they believed were effective measures, and if they were cost effective, at the Agency Industry summit. The WSFR-JTF would review the results from beta testing and the initial input by states into the TRACS system to see if it was possible to provide industry with clear effective performance metrics. Steve Barton agreed to report back to the WSFR-JTF on any major policy issues that were identified during the testing of Data TRACS. A subset of the WSFR-JTF (Lisa Evans, Gary Armstrong, Jon Gassett) would review policy issues identified or arising from decisions made by the TRACS Guidance Committee.

Minneapolis, MN – May 2013

At the May 2013 meeting of the WSFR-JTF, the FWS reported that they were now in the normal phase of Automated Standard Application for Payments (ASAP) and Financial Business and Management System (FBMS) and that grant delays from the rollout had been resolved. The beta version of TRACS was released in March and all WSFR staff had been trained. State training had begun in Denver and Alaska and was receiving generally positive responses from state participants. The FWS also reported that the production version of TRACS would be released later in May 2013. A guidance committee (consists of Federal Aid Coordinators, and state and FWS staff) had drafted a system guidance document for TRACS with questions and answers. This guidance follows all the general policies established in the WSFR-JTF.

The FWS reported that legacy data (from FAIMS) was being converted to TRACS, but the conversion might take a significant amount of time. They also reported that the information that will be displayed in public TRACS will be a high-level summary (summary of project, estimated cost, where the project was located) and the level of detail would be determined by state agencies not the FWS. The public TRACS information displayed would be under the control and discretion of the states.

The FWs reported that state agencies would have two licenses for their staff to access the TRACS program, and if there were a need for additional licenses, they would need to coordinate with the contractor (Paladin) and not the FWS. Licenses would be good for five years at which time the contract between the FWS and Paladin would be renegotiated. States would have unlimited licenses for data TRACS, because this was a federal system which the FWS would operate. The FWS requested that land acquisition projects in TRACS be as detailed as possible, but the level of detail of the information would be left to the discretion of the states.

The WSFR-JTF pointed out that it would be important to document the agreement made regarding the state's ability to determine what information goes into public TRACS. This

agreement should be added into the guidance document rather going through the process of creating a policy manual chapter, and that the easiest way to accomplish this would be to add the JTF minutes to the guidance document.

The WSFR-JTF expressed concerns that a Service Manual chapter could indirectly affect a grantee because the FWS Director could instruct an employee to award a grant subject to specific terms or conditions. As an action item, the FWS agreed to add the portion of the WSFR-JTF minutes to the guidance document on TRACS summarizing the agreement between the FWS and the WSFR-JTF on state's authority to manage the information added and displayed in public TRACS by the next WSFR-JTF meeting.

New Orleans, LA – November 2013

At the November task force meeting, the FWS reported that copies of guidance materials for TRACS had been distributed to the WSFR-JTF members. They also noted that the drafting 50 CFR 75, which would be a general administrative regulation for the WSFR program, had begun, and that a draft version for WSFR-JTF review would be ready by the April 2014 meeting.

Denver, CO – April 2014

At the April meeting, the WSFR-JTF was provided with a TRACS implementation schedule which consisted of eight additional development changes. The FWS noted that it had taken much longer than expected to get approval for TRACS data collection from OMB. However, these delays allowed the FWS to incorporate some significant improvements to the TRACS system. The FWS had reported that each state was asked to provide a TRACS system administrator, and that currently, 33 states had responded. The FWS also reported that training for TRACS had begun in May 2013 and more than 40 classes had been conducted. They also stressed that communication between states and the FWS as the changes were rolled out would be critical.

Denver, CO – October 2014

At the October meeting, the FWS reported that TRACS had been released for federal use in March of 2013 and for state use in April of 2014. The number of system users at this time was reported to be 458 system users (101 registered WSFR users and 357 registered state users). Also, 55 states and U.S. Territories had appointed TRACS administrators. The FWS reported that while TRACS has been available to the states for seven months, CMS states still were not accommodated by the current structure. They also reported that 30% of the data entry was being performed by states and that the template format of data entry would help reduce workload to the states as the system evolved. The system would also eliminate the need for hard copy reports by the states.

Denver, CO May 2015

At their May meeting, the FWS reported that 2 CFR 200 (OMB Super Circular) became effective December 26, 2014. The FWS was continuing to discuss how changes within the Super Circular would affect various bureaus of the Interior. The FWS was also continuing to discuss how to deliver services to the states while managing with lower staffing levels and additional regulations associated with the implementation of the Super Circular.

Other discussion on the Super Circular included the need: to conduct risk assessments for all grant sub-recipients utilizing FWS risk assessment form, for a training curriculum on the Super Circular, to determine which initial grant cycle the Super Circular would cover (starting after December 26, 2014), and to be sure there is consistent dialogue between the partners on changes in 2 CFR 200. States should also encourage their FA Coordinator to be involved with the communication.

The FWS noted that the Coastal Impact Assistance Program (CIAP) is a \$1 billion grant program under WSFR control. Administrative funds from CIAP had been used to help develop TRACS, but when the CIAP program ends, there would need to be an adjustment made for funding for TRACS.

Dan Hogan expressed appreciation for the WSFR-JTF continued involvement with the production of the TRACS program and provided a briefing. He explained that TRACS was collecting core proposal and performance data necessary for grant performance reporting. The application interface was stable and easy to use. Spatial performance, accuracy, and flexibility had been vastly improved. It was code tested, configurable, and extendable.

TRACS was the only FWS database in the Cloud. There was no dependency on the DOI/FWS network. Monthly QA/QC procedure identified major problems or shortcuts. The standard pick lists, required fields, and validation helped to preserve data quality. State-specific data layers made spatial data meaningful and easy to create, and the standard measurements allowed roll-ups despite structural flexibility.

Dan Hogan reported that acceptance of system purpose and data collection continues to improve with 38 states having now input at least one project. However, less than 25% of states *regularly* input data into TRACS. WSFR and states were working closely together on project statement and objective development. States were seeking a clear statement on system use, required fields, and “no-later-than date”.

Some technical debt needed to be addressed in a TRACS enhancement. Technical debt is the eventual consequence of system design, software architecture or software development within a codebase. Debt can be described as work that needs to be done before a job can be considered complete or proper. If the debt is not repaid, it will accumulate interest, making it hard to implement changes later.

Dan Hogan explained that Effectiveness Measures for SWG were based on principles of results-based outcomes. Most data were already collected in TRACS, including objectives, actions, strategies, and activities. A realignment of the data structure to support program outcomes might reduce overall reporting burden.

The TRACS Working Group requested the WSFR-JTF Directors or designees to participate with the TRACS Working Group over the next several months to ensure communication and state

participation in the scoping and design of results-based outcomes. At a minimum, WSFR-JTF members or their designees should be available to participate in a Working Group conference call the second week of August. They were also encouraged to participate in a two-day workshop in Denver the last week of September 2015. The WSFR-JTF was encouraged to endorse the Working Group's strategy for expediting the full implementation of TRACS by developing and implementing individual state strategies designed to address the obstacles to implementation as identified by each state and by establishing a date by which responsibility for entering projects into TRACS would transfer from WSFR to the individual state, with a recommended date of no later than September 30, 2016.

There was discussion about the development of standard objectives and the concerns that some regions were already rejecting grants because they didn't include SMART objectives. The FWS had promised that TRACS would not pigeonhole applicants into standardized objectives for the sake of reporting to Congress. There was significant concern among the FAC Working Group members regarding the rejection of grant proposals due to lack of SMART objectives.

The members agreed that many of the accomplishments of WSFR program were hard to measure. For instances, many times a result or accomplishment won't be known or fully understood until decades after the grant program had been completed. The states were concerned that result-based outcomes would be too much of a burden. Additionally, it seemed that results-based objectives would vary from region to region.

There was a gap between TRACS implementation team, the state representatives, and the policy makers. The proposed recommendations should be considered by the Directors as well as the WSFR-JTF. Dan Hogan stated that the JTF Working Group was currently proposing a TRACS enhancement, and that they needed a group to identify goals for the program. There may be more than just agency goals, since other groups would have different opinions and goals for measuring success (industry, etc.).

The partners need to identify the long-term goals of the program and how we measure success. They could look to the enabling legislation to set up performance goals and measures. There were already goals within the Acts that could be utilized.

TRACS was going in a different direction than what was brought to the states initially. TRACS should not be putting the states into a position where they are being denied grants for this program. Hannibal Bolton stated that the intent was not to seek long-term goals for each project. He would discuss further with his team and bring back to the next WSFR-JTF meeting.

The following actions were taken by the WSFR-JTF: AFWA staff will distribute the FA Wiki / Uniform Guidance address out to WSFR-JTF members. The Federal Aid Working Group and WSFR-JTF members would provide feedback on states entering all data for TRACS by September 30, 2016 in the two weeks following this meeting to the co-chairs who would distribute the feedback to Dan Hogan with the FWS.

Edgefield, SC – November 2015

The FWS noted that the Coastal Impact Assistance Program (CIAP) is a \$1 billion grant program under WSFR control. Administrative funds from CIAP had been used to help develop TRACS, but when the CIAP program ends, there would need to be an adjustment made to funding for TRACS.

The report on measuring effectiveness of state wildlife grants used a results-based framework. FWS planned to use this same framework for all WSFR programs. TRACS would be using this input in early 2016 and would eventually culminate in TRACS version 2.0. TRACS was intended to measure outcomes for WSFR program in general as well as WSFR-funded projects in TRACS.

Several state Directors indicated that states should be the ones to determine the effectiveness measures. The states had already expressed caution about transferring SWG effectiveness measures to the WSFR program. The states expressed their opinion that it was one thing to report on accomplishments, but if we were establishing standards for achievements, those should be determined by the states. Steve Barton noted that from the technical side, it was challenging to display what had been accomplished with the grant funds from a conservation standpoint. Every state would have different goals in what they were trying to accomplish. The effectiveness measures were designed to display the accomplishments over a longer period without establishing what those goals were. The TRACS working group was supposed to do this.

Larry Mellinger stated that OMB sees FWS as a billion-dollar appropriation that needs to have substantive results. It's possible to set the goals in the broadest sense. It was understandable that OMB would have this perception. The states still need to be able to see how goals were being determined before they were implemented. The types of projects and programs that were implemented with these funds would make it very difficult to set national standards, since each state is different. Another concern expressed by the states was that 99% of what is accomplished happens in a time horizon that is politically intolerant, and the day-to-day gains are slow.

The states inquired if the FWS was proposing a reporting system or a measure of effectiveness. The FWS indicated that they have no interest in operating on the micro-level. TRACS would operate at a much higher level, as a reporting system. The states would input the data, so the states would be setting the goals. The states requested to see what the FWS was measuring so the confusion could be cleared up.

In the TRACS production update, the FWS indicated that further development of TRACS had been suspended temporarily as bugs were being corrected. There are nearly 4,000 projects already entered in TRACS. The TRACS working group completed an assessment of the readiness of states to begin implementing TRACS in July. Only 10 were deemed less likely to be ready. TRACS user training was still available. The FWS had received concerns over the fact that users were being trained on TRACS version 1.0 even though TRACS version 2.0

would be out soon. TRACS was continuing to evolve and improve data quality. FWS indicated that the TRACS revision was moving towards less freeform.

Outputs/outcomes are being designed for WSFR-funded projects using methodology developed by AFWA for State Wildlife Grants. The FWS was currently in testing for application to all WSFR-funded projects. The process was to: 1) establish the purpose for each WSFR grant program and identify desired long-term results, 2) identify the most common generic actions funded by each grant program, 3) use updated AFWA/SWG generic results chain to fit all applicable WSFR grant programs, and 4) identify measures to assess, via results chain, how actions lead to desired impacts.

In the discussion that followed, the states expressed concerns that the identification of the common strategies should have come back to the WSFR-JTF for review, the AFWA/SWG effectiveness measures were not implementable for many WSR projects, and the granularity for SWG measures were so fine in many instances that it would create a huge burden on everyone. It was suggested that an MOU to outline what was discussed and what the plan/vision of the future is would be beneficial to all.

The WSFR-JTF took the following actions related to TRACS:

- A small WSFR-JTF working group comprised of Steve Barton, Clint Riley, Larry Voyles, and Dan Forster would draft a memorandum of understanding (MOU) to clarify the JTF's position regarding outputs vs. outcomes data inputs into TRACS. A draft version would be available for WSFR-JTF review by spring 2016 meeting.
- FWS would distribute to WSFR-JTF members the first preliminary draft of the WSFR five-year reporting grant template when available.
- FWS would distribute to WSFR-JTF members the list of required federal statutes the Service must adhere to while administering federal assistance.

Las Vegas, NV – April 2016

At the April WSFR-JTF meeting, the FWS provided a general update and indicated that recent laws coming from Congress and regulations from OMB have been focusing on accountability, transparency, and the public's right-to know. Specifically, under 2 CFR 200 (effective on December 2014), there is a section that deals with performance measurements, although it is unclear what this means. The language indicates that whenever appropriate or applicable, the awarding agency must require and the recipient must report, performance on a cost per unit basis. But it's hard to determine when that is appropriate.

With all the changes going on, there was a communication gap between those changes and how WSFR explains and provides updates on all those changes to the states. They need to think how to close those gaps.

The WSFR-JTF continued to discuss drafting a white paper that would define the common understanding and expectations for TRACS. The paper should address the need to be able to tell the story in quick efficient manner, to handle grants reporting, and explain the need for

implementing performance-based metrics. According to discussions last fall, the white paper itself would become policy.

The WSFR-JTF agreed that further guidance was also required regarding the continued development of standardized objectives. For instance, it would be helpful if they knew what the general standards look like. WSFR-JTF also needed to understand from OMB: 1) what level of reporting is required to support TRACS to report effectively and efficiently; 2) in reference to 2009 OMB WSFR recommendations on how to work with the partners, how do we define who those partners are?

States were concerned that standardized objectives create the potential to impair the way the grant is written. States might miss the mark and check the box instead of writing a more accurate narrative statement. There were also concerns about for whom the metrics are designed. Is it Industry, OMB, or others? There were different levels of reporting for different groups.

States expressed concern over information in TRACS and if the information collected is auditable. They were also concerned that cost reporting in TRACS would be compared with federal audits and raise alarms because of discrepancies. There was also a lot of state dissatisfaction because TRACS was hard to work with and is time-intensive.

The group agreed on the need to continue with the idea of an MOU and decide the direction of the TRACS system. In the minutes from last year's meetings, there were certain components that kept coming back that an MOU could address.

The FWS defined what they feel were next steps to be able to tell that story:

1. WSFR can only deal with outputs because that's what grants are. Outputs over time result in outcomes, but those should be determined by states. The system is designed where states could enter information voluntarily (for long-term outcomes) to some agreed upon basis they can report on.
2. Part of the outcomes may come from national surveys, or special surveys, and some through progress reporting. We could almost use an AFWA committee on how to put together data to tell the story and to consider how TRACS can be optimized to feed into that.
3. The Coast Guard will be adopting TRACS in 2017. One of the benefits is that they conduct the Recreational Boating Survey, which we will have access to, that is somewhat similar to the national survey.

AFWA and WSFR agreed to work together to produce a scope of work within 30 days that addresses overarching communication policy issues regarding TRACS. (Kelly Hepler, Clint Riley, Ed Carter, Jim Douglas, Bob Curry).

Participants agreed to focus further discussions on the collective goal/message for conservation in this country. TRACS should play an important role in that. TRACS provides incredible

opportunity and provides lots of helpful information to make it easy to roll accomplishments up on a national scale and help send an overarching message about conservation efforts.

The recommended hand-off date from the FWS to the states is October 1, 2016 (with flexibility) for the states to enter their own data (in TRACS). The effectiveness measures (standardized objectives) will be in the TRACS enhancement for fall 2017 (maybe 2018). Unless FACs are on the TRACS Working Group, they haven't seen any of the information on standardized objectives. This information has to go beyond the TRACS Working Group; it has to go to all states.

Appendix IV - Documents Examined for the TRACS Review

Federal Laws and Regulations

Administrative Requirements, Pittman-Robertson Wildlife Restoration and Dingell-Johnson Sport Fish Restoration Acts – 50 CFR 80.

Dingell-Johnson Sport Fish Restoration Act. 16 U.S.C. 777-777n.

Pittman-Robertson Wildlife Restoration Act. 16 U.S.C. 669-669k.

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards – 2 CFR 200.

TRACS Guidance Committee, TRACS Project Advisory Group, TRACS Working Group, TRACS Regional Representatives

- TRACS Guidance Committee Charge
- TRACS Guidance Committee Conference Call Notes
- TRACS Working Group Notes
- TRACS Working Group Recommendations
- TRACS Project Advisory Group Meeting and Conference Call Notes
- TRACS Regional Representatives Mission
- TRACS Regional Representatives Conference Call Notes

United States Fish and Wildlife Service Policy Manual

- 516 FW 1 (Financial Reporting for Grant and Cooperative Agreement Awards)
- 516 FW 2 (Performance Reporting for Grant and Cooperative Agreement Awards)
- 518 FW 1 (Authorities and Responsibilities)
- 521 FW 1 (Eligibility Standards for Wildlife Restoration)
- 521 FW 2 (Eligibility Standards for Sport Fish Restoration)

United States Fish and Wildlife Service - Wildlife and Sport Fish Restoration Program

Burkett, C., Derosier, A., Hess, K, Smith, T., and Whichel, S. 2014. *WSFR Project and Program Performance Reporting – A Framework for Moving Forward*. Technical Report for the United States Fish and Wildlife Service – Wildlife and Sport Fish Restoration Program.

Effectiveness Measures Working Group – Teaming with Wildlife Committee – Association of Fish and Wildlife Agencies. 2011. *Measuring the Effectiveness of State Wildlife Grants: Final Report*. Washington D.C.: Association of Fish and Wildlife Agencies.

Office of Management and Budget. 2005. *Program Assessment Rating Tool (PART) Review*. Washington D.C.

Wildlife and Sport Fish Restoration Program. 2008. *Conservation Heritage Strategic Plan – Wildlife and Sport Fish Restoration Program*. Washington D.C.: United States Fish and Wildlife Service.

Wildlife and Sport Fish Restoration Program. 2008. *Wildlife and Sport Fish Restoration Program – Conservation Heritage Measures*. Washington D.C.: United States Fish and Wildlife Service.

Wildlife and Sport Fish Restoration Program. 2015. *Reporting on Outcomes for WSFR Funded Projects – A Framework*. Washington D.C.: United States Fish and Wildlife Service.

Wildlife and Sport Fish Restoration – Joint Task Force

Wildlife and Sport Fish Restoration Program 2002. *Charter for a Joint Federal/State Task Force on Federal Assistance Policy*. Washington DC. United States Fish and Wildlife Service & International Association of Fish and Wildlife Agencies.

Wildlife and Sport Fish Restoration Program 2004. *Charter for a Joint Federal/State Task Force on Federal Assistance Policy – Amendment #1*. Washington DC. United States Fish and Wildlife Service & International Association of Fish and Wildlife Agencies.

Wildlife and Sport Fish Restoration Program 2011. *Charter for a Joint Federal/State Task Force on Federal Assistance Policy – Amendment #2*. Washington DC. United States Fish and Wildlife Service & Association of Fish and Wildlife Agencies.

Wildlife and Sport Fish Restoration Program 2014. *Charter for a Joint Federal/State Task Force on Federal Assistance Policy – Amendment #3*. Washington DC. United States Fish and Wildlife Service & Association of Fish and Wildlife Agencies.

Wildlife and Sport Fish Restoration Program 2006. *WSFR-JTF Meeting Minutes & Notes*. May 23-25, 2006. Charleston, SC.

Wildlife and Sport Fish Restoration Program 2006. *WSFR-JTF Meeting Minutes & Notes*. November 14-15, 2006. Wichita, KS.

Wildlife and Sport Fish Restoration Program 2007. *WSFR-JTF Meeting Minutes & Notes*. April 4-6, 2007. Sonoma, CA.

Wildlife and Sport Fish Restoration Program 2007. *WSFR-JTF Meeting Minutes & Notes*. October 16-17, 2007. Roscommon, MI.

Wildlife and Sport Fish Restoration Program 2008. *WSFR-JTF Meeting Minutes & Notes*. February 11-12, 2008. Arlington, VA.

Wildlife and Sport Fish Restoration Program 2008. *WSFR-JTF Meeting Minutes & Notes*. August 12-13, 2008. Albuquerque, NM.

Wildlife and Sport Fish Restoration Program 2009. *WSFR-JTF Meeting Minutes & Notes*. February 11-12, 2009. Washington DC.

Wildlife and Sport Fish Restoration Program 2009. *WSFR-JTF Meeting Minutes & Notes*. August 11-12, 2009. Portland, ME.

Wildlife and Sport Fish Restoration Program 2010. *WSFR-JTF Meeting Minutes & Notes*. April 13-14, 2010. Broomfield, CO.

Wildlife and Sport Fish Restoration Program 2010. *WSFR-JTF Meeting Minutes & Notes*. September 8-9, 2010. Portland, OR.

Wildlife and Sport Fish Restoration Program 2011. *WSFR-JTF Meeting Minutes & Notes*. February 16-17, 2011. Lexington, KY.

Wildlife and Sport Fish Restoration Program 2011. *WSFR-JTF Meeting Minutes & Notes*. August 16, 2011. San Francisco, CA

Wildlife and Sport Fish Restoration Program 2012. *WSFR-JTF Meeting Minutes & Notes*. January 31-February 1, 2012. Denver, CO.

Wildlife and Sport Fish Restoration Program 2012. *WSFR-JTF Meeting Minutes & Notes*. June 25-27, Alyeska, AK.

Wildlife and Sport Fish Restoration Program 2012. *WSFR-JTF Meeting Minutes & Notes*. November 7-8, 2012. Denver, CO.

Wildlife and Sport Fish Restoration Program 2013. *WSFR-JTF Meeting Minutes & Notes*. May 20-21, 2013. Minneapolis, MN.

Wildlife and Sport Fish Restoration Program 2013. *WSFR-JTF Meeting Minutes & Notes*. November 5-6, 2013. New Orleans, LA.

Wildlife and Sport Fish Restoration Program 2014. *WSFR-JTF Meeting Minutes & Notes*. April 23-24, 2014. Denver, CO.

Wildlife and Sport Fish Restoration Program 2014. *WSFR-JTF Meeting Minutes & Notes*. October 28-29, 2014. Denver, CO.

Wildlife and Sport Fish Restoration Program 2015. *WSFR-JTF Meeting Minutes & Notes*. May 27-28, 2015. Denver, CO.

Wildlife and Sport Fish Restoration Program 2015. *WSFR-JTF Meeting Minutes & Notes*.
November 16-17, 2015. Edgefield, SC.

Wildlife and Sport Fish Restoration Program 2016. *WSFR-JTF Meeting Minutes & Notes*. April
11-12, 2016. USFWS Desert National Wildlife Refuge. Las Vegas, NV.

Appendix V – DRAFT WSFR Communications Plan Template

TRACS/WSFR Communication Plan Outline

Goals:

1. To improve communication of current, proposed, and future changes to the WSFR program administration to all audiences.
2. To provide a forum for the discussion and resolution of current and emerging WSFR program issues for all audiences.

Audience:

1. State Agency Federal Aid Coordinators (FAC)
2. FAC Working Group (FAC-WG)
3. Association of Fish and Wildlife Agencies (AFWA)
4. State Directors
5. FWS Assistant Director of Wildlife and Sport Fish Restoration (WSFR-AD)
6. FWS Regional Directors (FWS-RD)
7. Assistant Regional Directors of Wildlife and Sport Fish Restoration (WSFR-ARD)
8. WSFR Regional Chiefs (WSFR-RC)
9. Joint Federal/State Task Force on Federal Assistance Policy (WSFR-JTF)
10. TRACS Working Group (TRACS-WG)
11. WSFR Training
12. WSFR Headquarters

Formal Communication Process:

1. Define roles and responsibilities of all audiences – mutual agreement between state Directors (or AFWA) and the WSFR-AD.
2. Define standards of practice among all audiences with respect to resolution of issues.
3. Issues referred to TRACS-WG, WSFR-JTF, FAC-WG for consideration and action.
4. Selection and prioritization of audience and messages/issues to be communicated – TRACS-WG, WSFR-JTF.
5. Assignment of media type, frequency of messaging, timing of reporting, responsible party (lead individual) – TRACS-WG, WSFR-JTF.
6. Resolution of issue – TRACS-WG, WSFR-JTF, WSFR-HQ, WSFR Training.
7. Message feedback criteria defined – TRACS-WG, WSFR-JTF.
8. Feedback recognition from affected audiences.
9. Documentation and storage of message/issue resolution by an individual (owner).
10. Final document/resolution transmitted to all audiences.

Informal Enhancements to Communications:

1. FAC provide reports to state Director for approval prior to reporting to FAC-WG.
2. FAC-WG reports messages/issues to state Directors via AFWA.
3. FAC-WG representative observes and reports as WSFR-JTF meetings.

4. Alignment of messages/issues between National WSFR meeting and monthly WSFR conference calls.
5. Alignment of messages/issues among WSFR-ARDs.

Communication Planning Matrix – Template

Key to Communication Matrix:

- *Audience* – (see above).
- *Message/Issue* – current or proposed changes, emerging or conflicting issues, status updates.
- *Media/Vehicle* – type of communication – written documentation, e-mail distribution, network shared folder, reports, minutes, change logs, conference calls, etc.
- *Frequency* – updates on project, task, or issue resolution.
- *Timing* – routine communications to maintain engagement.
- *Responsible Party* – team member responsible for message/issue.
- *Feedback Mechanism* – recognition of message receipt and appropriate interpretation – may include recognition, paraphrasing, surveys, interviews, etc.
- *Storage* – physical location of report or decision documentation (WSFR-HQ or WSFR Training).
- *Owner* – individual responsible for documentation and change logs.

Table 4. Communications Matrix Template for WSFR Program.

Audience	Message/ Issue	Media/ Vehicle	Frequency	Timing	Responsible Party	Feedback Mechanism	Storage	Owner
FAC								
FAC-WG								
AFWA								
State Directors								
FWS WSFR- AD								
FWS-RD								
FWS WSFR- ARD								
WSFR-RC								
WSFR-JTF								
TRACS-WG								

Appendix VI – TRACS Reporting (Memorandum from WSFR-AD)



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



In Reply Refer to:
FWS/AWSR/AIM:062262

FEB 2 - 2016

To: State Fish and Wildlife Directors
From: Assistant Director, Wildlife and Sport Fish Restoration

Friends –

Working together, we have made significant progress towards implementing the Wildlife TRACS data system. More than 720 state and federal registered users have entered over 98,000 projects into the system. Since June 2013, the Wildlife and Sport Fish Restoration Program (WSFR) has responded to over 4,000 requests and suggestions from users. Many of these suggestions have led to changes that make the system easier to use. In addition, the TRACS Working Group, comprised of State and WSFR regional representatives, has identified and prioritized 150 system updates. Based on a recent survey, we are on target for all 56 states and territories to meet the October 2016 target for entering WSFR-funded project information into TRACS.

Wildlife TRACS is in place, meeting the grant reporting needs of the WSFR program. It's now time to fulfill the original vision of TRACS – to improve program accountability, report on the many accomplishments of our partner states, and document the effectiveness of these important federal programs to Congress, the Office of Management and Budget (OMB), industry, state legislatures and the public.

In 2011, on the tenth anniversary of the State Wildlife Grants (SWG) program, the Association of Fish and Wildlife Agencies published a report, "*Measuring the Effectiveness of State Wildlife Grants*". The report laid out a method to identify interim and long-term outcome measures for 13 of the most common strategies used by states to implement SWG projects, and recommended that the effectiveness measures be integrated into the future TRACS data system. Six months ago, I directed my staff to begin development of a system enhancement, Project Level Outcomes, to act on those recommendations, and to apply the approach to all WSFR grant programs.

Project Level Outcomes will provide two important benefits: 1) Program partners will be able to quickly and easily report accomplishments across any of the data fields contained in the system, including project type, location, target species and habitats, time frame, and status; and 2) The development of a list of standard objectives in the system will allow individual project information to roll up to report state accomplishments and also enable WSFR to report the performance of individual grant programs and for the WSFR program as a whole. Standard objectives will significantly reduce the workload required to enter project level data into TRACS by replacing narrative descriptions with a pick list of standardized project objectives.

In March, the TRACS Working Group will convene to finalize the data structure and reporting fields for Project Level Outcomes. This configuration document will be handed over to the TRACS Development Team. We expect approximately 12-15 months of development time, so Project Level Outcomes should be ready for use by the third quarter of 2017. In the interim, all current efforts around operations, maintenance and training will continue without interruption. Project Level Outcomes is an update to the TRACS system, and does not replace it, so all past and current training efforts remain valid and critical to the successful use of the TRACS system.

It's been a long road. Thank you for your patience and for your support.

Hannibal Bolton

Attachment: White Paper: A Framework for Project Level Outcomes.

Appendix VII – Biographies of Review Participants

JONATHAN GASSETT, Ph.D. – Jon has served as WMI’s Southeast Field Representative since 2013. He works with all SEAFWA states and served as President of AFWA, MAFWA, and SEAFWA. He is a graduate of the National Conservation Leadership Institute and serves on their Board of Directors. Jon also serves as WMI’s State-Industry Liaison, helping to build and improve relations between state and industry partners. Jon has more than 14 years of experience with Kentucky Department of Fish and Wildlife Resources – including eight years as the Commissioner, four years as the Wildlife Division Chief, and two years as the Big Game Program Coordinator of the Department.

STEVEN WILLIAMS, Ph.D. – WMI President – Steve served as Director of the U. S. Fish and Wildlife Service, Secretary of the Kansas Department of Wildlife and Parks, Deputy Executive Director of the Pennsylvania Game Commission, and Assistant Director for Wildlife and Deer Project Leader of the Massachusetts Division of Fisheries and Wildlife. He serves on the National Fish and Wildlife Foundation board, American Wildlife Conservation Partners, Wildlife and Hunting Heritage Conservation Council, Council to Advance Hunting and Shooting Sports, and National Conservation Leadership Institute.

SCOT WILLIAMSON – WMI Vice President – Scot has served as WMI’s Northeast Field Representative since 1994. He has coordinated the NEAFWA Regional Conservation Needs program since 1995 and assisted NEAFWA initiatives including conservation and restoration of shrub-dependent wildlife and the advancement of Landscape Conservation Cooperatives. Scot served as the Big Game Director for the Texas Parks and Wildlife Department and White-tailed Deer Project Leader for the New Hampshire Fish and Game Department.

Appendix VIII – Contract for Services

MEMORANDUM OF UNDERSTANDING

Improving Performance Reporting for the Wildlife and Sport Fish Restoration Program

This Memorandum of Understanding is hereby entered into by and between the Wildlife Management Institute, hereinafter referred to as WMI, and the Association of Fish and Wildlife Agencies, hereinafter referred to as AFWA.

A. Purpose

This MOU affirms a policy of cooperation and coordination among the parties to review the purpose, function, and implementation of a national performance-reporting database, Wildlife Tracking and Reporting Actions for the Conservation of Species that is commonly known as TRACS, for FWS's Wildlife and Sport Fish Restoration (WSFR) Program.

B. Parties

WMI was established in 1911 by sportsmen/businessmen gravely concerned about the dramatic declines of many wildlife populations. Its founders saw need for a small, independent and aggressive cadre of people dedicated to restoring and ensuring the well-being of wildlife populations and their habitats.

AFWA is the Association of Fish & Wildlife Agencies, which represents North America's state fish and wildlife agencies to advance sound, science-based management and conservation of fish and wildlife and their habitats in the public interest.

C. Background

Over the past several years, FWS has been developing a data system (TRACS) to replace the now-defunct FAIMS database as a means of collecting performance-reporting data for the WSFR program. WSFR grants over the last two years have been entered into the first iteration of the TRACS database, and most states are preparing to assume primary responsibility for entering grant information into the system by Fall 2016.

The WSFR Joint Task Force (WSFR - JTF) has been instrumental in the development and review of TRACS since its inception. In past meetings, the WSFR - JTF has provided input, reviewed milestones, and resolved conflicts over performance reporting requirements in general and TRACS specifically. This Review has been requested by the WSFR - JTF in order to provide an independent analysis of the TRACS system, including its legal mandates, the needs of participants and audience, and program development, review, and implementation.

The initial start-up for TRACS has not accomplished all potential uses for such a system, nor has there been universal agreement on which potential uses are the primary purpose and goals for the system. With the assistance of a TRACS Working Group, including both federal and state participants, substantial discussion has already occurred concerning the future of TRACS. Nonetheless, as the first wave of substantial updates and revisions to TRACS is on the horizon, it is critical that the time and resource investments in the system reflect a common vision for both state fish and wildlife agencies and FWS.

Critical issues to be addressed include the intended audience(s) including states, FWS, and Industry, the intended purpose of TRACS, and informational accountability for TRACS, in order to ensure that the scope, detail, and information data points sufficient to meet the purpose, but also avoid unnecessary reporting time and effort.

D. Scope of Work

As requested by AFWA, WMI will conduct a review and evaluation of the national grant performance-reporting database (TRACS) for the WSFR Program in order to facilitate the continued development of the system and to clarify and delineate the requirements set forth by Congress, the Office of Management and Budget (OMB), and FWS. This review and evaluation is necessary in order to maximize the likelihood of achieving the common vision for TRACS among all partner agencies and entities and to minimize undue burdens placed upon the partners due to misinterpretation or miscommunication.

To accomplish this Scope of Work, WMI agrees to:

1. Review and summarize the work that has already been done (at various levels) on the issue of development and implementation of the TRACS performance-reporting database.
2. Determine legal, administrative, and congressional mandates (with appropriate state and federal staff) of performance reporting by the WSFR Program.
3. Coordinate an independent needs analysis for TRACS with select FWS staff and AFWA members in advance of a joint Meeting of the Parties.
4. Challenge applicable parties to objectively and critically review and evaluate their collective, essential needs as well as their ultimate wants prior to a joint meeting of the partners.
5. Coordinate with federal and state leadership in developing a joint Meeting of Parties, including logistics, agenda, presentations, and expectations.
6. Convene a 1-2 day, facilitated, invite-only (30-50 participants) joint Meeting of Parties among:
 - State fish and wildlife agency Directors, or their representatives (with regional diversification)
 - FWS WSFR leadership
 - State and federal staff, as appropriate, who have background in TRACS development and TRACS working group discussions
7. Through pre-meeting information and meeting presentations, establish a common baseline among meeting participants to enable productive discussions.
8. Through facilitated discussion, accomplish the desired outcome of a common vision and shared purpose and goals for a national performance-reporting database for the WSFR Program, such that continued development and implementation of TRACS may proceed efficiently and with a high likelihood achieving its common vision.

To accomplish this Scope of Work, AFWA agrees to:

1. AFWA agrees to provide funding to WMI to carry out the scope of work in the amount of \$60,000 of which half is dependent on a cooperative agreement with the Fish and Wildlife Service.
2. Provide copies of all governing documents, data, or information, relevant to the review as requested.
3. Provide a list of key staff, stakeholders, and experts along with their contact information.
4. Develop and promote a directed letter of invitation to key personnel for a Meeting of Parties.
5. Participate and collaborate jointly with the partners, contractors, or other personnel, in carrying out the Scope of Work.
6. Provide meeting space for independent needs analysis (2 days: 10-12 people).
7. If necessary, detail personnel to work on the review effort.
8. Review and approve one stage of work before the next stage can begin.
9. Review and approve any proposed modifications to the review as detailed in this document.

E. Deadlines and Milestones for WMI.

1. Establish approved Meeting of Parties logistics, including date, location, and appropriate meeting participants by July 15, 2016.
2. Review and summarize the current development and implementation of TRACS by August 1, 2016.
3. Summarize the controlling mandates of performance reporting for the WSFR Program by August 1, 2016.
4. Develop an agenda vetted by FWS and AFWA by August 15, 2016.
5. Compile background information to provide to all partners and Meeting of Parties participants in advance of Meeting of Parties by August 15, 2016.
6. Conduct a needs analysis of the performance reporting requirements for the WSFR Program by August 30, 2016.
7. Coordinate any presentations necessary and appropriate to set stage for facilitated Meeting of Parties discussions. (Two days between September 1 and September 30 - During Meeting)
8. Provide facilitation services during the Meeting of Parties to assist meeting participants in achieving Desired Outcomes as detailed in this Scope of Work. (Two days between September 1 and September 30 - During Meeting)
9. Craft minutes during Meeting of Parties to capture issues, ongoing needs, and agreed-upon results, or other items relevant to the Desired Outcomes as specified in this Scope of Work. (Two days between September 1 and September 30 - During Meeting)
10. Compile an initial Meeting of Parties report sufficient for state and federal partners to finalize in a form agreed-upon during meeting as documentation of the Desired Outcomes as specified in this Scope of Work by November 1, 2016.
11. Provide a DRAFT report to WSFR – JTF by November 1, 2016.
12. Provide a FINAL report to AFWA by December 1, 2016.

F. Desired Outcomes

- Identify critical outputs and outcomes to measure that are responsive to stakeholder needs and meet current and future information needs of the conservation, recreation and education community.
- Review the work performed to date by WSFR and State partners on TRACS. That work is rooted in legislative program purposes and in effectiveness measures developed by AFWA for State Wildlife Grants.
- Define how TRACS could be used to support performance reporting.
- Ensure that any agreements resulting from the review satisfy regulatory requirements of 50 CFR 80 and 2 CFR 200; for example, resolving cost level of accounting in a way that meets OMB requirements, so early involvement of the OMB Examiner could help clarify requirements.
- Productive continued development and implementation of the TRACS system.
- A thorough understanding of the TRACS system, and its purpose and function, among all partner agencies and entities.
- Clarify and delineate the performance-reporting requirements set forth by Congress, the Office of Management and Budget (OMB), and FWS.
- Minimize undue burdens placed upon TRACS users due to misinterpretation or miscommunication of Congressional and/or Agency mandates.
- Protection of sensitive data that is entered into the TRACS system by its state partners.
- A common vision and shared purpose and goals for TRACS as the national performance-reporting database for the WSFR Program.

- A continued development of TRACS that proceeds efficiently and with high likelihood achieving that common vision.
- Define and implement a communication plan that will clearly articulate to state and industry partners the common vision and shared purpose and goals for TRACS.

G. Potential Criteria Achieving Desired Outcome.

- Agreement on the performance measures/outcomes to be tracked.
- Agreement on how these measures will be tracked.
- A high level framework for implementing these agreements to include:
 - Roles and responsibilities going forward;
 - Timeline/schedule; and
 - Communication plan to ensure all stakeholders are fully informed on the decisions made, the rational for and implications of those decisions, and expectations for their engagement going forward.
- Compliance with requirements of the program as established by OMB & Congress.
- Common identification of intended audiences for the TRACS database, purpose for each agreed-upon audience, and type and level of information relevant to each audience. *(E.g. Congress; industry; public constituencies; federal or state grant administrators or leads; federal or state leadership and planners; etc.)*
- Agreed-upon connection between audience and vision for the TRACS database, regarding its purpose and goals. *(E.g. Share "Success Stories;" meet legal reporting requirements; improve program efficiency and coordination; enhance fish and wildlife conservation efforts; etc.)*
- Common identification of type and scope of "program outcomes" relevant to the agreed-upon purpose and goals.
- Protection of sensitive data generated by the states that is entered into the system.
- Agreed-upon scope, level and/or type of grant reporting data necessary and sufficient to achieve these standards, with sufficient explanation to allow technical and program staff to proceed with TRACS development and implementation. *(E.g. Common understanding of grant activities or "outputs" that would be necessary and relevant to achieved agreed-upon levels of "outcome" reporting for identified audiences, purpose, and goals.)*
- Touchstone metrics of these criteria for TRACS developers to have consistent guidance, and for leadership to review future TRACS system based on agreed-upon expectations.
- Improved communications and working relationship between states and FWS as related to TRACS and performance reporting.

H. WMI Review Team.

STEVEN WILLIAMS, Ph.D. – WMI President – Steve served as Director of the U. S. Fish and Wildlife Service, Secretary of the Kansas Department of Wildlife and Parks, Deputy Executive Director of the Pennsylvania Game Commission, and Assistant Director for Wildlife and Deer Project Leader of the Massachusetts Division of Fisheries and Wildlife. He serves on the National Fish and Wildlife Foundation board, American Wildlife Conservation Partners, Wildlife and Hunting Heritage Conservation Council, Council to Advance Hunting and Shooting Sports, and National Conservation Leadership Institute.

JONATHAN GASSETT, Ph.D. – WMI Southeast Field Rep – Jon is WMI's Southeast Field Representative. He works with all SEAFWA states, has served as President of AFWA, MAFWA and SEAFWA, and has served for 8 years on the WSFR Joint Task Force. He is a graduate of the National Conservation

Leadership Institute and serves on their Board of Directors. Jon also serves as the WMI State/Industry Liaison, helping to build and improve relations between state and Industry partners. Jon has more than 14 years experience with Kentucky Department of Fish and Wildlife Resources, including 8 years as Commissioner of the Department.

SCOT WILLIAMSON – WMI Vice President – Scot has served as WMI’s Northeast Field Representative since 1994. He has coordinated the NEAFWA Regional Conservation Needs program since 1995 and assisted NEAFWA initiatives including conservation and restoration of shrub land-dependent wildlife and advancement of Landscape Conservation Cooperatives. Scot served as Big Game Director for Texas Parks and Wildlife Department and White-tailed Deer Project Leader for New Hampshire Fish and Game Department.

I. Modification.

Any modifications to this MOU shall be made by mutual consent of the parties, by the issuance of a written modification, signed and dated by all parties, prior to any changes being performed.

J. Participation in Similar Activities.

This instrument in no way restricts AFWA or WMI from participating in similar activities with other public or private agencies, organizations, and individuals.

K. Termination.

Any of the parties, in writing, may terminate the instrument in whole, or in part, at any time.

L. Establishment of Responsibility.

This MOU is not intended to, and does not create, any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity, by a party against the United States, its agencies, its officers, or any person.

M. Principle Contacts.

The principal contacts for this instrument are:

AFWA Contact

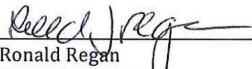
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WMI

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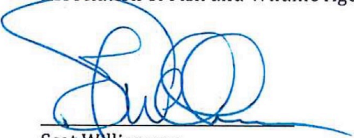
N. Authorized Representatives.

THE PARTIES HERETO have executed this instrument as of the last date shown below:



Ronald Regan
Executive Director
Association of Fish and Wildlife Agencies

7/1/2016
Date



Scot Williamson
Vice President
Wildlife Management Institute

6/27/2016
Date

WSFR Performance Reporting Review Timeline Updated: 6/26/2016		
Activity	Exp Start Date	Exp Completion Date
Initial Interviews & Document Collection	July 1, 2016	July 15, 2016
Document Review	July 1, 2016	July 15, 2016
Establish Approved Logistics for Meeting of Parties	July 1, 2016	July 15, 2016
Review and Summarize Development and Implementation o	July 15, 2016	August 1, 2016
Develop Agenda for Meeting of Parties	August 1, 2016	August 15, 2016
Perform Needs Analyses with AFWA & FWS (Small Group) Meeting with designated State & Federal Officials Meeting with OMB and/or Congressional Staff	July 15, 2016	August 15, 2016
Evaluate and Compile Results from Needs Analyses	August 15, 2016	August 30, 2016
Coordinate and Host Meeting of Parties Background Materials Presentation Coordination Facilitation Services Minutes and Notes	September 1, 2016	September 30, 2016
Review and Analysis of Meeting Outputs	October 1, 2016	October 15, 2016
Draft Document Analysis and Review (Internal - WMI)	October 15, 2016	November 1, 2016
Draft Document to WSFR JTF	November 1, 2016	November 1, 2016
Incorporation of Document Edits from WSFR JTF	November 15, 2016	November 30, 2016
Final Product to AFWA	December 1, 2016	December 1, 2016