

2/1997



**U.S. Department of the Interior
Office of Inspector General**

AUDIT REPORT

**EXPENDITURES CHARGED TO THE
WILD HORSE AND BURRO PROGRAM,
BUREAU OF LAND MANAGEMENT**

**REPORT NO. 97-I-375
FEBRUARY 1997**

At the time of our review, the Bureau had formed an emergency review team to examine Program operations. Specifically, the team was to evaluate Program funding and past spending patterns, animal management, compliance with legal requirements, and appropriateness of current Program policies. Of immediate concern to the team was the continuing drought in Nevada and the deteriorating health of the wild horses and burros in that area caused by the drought.

SCOPE OF AUDIT

To accomplish our audit objective, we reviewed Program expenditures charged during fiscal years 1995 and 1996 (through August 3, 1996) and evaluated Bureau procedures for allocating certain administrative costs. Specifically, we reviewed a judgmentally selected sample of transactions representing charges for salaries and for other expenditures, such as employee buyouts and change-of-station moves, contract services, and other materials and supplies. Our review included salary charges for the California and Nevada State Offices, which included the states' district and resource area offices, and for the Eastern States Office, which included its district offices. The salary charges for these offices totaled nearly \$3 million, or 54 percent of the \$5.5 million in total salaries charged to the Program, for fiscal year 1995 and more than \$2.2 million, or 53 percent of the \$4.2 million in total salaries, for fiscal year 1996 (Appendix 2). We also reviewed \$1.1 million of the \$8.7 million in other expenditures charged to the Program for fiscal year 1995.

In performing the audit, we reviewed accounting records at the Nevada State Office in Reno, Nevada, and at the Bureau's Service Center in Lakewood, Colorado. Additionally, we interviewed officials in the Bureau's Wild Horse and Burro National Program and Nevada State Office in Reno; the California State Office in Sacramento, California; the Eastern States Office in Springfield, Virginia, and its district offices; the Canon City District Office, within the Colorado State Office; and the Service Center (Appendix 3). The review was made, as applicable, in accordance with the "Government Auditing Standards," issued by the Comptroller General of the United States. Accordingly, we included such tests of records and other auditing procedures considered necessary under the circumstances. Because of the limited scope of this review, we reviewed internal controls only to the extent necessary to accomplish our objective. We also reviewed the Department's Annual Statement and Report, required by the Federal Managers' Financial Integrity Act, for fiscal year 1995 and determined that none of the reported weaknesses were directly related to the objective and scope of this audit.

PRIOR AUDIT COVERAGE

During the past 5 years, the General Accounting Office has not issued any audit reports on the Bureau of Land Management's Wild Horse and Burro Program, but the Office of Inspector General has issued two related audit reports as follows:



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20240

FEB 7 1997

AUDIT REPORT

Memorandum

To: Assistant Secretary for Land and Minerals Management

From: Robert J. Williams *Robert J. Williams*
Acting Assistant Inspector General for Audits

Subject: Audit Report on Expenditures Charged to the Wild Horse and Burro Program, Bureau of Land Management (No. 97-I-375)

INTRODUCTION

This report presents the results of our audit of Bureau of Land Management expenditures charged to the Wild Horse and Burro Program. We performed this review at the request of Bureau officials. This is the first of two reports that we are issuing on the Program. The second report will address certain Program activities. The objective of this review was to determine whether the Bureau's expenditures charged to the Program were spent for activities related to the Program.

BACKGROUND

The Wild Free-Roaming Horses and Burros Act of 1971, as amended, mandates the protection, management, and control of wild horses and burros on public lands at population levels that ensure a thriving natural ecological balance while also recognizing multiple-use management of the public lands. The primary Bureau activities under the Program have been to remove excess wild horses and burros from public lands and to place them with private individuals and organizations through the Bureau's adoption program. During fiscal year 1995, the Bureau removed 9,286 excess wild horses and burros from public lands and placed 9,655 animals through the adoption program. At the end of fiscal year 1995, an estimated 43,590 wild horses and burros were in herd management areas on public lands in 11 western states, with 24,067 of these animals in Nevada. Also at the end of fiscal year 1995, the Bureau determined that the public lands could sustain only about 27,150 wild horses and burros, including 14,430 animals in Nevada. The Bureau spent approximately \$16.5 million in fiscal year 1995 and approximately \$12.2 million in fiscal year 1996 (through August 3, 1996) on the Program (Appendix 1).

- "Memorandum of Understanding Relating to the South Dakota Wild Horse Sanctuary, Bureau of Land Management" (No. 92-I-543), issued in March 1992, concluded that the Bureau made payments of \$95,000 for services that were not the Bureau's responsibility; approved a basic rate increase for horse care that was not justified; and lost the opportunity to save \$800,000 by not evaluating alternative offers for horse care. The report additionally stated that the sanctuary had not achieved financial self-sufficiency. The report's four recommendations have been resolved and implemented.

- "Selected Aspects of the Wild Horse and Burro Program, Bureau of Land Management" (No. 94-I-585), issued in May 1994, concluded that it was not cost effective to maintain the Oklahoma sanctuary and that it would be less expensive to return the horses to the public lands. Additionally, the report concluded that the Bureau may have overpaid the State of New Mexico to terminate the New Mexico prison horse training program. The report's one recommendation has been resolved and implemented.

RESULTS OF AUDIT

Based on our review of the Bureau's expenditures charged to the Wild Horse and Burro Program for fiscal years 1995 and 1996, we found that the Bureau had recorded and generally spent funds for Program purposes in accordance with its accounting procedures. However, the Bureau inaccurately classified certain indirect salaries as direct costs in its financial records for the Program. The Bureau's accounting procedures require that certain program support costs be charged directly to Bureau programs. This procedure caused the Bureau to report charges that support programs (primarily indirect salaries for the district and resource area offices) as direct program charges. As such, at the offices we reviewed, the accounting records reflected a 9 percent rate for indirect salaries, whereas we calculated an average rate of nearly 35 percent from the same records. Additionally, we noted that, because of the Bureau's accounting procedures, charges were made to the Program for an employee buyout and for an employee change-of-station move, although the employees did not work for the Program. As a result, reported salary and other expenditure costs indicated that more direct work was accomplished for the Program than may have actually occurred.

Salaries

An August 23, 1994, Bureau memorandum stated that certain administrative positions were to be funded through program support (indirect) costs and the remaining administrative positions were to be charged directly to programs. The Bureau defines program support as "items which benefit multiple programs, but whose costs cannot be readily assignable to a specific organization or program." The Bureau's memorandum stated that indirect salary costs from the state offices may be allocated to a program based on a percentage that is determined annually. The accounting procedures, however, did not provide for a similar

allocation of indirect salary costs from the district and resource area offices. Consequently, district and resource area offices' indirect salary costs were recorded in the Bureau's accounting records as direct costs.

As shown in Appendix 1, salary costs for the Program totaled about \$5.5 million for fiscal year 1995 and about \$4.2 million for fiscal year 1996 (through August 3, 1996). We reviewed salaries charged by the California and the Nevada State offices and the Eastern States offices for the 22-month time period, which totaled about \$5.2 million (Appendix 2). We found that 65 percent, or about \$3.4 million, of the salaries for both fiscal years were charged by personnel whose positions were directly related to the Program, such as wranglers, wild horse and burro specialists, range conservationists, range technicians, and law enforcement rangers and investigators. The remaining 35 percent, or about \$1.8 million, of the salaries were charged by managers, clerical staff, purchasing staff, public affairs specialists, computer specialists, and others who performed services in support of the Program on a periodic basis.

Of the \$1,818,000 charged for personnel, such as managers and clerical staff, costs of only \$464,000 were shown in the Bureau's accounting records as program support costs or indirect salaries. The remaining administrative salary costs of about \$1,354,000 were charged directly to the Program, of which \$996,000 was from district and resource area offices. Because of the method of recording these charges, the Bureau's accounting records reflected an indirect cost rate of only 9 percent, which we believe implies that more direct work was performed on the Program than may have actually occurred. In our opinion, the administrative salary costs of about \$1,354,000 that were directly charged to the Program meet the Bureau's definition of program support (or indirect costs) and should have been charged as indirect salaries.

Of the offices reviewed, we found that the Eastern States Office charged the highest percentage, an average of more than 53 percent, of indirect salaries to the Program for the period audited. For example, the Office charged \$125,100 for public affairs specialists and \$123,000 for district managers and associate district managers. We contacted some of the Bureau personnel involved, who told us that they charged a portion of their salary because they performed services that supported the Program. The California and Nevada offices charged 34 percent and 27 percent, respectively, in indirect salaries to the Program. In our opinion, indirect charges for salaries of 53 percent, 34 percent, and 27 percent were more representative of the actual indirect salary costs of the Program for the three offices reviewed than the 9 percent indirect rate reflected in the Bureau's financial records.

Other Expenditures

Of the \$8.7 million charged for fiscal year 1995 for other expenditures, we reviewed costs of \$1.1 million and noted instances in which expenditures were charged to the Program for employees who did not charge time to the Program.

To cover employee costs, such as buyouts and change-of-station moves, the Bureau determined that it would "set aside" a percentage of funds from each program based on direct salaries charged to the program. For example, in fiscal year 1995, Program funding for Nevada was assessed 8 percent for these costs. However, because the Bureau did not actually charge the costs to a "pool" of funds and then allocate a percentage of those costs to its various programs, individual buyouts and change-of-station moves were charged directly to unrelated programs. For example, the Eastern States Office charged a \$25,000 buyout of an employee who worked in the public information room to the Program because, according to a States Office official, that was "where funding was available." In Nevada, a \$74,000 permanent change-of-station move for an environmental specialist was charged to the Program. Conversely, we noted that for fiscal year 1996, a permanent change-of-station move costing \$18,600 of a wild horse and burro specialist was charged to the Soil, Water, and Air Management Program.

Recommendations

We recommend that the Director, Bureau of Land Management, ensure that:

1. Procedures are developed and implemented which require support costs to be identified and charged as indirect costs and that these costs are applied consistently by all offices to the Program. Also, these indirect costs should be reviewed by managers, who should then determine whether these costs are appropriately charged to the Program.
2. The practice is discontinued of charging buyouts and change-of-station moves directly to unrelated programs.

Bureau of Land Management Response and Office of Inspector General Reply

In the December 18, 1996, response (Appendix 4) from the Director, Bureau of Land Management, the Bureau indicated concurrence with both recommendations. Based on the response, additional information is needed for both recommendations (see Appendix 5).

Recommendation 1. Concurrence.

Bureau Response. The Bureau stated that it "will expand the use of the program support cost methodology to all field offices or implement another technique to improve its identification and allocation of indirect costs to all programs." The Bureau also stated that its in-house review of the Program concluded that "practically all of the amounts reviewed were clearly legitimate expenditures of the program." Additionally, the Bureau stated that it agreed that "some of the \$996,000 in BLM [Bureau of Land Management] District and

Resource Area costs charged directly to the Wild Horse and Burro Program may have been eligible for distribution through the program support cost methodology."

Office of Inspector General Reply. We do not agree with the Bureau's statement that "practically all of the amounts reviewed were clearly legitimate expenditures of the program." A cost that is clearly a legitimate expenditure of one program must be directly charged to that program and should not be eligible for distribution to another program. However, the Bureau's policy of identifying indirect costs as program support costs and then charging those program support costs directly to its programs at the district and resource area office levels rather than through an allocation procedure overstates the actual amount of direct work on the Program. In its response, the Bureau agreed that some of the costs charged directly to the Program may have been eligible for distribution to other programs through the program support cost methodology. In addition, we found that certain costs, such as permanent change-of-station moves for personnel who did not work in the Program, were charged to the Program (also see discussion under Recommendation 2). We believe that the Bureau's plan to expand the use of the program support cost allocation methodology to its field offices will correct the overstatement. Although management concurred with the recommendation, additional information is needed, and if the Bureau decides to "implement another technique to improve [its] identification and allocation of indirect costs," information is requested on that technique (see Appendix 5).

Recommendation 2. Partial concurrence.

Bureau Response. The Bureau stated that it "will charge all future buyouts and permanent change of station costs in field offices as part of program support costs" and that, as part of streamlining processes and practices, it charged certain costs to one subactivity rather than applying these costs proportionally among approximately 25 subactivities. Further, the Bureau stated that it will "encourage Bureau offices to minimize this practice in the future."

Office of Inspector General Reply. The buyout and permanent change-of-station costs were charged directly to an unrelated program, which was contrary to the Bureau's procedures to charge those costs to a "pool" of funds and then allocate those costs to its various programs. In developing its program support cost methodology, the Bureau should reconsider procedures for accounting for certain costs. Specifically, we believe that permanent change-of-station costs should be charged directly to the program for which the employee works or will work when there is no benefit to any other program. For example, if a wild horse and burro employee transfers to another state office in this program, then this program should be charged for the employee's change-of-station costs. Conversely, if a wild horse and burro employee transfers to another state office in a different program, such as the environmental program, then the environmental program should be charged for the move. Further, a program support employee's move should be charged to the "pool" and allocated equitably to the various programs, since there is no benefit to a specific program for the

action. We agree that buyout costs should be charged as program support costs and allocated equitably to all programs.

As required by the Departmental Manual (360 DM 5.3), please provide us with your written comments to this report by March 25, 1997. The response should provide the information requested in Appendix 5.

The legislation, as amended, creating the Office of Inspector General requires semiannual reporting to the Congress on all audit reports issued, actions taken to implement audit recommendations, and identification of each significant recommendation on which corrective action has not been taken.

We appreciate the cooperation of Bureau officials in the conduct of our audit.

cc: Assistant Secretary - Land and Minerals Management
Audit Liaison Officer, Land and Minerals Management
Audit Liaison Officer, Bureau of Land Management

**EXPENDITURES OF THE WILD HORSE AND BURRO PROGRAM
FOR FISCAL YEARS 1995 AND 1996***

<u>Category</u>	<u>Fiscal Year 1995</u>	<u>Fiscal Year 1996*</u>
Salaries and Personal Benefits		
Salaries	\$5,500,897.98	\$4,237,715.35
Payroll Additive	1,186,625.56	989,940.94
Leave Surcharge	<u>1,139,518.17</u>	<u>822,149.94</u>
Subtotal	<u>\$7,827,041.71</u>	<u>\$6,049,806.23</u>
Other Expenditures		
Travel - Persons	509,448.30	266,930.96
Transportation - Things	473,397.33	320,202.63
Rent, Utilities, Printing	546,598.66	368,610.53
Equipment Use and Repair	330,915.44	200,766.40
Contracts	2,009,966.67	1,916,956.11
Advertising, Storage	9,933.96	9,113.36
Miscellaneous Services	2,838,786.92	1,974,896.25
Office Supplies & Materials	227,750.94	54,180.06
Other Supplies & Materials	1,532,470.64	894,954.54
Equipment	168,779.04	58,484.92
Land, Buildings, & Other	25,962.12	19,143.51
State Grants	17,000.00	16,050.00
Insurance Claims	<u>2,377.60</u>	<u>12,524.53</u>
Subtotal	<u>\$8,693,387.62</u>	<u>\$6,112,813.80</u>
Total	<u>\$16,520,429.33</u>	<u>\$12,162,620.03</u>

*Expenditures incurred through August 3, 1996.

**WILD HORSE AND BURRO PROGRAM SALARY CHARGES
FOR FISCAL YEARS 1995 AND 1996***

<u>Office</u>	<u>Total Salaries Charged to Program</u>	<u>State Office Salaries Charged as Support</u>	<u>State Office Salaries Charged as Direct</u>	<u>District/Resource Indirect Salaries Charged as Direct</u>	<u>Total Indirect</u>	<u>Percentage of Indirect to Total Salary</u>
<u>Fiscal Year 1995</u>						
California	\$508,250.29	\$46,524.70	\$70,789.80	\$60,093.25	\$177,407.75	34.91
Eastern States	784,358.89	131,449.23	70,144.38	217,806.56	419,400.17	53.47
Nevada	<u>1,675,677.92</u>	<u>77,583.96</u>	<u>42,201.02</u>	<u>289,729.10</u>	<u>409,514.08</u>	<u>24.44</u>
Total - 1995	<u>\$2,968,287.10</u>	<u>\$255,557.89</u>	<u>\$183,135.20</u>	<u>\$567,628.91</u>	<u>\$1,006,322.00</u>	<u>33.90</u>
 <u>Fiscal Year 1996</u>						
California	\$425,517.77	\$43,004.79	\$74,775.86	\$24,046.64	\$141,827.29	33.33
Eastern States	617,113.07	81,388.69	55,974.85	188,658.13	326,021.67	52.83
Nevada	<u>1,190,850.86</u>	<u>84,316.00</u>	<u>44,688.49</u>	<u>215,263.34</u>	<u>344,267.83</u>	<u>28.91</u>
Total - 1996	<u>\$2,233,481.70</u>	<u>\$208,709.48</u>	<u>\$175,439.20</u>	<u>\$427,968.11</u>	<u>\$812,116.79</u>	<u>36.36</u>
 Total	 <u>\$5,201,768.80</u>	 <u>\$464,267.37</u>	 <u>\$358,574.40</u>	 <u>\$995,597.02</u>	 <u>\$1,818,438.79</u>	 <u>34.96</u>

*Fiscal year 1996 costs through August 3, 1996.

**WILD HORSE AND BURRO PROGRAM
OFFICES VISITED OR CONTACTED DURING AUDIT**

<u>OFFICES</u>	<u>LOCATION</u>
Washington Headquarters*	Washington, D.C.
Service Center	Lakewood, Colorado
National Office, Wild Horse and Burro Program	Reno, Nevada
California State Office*	Sacramento, California
Eastern States Office*	Springfield, Virginia
Jackson District Office*	Jackson, Mississippi
Milwaukee District Office*	Milwaukee, Wisconsin
Nevada State Office	Reno, Nevada
Palomino Valley Center	Sparks, Nevada
Carson City District Office*	Carson City Nevada
Canon City District Office (Colorado State Office)	Canon City, Colorado

*Contacted only.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Washington, D.C. 20240

DEC 18 1996

In Reply Refer To:
1684 (BC-605)

MEMORANDUM

To: Assistant Inspector General for Audits

Through: ^{For} Bob Armstrong *Sylvia V. Bann* 9 99
Assistant Secretary, Land and Minerals Management

From: ^{Deputy} Director, Bureau of Land Management *[Signature]*

Subject: Draft Audit Report on Expenditures Charged to the Wild Horse and Burro Program, Bureau of Land Management (C-IN-BLM-004-96(A))

Thank you for the opportunity to respond to the subject audit. We appreciate the Office of Inspector General (OIG) undertaking this audit on such short notice and completing the audit in three months.

We conducted an in-house review of the Wild Horse and Burro Program expenditures in Nevada last August. Our review concluded that "there were no instances where other BLM programs inappropriately charged to the wild horse and burro program" and that practically all of the amounts "reviewed were clearly legitimate expenditures of the . . . program."

Results of AuditSalaries

The Bureau of Land Management (BLM) is working toward more accurately representing direct and indirect costs through application of the program support cost methodology. We initiated this methodology in Fiscal Year 1995 in response to earlier OIG audits. This methodology permits the BLM to charge costs common to multiple programs in a rational, predetermined manner. We do not consider this an attempt to confuse direct and indirect costs.

The program support cost methodology uses a Federal Financial System subsystem called cost allocation. This subsystem is computer processing resource intensive, is time consuming, and is expensive to operate. For these reasons, we limited its application almost exclusively to the BLM State Offices. We agree that some of the \$996,000 in BLM District and Resource Area costs charged directly to the Wild Horse and Burro Program may have been eligible for distribution through the program support cost methodology had the system been available to handle it. Now that we have had experience with the cost allocation subsystem, we will evaluate expanding its use to the BLM District and Resource Area Offices.

The implication in the draft report is that certain positions/skills cannot charge directly to the Wild Horse and Burro Program. Under the BLM's benefitting subactivity concept, any position working directly for the benefit of any BLM program normally would charge costs directly to that program. Therefore, it may be legitimate for District Managers, Assistant District Managers, and Public Affairs Specialists to charge their salaries directly to the Wild Horse and Burro Program if that is where they are working. Again, this is not an attempt to hide or confuse direct and indirect costs.

Other Expenditures

In this era of downsizing and reengineering, we are continually looking for ways to streamline processes and practices. Part of that approach was to charge certain budgeted non-program specific costs to one subactivity rather than applying it proportionally among some 25 subactivities. This explains how costs for seemingly unrelated items were charged to the Wild Horse and Burro Program, e.g., a change of station move for an environmental specialist. We will encourage our offices to minimize this practice in the future.

Recommendations

1. We will expand the use of the program support cost methodology to all field offices or implement another technique to improve our identification and allocation of indirect costs to all programs.
2. We will charge all future buyouts and permanent change of station costs in field offices as part of program support costs.

Again, we appreciate the OIG redirecting its audit resources toward this audit on such short notice. Please contact Jack Blickley, Financial Liaison Officer, at (202) 452-5147 if you have any questions.

STATUS OF AUDIT REPORT RECOMMENDATIONS

<u>Finding/Recommendation Reference</u>	<u>Status</u>	<u>Action Required</u>
1	Management concurs; additional information needed.	A target date for implementation is needed. However, if "another technique" is chosen, an action plan that includes target dates and titles of officials responsible for implementation is needed.
2	Management concurs; additional information needed.	A target date for implementation is needed.

**ILLEGAL OR WASTEFUL ACTIVITIES
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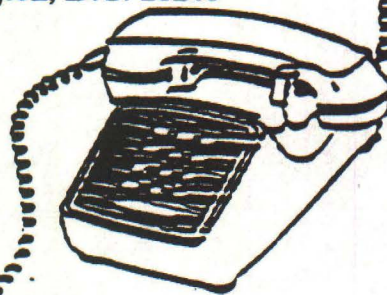
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Washington, D.C. 20240



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Washington, D.C. 20240

REPLY REFER TO:
1245 (830)

August 26, 1997

MEMORANDUM

To: AD, Renewable Resources & Planning
(Attn: Bob Bainbridge, Audit Coordinator)

From: Gwen Midgette, Audit Liaison Officer *GMM*

Subject: OIG Final Audit Report: Management of Herd Levels, Wild Horse and Burro Program, BLM, August 1997 (97-I-1104)

The OIG is requesting a response to the subject final audit report by September 22, 1997. The response should provide an action plan that includes target dates and titles of officials responsible for implementation of Recommendation 1.

The BLM response in final form should be routed through the appropriate program offices and should reach me by September 10, 1997.

In addition to the report, I have attached response and routing guidance. BLM's response should address the findings and recommendations in a positive fashion. Please do not use the BLM's response to criticize the OIG's methodology, etc. If there are other issues that need to be addressed, we can do so using another process. If that is the case, give me a call so that we can arrange to discuss and hopefully resolve the issue(s).

If you have questions about the format and/or procedure, please contact me at (202) 452-7739.

Attachments

BLM LETTERHEAD

1245 (WO-)

MEMORANDUM

To: Assistant Inspector General for Audits

Through: Bob Armstrong
Assistant Secretary, Land and Minerals Management

From: Director, Bureau of Land Management

Subject: Response to Final Audit Report: Management of Herd Levels, Wild Horse and Burro Program, Bureau of Land Management, August 1997 (97-I-1104)

(OPEN THE FIRST PARAGRAPH WITH)

Thank you for the opportunity to respond to the subject final audit report. . . .

(INCLUDE IN THE CLOSING PARAGRAPH)

If you have any questions, please contact (program person's name, title, phone number) or Gwen Midgette, BLM Audit Liaison Officer, at (202) 452-7739.

(RETURN ABOUT 5 SPACES FROM THE LAST LINE)

Attachment (**if applicable**)

cc: AS/LM (2), Room 6638, MIB
(**AD- #**)
(**Program Office**)
PFM, Judy Moy, Room 5423, MIB
WO-830, Gwen Midgette, Room 1000, LS

RESPONSE TO FINAL AUDIT REPORT
MANAGEMENT OF HERD LEVELS,
WILD HORSE AND BURRO PROGRAM, BUREAU OF LAND MANAGEMENT
AUGUST 1997
(97-I-1104)

Recommendation 1: (As it is stated in the draft report)

Comment: (State concurrence or nonconcurrence with the finding and each recommendation, including specific reasons for any nonconcurrence. The response should also provide information on actions taken or planned, including target dates and titles of officials responsible for implementation.)

REPEAT FOR EACH RECOMMENDATION IN THE DRAFT REPORT NEEDING TO BE ADDRESSED

Attachment 1

ADDITIONAL INSTRUCTIONS:

1. Do a "NOTE TO REVIEWERS"
2. Put a copy of the audit report on the left hand side of the correspondence folder behind the NOTE TO REVIEWER.
3. The Route Slip/Surname process should look very similar to the following:
 1. Author/Program Office
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 3. Other Appropriate Program Offices/ADs
 4. WO-830 (Gwen Midgette)
 5. AD-800
 6. WO-101

DEPARTMENTAL ROUTE SLIP

1. AS/LM
2. OIG



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20240

MEMORANDUM

AUG 22 1997

TO:

The Secretary

FROM:

Wilma A. Lewis
Inspector General

SUBJECT SUMMARY: Final Audit Report for Your Information - "Management of Herd Levels, Wild Horse and Burro Program, Bureau of Land Management" (No. 97-I-1104)

Attached for your information is a copy of the subject final audit report. The objective of the audit was to determine whether the Bureau of Land Management was effectively managing the herd levels and monitoring the health of wild horse and burro populations on public lands. This is the second of three reports we are issuing on the Wild Horse and Burro Program.

We determined that the Bureau had not achieved the appropriate management levels of wild horse and burro herd populations on public lands. These levels are needed to maintain a thriving natural ecological balance of the animals, as stated in the Wild Free-Roaming Horses and Burros Act, as amended. Specifically, the Bureau had not been able to place sufficient numbers of animals through its Adopt-A-Horse Program; was prevented from disposing of excess healthy animals by legislative restrictions included in its appropriations acts; and had not aggressively pursued other options for controlling herd sizes, such as birthrate controls. As a result, approximately 15,226 more wild horses and burros were on the range than the Bureau determined that the range could sustain at the end of fiscal year 1996.

In addition, the Bureau was not monitoring and evaluating the health of the herds because it did not have or establish requirements for performing this function. Because the Bureau did not have appropriate information regarding the health of the herds, it could not properly evaluate the effect decisions regarding Program operations had on the health of the animals.

Based on the Bureau's response, we considered one of the report's two recommendations resolved but not implemented and requested additional information for the remaining recommendation.

If you have any questions concerning this matter, please contact me at (202) 208-5745 or Mr. Robert J. Williams, Assistant Inspector General for Audits, at (202) 208-4252.

Attachment



**U.S. Department of the Interior
Office of Inspector General**

AUDIT REPORT

**MANAGEMENT OF HERD LEVELS,
WILD HORSE AND BURRO PROGRAM,
BUREAU OF LAND MANAGEMENT**

**REPORT NO. 97-I-1104
AUGUST 1997**



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20240

AUG 12 1997

Memorandum

To: Assistant Secretary for Land and Minerals Management

From: Robert J. Williams *Robert J. Williams*
Assistant Inspector General for Audits

Subject: Audit Report on Management of Herd Levels, Wild Horse and Burro Program, Bureau of Land Management (No. 97-I-1104)

This report presents the results of our audit of the Bureau of Land Management's management of herd levels in the Wild Horse and Burro Program. This is the second of three reports we are issuing on the Program. The first report, "Expenditures Charged to the Wild Horse and Burro Program, Bureau of Land Management" (No. 97-I-375), dated February 1997, determined whether expenditures charged to the Program were used for Program purposes. The Bureau requested that we perform that audit so that the results could be included in the Bureau's special task force report reviewing the Wild Horse and Burro Program and the effect that drought conditions had on herd areas in Nevada. This audit was initiated as part of our annual audit plan; however, because of Congressional interest, we also reviewed Bureau information on the health of the wild horses and burros. The objective of this audit was to determine whether the Bureau was effectively managing the herd levels and monitoring the health of wild horse and burro populations on public lands. Our third report will present the results of our review of the Bureau's Adopt-A-Horse Program.

We determined that the Bureau's Wild Horse and Burro Program has not achieved the appropriate management levels of wild horse and burro herd populations. The Bureau must achieve these management levels in order to maintain a thriving natural ecological balance of the animals, as stated in the Wild Free-Roaming Horses and Burros Act of 1971, as amended. Specifically, the Bureau had not been able to place sufficient numbers of animals through its Adopt-A-Horse Program; was prevented from disposing of excess healthy animals by legislative restrictions included in its appropriations acts; and had not aggressively pursued other options for controlling herd sizes, such as birthrate controls. Consequently, approximately 15,226 more wild horses and burros were on the range than the Bureau determined the range could sustain at the end of fiscal year 1996.

In addition, the Bureau was not monitoring and evaluating the health of the herds. This occurred because the Bureau did not have or establish requirements for performing this function. Because the Bureau did not have appropriate information regarding the health of

the herds, it could not properly evaluate the effect decisions regarding Program operations had on the health of the animals.

In the June 4, 1997, response (Appendix 5) to the draft report from the Director, Bureau of Land Management, the Bureau concurred with the recommendations that it should implement a plan which details the methods and costs for achieving appropriate management levels for wild horses and burros on public lands and that it should establish requirements to collect and analyze comprehensive data on the health of wild horse and burro herds on public lands. Specifically, in response to Recommendation 1, the Bureau stated that it had "successfully maintained a schedule for achieving AML's [appropriate management levels], . . . by the year 2001," as documented in its Strategic Plan. In that regard, the Bureau's Strategic Plan stated that the appropriate management level would be reached in "6 years" (or 1998), not 2001. However, in our opinion, the Bureau's statistics on herd population, removals of animals, and estimated growth of the herds do not support the Bureau's statement that it will reach the appropriate management level by 2001. The Bureau also stated that it has "actively pursued" research concerning the effects of its selective removal policy and to develop a birth control technology that is "safe and effective." In response to Recommendation 2, the Bureau stated that procedures would be initiated for collecting and recording data regarding the physical condition of wild horses and burros for the fiscal year 1998 gathering season (which begins on October 1, 1997).

On June 24, 1997, a conference was held at the Bureau's request to discuss its response to Recommendation 1. Based on the conference and additional information provided, changes were made to the final report as appropriate. Additionally, the Bureau noted actions that it had taken or planned to take in response to Recommendation 1 as follows: (1) the Wild Horse and Burro Advisory Board would review the Strategic Plan to determine what revisions were necessary; (2) approximately 10,000 animals per year would be removed for the next 5 years (according to the Bureau, the Congress appears to be responsive to providing the additional appropriations necessary); and (3) the agreement to study the effects of the selective removal policy has been signed with the University of Nevada-Reno.

Based on the Bureau's response, additional information is needed for Recommendation 1, and Recommendation 2 is considered resolved but not implemented (see Appendix 6). Accordingly, the unimplemented recommendation will be referred to the Assistant Secretary for Policy, Management and Budget for tracking of implementation.

In accordance with the Departmental Manual (360 DM 5.3), we are requesting a written response to this report by September 21, 1997. The response should provide the information requested in Appendix 6.

The legislation, as amended, creating the Office of Inspector General requires semiannual reporting to the Congress on all audit reports issued, actions taken to implement audit recommendations, and identification of each significant recommendation on which corrective action has not been taken.

We appreciate the assistance of Bureau of Land Management personnel in the conduct of our audit.

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INTRODUCTION

BACKGROUND

The Wild Free-Roaming Horses and Burros Act of 1971, as amended (16 U.S.C. 1331-1340), authorized and directed the Secretary of the Interior to manage and protect wild free-roaming horses and burros as components of the public lands. Further, the Act stated that the Secretary "shall manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands" while also recognizing multiple-use management of the public lands. A thriving ecological balance, as defined by the Congress, is the "balance between wild horse and burro populations, wildlife, livestock and vegetation." Additionally, the Act states:

Where the Secretary determines . . . that an overpopulation exists on a given area of the public lands and that action is necessary to remove excess animals, . . . he shall immediately remove excess animals from the range so as to achieve appropriate management levels. . . . The Secretary shall order old, sick, or lame animals to be destroyed in the most humane manner possible . . . The Secretary shall cause such number of additional excess wild free-roaming horses and burros to be humanely captured and removed for private maintenance and care for which he determines an adoption demand exists. . . . The Secretary shall cause additional excess wild free-roaming horses and burros for which an adoption demand by qualified individuals does not exist to be destroyed in the most humane and cost efficient manner possible.

The Act also authorizes the Secretary to contract for research in controlling animal populations through the development of birthrate controls, such as a contraceptive vaccine.

Although authorized by the Act, the Congress has prevented the Bureau from destroying excess healthy unadopted animals by stating, in the Department of the Interior's annual appropriations acts, that "appropriations herein shall not be available for the destruction of healthy unadopted wild horses and burros in the care of the Bureau of Land Management or its contractors."

The primary focus of Bureau activities under the Wild Horse and Burro Program has been the removal and the placement of excess wild horses and burros with private individuals and organizations through the Bureau's Adopt-A-Horse Program.¹ As of September 1996, the

¹The Bureau's Adopt-A-Horse Program is a popular program established in May 1976 that places wild horses and burros removed from public lands into private care. When the Program was first established, there were no provisions to pass title for the animals to the adopters.

Bureau reported that it had placed approximately 148,000 animals in private care through the Program.

As determined by the Bureau, the number of excess wild horses and burros on public lands is the difference between the actual populations and the appropriate management levels. The Bureau determines the appropriate management levels of wild horses and burros on public lands through monitoring available forage and estimating the numbers of animals, such as wild horses, other wild animals, cattle, and other livestock, that can be supported by the forage. In an attempt to control the herd levels, the Bureau removed about 165,000 excess wild horses and burros from public lands during 1973 through 1996.² However, the Bureau estimated that about 42,100 wild horses and burros, including about 15,200 excess animals, were in herd management areas on public lands in 11 western states as of the end of fiscal year 1996³ (Appendix 1).

During 1992 through 1996, the Bureau expended an average of about \$15.6 million per year of appropriated funds on the Wild Horse and Burro Program: \$6.5 million on Program management, \$2.6 million on the removal of wild horses and burros from public lands, and \$6.5 million on adoption activities. (The expenditures for fiscal years 1992 through 1996 are detailed and described in Appendix 2.) In addition to the appropriated funds, the Bureau was authorized by the Act to collect and retain adoption fees. These fees, which have averaged about \$780,000 per year, were used by the Bureau to defray the costs of transporting animals among preparation, maintenance, prison, sanctuary, and adoption facilities.

In 1992, the Bureau formalized its Strategic Plan for Management of Wild Horses and Burros on Public Lands. The Plan provided the mission statement, goals and objectives, assumptions, and a proposed action plan for the Program. The Plan called for the removal of all excess animals to reduce the herd populations to appropriate management levels within 6 years (by 1998). However, at the 1994 Senate appropriations hearings, the Bureau reported that it would take 3 to 4 additional years (by 2002) to reach the appropriate management levels. The Plan also established goals for the number of animals to be removed from public lands each year. The Bureau determined that, as of the end of fiscal year 1996, the appropriate management level of wild horses and burros on public lands was about 26,910.

²Of the 165,000 horses and burros removed, approximately 148,000 were placed in private care, and the remaining 17,000 were, according to a Bureau official, put into sanctuaries or holding areas, died of natural causes, or were sick or lame and were subsequently destroyed by the Bureau.

³A herd area is the geographic area identified as having provided habitat for a herd in 1971. A herd management area is a herd area identified in a management framework or resource management plan for the long-term management of a wild horse or burro herd.

OBJECTIVE AND SCOPE

The objective of the audit was to determine whether the Bureau was effectively managing the herd levels and monitoring the health of wild horse and burro populations on public lands. The audit was made, as applicable, in accordance with the "Government Auditing Standards," issued by the Comptroller General of the United States. Accordingly, we included such tests of records and other auditing procedures that were considered necessary under the circumstances. The audit was conducted during April through October 1996 and included visits to the Bureau's National Wild Horse and Burro Office, the Palomino Valley Center, and the Nevada State Office, all in Reno, Nevada; the Carson City District Office in Carson City, Nevada; the Montana State Office and the Billings Resource Area Office in Billings, Montana; the Wyoming State Office in Cheyenne, Wyoming; the Canon City District Office in Canon City, Colorado; and the Jackson District Office in Jackson, Mississippi.

To accomplish our objective, we reviewed records pertaining to herd management area plans, animal removals and adoptions, and Interior Board of Land Appeals and Bureau decisions on appropriate management levels. We also reviewed the health care procedures at the Palomino Valley Center. (The Center is an area in which wild horses and burros are placed subsequent to removal from the range. The Center also administers adoptions and provides health care for the animals.) In addition, we contacted members of the following horse advocacy groups regarding the Bureau's Program: the Animal Protection Institute of America; the Humane Society of the United States; the Nevada Commission for the Preservation of Wild Horses; the Wild Horse Organized Assistance; the Colorado Wild Horse and Burro Coalition; and the American Horse Protection Association, Inc.

Many allegations of abuses in the Wild Horse and Burro Program have been reported, including some identified in the media. These allegations are being reviewed by the appropriate law enforcement authorities. Accordingly, this report does not specifically address these allegations.

As part of the audit, we reviewed internal controls to the extent considered necessary to accomplish our objective. We also reviewed the Department's Annual Statement and Report, which is required by the Federal Managers' Financial Integrity Act, for fiscal year 1995 and determined that none of the reported weaknesses were directly related to the objective and scope of this audit.

PRIOR AUDIT COVERAGE

During the past 5 years, the General Accounting Office has not audited the Bureau of Land Management's Wild Horse and Burro Program. However, the Office of Inspector General has issued three audit reports on the Program as follows:

- "Memorandum of Understanding Relating to the South Dakota Wild Horse Sanctuary, Bureau of Land Management" (No. 92-I-543), issued in March 1992, concluded that the Bureau made payments of \$95,000 for services that were not the Bureau's responsibility; approved a basic rate increase for horse care that was not justified; and lost the opportunity to save \$800,000 by not evaluating alternative offers for horse care. The report additionally stated that the sanctuary had not achieved financial self-sufficiency. The report's four recommendations were considered resolved and implemented.

- "Selected Aspects of the Wild Horse and Burro Program, Bureau of Land Management" (No. 94-I-585), issued in May 1994, stated that it was not cost effective to maintain the Oklahoma Wild Horse Sanctuary. The report recommended that the Bureau evaluate other options for the sanctuary horses, including returning the horses to the public lands and closing the sanctuary, since most of the sanctuary horses were old and unadoptable. The Bureau concurred with the recommendation but offered an alternative solution. Specifically, the Bureau decided to develop and implement an adoption initiative for the animals in the sanctuary, which had been successful in the Bureau's Montana State Office in 1992 in that over 500 sanctuary animals from South Dakota had been adopted. Subsequently, the Bureau reduced the number of horses at the sanctuary from 1,569 in 1994 to 1,143 in March 1996. Reports from the sanctuary contractor disclosed that the reduction of 433 horses was due to 236 adoptions and 197 deaths.

- "Expenditures Charged to the Wild Horse and Burro Program, Bureau of Land Management" (No. 97-I-375), issued in February 1997, concluded that the Bureau had recorded and generally spent funds for Program purposes in accordance with its accounting procedures. However, the Bureau inaccurately classified certain indirect salaries and other expenditures as direct costs in its financial records. As a result, reported salary and other expenditures indicated that more direct work was accomplished for the Program than may have actually occurred. The Bureau concurred with the report's two recommendations.

OTHER REVIEW

On January 29, 1997, the Bureau of Land Management issued the report "Wild Horse and Burro Evaluation" of the Wild Horse and Burro Emergency Evaluation Team. The Team was composed of Federal and state officials, with contributions from advisors from a university, wild horse advocacy groups, a cattlemen's association, former Bureau employees, and local government officials. The Team was convened by the former Director of the Bureau of Land Management in response to concerns expressed by interest groups, the public, and Bureau employees about the effects that a prolonged drought had on areas of Nevada, Utah, and Arizona. The drought reduced the amount of forage and water available to the animal populations in those areas. The report presented findings and recommendations regarding the Wild Horse and Burro Strategic Plan, organizational considerations, management oversight and accountability, the Wild Horse and Burro Advisory Council, herd

management area designations, appropriate management levels, the selective removal policy, adoption, and the Nellis (Nevada) Wild Horse Range. The Team's report contained about 34 recommendations that addressed issues relating to the emergency drought situation and proposed guidance for the long-range direction of the Program. The Interim Director concurred with the recommendations and instructed Bureau personnel to "move immediately" to implement these recommendations under the general direction of the Assistant Director for Renewable Resources and Planning. The Interim Director stated, "We have already initiated some actions recommended by the team. For example, responsibility for wild horse and burro operations is being reassigned, effective today [January 29, 1997], from Nevada BLM [Bureau of Land Management] to the BLM Headquarters in Washington, D.C." The Interim Director also stated, "Implementing the recommendations set forth in the Emergency Evaluation Team's report, and taking the other actions I have detailed, are the first in a series of measures we are taking to improve the operation and management of the Wild Horse and Burro Program."

FINDING AND RECOMMENDATIONS

MANAGING HERD POPULATIONS

The Bureau of Land Management's Wild Horse and Burro Program has not achieved the appropriate management levels of wild horse and burro herd populations. The Bureau must achieve these management levels of the herds in order to maintain a thriving natural ecological balance between the needs of the herds and other wildlife and livestock and the resources available on the lands to provide for these needs. The Wild Free-Roaming Horses and Burro Act of 1971, as amended, states that the Secretary "shall determine appropriate management levels of wild free-roaming horses and burros and determine whether appropriate management levels should be achieved by the removal or destruction of excess animals or other options (such as sterilization or natural controls on population levels)." However, the Bureau has not been able to place sufficient numbers of excess animals through its Adopt-A-Horse Program; was prevented from disposing of excess healthy animals by restrictions included in its appropriations acts; and needed to more aggressively pursue other options for controlling herd sizes, such as birthrate controls. As a result, approximately 15,226 more horses and burros were on the range than the appropriate management level that the Bureau determined the range could sustain at the end of fiscal year 1996. In addition, the Bureau was not systematically monitoring the health of the herds. This occurred because the Bureau did not have or establish requirements for performing this function. Because the Bureau did not have appropriate information regarding the health of the herds, it could not evaluate the effect decisions regarding Program operations had on the health of the animals.

The Bureau's Strategic Plan for management of wild horses and burros on public lands, which was formalized in 1992, has not resulted in the Bureau's reaching appropriate management levels. One of the objectives in the Strategic Plan was adjusting population levels to reach appropriate management levels by 1998. Since fiscal year 1986, when appropriate management levels were first established, the number of excess wild horses and burros has increased. Specifically, 14,605 wild horses and burros were over the appropriate management level of 30,158 (48.4 percent excess) at the end of fiscal year 1986 and 15,226 wild horses and burros were over the appropriate management level of 26,912 (56.6 percent excess) at the end of fiscal year 1996, although 88,214 excess horses and burros were removed from fiscal years 1986 through 1996. During this time frame, the number of wild horses and burros on public lands exceeded the appropriate management levels by an average of about 58 percent. (The wild horse and burro populations, management levels, and excess numbers for fiscal years 1986 through 1996, as reported by the Bureau, are presented in Appendix 3.)

Achieving Appropriate Management Levels

The Bureau establishes appropriate management levels of wild horses and burros to maintain the natural ecological balance on public lands.⁴ To establish these levels, the Bureau conducts field surveys of the land used by wild horses and burros. These surveys collect data on the type of forage available to the horses and burros, the condition of the rangeland, and the other uses of the land by domestic livestock and wildlife. From this information, the Bureau determines the number of all types of animals that the rangeland can sustain and the number of wild horses and burros that must be removed from the range. To accomplish the goal of adjusting wild horse and burro population levels, the Bureau is authorized by the governing legislation to place wild horses and burros in an adoption program; destroy, in the most humane and cost-efficient manner possible, those excess wild horses and burros for which an adoption demand by qualified individuals does not exist; and develop and use birthrate controls to slow the growth of the herds. However, the Bureau has been limited in the actions it could take under each of these options, as described in the following paragraphs.

Adopt-A-Horse Program

The Adopt-A-Horse Program has not been able to place all of the excess animals. Some of the animals gathered during "roundups" were unadoptable because of age or physical defects. In 1988, as a means of providing for horses that were gathered but not placed through the adoption program, the Bureau established the first of three wild horse sanctuaries for unadoptable horses. However, the sanctuaries were not cost effective as a long-term solution for handling the excess horses that were unadoptable. Consequently, in fiscal year 1993, the Bureau implemented a selective removal policy for wild horses which was designed to gather horses that were more adoptable. Under the selective removal policy, only horses through 5 years of age and without defects were removed from the herd areas.⁵ For horses outside herd areas, the Bureau could remove horses that were 9 years of age and younger for adoption. This policy was implemented by the Bureau because it found that younger animals were more attractive to potential adopters. However, the average annual reproduction rates of the herds (approximately 18 percent) have been at least equal to the Bureau's annual rates for removal and adoption of wild horses and burros. As such, the Bureau's Adopt-A-Horse Program has not resulted in achieving appropriate management levels of the animals on a nationwide basis by sufficiently reducing the number of excess

⁴We did not examine the Bureau's process for establishing appropriate management levels because this examination would have required a review of other Bureau programs, such as grazing allotment and land use planning, which were outside the scope of this audit.

⁵Because of the difficulty in reaching appropriate management levels, the Bureau issued, in fiscal year 1996, instructions changing the age criterion under the selective removal policy for animals within herd areas and herd management areas from 5 years and younger to 9 years and younger.

horses and burros on public lands. In addition, the selective removal policy was not based on any scientific evidence of the effects the policy would have on the growth rates or on the genetic diversity of the herds (see section "Health of Wild Horses and Burros").

Legislative Restrictions

The Wild Free-Roaming Horses and Burros Act allows the Bureau to destroy excess horses and burros for which an adoption demand does not exist. However, the Bureau has been precluded from taking this action because, since fiscal year 1988, the Department of the Interior's annual appropriations acts have stated, "Appropriations herein made shall not be available for the destruction of healthy, unadopted, wild horses and burros in the care of the Bureau of Land Management or its contractors." As a result, the Bureau can only destroy sick or lame excess animals. However, even this action has been limited, according to Bureau and Departmental officials, because of concerns expressed by horse advocates.

Birthrate Controls

The Bureau needed to more aggressively pursue other options, such as birthrate controls, to slow the growth of the herds. Bureau officials said that since wild horses and burros will reproduce at a rate, conservatively, of about 18 percent per year, populations will double about every 4 years. The Bureau began to study the idea of birthrate controls of wild horse and burro populations in 1985. Bureau officials told us that the early tests found that mare contraception was an effective means of birth control. In 1992, the Congress directed the Bureau to support additional research of a contraceptive vaccine to control wild horse reproduction and to undertake a pilot project in Nevada to evaluate the use of birthrate controls. The goal of the project was to develop and test a contraceptive vaccine for the horses that would have a 1- to 3-year period of effectiveness. The project was conducted through a cooperative agreement with the University of Nevada in Reno, Nevada, and resulted in the development of a reversible vaccine that was field tested in one Nevada herd area in 1992. The final report for the field study portion of the project (for the period of December 1992 through December 1994) was issued by the University on January 24, 1995. The report stated that in the first year after vaccination, 95.5 percent of the vaccinated mares did not get pregnant, as compared with 45 percent of a control group of unvaccinated mares from the same herd that did not get pregnant. Bureau officials also stated that they were not aware of any reported safety problems with the vaccine.

The pilot project to develop the vaccine was funded with \$653,413 (provided by the former National Biological Service) under an assistance agreement with the University of Nevada-Reno and the Humane Society of the United States. The project, initiated in 1992, was recently modified and extended through 1997 with additional funding totaling \$200,000. However, as of February 4, 1997, the Bureau had not approved the contract for the continuing project, which has resulted in at least a 6-month delay in the project, according

Q, indeed the IBLA 1989
test that monitoring was
necessary to determine
removals - how can BLM
now state that there are
15,226 species names?

to a research official. The funds will be used for the field application of the remaining contraceptive vaccine and for studies on the effects of the vaccine on the population. Bureau officials said that there is sufficient remaining vaccine to inoculate about 1,000 mares during the extended pilot program. Bureau officials also said that the Bureau has no plans to use its own appropriated funds to supplement the pilot project or to develop more vaccine.

Although effective, the vaccine has not been approved for commercial use by the Food and Drug Administration. Bureau officials stated that the vaccine has not been approved for commercial use because a determination is needed as to whether the food chain will be adversely affected by the vaccine. A research scientist working under the Biological Service assistance agreement stated that, as of February 1997, the approval of the vaccine will take approximately 2 more years.

We believe that the Bureau should be more aggressive in its study of the use of the contraceptive vaccine and seek expedited approval from the Food and Drug Administration because the use of contraception to slow the birthrate of wild horses and burros on public lands, combined with removing excess animals and placing them through the Adopt-A-Horse Program, would be a more effective strategy than using only the Adopt-A-Horse Program.

Based on its historical removal rates, the Bureau cannot reach appropriate management levels. The Bureau has reduced the number of excess animals over the last 5 years by removing and placing an average of approximately 7,900 animals each year. However, assuming an estimated growth rate of 18 percent per year and the population of 42,138 animals at the end of fiscal year 1996, the Bureau would be able to keep pace only with the annual growth rate of about 7,600 animals and would not be able to significantly reduce the excess 15,226 animals on public lands.

Health of Wild Horses and Burros

The Bureau did not systematically maintain records that documented the prior or current condition of animals on the land, and the Bureau had not performed studies to evaluate the overall health of the wild horses and burros. This occurred because neither the Act nor Bureau regulations require the Bureau to maintain records or perform studies on the health of the herds. Therefore, the Bureau had no documentation evidencing the effect that its policies for the Wild Horse and Burro Program had on the health of the herds. For example, the Bureau developed a selective removal policy in response to the imbalance between the number of excess animals and the demand by adopters. Although this policy emphasized the removal of the younger and more adoptable animals, the Bureau had little or no scientific evidence of the effects this policy would have on the health of the herds. According to a Bureau official, maintaining genetic diversity helps to ensure that in-breeding and disease problems, including recessive genes which can cause blindness and other disorders, are

prevented. The Emergency Evaluation Team report stated, "In some instances, this [selective removal] policy has skewed age or sex ratios in some herds, which if continued in the long-term, could harm the viability of the herd." Also, an internal review, conducted in Utah in 1995 by the Bureau, noted that there is "anecdotal evidence" that genetic defects, which negatively impact survival, are becoming more common in some isolated herds in Utah. We believe that the Bureau should document the health conditions of wild horses and burros under its protection so that it has data on which to evaluate the effects of its decisions on the Program.

Recommendations

We recommend that the Director, Bureau of Land Management:

1. Implement a plan which details methods and costs for achieving appropriate management levels for wild horses and burros on public lands. At a minimum, the plan should address:

- The development of a removal policy, supported by sufficient data, which will remove excess wild horses and burros without adversely affecting the health of the herds that remain on public lands.

- The use of birthrate controls, including an aggressive plan to complete testing and obtain expedited approval for the contraceptive vaccine, as a method to reduce future excess wild horse and burro populations.

2. Establish requirements to collect and analyze comprehensive data on the health of the wild horse and burro herds on public lands and ensure that this information is considered in making Program decisions.

Bureau of Land Management Response and Office of Inspector General Reply

In the June 4, 1997, response (Appendix 5) from the Director, Bureau of Land Management, the Bureau concurred with both recommendations. Based on the response, Recommendation 2 is considered resolved but not implemented, and additional information is needed for Recommendation 1 (see Appendix 6).

Recommendation 1. Concurrence.

Bureau of Land Management Response. The Bureau stated that, although the appropriate management levels had not been achieved on all herd management areas, most herds in Colorado, Idaho, Montana, New Mexico, and Oregon were at or near the desired

populations. The Bureau also stated that it had adopted a Strategic Plan in 1992, which included a 9-year plan to achieve appropriate management levels, and that since 1992, while operating under the Plan, it had "steadily reduced" the percentage of excess animals each year. Further, the Bureau stated that, while the appropriate management levels had decreased from 28,527 to 26,912, the estimated population had decreased from 54,804 to 42,138 (from about 92 percent excess to 56 percent excess).

The Bureau also noted that the Wild Horse and Burro Emergency Evaluation Team reviewed the procedures for establishing the appropriate management levels and made recommendations which included: (1) establishing the levels by using the best available data with full disclosure and public participation through the National Environmental Policy Act; (2) defining levels for herd management areas as a single number with an acceptable range; and (3) reviewing and updating the Strategic Plan to include these recommendations.

The Bureau also stated that it supports and is actively pursuing additional research to gain a "better scientific understanding" of any effects the policy of selective removal may have on the health of the herds. However, the Bureau noted that the policy was developed to address the issue of unadoptable animals without killing "healthy-but-unadoptable" animals or spending public funds to maintain thousands of unadoptable animals in Federal sanctuaries. The Bureau stated that "selective removal is based on the assumption that the best way to deal with unadoptable animals would be to let them remain on the range" and that "both field experience and population modeling have indicated that the policy of selective removal does not prevent wild herds from reproducing successfully and maintaining their populations." Nevertheless, the Bureau said that it is working with the University of Nevada-Reno to initiate a study that assesses the impacts the selective removal policy "might have on herd population dynamics."

The Bureau further stated that it has "actively pursued" research to develop a birth control technology which is "safe and effective, long lasting, easy to administer, cost effective, and has public acceptance." The Bureau also said that it had achieved all of the goals except for "multi-year efficacy" and that it will begin to implement field management trials in fiscal year 1998 of the 1-year single injection while continuing research efforts to develop a single injection, multiyear formula. Also, the Bureau stated that it is "convinced that contraceptive vaccines can serve as a major, cost-effective tool" for maintaining appropriate management levels but that even with the use of immunocontraceptive vaccines, it anticipates "a positive growth" in many herds which will still require gathers and adoptions, "although at reduced levels." The Bureau stated that it, and more recently the National Biological Service, has "supported directly" the effort to "research and develop an effective . . . vaccine." The Bureau said that it is working directly with the Ohio Medical College on fertility research, with the research portion of the funding coming from the Biological Service (now the Biological Service Division of the U.S. Geological Survey) and funds for field implementation of the research coming from the Bureau. The Bureau also noted that it had

recently announced the formation of a new Wild Horse and Burro Advisory Board, which "will assist [the Bureau of Land Management] in meeting this recommendation."

Office of Inspector General Reply. Although the Bureau concurred with this recommendation, it primarily addressed its past and current program actions, which, as stated in our report (page 9), will not result in the Bureau's achieving appropriate management levels by the year 2001. As stated in our report (page 9), the Bureau, using current trends, is removing an average of 7,900 animals per year, as compared to an estimated growth of 7,600 animals per year. An estimated net removal of 300 animals per year will not significantly reduce the estimated 15,226 excess animals by the year 2001.

At our June 24, 1997, conference, Bureau officials agreed that the Bureau's historical removal rates of approximately 7,900 animals would be insufficient to achieve appropriate management levels by 2001. At the conference, these officials also told us that the Bureau planned to increase removals and subsequent adoptions to 10,000 animals per year. In that regard, the Bureau stated that in order for the increased level of removals and adoptions to succeed, the Bureau must be supported by an increase in its use of volunteers in the Adopt-A-Horse Program. However, we are concerned that the Bureau will not be able to administer such an increased level of removals and that there may not be an annual adoption demand for 10,000 animals. We base these concerns on the Bureau's past experience when it increased removal levels from 1985 to 1987. The Bureau could not place all of the animals through its adoption program. As a result, it was forced to establish sanctuaries, which were expensive to maintain, to care for these excess unadopted animals. In addition, during the conference, the Bureau did not offer any contingency plan for handling the excess unadoptable animals that may result when it increases its removal level to 10,000 animals per year.

The Bureau stated that five states are at or near the appropriate management levels. However, these states represent only 8 percent of the wild horse and burro populations on public lands, and as shown in Appendix 4, only two of these states are below the desired populations, while the remaining three states are 40 to 79 percent above the desired populations.

The Bureau stated that it had reduced the estimated population from 54,804 animals in 1992 to the current level of 42,138. Although the Bureau said that it had "steadily reduced" the population levels, according to its statistics, the major reduction occurred in 1993, when it reduced the estimated population from 54,804 to 46,462, or by 8,342 animals, in that year (see Appendix 3). In contrast, the Bureau's "Summary of Wild Horse and Burro Removals and Adoptions," dated January 26, 1996, showed that 8,545 animals were removed during 1993. Therefore, the calculated growth level for all herds during 1993 was only 203 animals (8,545 animals removed less 8,342 reduction in population) as opposed to the average reproductive rates of 18 percent per year, or about 7,600 animals. Consequently, this drastic reduction in the growth rate appears to indicate that the Bureau's population statistics were inaccurate. Also, the Bureau's Strategic Plan stated that the appropriate management level

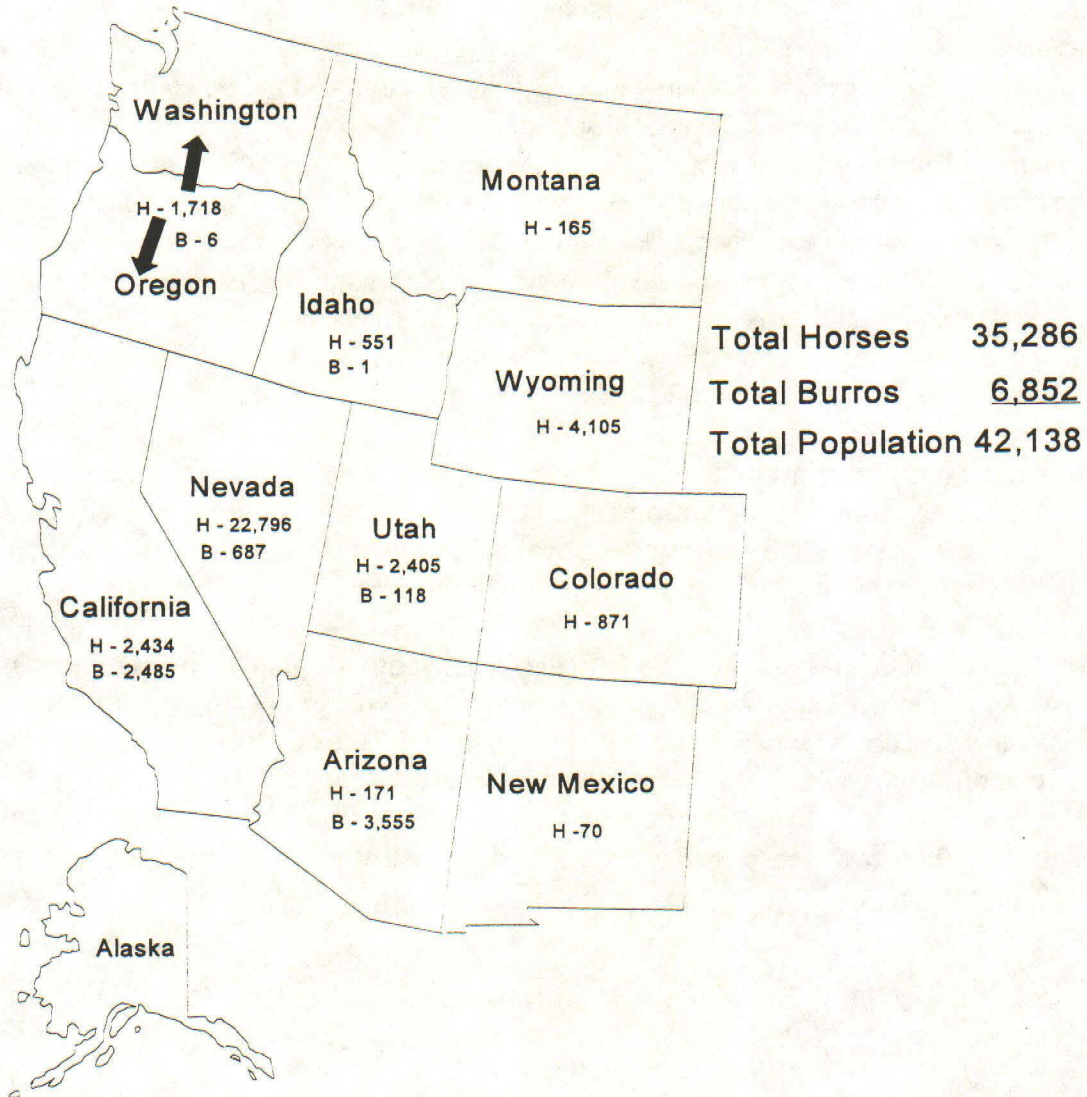
would be reached in 6 years from the date that the Plan was implemented, or in 1998, not in 2001, as stated in the Bureau's response.

We commend the Bureau and its Wild Horse and Burro Emergency Evaluation Team for their efforts, including initiating studies of the selective removal policy and placing increased emphasis on the animal birth control measures. The Bureau correctly noted in its response that the selective removal policy was implemented to address the issue of unadoptable wild animals. However, the policy did not give proper consideration to the effects that the policy might have on the genetic diversity of the animals remaining on public lands, for which the Bureau has management responsibility under the Act. The Bureau's statement that the selective removal policy has not affected the reproductive rate of the herds and has not prevented herds from maintaining their populations does not consider the genetic diversity of the animals born into the herds. Regarding animal birth control measures, we believe that the Bureau should also consider using its appropriated funding to expand the field testing of the new vaccine and seek expedited approval of the vaccine from the Food and Drug Administration. This approach would be a more aggressive effort in developing and implementing a contraceptive vaccine.

Regarding our comments on the Bureau's internal review which noted that genetic defects are becoming more common in some isolated herds in Utah, we did not assert that these defects were caused by the selective removal policy but presented this as another example of why the Bureau needs to monitor the health of the herds.

The Bureau did not respond adequately to the formulation of a plan, including methods and costs, to achieve the appropriate management levels. We believe that the Bureau should consider revising its plan because, in our opinion, the Bureau will not reach the desired population by the year 2001 under its current approach. Therefore, we request that the Bureau provide additional information on the actions it plans to take, as indicated during the June 24, 1997, conference, including target dates and titles of officials responsible for implementation.

Wild Horse and Burro Populations
(Estimated at 9/30/96)



Key: H - Number of Horses; B - Number of Burros

Alaska has no horse or burro populations.

WILD HORSE AND BURRO PROGRAM EXPENDITURES

	<u>1992</u>	<u>1993</u>	<u>1994</u>	<u>1995</u>	<u>1996</u>	<u>Total</u>
Program Management	\$5,717,000	\$6,799,800	\$7,859,200	\$7,189,500	\$5,749,100	\$33,314,600
Removal	2,057,000	3,189,300	2,532,100	3,472,300	6,321,100	17,571,800
Adoption	<u>6,802,000</u>	<u>5,938,100</u>	<u>6,227,100</u>	<u>5,858,900</u>	<u>3,779,100</u>	<u>28,605,200</u>
Total	<u>\$14,576,000</u>	<u>\$15,927,200</u>	<u>\$16,618,400</u>	<u>\$16,520,700</u>	<u>\$15,849,300</u>	<u>\$79,491,600</u>

Program Management

Program management expenditures include costs of managerial direction, policy and program development, training, office operations, personnel transfers, development of wild horse population and range data, research and development, environmental planning work, herd management area planning, monitoring, and project development.

Removal

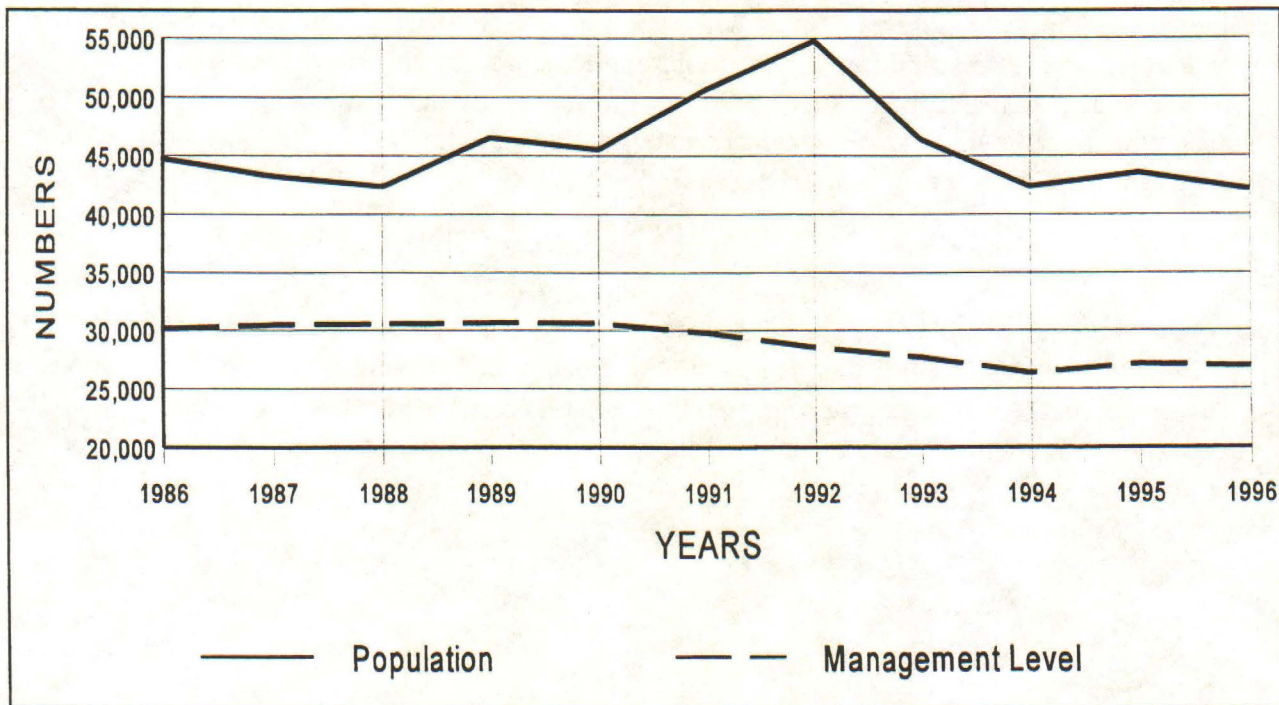
Removal costs include those associated with capturing and transporting animals to facilities where they are prepared for distribution or relocation to other areas of public land; capturing, sorting, and removing excess animals; and destroying old, sick, and lame animals in the field. Removal costs also include planning animal removals; conducting site analyses; designing, constructing, and maintaining capture facilities; performing capture and relocation operations; and destroying animals.

Adoption

Adoption costs include those for animal disposition, titling, and complying with laws and regulations related to the public's actions in connection with the adoption of wild horses and burros. Animal disposition includes feeding, testing, treating, marking, and transporting animals; planning, publicizing, conducting, and evaluating disposal activities; and designing, constructing, and maintaining distribution facilities.

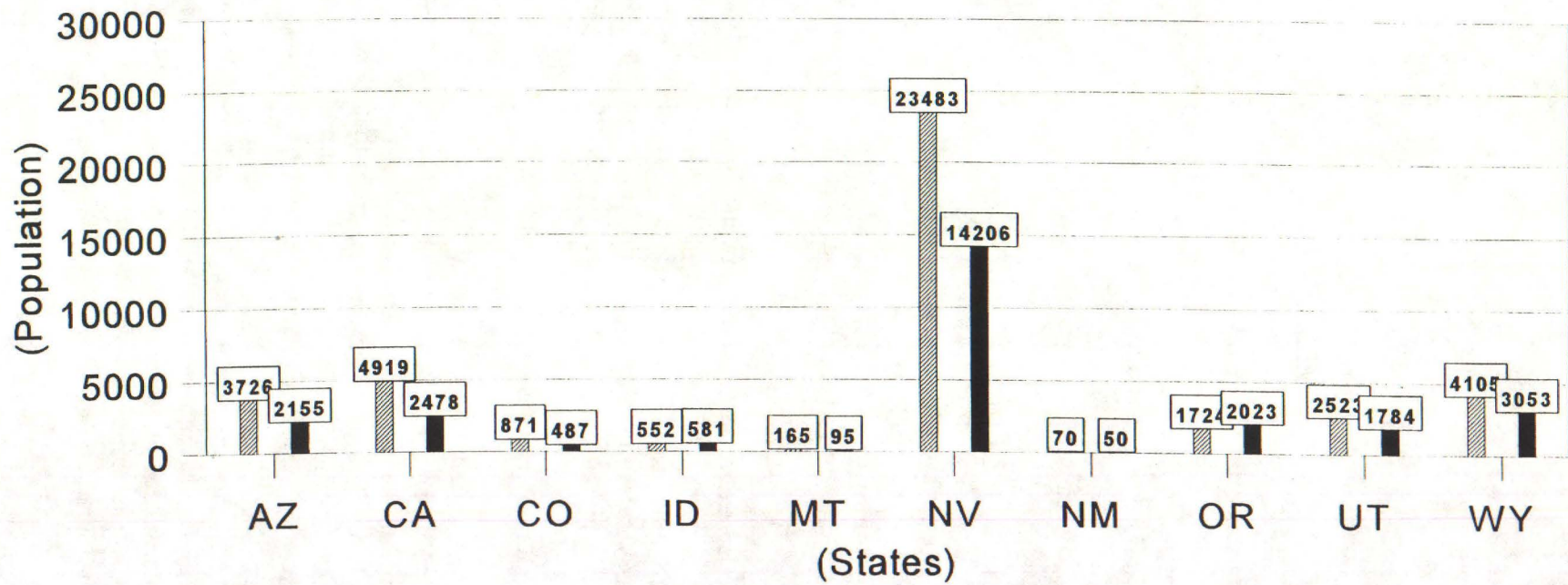
**WILD HORSE AND BURRO*
POPULATION HISTORY -
FISCAL YEARS 1986 THROUGH 1996**

YEAR	POPULATION ON PUBLIC LANDS	APPROPRIATE MANAGEMENT LEVEL	EXCESS ON PUBLIC LANDS	PERCENT OF EXCESS
1986	44,763	30,158	14,605	48.43
1987	43,286	30,477	12,809	42.03
1988	42,347	30,554	11,793	38.60
1989	46,549	30,646	15,903	51.89
1990	45,541	30,607	14,934	48.79
1991	50,697	29,797	20,900	70.14
1992	54,804	28,537	26,267	92.05
1993	46,462	27,737	18,725	67.51
1994	42,410	26,334	16,076	61.05
1995	43,593	27,153	16,440	60.55
1996	42,138	26,912	15,226	56.58



*Source: Bureau of Land Management.

**Wild Horse and Burro Populations and
Appropriate Management Level by State as of September 30, 1996**



Estimated Population



Appropriate Management Level

BUREAU OF LAND MANAGEMENT
Washington, D.C. 20240

June 3, 1997

In Reply Refer To:
1245 (220)

MEMORANDUM

To: Assistant Inspector General of Audits

Through: Bob Armstrong *Piet deWitt* JUN - 4 1997
Assistant Secretary, Land and Minerals Management

From: *ACTING FOR* ^{FO}Director, Bureau of Land Management *Mat Millenbach*
Mat Millenbach

Subject: Response to the Office of Inspector General's Draft Report on "Management of Herd Levels, Wild Horse and Burro Program. Bureau of Land Management," Report No. C-IN-BLM-004-96b, April 1997

Thank you for the opportunity to respond to the draft audit report on the management of herd levels in the Wild Horse and Burro Program. Our specific response to your recommendations is attached.

As you are aware, the Bureau of Land Management (BLM) is responsible for the management and care of some 42,000 federally protected, free-roaming wild horses and burros on the western public rangelands. It gathers thousands of animals each year to balance the number of animals with available forage and water, and offers the excess animals for adoption to people who commit to providing them with good homes.

We recognize that this highly controversial program has its shortcomings, as you have identified in the draft audit report, such as difficulty in the placement of gathered animals, the lack of an effective birthrate control system, and the need for a further understanding of herd population dynamics. However, during the past 5 years, we have made meaningful progress in establishing appropriate management levels (AMLs), reducing overpopulated herds to within their AML, and finding homes for those animals that have to be removed from the rangelands. Our goal is to reach AMLs Bureauwide within the next 4 years while ensuring that all animals removed from the rangelands are properly and humanely cared for.

We take our responsibility for the management of America's wild horse and burro heritage seriously. We have recently instituted several changes to strengthen the program across the board. These changes include increased onsite compliance inspections of untitled animals, improving the system for tracking the animals after they are gathered from the rangelands, increased employee training, and increased management oversight and accountability.

These and other improvements in the Wild Horse and Burro Program are already underway. These actions reflect our commitment to protect wild horses and burros on the public lands, protect the lands themselves, and ensure that all wild horses and burros receive sensitive and humane treatment. The animals and the public deserve no less. We appreciate your help in identifying areas where we can improve this important program.

Questions to our response may be addressed to Tom Pogacnik at the Wild Horse and Burro National Program Office at 702-785-6583 or Gwen Midgette, BLM Audit Liaison Officer, at 202-452-7739.

Attachment

**RESPONSE TO DRAFT AUDIT REPORT
MANAGEMENT OF HERD LEVELS,
WILD HORSE AND BURRO PROGRAM, BUREAU OF LAND MANAGEMENT
(Report No. C-IN-BLM-004-96b)**

Recommendation 1. Implement a plan which details methods and costs for achieving appropriate management levels for wild horses and burros on public lands. At a minimum, the plan should address:

- The development of a removal policy, supported by sufficient data, which will remove excess wild horses and burros without adversely affecting the health of herds that remain on public lands.

- The use of birthrate controls, including an aggressive plan to complete testing and obtain expedited approval for the contraceptive vaccine, as a method to reduce future excess wild horse and burro populations.

Comment: Concur. In order to achieve a proper balance between the needs of the herds and other public land resources, appropriate management levels (AML's) must be reached. Although AML's have yet to be achieved on all herd management areas, most herds in Colorado, Idaho, Montana, New Mexico, and Oregon are at or near the desired population. Progress toward achieving AML's has been slowed by statutory provisions and funding constraints that have limited the options for dealing with unadoptable animals as acknowledged in the Office of Inspector General's (OIG) draft audit report. However, since 1992, the Bureau of Land Management (BLM) has successfully maintained a schedule for achieving AML's, Westside, by the year 2001.

In 1992, the BLM adopted a Strategic Plan for Management of Wild Horses and Burros on Public Lands, which set out a 9-year action plan to achieve AML's. At that time, the total AML was 28,527 and the actual population was estimated to be 54,804 (192 percent of the total AML or 92 percent excess). Since 1992, while operating under the Strategic Plan, the BLM has steadily reduced the percentage of excess animals each year. At the same time, the total AML has declined from 28,527 to 26,912 due to the effects of prolonged drought on vegetation conditions in portions of the Great Basin. Current population is estimated to be at 42,138 (56 percent excess). The BLM expects to maintain the schedule set out in the Strategic Plan and to achieve AML's on all public lands by 2001.

The BLM's Wild Horse and Burro Emergency Evaluation Team reviewed the procedures for establishing AML's and made recommendations which included that AML's be established using the best available data with full disclosure and public participation through the National Environmental Policy Act, that AML's be defined for herd management areas as a single number with an acceptable range, and that the Strategic Plan be reviewed and updated to include these recommendations.

We agree that it is desirable to gain a better scientific understanding of any effects the policy of selective removal may have on the health of the herds. We support, and are actively pursuing, additional research on this topic. However, it is important to understand the reasons why selective

removal was initially adopted. *The selective removal policy was developed in an effort to address the issue of unadoptable animals, making it possible to achieve AML's without killing healthy-but-unadoptable animals or spending public funds to maintain many thousands of unadoptable animals on Federal sanctuaries.* The Congress has prohibited humane destruction of unadoptable animals; the General Accounting Office and OIG have recommended against placing unadoptable animals on sanctuaries; and the public has been unwilling to adopt older animals. Selective removal is based on the assumption that the best way to deal with unadoptable animals would be to let them remain on the range to live out their lives. Both field experience and population modeling have indicated that the policy of selective removal does not prevent wild herds from reproducing successfully and maintaining their populations. Indeed, under the selective removal policy, wild horse herds have continued to increase at a rate of approximately 18 percent per year. Computer modeling using the Wild Horse and Burro Population Model developed by the University of Nevada, Reno (UNR) to evaluate the potential long-term effects of herd growth and reproduction has indicated that wild horse herds retain reproductive viability even with a predominantly older-aged population. Nevertheless, we plan to increase our efforts in assessing the impacts BLM's selective removal policy might have on herd population dynamics. We are currently working with the UNR to initiate such a study.

The BLM has actively pursued research into the development of birth control technology that is safe and effective, long lasting, easy to administer, cost effective, and has public acceptance. Our research has achieved all of the goals except for multi-year efficacy. In Fiscal Year (FY) 1998, the BLM will begin implementing field management trials of a single-injection, 1-year, immunocontraceptive vaccine while continuing an aggressive research effort to develop a single-injection, multi-year, formulation.

The BLM supports continued research in this area, including large-scale field trials. We are convinced that contraceptive vaccines can serve as a major, cost-effective tool for maintaining AML's. However, even with the use of immunocontraceptive vaccines, we anticipate there will be a positive growth rate in many herds. As a result, there will remain a need for gathers and adoptions, although at reduced levels.

The effort to research and develop an effective immunocontraceptive vaccine has been financially supported directly by the BLM and, more recently, by the National Biological Service (NBS) and the Biological Service Division of the U.S. Geological Survey. The NBS was created to be the biological research arm of the Department of the Interior. Funding and personnel were transferred from BLM to NBS when the agency was created, with the understanding that BLM research would henceforth be carried out by NBS. The BLM expended funds on wild horse fertility research prior to the creation of the NBS, and continues to do so. The BLM is currently working directly with the Ohio Medical College on fertility research. The research portion of the funding is coming from NBS. Funding for field implementation of the research is being paid by BLM.

The BLM has recently announced the formation of a new Wild Horse and Burro Advisory Board; and plans to have members identified by the end of the fiscal year. This Board will assist the BLM in meeting this recommendation.

Recommendation 2. Establish requirements to collect and analyze comprehensive data on the health of the wild horse and burro herds on public lands and ensure that this information is considered in making Program decisions.

Comment: Concur. The BLM monitors the rangeland vegetation conditions within all herd management areas. It has been our observation that the health of the animals is directly related to the health of the land that they occupy and use. Our rangeland monitoring data are used to help establish AML's. In addition, our Wild Horse and Burro Specialists monitor the condition of the wild horses and burros, both during their visits to the herd management areas and again at the time the animals are gathered to prevent overpopulation of the available habitat.

We believe that monitoring of animal condition is important and that our field observations should be recorded in a consistent and retrievable manner through a data base. The BLM's Wild Horse and Burro Emergency Evaluation Team also made this recommendation.

At present, the age and gender of all animals gathered are routinely recorded during gathering operations. In addition to this, the Group Manager for Rangeland, Soils, Water, and Wild Horses and Burros has the responsibility to develop a team, including external scientific advisors, to establish procedures for collecting and recording data regarding the physical condition of the wild horses and burros handled during gathering operations. This could include identifying the condition classification of the animal, listing physical defects or injuries, and periodically drawing blood for genetic analysis. All of the data would be collected in a manner that allows for entry into a data base, allows easy access and retrieval, and facilitates scientific analysis. The BLM anticipates these procedures will be in place for the FY 1998 gathering season.

Finally, we would like to clarify that the selective removal policy had not been implemented on the Chloride Herd Management Area prior to the Wild Horse and Burro Technical Program Review performed in Utah in May 1994. Therefore, the selective removal policy could not have been the cause of genetic defects to this herd. The reference in the Technical Program Review dealt with maintaining genetic diversity in small herd areas.

STATUS OF AUDIT REPORT RECOMMENDATIONS

<u>Finding/Recommendation Reference</u>	<u>Status</u>	<u>Action Required</u>
1	Management concurs; additional information needed.	Provide an action plan that includes target dates and titles of officials responsible for implementation.
2	Resolved; not implemented	No further response to the Office of Inspector General is required. The recommendation will be referred to the Assistant Secretary for Policy, Management and Budget for tracking of implementation.

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