

# ILF Program Evaluation

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# The central questions are:

- Is the program **meeting** its goals and objectives?
- Is it operating **effectively** and **transparently**?

Two subsidiary questions:

- Is it providing **appropriate** & **timely** compensation?
- Are operations **accounted** for appropriately?



# What is meant by *appropriate* and *timely* compensation?

Projects are:

- **Located** to offset permitted losses 33 CFR 332.8(c)
- Of an **appropriate resource type** to offset losses 33 CFR 332.8(c)
- Implemented within **3 growing seasons of debit** of advance credits 33 CFR 332.8(n)(4)



# What should be *accounted* for?

- Funds
- Advance credit fee schedules
- Crediting/Debiting



# Accounting for funds 33 CFR 332.8(i)

- ILF program account contains *only* mitigation fees
- *Other* sources of *funds* are clearly identified
- *Earnings* are identified
- Receipts and expenditures tracked by *resource type* and *service area*
- Funds are managed in accordance with generally accepted accounting principles



# Advance credit fee schedules

- Are fees sufficient to fund operations?
- How often is the fee schedule revised?
- Are administrative fees sufficient to fund operations?

Fee Category	Unit	Fee per Unit - Higher Fee HU	Fee per Unit - Lower Fee HU
Riparian Buffer	Sq.ft	\$1.11	\$1.11
Stream	Lin.ft	\$390	\$296
Non-riparian wetland	Acre	\$51,370	\$26,418

# Accounting for crediting activity

- Are all *credit releases & debits* of advance & released credits shown in the ledgers?
- Are all *permits* associated with debits shown in the ledger?
- Are debited advance credits associated with the appropriate ILF projects?
- Is the association of debited advance credits with ILF projects timely?



# Tools for evaluating program performance

- Annual program reports:
  - Program account (financial) reporting 33 *CFR* 332.8(i)(3)
  - Ledger (credit) reporting - 33 *CFR* 332.8(q)(1)
- Annual financial assurances & long-term management funding report - 33 *CFR* 332.8(q)(3)
- Program Audit – financial and programmatic  
33*CFR* 332.8(i)(4)
- RIBITS



**RIBITS**

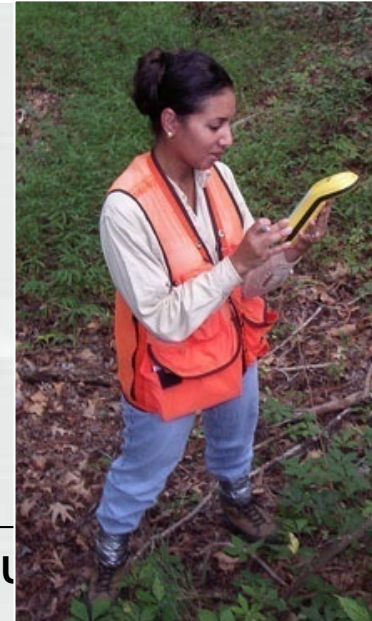
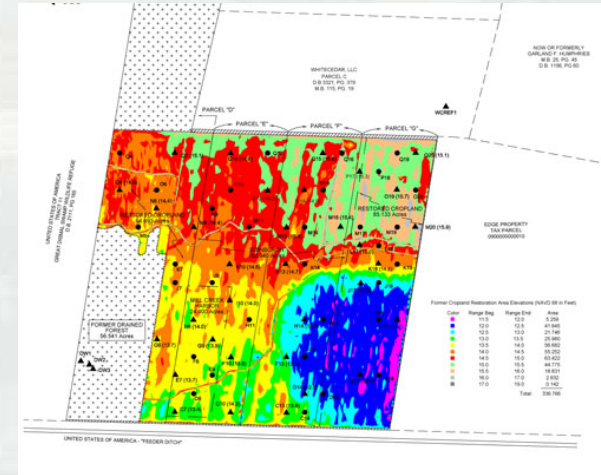
Regulatory In-lieu Fee and Bank Information Tracking System





# Tools for evaluating project performance

- As-built drawings  
33 CFR 332.6(c)(1)
- Monitoring reports 33 CFR 332.6(c)
- Site visits 33 CFR 332.6(a)(3)
- Credit transaction notification  
33 CFR 332.3(l)(3)



# Thank you!

