

From: [Darrell Echols](#)
To: [Mike Murray](#)
Subject: Fw: ORV orientation film
Date: 06/17/2010 03:13 PM
Attachments: [Interior Cost Recovery Policy.doc](#)

Mike,

I followed up with Pat Bentley regarding what I thought I heard at the SUP training. What I recalled related to a filming SUP only and not general SUP's. See her guidance below. It appears that the SUP route is still the correct path to go.

Darrell

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----- Forwarded by Darrell Echols/CAHA/NPS on 06/17/2010 03:01 PM -----

**Patricia
Bentley/PHILADELPHIA/NPS**

To: Darrell Echols/CAHA/NPS@NPS
cc

06/16/2010 11:23 AM

Subject: Re: Fw: ORV orientation film 

There is no impediment to using PWE 318 funds in any way you choose within the meaning of "credit to the account current at that time" (16 U.S.C. 3a). You may be confused with the location fee guidance under filming, which does have a provision that the funds can only be used as "fee demonstration" monies would have been, i.e. resource management, maintenance backlog, etc. Those funds cannot be used to hire permanent employees.

One of the issues with permit funds is that you cannot rely on that source of funding. If gasoline goes up to \$5 a gallon, the use would dry up. If the use area gets closed for whatever reason, say you found ordinance buried in the sand, many people would drop the permit rather than move to another SUP area, reducing your collections.

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You just need to be careful that you charge for the acts of permitting and monitoring ORV use, rather than the beach permit program. The Department of the Interior policy on cost recovery is attached.



Interior Cost Recovery Policy.doc

I hope this helps.

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Cost Recovery Policy
Departmental Manual Chapter 346

4.2 **Policy.** Costs associated with processing right-of-way applications, issuing grants and permits, and administering grant and permit provisions must be accumulated in such a manner to withstand dispute in a court of law. Billings must be adequately supported by internal cost records in sufficient detail to leave no doubt as to the purpose for which the costs were incurred. Consistent procedures must be followed to (a) coordinate activities and provide a mechanism for resolution of disputes, (b) authorize work and incur costs under an approved work plan, (c) ensure that estimated and actual billings do not materially understate or overstate bureau or office costs, (d) ensure that items of costs billed are traceable to a documented entry (i.e., contracts; travel vouchers; time and attendance reports), and (e) ensure that items of cost are continually reviewed as to accuracy, completeness, and appropriateness.