
PENNSYLVANIA DEPARTMENT OF THE AUDITOR GENERAL



Pennsylvania Auditor General



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Auditor General DeFoor: DCNR Ignored its Internal Policies and Procedures When Awarding Grants for Conservation Projects

HARRISBURG, Pa. – Auditor General Timothy L. DeFoor today released an audit of the Department of Conservation and Natural Resources (DCNR) that showed it did not award all Community Conservation Partnerships Program (C2P2) grants competitively, instead using its own discretion when awarding some grants despite advertising it as a competitive process. “We found instances where DCNR executive management made the decision to award grants to applicants who missed application deadlines, funded projects that were ranked lower than others or ignored the ranking all together,” Auditor General DeFoor said. “This is very concerning because DCNR’s executive management opened the door to outside pressure and influence in awarding state grants by not solely relying on the advertised process. When management can make its own rules, it diminishes the integrity of a grant program.”

The audit, which included grants issued between July 1, 2021, through June 30, 2023, had three objectives:

- Determine whether DCNR complied with applicable laws, regulations, internal policies, guidelines, and manuals relevant to the awarding of C2P2 grant monies;
- Determine whether the C2P2 funds and grant expenditures are accurate, adequately supported, and used for their intended purpose; and
- Ensure that DCNR adequately monitored each grantees’ performance, ensured proper submission of progress reports, and performed post-completion site inspections required for certain C2P2 projects as stipulated by applicable laws, regulations, program requirements, guidelines and manuals.

Auditors had three findings in the audit, which include:

- **While DCNR claims its C2P2 grant award process is competitive, certain grants were not competitively awarded. Opportunities exist to enhance accountability and transparency in DCNR’s grant award process.** Although the C2P2 grant program is structured and advertised as a competitively awarded grant process, not all C2P2 grants were awarded based on the project evaluation, scoring and ranking process set forth in the program guidelines. DCNR accepted grant applications submitted late and awarded grants for those projects; awarded grants to lower-ranked projects instead of projects ranked higher; and executive management awarded grants for certain projects

regardless of internal recommendations and project rankings, suggesting other factors may have impacted those decisions, such as outside influence or pressure.

- **DCNR improved its monitoring of C2P2 grant expenditures and should continue to evaluate its procedures to identify and implement changes that strengthen its grants process.** DCNR's conversion to a new electronic records system improved its oversight of C2P2 grant expenditures for grants issued after the system was in place. However, DCNR lacked certain documents in the hardcopy files maintained for older grants that closed during the audit period. DCNR also updated its standard operating procedures to require grantees to upload certain documents to the new system, but only for certain project types. Grantees may submit only summary lists of expenditures for other project types.
- **Despite some monitoring improvements with federally funded C2P2 grant projects, DCNR failed to adequately oversee inspection, documentation, and reporting requirements.**

The C2P2 program provides federal and state grants to municipalities, non-profit organizations and other community-based organizations for conservation projects.

Auditors provided seven recommendations to DCNR to improve the grant process and oversight. These include following existing policies and procedures, using electronic submission of documents to monitor grants and improve oversight of the inspection process for federally funded grants.

"The good news is that we have an agency that is willing to implement change and do better," Auditor General DeFoor said. "DCNR's commitment to supporting these projects is commendable, but these are taxpayer-funded programs. When it comes to spending taxpayer dollars, internal controls and processes must be followed and any practice that undermines objectivity, accountability and transparency must be eliminated."

A media kit with more information on the audit is available on our website:

<https://www.paauditor.gov/media-kit-audit-of-dcnr-community-conservation-partnerships-program/>

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