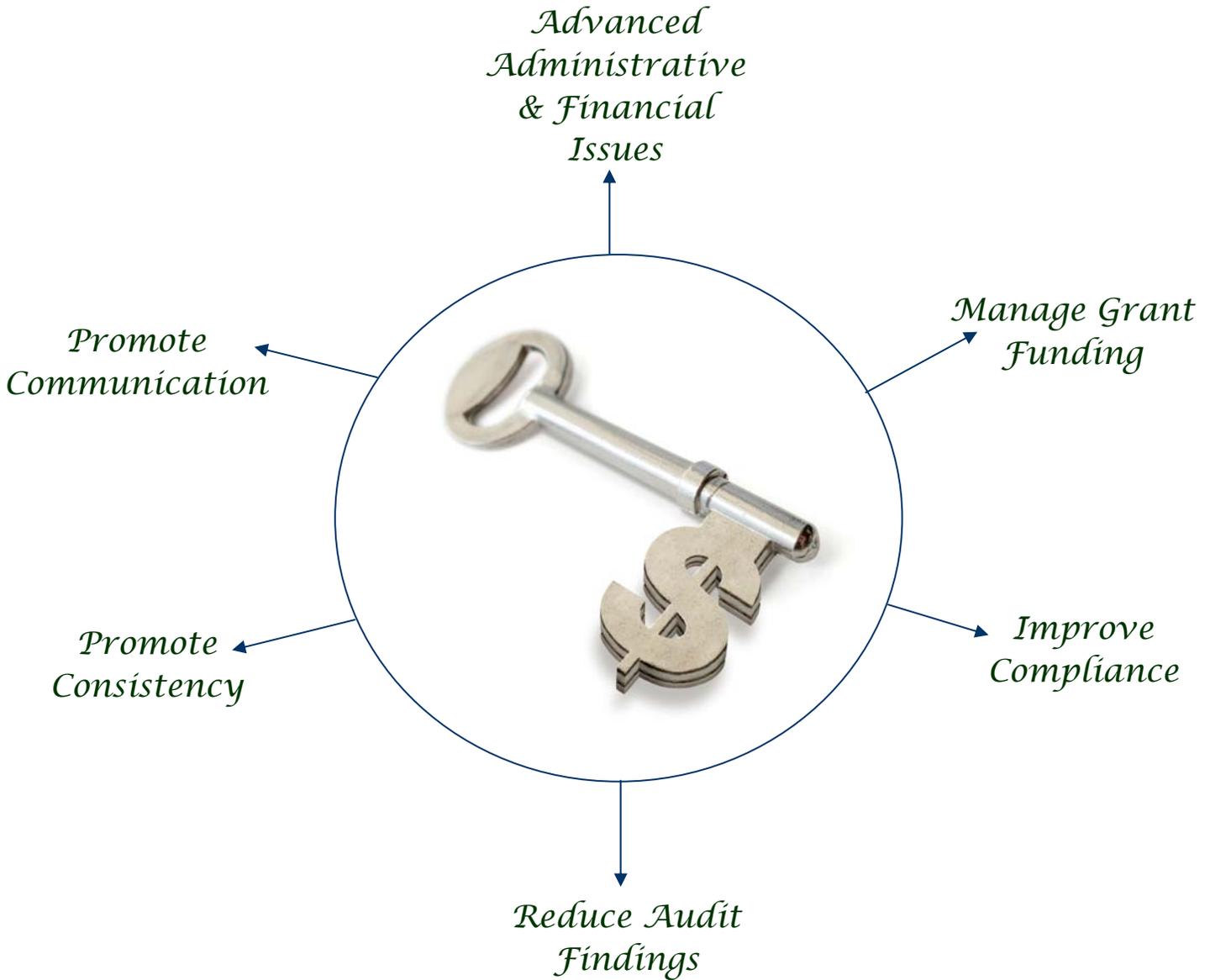


Advanced Grants Management

Course Workbook ~ 2014



October 20 ~ October 23, 2014

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1

Advanced Grants Management Course

Wildlife and Sport Fish Restoration
National Training Program
National Conservation Training Center
Shepherdstown, West Virginia
October 19th – October 24th, 2014

SUNDAY (Travel Day)

Check-in

MONDAY

MORNING SESSION

8:30 a.m. Welcome/Introductions/Getting Acquainted

Review Agenda

Course Goals and Objectives

MORNING BREAK

MORNING SESSION (continued)

IPAD Basics

WSFR Program Requirements

LUNCH

AFTERNOON SESSION

WSFR Program Requirements

AFTERNOON BREAK

AFTERNOON SESSION (continued)

WSFR Program Requirements

Review Day 1/Preview Day 2/Wrap-up

4:30 p.m. Adjourn

TUESDAY

MORNING SESSION

8:00 a.m. Review Day 1/Preview Day 2

Program Income

MORNING BREAK

MORNING SESSION (continued)

Program Income

LUNCH

AFTERNOON SESSION

In-Kind Match

AFTERNOON BREAK

AFTERNOON SESSION (continued)

In-Kind Match

Review Day 2/Preview Day 3/Wrap-up

4:30 p.m. Adjourn

WEDNESDAY

MORNING SESSION

8:00 a.m. Review Day 2/Preview Day 3

Federal Financial Report– Completing SF 425

MORNING BREAK

MORNING SESSION (continued)

Federal Financial Report– Completing SF 425

LUNCH

AFTERNOON SESSION

Real and Personal Property

AFTERNOON BREAK

AFTERNOON SESSION (continued)

Real & Personal Property

4:30 p.m. Adjourn

THURSDAY

MORNING SESSION

8:00 a.m. Review Day 3/Preview Day 4

Financial Systems and Cost Principles

MORNING BREAK

MORNING SESSION (continued)

Financial Systems and Cost Principles

LUNCH

AFTERNOON SESSION

Subrecipient Rules and Monitoring

AFTERNOON BREAK

AFTERNOON SESSION (continued)

Quiz Bowl

Instructor Round Table and Discussion

Course Review/Post-Course Survey/Certificates

4:30 p.m. Adjourn

FRIDAY (Travel Day)

Have a safe trip home!

2

Goals and Objectives

Welcome to USFWS – Wildlife and Sport Fish Restoration Program’s National Training. The goal of training is to:

Provide a systematic and ongoing national training program to develop basic and specialized grants management knowledge and skills that result in the consistent and sensible application of regulations, processes, and decisions in the grant programs administered by WSFR Program

The purpose of the Advanced Grants Management Course is to provide a conceptual and working knowledge of ADVANCED administrative and financial issues in managing grants administered by WSFR Program.

Course Goal

To more effectively manage grant funding, improve compliance with administrative and financial rules and regulations, reduce audit findings, and promote consistency and communication.

Course Objectives

Increase participant’s knowledge, skills, and abilities on

- Funding sources and methods of funds distributed for various grant programs administered by WSFR: and the Acts, Rules, and Regulations governing these grant programs
- Administrative compliance requirements including subrecipient monitoring
- Issues arising from management and monitoring of grant funds, spending mandates, and grant awards
- Accessibility of professional contacts across state and regional boundaries to assist in solving grant administrative and financial issues

3

Objectives:

1. Identify the special conditions, requirements and spending mandates in the Wildlife Restoration and Sport Fish Restoration Acts
2. Explain the requirements and/or mandates relating to Wildlife Restoration Program including hunter education
3. Explain the requirements and/or mandates relating to Sport Fish Restoration Program including aquatic education, freshwater and marine fisheries and boating access
4. Recognize the need for monitoring legislation affecting the State Fish and Wildlife Agency
5. Describe the purpose and process of certifying hunting and fishing license holders and the importance of accurately reporting this information on the annual certification
6. Analyze license counts to be included in an annual license certification in accordance with the rules and regulations
7. Discuss the strategies for allocating and managing the requirements and mandates for both Wildlife Restoration and Sport Fish Restoration
8. Explain how apportionments are obligated for approved grant awards, deobligated, recovered, reverted or returned

License Certification Process

The Wildlife Restoration and Sport Fish Restoration Acts require the States to annually certify the number of persons holding paid licenses to hunt or fish for sport or recreation. The license certification counts are used in the apportionment formula; therefore it is critical that States prepare the license certification correctly.

The State prepares the Annual License Certification in the spring of each year. The information is certified as accurate by the Director of the State fish and wildlife agency

The counts are reviewed by the Washington Office and the Regional Office. If a State's certification shows an increase or decrease of greater than 5% in the number of certified paid license holders, WSFR will request an explanation from the State, determine reasonableness.

Once this process is complete, the license data is used to calculate and produce the apportionment to each State and Territory.

Notes:



50 CFR 80.30-39



Exercise: Preparing the License Certification – Annual Licenses

Using the Toolkit read **50 CFR 80.30-39**. After reading the guidance, answer the questions below for the State of Protection’s annual license certification. The State of Protection’s 2005 annual license sales information can be found on **Handout 3-7**.

1. How would the State of Protection count the X Combination Hunting and Fishing License?

Each holder would be counted once for hunting and once for fishing

50 CFR 80.33

2. What would the State need to do to properly count the H and KK licenses?

The State would have to ensure that the counts do not include duplicates.

Either by having their automated license system eliminated the duplicates or by another valid statistical methods that elements the duplicates.

50 CFR 80.31(3) and (4)

3. Could the State count the O license in the total of paid fishing licenses?

No since the O license requires the purchase of a B or X license these license holders are already counted. The O license sales should be ignored when totaling the paid fishing license holders 50 CFR 80.33

4. Does the price of the H license cause any concern? If so, what specifically is the concern?

50 CFR 80.34 requires that a license produce net revenue to the State to qualify as a paid license for the purpose of the License Certification. The State must be able to document that the license does produce net revenue.



Exercise: Preparing the License Certification – Multiyear Licenses

Answer the questions below relating to the State of Protection’s license certification. The State of Protection’s 2005 lifetime license sales information can be found on **Handout 5-1**. Make sure you read the notes section below the chart.

1. Can the State of Protection count the infant lifetime license holders as paid hunting or fishing license holders? Please explain your answer.

They can count valid licenses. Since the legal status of a license is State law it would depend on the language used in the State law. For example, if the law required Hunter Ed before the license was valid then the State would be required to eliminate for those holders who have not completed Hunter Ed
Is the revenue in close approximation? Do it have to be annual or total?

2. Can the State of Protection count all the adult lifetime license holders? Please support your answer.

No the State would have to eliminate for death using a statistically valid Method. If the State revoked the privileges of lifetime holders if they moved out of state they would also account for those holders.

3. How does the State of Protection demonstrate that the lifetime licenses produced net revenue?

50 CFR 80.35 requires that a license produce net revenue to the State to qualify as a paid license for the purpose of the License Certification. The State must be able to document that the license does produce net revenue.

Wildlife Restoration and Hunter Education Apportionments

Wildlife Restoration

- Distribution based on land/water area and license certification
- Available for 2 years (unused funds must pass safety margins or revert)
- Eligible Wildlife Restoration projects:
 - Restore and manage wildlife for public benefit
 - Research
 - Obtain data to regulate hunting
 - Acquire real property for habitat or access to hunting or other wildlife dependent recreation
 - Build structures, acquire equipment or goods and services for habitat restoration and public access
 - Operate and maintain WSFR funded projects or non-WSFR funded facilities if necessary for WSFR-authorized activities
 - WSFR and other related program grant coordination

States/Territories receive four separate WR apportionments annually

- Wildlife Restoration
- Basic Hunter Ed
- Enhanced Hunter Ed
- Reverted Enhanced HE

Basic Hunter Education

- Distributed based on population
 - Available for 2 years (unused funds must pass safety margins or revert)
 - Eligible Basic HE projects:
 - May use for HE or WR
 - Hunter education (teach knowledge, skills, attitudes)
 - Construct, operate & maintain firearm and archery ranges
-
-

Enhanced Hunter Education

- Distributed based on population (\$8 million set aside)
- Eligible projects include:
 - Enhanced hunter development (introduce and recruit).
 - Enhanced interstate coordination of HE, firearm/archery range program
 - Enhanced programs for education, safety, or hunter and shooter development
 - Enhance construction & development of firearm & archery ranges
 - Update safety features of firearm & archery ranges
- 1 year availability
 - Funds not obligated or unspent for Enhanced HE unless transferred to Wildlife Restoration (if applicable) by the end of the fiscal year will revert
- Must use for Enhanced HE unless all Basic HE funds are used for HE
 - If all Basic HE funds are obligated for HE (no CY funds transferred to WR), Enhanced HE funds may be used on any WR project
 - If all Basic HE funds are obligated for HE (no CY funds transferred to WR), States/Territories are eligible for reverted Enhanced HE funds subsequent fiscal year

Wildlife Restoration Enhanced HE Reverted Funds

- Reverted Enhanced HE funds made available to eligible States/Territories. the subsequent fiscal year
 - Distributed based on WR formula
 - Available for 2 years
 - Shown as separate apportionment
-
-



Learning Points

- ✓ An accurate count of certified license holders is part of the apportionment formula for SFR and WR programs. Inaccurate reporting results in incorrect apportionment amounts and may result in audit findings
- ✓ Lifetime licenses may be counted as long as they provide net revenue to the State and the licensee remains a license holder in the year of certification
- ✓ Basic HE and WR funds are available for 2 years. The funds revert or recover based on safety margins
- ✓ Enhanced HE funds must be used for enhanced hunter education projects and are available for 1 year. After 1 year unobligated or unspent funds are reverted and re-apportioned as 2 year WR funds to eligible States
- ✓ SFR funds must be split between marine and freshwater projects in proportion to the estimated number of resident marine and freshwater anglers
- ✓ The SFR Act mandates at least 15% of the SFR apportionment be spent on boating access in a 5 year period using regional averaging
- ✓ Boating Access funds are available for a 5 year period and will revert or recover based on safety margins
- ✓ Funds used for Aquatic Education may not exceed 15% of the annual apportionment, including both marine and freshwater (Exception are insular territories and the District of Columbia. These may spend in excess of 15% with approval of the Regional Director)
- ✓ SFR funds are available for 2 years. The funds revert or recover based on safety margins. Freshwater, marine and aquatic education funds are one combined safety margin.
- ✓ Reverted funds for SFR are returned to the Trust Fund to be re-apportioned to the States (In addition to 57% distributed for grant programs)
- ✓ SFR funds are available for 2 years. The funds revert or recover based on safety margins. Freshwater, marine and aquatic education funds are one combined safety margin.
- ✓ Reverted funds for SFR are returned to the Trust Fund to be re-apportioned to the States (In addition to 57% distributed for grant programs)

State of Protection 2011 Annual License Sales

License	Description	Price	Count	Revenue
Resident Hunting and Fishing Licenses				
A	Annual Hunting License(Big Game and Small Game)	\$20	50,000	\$1,000,000
B	Annual Fishing	\$20	70,000	\$1,400,000
X	Combination Annual Hunting and Fishing License	\$30	120,000	\$3,600,000
H	6-Day Hunting (Small Game Only)	\$2	10,000	\$20,000
O	Trout Stamp (Annual Fishing License Required B or X)	\$10	70,000	\$700,000
Non-Resident Hunting and Fishing Licenses				
FF	Annual Fishing License	\$40	15,000	\$600,000
EE	Annual Hunting License	\$150	40,000	\$6,000,000
KK	3 – Day Fishing	\$15	50,000	\$750,000
OO	Trout Stamp (Annual Fishing License Required FF)	\$10	10,000	\$100,000

State of Protection Lifetime License Sales

License	Description	Cumulative Sales	2011 Sales	Total License Holders
A-L	Adult Hunting	20,000	2,000	14,000
B-L	Adult Fishing	10,000	1,000	11,000
A- I	Infant Hunting	7,000	1,000	8,000
B-I	Infant Fishing	500	100	600

Notes:

The infant hunting (A-I) and fishing (B-I) is available for purchase for State residents 2 years of age and younger.

State law does not require a license for residents less than 12 years of age or greater 65 years of age.

All lifetime license revenue is deposited into an equity fund. State law specifies the principal shall be held inviolate. The State may use the increased market share for the purposes of administering the State fish and wildlife agency.

Lifetime license holders that no longer reside in the State retain their privileges.



CY Basic HE Appportionment

All Basic Hunter Education current year apportionment fully obligated for Basic Hunter Education projects?

Yes

- **State may use Enhanced HE for Basic HE, Enhanced HE or transfer to WR for use on WR grants.**
- **State is eligible for reverted Enhanced HE funds.**

No

- **State is restricted to use Enhanced HE for Enhanced HE only or revert.**
- **State is ineligible for reverted Enhanced HE funds.**
- **Un-obligated or recovered Basic HE funds will be carried over and may cause concern in subsequent year.**

FY2012 Preliminary Sport Fish Apportionment = \$1,800,000

State of Grace Sport Fish Restoration Grant Information

Grant	Grant Title	Approved by FWS	Start Date	End Date	Total	Approved Federal Share	Approved State Share	Amount Obligated	Unobligated Balance
F-31-D-16	Trout Hatchery Operations	6/14/2011	7/1/2011	6/30/2012	\$2,000,000	\$1,500,000	\$500,000	\$1,500,000	\$0
F-7-D-12	Statewide Fisheries	6/18/2011	7/1/2011	6/30/2012	\$500,000	\$375,000	\$125,000	\$300,000	\$75,000
F-48-R-16	Statewide Fisheries Research	6/23/2011	7/1/2011	6/30/2012	\$400,000	\$300,000	\$100,000	\$0	\$300,000
FW-4-C-18	Coordination	6/25/2011	7/1/2011	6/30/2012	\$200,000	\$150,000	\$50,000	\$0	\$150,000
FW-8-T-5	Technical Assistance	7/6/2011	7/1/2011	6/30/2012	\$100,000	\$75,000	\$25,000	\$0	\$75,000
				Totals	\$3,200,000	\$2,400,000	\$800,000	\$1,800,000	\$600,000

State of Grace Month Project Cost Estimates

Total Project Costs

	F-31-D-16	F-7-D-12	F-48-R-16	FW-4-C-18	FW-8-T-5	Total
July	95,000	45,000	35,000	18,000	8,000	201,000
August	100,000	45,000	30,000	18,000	10,000	203,000
September	110,000	45,000	30,000	20,000	15,000	220,000
October	120,000	50,000	30,000	16,000	10,000	226,000
November	160,000	35,000	30,000	16,000	7,000	248,000
December	160,000	35,000	30,000	16,000	7,000	248,000
January	345,000	35,000	30,000	16,000	6,000	432,000
February	345,000	35,000	30,000	16,000	7,000	433,000
March	210,000	35,000	30,000	16,000	7,000	298,000
April	125,000	35,000	45,000	16,000	7,000	228,000
May	120,000	35,000	45,000	16,000	8,000	224,000
June	110,000	70,000	35,000	16,000	8,000	239,000
Total Costs	2,000,000	500,000	400,000	200,000	100,000	3,200,000

**Sport Fish Restoration
(Freshwater, Marine,
Boating Access)
Apportionment**

**Section 1 (b) (1)
Section 4 (c)
Section 8 (b) (c)**

1

Sport Fish Restoration Section 4 (c)

(c) (e) ~~The Secretary of the Interior, after the distribution, transfer, use, and deduction under subsections (a), (b), (c), and (d), respectively, and after deducting amounts used for grants under section 14, shall apportion the remainder~~ Secretary, for each of fiscal years 2006 through 2009, after the distribution, transfer, use and deduction under subsection (b), and after deducting amounts used for grants under section 14 of this title, shall apportion 57 percent of the balance of each such annual appropriation among the several States in the following manner: 40 percentum in the ratio which the area of each State including coastal and Great Lakes waters (as determined by the Secretary of the Interior) bears to the total area of all the States, and 60 percentum in the ratio which the number of persons holding paid licenses to fish for sport or recreation in the State in the second fiscal year preceding the fiscal year for which such apportionment is made, as certified to said Secretary by the State fish and game departments, bears to the number of such persons in all the States. Such apportionments shall be adjusted equitably so that no State shall receive less than 1 percentum nor more than 5 percentum of the total amount apportioned. Where the apportionment to any State under this

2

**Freshwater / Marine Split
Section 1(b)(1) Funds**

(b) ALLOCATION OF AMOUNTS BY COASTAL STATES BETWEEN MARINE FISH PROJECTS AND FRESHWATER FISH PROJECTS.—

(1) IN GENERAL.—Subject to paragraph (2), each coastal State, to the extent practicable, shall equitably allocate amounts apportioned to such State under this Act between marine fish projects and freshwater fish projects in the same proportion as the estimated number of resident marine anglers and the estimated number of resident freshwater anglers, respectively, bear to the estimated number of all resident anglers in that State.

3

**Sport Fish Restoration
Section 4(c) Funds**

Purpose:

- ◆ **Restoration and management of fish species of material value for sport-fishing and recreation**
- ◆ **Provide facilities that create or add to public access for recreational boating**
- ◆ **Provide aquatic education to public to increase understanding of water resources and associated aquatic life**

4

Sport Fish Restoration

- ◆ **Funds available for 2 years**
- ◆ **Used for Marine or Freshwater**

5

Aquatic Education Limit Sec 8(c)

(c) Each State may use not to exceed 15 percent of the funds apportioned to it under section 4 of this Act to pay up to 75 per centum of the costs of an aquatic resource education and outreach and communications program for the purpose of increasing public understanding of the Nation's water resources and associated aquatic life forms. The non-Federal share of such costs may not be derived from other Federal grant programs. The Secretary shall issue not later than the one hundred and twentieth day after the effective date of this subsection such regulations as he deems advisable regarding the criteria for such programs.

50 CFR 80 amended 4/6/01

**Removed 15% limit for PR, DC CNMI,
Guam, VI, American Samoa**

6

Aquatic Education

- ◆ Provide aquatic education to public to increase understanding of water resources and associated aquatic life
- ◆ Limit of 15% of SFR apportionment

7

Boating Access Mandate Sec 8(b)

b)(1) Each State shall allocate 15 percent of the funds apportioned to it for each fiscal year under section 4 of this Act for the payment of up to 75 percentum of the costs of the acquisition, development, renovation, or improvement of facilities (and auxiliary facilities necessary to insure the safe use of such facilities) that create, or add to, public access to the waters of the United States to improve the suitability of such waters for recreational boating purposes. Notwithstanding this provision, States within a United States Fish and Wildlife Service Administrative Region may allocate more or less than 15 percent in a fiscal year, provided that the total regional allocation averages 15 percent over a 5 year period.(2) So much of the funds that are allocated by a State under paragraph (1) in any fiscal year that remained unexpended or unobligated at the close of such year are authorized to be made available for the purposes described in paragraph (1) during the succeeding four fiscal years, but any portion of such funds that remain unexpended or unobligated at the close of such period are authorized to be made available for expenditure by the Secretary of the Interior in carrying out the research program of the Fish and Wildlife Service in respect to fish of material value for sport or recreation, to supplement the 57 percent of the balance of each annual appropriation to be apportioned among the States under section 4(c).

8

Boating Access

- ◆ Provide facilities that create or add to public access for recreational boating.
- ◆ The Region must ALLOCATE 15% collectively over a 5 year period
 - FY 93 – FY 97
 - FY 98 – FY 02
 - FY 03 – FY 07
 - FY 08 – FY 12

9

Federal Assistance Terms

- ◆ Apportionment - funds available to State based on formula
- ◆ Obligate – set aside funds for grant award
- ◆ De-obligate – reduce funds available for awarded grant
- ◆ Recover – unused balance from closed grant award returned to State’s apportionment
- ◆ Revert – unused balance from closed grant award or never obligated that will not be returned to State’s apportionment
- ◆ Boating Safety Allocation – set aside for mandate

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SFR Apportionment

U.S. FISH AND WILDLIFE SERVICE
FINAL APPORTIONMENT OF DINGELL - JOHNSON
SPORT FISH RESTORATION (CFDA # 15.605) FUNDS FOR FISCAL YEAR 2007

STATE	SPORT FISH RESTORATION*
ALABAMA	\$5,115,720
ALASKA	17,454,453
ARIZONA	7,088,411
ARKANSAS	6,656,089
CALIFORNIA	17,454,453
COLORADO	8,547,935
CONNECTICUT	3,490,891
DELAWARE	3,490,891
DISTRICT OF COLUMBIA	1,163,630
FLORIDA	11,456,826

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Boating Access Mandate

- ◆ The Region must **ALLOCATE 15% collectively over a 5 year period**
- ◆ If Region falls short any State below **15% reverts funds**
 - FY 93 – FY 97 reverts FY 98
 - FY 98 – FY 02 reverts FY 03
 - FY 03 – FY 07 reverts FY 08
 - FY 08 – FY 12 reverts FY 13

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	State A		State B		State C		Region Total		
FY	Appn	Alloc	Appn	Alloc	Appn	Alloc	Appn	Alloc	%BA
03	40K	6K	20K	3K	80K	12K	140K	21K	15%
	15%		15%		15%				
04	40K	6K	40K	3K	80K	12K	160K	21K	13.1%
	15%		7.5%		15%				
05	40K	6K	40K	3K	80K	12K	160K	21K	13.1%
06	40K	6K	40K	3K	80K	12K	160K	21K	13.1%
07	40K	6K	40K	3K	80K	12K	160K	21K	13.1%
Total	200K	30K	180K	15K	400K	60K	780K	105K	13.5%
15% Difference	15K	30K	8.3K	27K	15K	60K		117K	
	0		12K		0			12K	

Reverts

	State A		State B		State C		Region Total		
FY	Appn	Alloc	Appn	Alloc	Appn	Alloc	Appn	Alloc	%BA
03	40K	6K	20K	3K	80K	12K	140K	21K	15%
04	40K	6K	40K	3K	80K	12K	160K	21K	13.1%
05	40K	6K	40K	3K	80K	12K	160K	21K	13.1%
06	40K	6K	40K	3K	80K	25K	160K	34K	21.3%
07	40K	6K	40K	3K	80K	12K	160K	21K	13.1%
Total	200K	30K	180K	15K	400K	73K	780K	118K	15.1%
15% Difference	30K		27K		60K			117K	
	0		12K		13K			1K	
	15%		8.3%		8.3%				

Boating Access

- ◆ Obligate funds that have been allocated
- ◆ Spend funds once obligated

	2002	2003	2004	2005	2006	2007
Carryover	0	2,000	3,000	4,000		
Allocation	5,000	6,000	6,000	6,000		
Recoveries	0	0	0			
Available	5,000	8,000	9,000			
Obligated	3,000	5,000	5,000			
Un-obligated	2,000	3,000	4,000			
Safety Margin	15,000	16,000	17,000			

What happens if money comes back?

- ◆ 2002 grant for \$3,000 closes in FY 2005
- ◆ Only \$2,000 was spent.
- ◆ To be recovered, the remaining \$1,000 must 'pass through' the 2002 safety margin and *each* subsequent safety margin



	2002	2003	2004	2005	2006	2007
Carryover	0	2,000	3,000	4,000	6,000	
Allocation	5,000	6,000	6,000	6,000	6,000	
Recoveries	0	0	0	1,000		
Available	5,000	8,000	9,000	11,000		
Obligated	3,000	5,000	5,000	5,000		
Un-obligated	2,000	3,000	4,000	6,000		
Safety Margin	15,000	16,000	17,000	17,000		
Unused FY02	-1,000	-1,000	-1,000			
	14,000	15,000	16,000			

What happens if funds remaining on a closed grant exceeds the safety margin?

- ◆ Funds not clearing the safety margin revert
- ◆ State loses the funds
- ◆ Reverted funds are returned to USFWS to be apportioned with subsequent SFR funds (57% to States)

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Remember!



Boating Access Safety Margin:

- ◆ establishes maximum amount of funds that may be recovered
- ◆ is established at end of each FY
- ◆ is determined by taking sum of the last 4 years allocations and subtracting the unobligated balance
- ◆ is established as separate from SFR and includes marine and freshwater

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Safety Margins:



- ◆ Unused Balances must “pass through” each Safety Margin, starting with year of obligation, to determine if \$\$ can be recovered and re-obligated
- ◆ Unused Balances that can’t “pass through” the Safety Margin REVERT.

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Allocate \$\$ after apportioned

Obligate \$\$ after allocated

Spend \$\$ after obligated

Close grants in a timely manner

25

Safety Margins

- ◆ **Sport Fish Restoration funds available for 2 years**
- ◆ **SFR Freshwater, Marine and Aquatic Education rollup – one safety margin**
- ◆ **Safety margin process same as WR except: reverted funds return to be re-apportioned to States/Territories**

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Safety Margins

- ◆ **Act mandates 15% over 5 years - regional averaging for Boating Access**
- ◆ **Boating Access separate safety margin**

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**Wildlife Restoration &
Hunter Education
Apportionments**

**Section 4 (b)
Section 4 (c)
Section 10**

1

Wildlife Restoration Section 4 (b)

(b) APPOINTMENT TO STATES.—The Secretary of the Interior, after deducting the available amount under subsection (a), the amount apportioned under subsection (c), any amount apportioned under section 8A, and amounts provided as grants under sections 10 and 11, shall apportion the remainder of the revenue in said fund for each fiscal year among the several States in the following manner: One-half in the ratio which the area of each State bears to the total area of all the States, and one-half in the ratio which the number of paid hunting-license holders of each State in the second fiscal year preceding the fiscal year for which such apportionment is made, as certified to said Secretary by the State fish and game departments, bears to the total number of paid hunting-license holders of all the States. Such apportionments shall be adjusted equitably so that no State shall receive less than one-half of 1 per centum nor more than 5 per centum of the total amount apportioned. The term fiscal year as used in this Act shall be a period of twelve consecutive months from October 1 through the succeeding September 30, except that the period for enumeration of paid hunting-license holders shall be a State's fiscal or license year.

2

**Wildlife Restoration
Section 4(b) Funds (5220)**

Purpose:

- ◆ **restoration, conservation, management & enhancement of wild birds and mammals & their habitat**
- ◆ **provide public use & access to wildlife resources**
- ◆ **provide education of hunters & development of shooting ranges**

Funds have a two year period of availability.

3

Hunter Education – Section 4 (c)

(c) One-half of the revenues accruing to the fund under this Act each fiscal year (beginning with the fiscal year 1975) from any tax imposed on pistols, revolvers, bows, and arrows shall be apportioned among the States in proportion to the ratio that the population of each State bears to the population of all the States; *Provided*, That each State shall be apportioned not more than 3 per centum and not less than 1 per centum of such revenues and Guam, the Virgin Islands, American Samoa, Puerto Rico, and the Northern Mariana Islands shall each be apportioned one-sixth of 1 per centum of such revenues. For the purpose of this subsection, population shall be determined on the basis of the latest decennial census for which figures are available, as certified by the Secretary of Commerce.

4

Hunter Education Section 4(c) Funds (5210)

Purpose:

- ◆ hunter education activities
- ◆ shooting range development/maintenance
- ◆ wildlife restoration activities

Funds have a two year period of availability.

5

Hunter Education – Section 10

SEC. 10. FIREARM AND BOW HUNTER EDUCATION AND SAFETY PROGRAM GRANTS.

(a) In GENERAL.—

(1) GRANTS.—Of the revenues covered into the fund, \$7,500,000 for each of fiscal years 2001 and 2002, and \$8,500,000 for fiscal year 2003 and each fiscal year thereafter, shall be apportioned among the States in the manner specified in section 4(c) by the Secretary of the Interior and used to make grants to the States to be used for—

(A) in the case of a State that has not used all of the funds apportioned to the State under section 4(c) for the fiscal year in the manner described in section 8(b)—

(i) the enhancement of hunter education programs, hunter and sporting firearm safety programs, and hunter development programs;

(ii) the enhancement of interstate coordination and development of hunter education and shooting range programs;

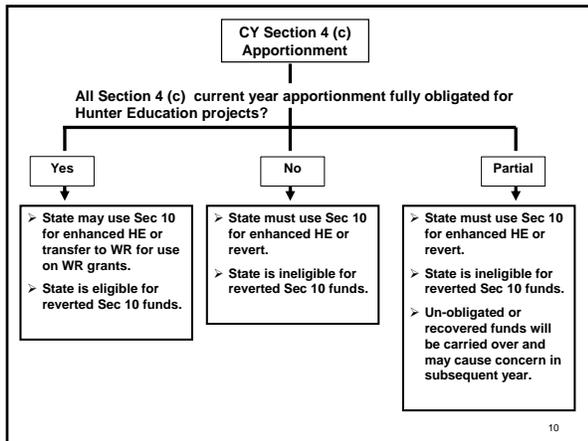
(iii) the enhancement of bow hunter and archery education, safety, and development programs; and

(iv) the enhancement of construction or development of firearm shooting ranges and archery ranges, and the updating of safety features of firearm shooting ranges and archery ranges; and

(B) in the case of a State that has used all of the funds apportioned to the State under section 4(c) for the fiscal year in the manner described in section 8(b), any use authorized by this Act (including hunter safety programs and the construction, operation, and maintenance of public target ranges).

(2) LIMITATION ON USE.—Under paragraph (1), a State shall not be required to use more than the amount described in section 8(b) for hunter safety programs and the construction, operation, and maintenance of public target ranges.

6



Section 4 Hunter Education 5210

2003	
PY Carryovers	\$0
CY Apportionment	\$100K
Transfer to WR 5220	\$100K
Balance	\$0
	\$0 Obligated for HE

Must use Section 10 for HE
Ineligible for Reverted Section 10 in FY 2004

11

Section 4 Hunter Education 5210

2003	
PY Carryovers	\$0
CY Apportionment	\$100K
Obligate Grant A-HE	\$75K
Obligate Grant B-HE	\$25K
Balance	\$0
	CY Apportionment Obligated for HE

FY 2003 May use Section 10 for HE or WR
Eligible for Reverted Section 10 in FY 2004

12

Section 4 Hunter Education 5210		2003	2004
PY Carryovers		\$0	\$0
CY Apportionment		\$100K	\$100K
Obligate Grant A-HE		\$75K	
Obligate Grant B-HE		\$25K	
Obligate Grant C-HE			\$50K
Obligate Grant D-HE			\$25K
Balance		\$0	\$25K
			\$25K carryover

FY 2004 – Must use Section 10 for HE
Ineligible for Reverted Section 10 in FY 2005

Section 4 Hunter Education 5210		2003	2004	2005
PY Carryovers		\$0	\$0	\$25K
CY Apportionment		\$100K	\$100K	\$100K
Obligate Grant A-HE		\$75K		
Obligate Grant B-HE		\$25K		
Obligate Grant C-HE			\$50K	
Obligate Grant D-HE			\$25K	
Obligate Grant E-HE				\$125K
Balance		\$0	\$25K	\$0

FY 2005 May use Section 10 for HE or WR
Eligible for Reverted Section 10 in FY 2006

CY Apportionment Obligated for HE

Section 4 Hunter Education 5210		2003	2004	2005
PY Carryovers		\$0	\$0	\$25K
CY Apportionment		\$100K	\$100K	\$100K
Obligate Grant A-HE		\$75K		
Obligate Grant B-HE		\$25K		
Obligate Grant C-HE			\$50K	
Obligate Grant D-HE			\$25K	
Obligate Grant E-HE				\$100K
Balance		\$0	\$25K	\$25

FY 2005 Must use Section 10 for HE.
Ineligible for Reverted Section 10 in FY 2006

\$75K CY Obligated for HE

Section 4 Hunter Education 5210			
	2003	2004	2005
PY Carryovers	\$0	\$0	\$25K
CY Apportionment	\$100K	\$100K	\$100K
Obligate Grant A-HE	\$75K		
Obligate Grant B-HE	\$25K		
Obligate Grant C-HE		\$50K	
Obligate Grant D-HE		\$25K	
Obligate Grant E-HE			\$100K
Transfer to WR			\$25K
Balance	\$0	\$25K	\$0
			\$75K CY Obligated for HE

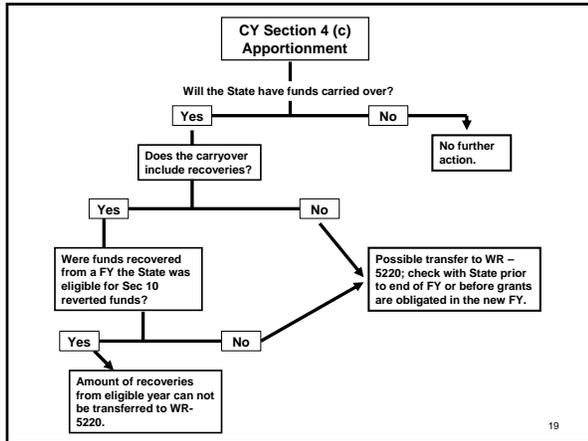
FY 2005 Must use Section 10 for HE. Ineligible for Reverted Section 10 in FY 2006

Section 4 Hunter Education 5210			
	2003	2004	2005
PY Carryovers	\$0	\$0	\$10K
CY Apportionment	\$100K	\$100K	\$100K
Obligate Grant A-HE	\$75K		
Obligate Grant B-HE	\$25K		
Obligate Grant C-HE		\$50K	
Obligate Grant D-HE		\$25K	
Recovery Grant A-HE		\$10K	
Transfer to WR		\$25K	
Balance	\$0	\$10K	\$110K

FY 2004 Must use Section 10 for HE. Ineligible for Reverted Section 10 in FY 2005

Section 4 Hunter Education 5210			
	2003	2004	2005
PY Carryovers	\$0	\$0	\$25K
CY Apportionment	\$100K	\$100K	\$100K
Obligate Grant A-HE	\$75K		
Obligate Grant B-HE	\$25K		
Obligate Grant C-HE		\$50K	
Obligate Grant D-HE		\$25K	
Transfer to WR			\$25K
Obligate Grant E-HE			\$100K
Recovery Grant A-HE			\$10K
Balance	\$0	\$25K	\$10K

FY 2005 May use Section 10 for HE. Eligible for Reverted Section 10 in FY 2006



Obligate All CY Section 4 (c) Apportionment:

- ◆ Allows State flexibility to use Section 10 for enhanced HE or WR
- ◆ Reverted Section 10 funds apportioned the following year
 - FY 02 \$254,683 (apportioned FY 03)
 - FY 03 \$627,877 (apportioned FY 04)
 - FY 04 \$714,016 (apportioned FY 05)
 - FY 05 \$650,553 (apportioned FY 06)
 - FY 06 \$294,971 (apportioned FY 07)
 - FY 07 \$274,078 (apportioned FY 08)

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Wildlife Restoration Apportionment

U.S. FISH AND WILDLIFE SERVICE
FINAL APPORTIONMENT OF PITTMAN-ROBERTSON
WILDLIFE RESTORATION FUNDS FOR FISCAL YEAR 2006

STATE	5220		5210		5231 5232		TOTAL Wildlife + Hunter Ed
	Wildlife*	FY 2005 Sect 10 Reverted Funds	TOTAL	Hunter Education FY 2006 Section 4	FY 2006 Section 10	Hunter Ed	
ALABAMA	\$3,137,755		\$3,137,755	\$763,072	\$180,544		\$4,081,371
ALASKA	9,542,391	34,001	9,576,392	338,121	80,000		9,994,513
ARIZONA	4,539,723		4,539,723	880,358	208,294		5,628,375
ARKANSAS	3,861,000	34,001	3,895,001	338,121	80,000		4,313,222
CALIFORNIA	6,603,025		6,603,025	1,014,361	240,000		7,857,386
COLORADO	5,265,268		5,265,268	738,048	174,624		6,177,940
CONNECTICUT	954,240		954,240	584,356	138,260		1,676,856
DELAWARE	954,240		954,240	338,121	80,000		1,372,361
							5230
							1 year (rollup)
							5200 - 2 years (rollup)

21

Wildlife Restoration Funds

- Funds are available for 2 yrs
- First year of availability is year apportioned
- Funds not obligated in year apportioned, or in following year, *REVERT*
- Funds obligated in year apportioned (if not spent) have 2nd year of availability
- A Safety Margin determines if funds obligated, but not spent, still have a 2nd year to be obligated

WR Rollup

22

	2003		2004		2005		2006	
	Old	New	Old	New	Old	New	Old	New
	500K	300K	500K	400K	500K	100K		
	100K	100K	100K	400K	200K			
	100K	200K			200K			
Oblig. >	200K	300K	100K	400K	400K			
Unob. >	300K	400K	100K	100K				
Safety Margin	200,000	100,000	400,000					

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What happens if money comes back?

- 2003 grant of \$100,000 closes in FY 2006
- Only \$60,000 was spent.
- To be recovered, the remaining \$40,000 must 'pass through' 2003 safety margin and *each* subsequent safety margin



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		2003		2004		2005		2006	
		Old	New	Old	New	Old	New	Old	New
		500K	300K	500K	400K	500K	100K		
		100K	100K	100K	400K	200K	40K		
		100K	200K			200K			
Oblig. >		200K	300K	100K	400K	400K			
Unob. >		300K	400K	100K	100K				
Safety Margin									
Unused		200,000	100,000	400,000					
FY03		-40,000	-40,000	-40,000					
		160,000	60,000	360,000					

25

What happens if MORE money comes back?

- Another \$100,000 2003 grant closes in FY 2006 and only \$25,000 was spent.
- The remaining \$75,000 must pass through the safety margin in order to be recovered.



26

		2003		2004		2005		2006	
		Old	New	Old	New	Old	New	Old	New
		500K	300K	500K	400K	500K	100K		
		100K	100K	100K	400K	200K	40K		
		100K	200K			200K			
Oblig. >		200K	300K	100K	400K	400K			
Unob. >		300K	400K	100K	100K				
Safety Margin									
Unused		200,000	100,000	400,000					
FY03		-40,000	-40,000	-40,000					
		160,000	60,000	360,000					
		85,000	15,000	60,000					

27

15K Reverts
60K passes through the Safety Margin

What happens to reverted funds?

- Returned to USFWS
- Used in Service's Migratory Bird Program

28

What happened to the FY04 Safety Margin?

Safety Margin was reduced to zero balance.

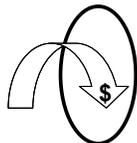
Any additional FY04, or prior, unused balances will revert.

29

What happens to the \$60,000 which passed through the FY05 Safety Margin?

It continues through all subsequent safety margins.

let's track it...



30

Obligate \$\$ after it's apportioned.
(But not more than you plan to spend!)

Spend \$\$ after it's obligated.

Close grants in a timely manner.

Wildlife Restoration Act

11% tax on firearms and ammunition

10% tax on pistols, handguns and revolvers

11% tax on bows, quivers, broadheads, points
\$.45 per arrow shaft

Revenue transferred or deposited to the account

+

Wildlife Restoration Account

Interest earned on fund

-

North American Wetlands Conservation Fund

Deductions from account

-

WSFR Administration
\$\$ based on 2000 Improvement Act

\$3 M
Multistate Conservation Grant Program

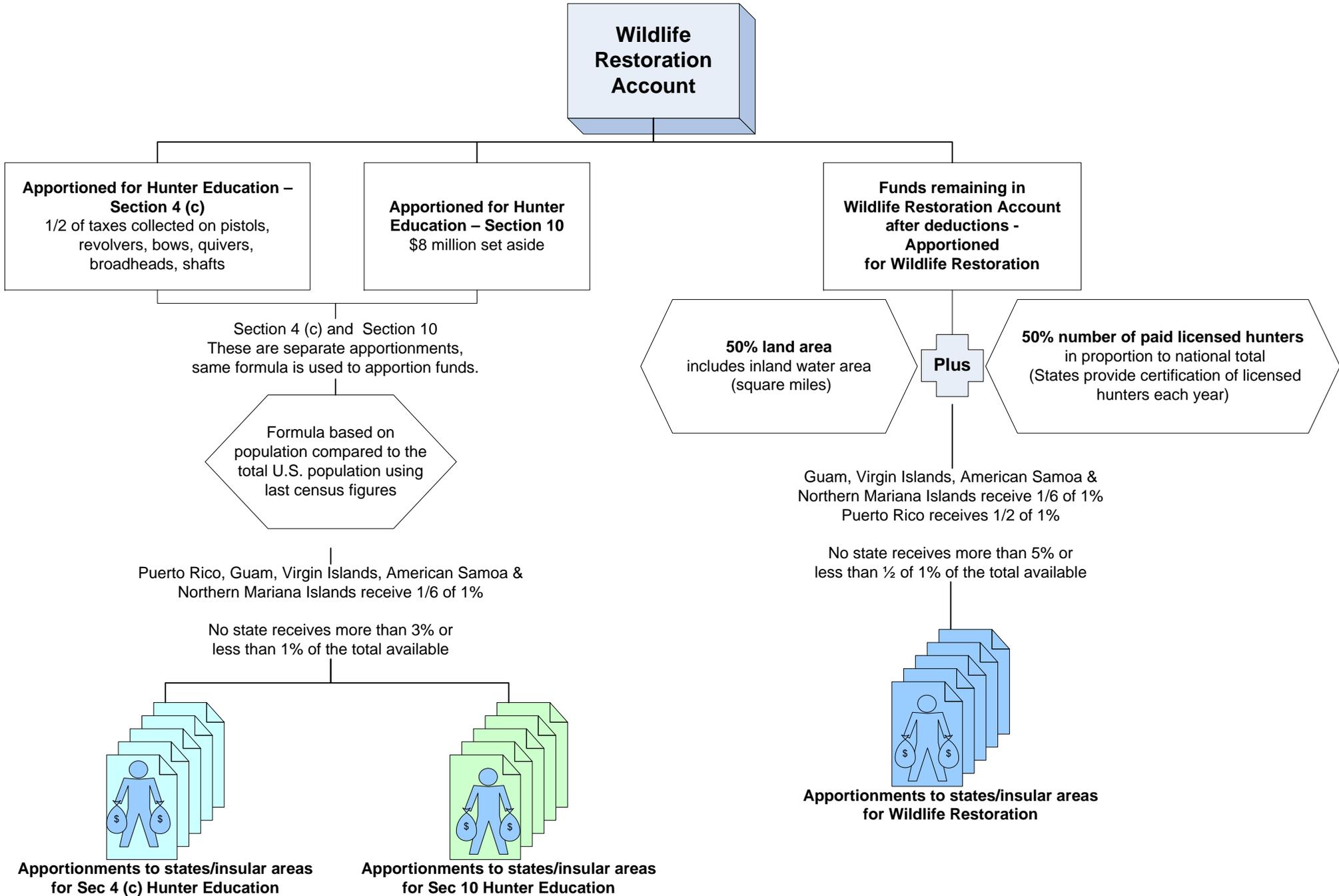
\$8 M
Section 10 Hunter Education & Shooting Range Enhancement

Section 4 (c)
1/2 of taxes collected on pistols, revolvers, bows, quivers, broadheads, shafts, apportioned to states/insular areas
Hunter Education

Distribution of remaining funds

Apportioned to states/insular areas for Wildlife Restoration Program

Wildlife Restoration Program Apportionment Formula

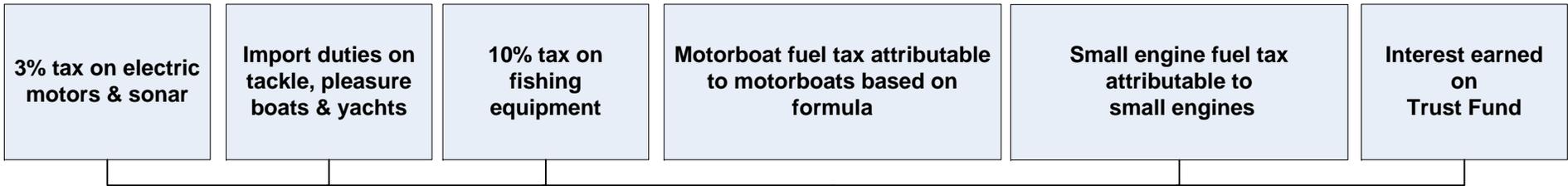


AppORTionments to states/insular areas for Sec 4 (c) Hunter Education

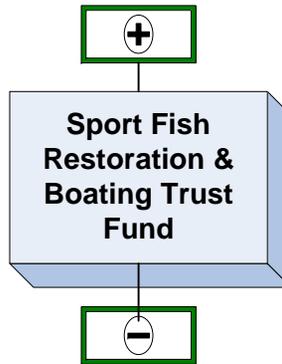
AppORTionments to states/insular areas for Sec 10 Hunter Education

AppORTionments to states/insular areas for Wildlife Restoration

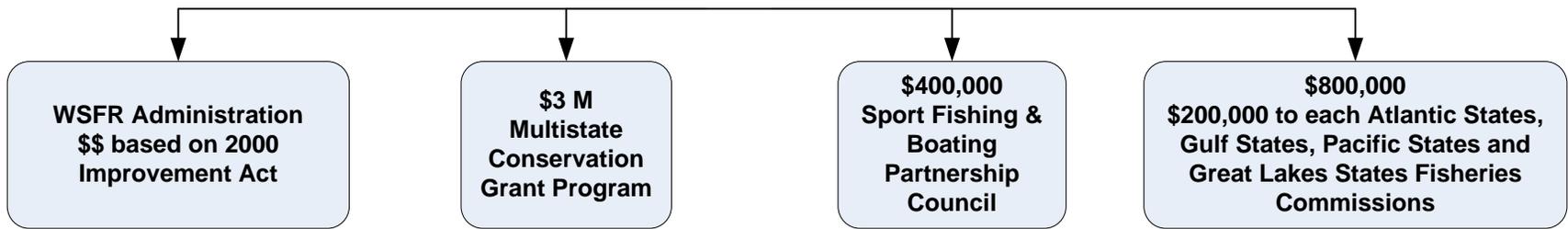
Sport Fish Restoration Act



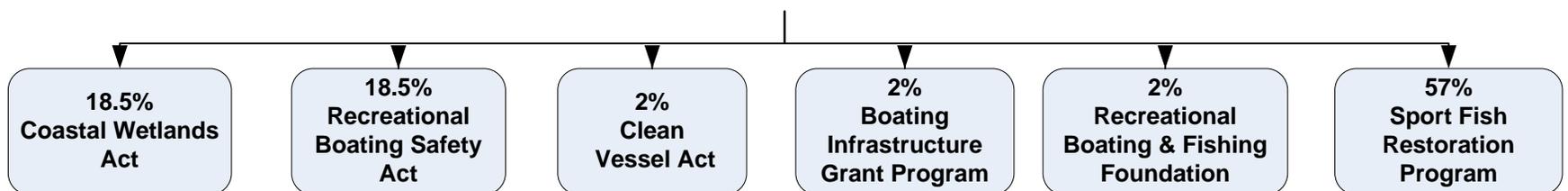
Revenue transferred or deposited to the Trust Fund



Deductions from the Trust Fund



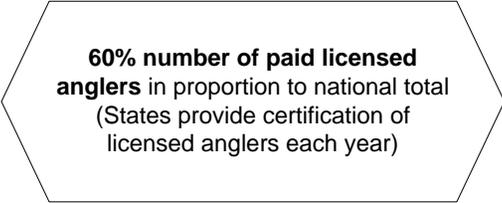
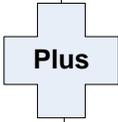
Distribution of remaining funds



Sport Fish Restoration Program Apportionment Formula

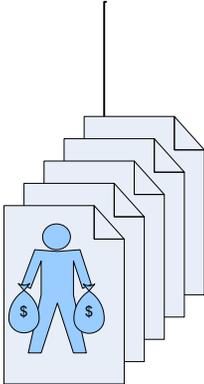


SFR Program receives 57% of funds remaining in Trust Fund after deductions annually



Puerto Rico receives 1%
District of Columbia, Guam, Virgin Islands, American Samoa & Northern Mariana Islands receive 1/3 of 1%

No state receives more than 5% or less than 1% of the total available

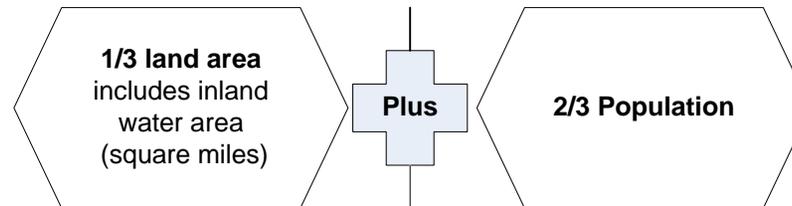


Apportionments to states/insular areas

State Wildlife Grant Program Apportionment Formula



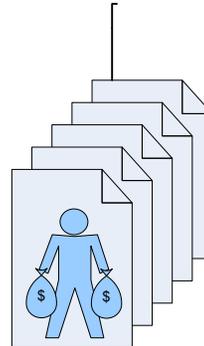
Funds appropriated annually less amount allocated to Tribal
Wildlife Grants and 3% for WSFR Administration



District of Columbia and Puerto Rico receive 1/2 of 1%

Guam, American Samoa, Northern Mariana Islands,
Virgin Islands receive 1/4 of 1%

No state receives more than 5% or
less than 1% of the total available



Apportionments to states/insular areas

4

Objectives:

1. Define program income
2. Describe and demonstrate the methods of handling program income
3. Explain the treatment of proceeds from the sale of property as program income
4. Discuss the documentation and reporting of program income
5. Discuss program income earned by non-profit and for-profit sub-grantees

Program Income

The definition of program income is **gross** income received by the grantee or subgrantee **directly generated** by a grant supported activity, or earned only as a result of the grant award **during the grant period**. “During the grant period” is the time between the effective date of the award and the ending date of the award reflected in the final financial report. Grantees are encouraged to earn income to defray program costs.

Program Income Criteria

- Earned during grant period
- Earned by grantee or subgrantee
- Direct result of grant funded activity

Grant Supported Activities

Income generated during the grant period as a result of grant supported activities is considered program income.

After the grant is closed, if the activities are supported with revenue from license fees any income received has the same restrictions as license fee revenues (i.e. used for the administration of the Fish and Wildlife Agency).

Incidental costs in the generation of program income may be deducted from gross income to determine program income, if authorized by regulation or grant



Real Property Acquired with Federal Funds

Disposal of real property acquired with federal funds requires prior approval from the FWS Regional Director, even if the grant is closed. The Regional Director and State negotiates disposal terms.

An exception exists for timber and other renewable resource sales. While timber, grazing and crop sharing is not considered real property, income generated from these items on property acquired with federal funds while the grant is open is considered program income. If the grant is closed the income must be treated as license fee revenue and be used for the administration of the Fish and Wildlife Agency.

Real property disposal is not program income, consult your WSFR Regional Office for specific disposal directions.

 2 CFR 200.311(c)

Personal Property

Proceeds from the sale of personal property acquired with **federal funds** may be required to be returned to the federal program. However, States are required to manage, use and dispose equipment in accordance with State laws.

Is the income from disposal program income? Only if the original acquisition grant is open. Otherwise, the net proceeds are considered license revenue.

A processing fee may be withheld from the sale of personal property, if required by State law or policy.

 2 CFR 200.313(a)(3)(b)



Exercise: Income Determination

Using the **2 CFR 200.307** and **50 CFR 80.120-126** determine if the income in each scenario is program income, treated as license revenue, treated as program income or has no requirement.

1. Income is received as a result of issuing duplicate hunter education cards. The activities are supported in an open hunter education grant.

Program income, it meets the criteria listed in 50 CFR 80.120. The grant is open, the grantee is received the program income and it is a direct result of a grant funded activity. Staff time and card stock are grant funded

2. Revenue is received from timber sales on land acquired with license revenue. The activities are being managed by an open WR grant. Managing timber for wildlife habitat is listed as an activity in the project statement.

Program income, it meets the the criteria listed in 50 CFR 80.120. The direct result nexus may be broken by removing the area from the O&M grant for that funding period.

3. The fish and wildlife agency sells a surplus vehicle that was acquired on a WR grant. The grant is now closed and did not contain any conditional statements relating to equipment disposition. The fair market value of the vehicle is \$5,500.

Not program income. Revenue is to be treated as license revenue. The grant is closed therefore criteria for 50 CFR 80.120 is not meet. For States Disposal of equipment follows their policies and procedures. 200.313(2)(b)

4. Income from coal royalties are received from land acquired with SWG grant. The grant is open at the time royalties are received.

Program income, only because the acquisition grant is open. This the only instance of how mineral extraction could be program income. 2 CFR 200.207

5. The fish and wildlife agency received income from oil and gas royalties. The land was land acquired with a federal grant that has since closed. The land is currently being managed with State license revenue.

Mineral extraction can not be a direct result because it is not an eligible activity revenue must treated as license revenue.



Exercise: Income Determination

6. A subrecipient (private marina) is collecting usage fees for a pump out facility that was renovated using a CVA grant. The grant was closed last year.
- Not program income since the acquisition grant is closed. If there is a O&M grant the fees would be program income because they would be the criteria for PI
- 50 CFR 80.120
7. The fish and wildlife agency sells a research vessel that no longer serves the useful purpose of the SFR grant (75/25) under which it was acquired. The grant is closed, but had a conditional statement in the award letter stating that equipment purchased with grant funds was to be used on this grant or other WSFR Program grants until no longer needed and proceeds from disposition after deducting disposal fees are to be returned to the grant program. The vessel was sold at auction for \$10,000 by the State Surplus Agency. The Surplus Agency charges a 10% fee for handling surplus equipment.
- Not program income because the acquisition grant is closed, However, the condition requires fees from disposal of the equipment to be returned to the program. That can be done by returning the sale proceeds via the program income method. Without the condition
- 200.313(2)(b)
8. The fish and wildlife agency received revenue generated from oil and gas royalties on land acquired with license revenue. The land is managed by an open WR grant. The activities listed in the project statement include maintaining roads.
- Not program income. Activities associated with mineral extraction are not eligible, The roads are usually improved under the extraction agreement therefore road maintenance
- As a direct result of a grant funded activity would not apply. 50 CFR 80.120
9. Revenue is received from the lease of a right of way on land acquired with a WR grant. The WR grant is closed and property is managed using license revenue.
- Not program income, but it is a disposal of real property. Federal share of the revenue
- Should be returned to the program.



Exercise: Income Determination

10. A subrecipient received income generated from the sale of timber on his land. The sale of timber resulted from managing wildlife habitat under an open SWG grant.

Special circumstance see Director's memo regarding LIP/SWG private landowners, which states that private landowners will be treated as vendors under the SWG and LIP programs.

Note: letter is in the toolkit

11. Bill's Bait Shop receives revenue from concession and bait shop operations on a State WMA. The WMA is managed with federal funds.

Not program income, because Bill's Bait Shop is a contractor not a subgrantee. If the State Received a portion of the sales then the amount they receive would be subject to PI.

50 CFR 80.120

12. The Wildlife Management Area supervisor enters into an agreement with a local farmer to allow the farmer's cattle to graze in an area that will not interfere with wildlife habitat. In exchange for grazing rights the farmer has agreed to perform fencing repairs on the WMA. The WMA is listed as a grant supported activity in the State's WR grant.

Not program income. Under 50 CFR 80.98 this is considered a cooperative farming arrangement. Must be noted that activity is occurring in project statement and annotated in the SF 425 comment box.

13. The fish and wildlife agency sells land acquired with a WR grant. The agency receives market value for the property and does not replace the property. WSFR Program approved the sale in advance and instructed the agency to return the proceeds to the WR program.

Not program income, but instead this is disposal of real property. The proceeds from the Transaction must be returned to the program, if you are not acquiring a replacement property. 50 CFR 80.137

Disposal of Program Income

A State fish and wildlife agency may choose any of the three methods listed in 50 CFR 80.123 (b) for applying program income to Federal and non-Federal outlays. The agency may also use a combination of these methods. The method or methods that the agency chooses will apply to the program income that it earns during the grant period and to the program income that any subgrantee earns during the grant period. The agency must indicate the method that it wants to use in the project statement that it submits with each application for Federal assistance.



2 CFR 200.307 | 50 CFR 80.120-126

Methods of using Program Income

- Deductive
 - Unless otherwise approved in the grant award use of program income defaults to deductive for States.
 - Gross program income received is applied to the total allowable project costs during the grant period. Exception: Net program income may be used if approved by WSFR Program
 - Program income reduces both the federal and non-federal share of project costs
 - Program income used in accordance with the deductive method shall not exceed total approved award amount
 - Excess program income may be applied to subsequent grant within same grant program
 - Must be deducted prior to requesting reimbursement (drawdown)

Deductive Method Example

Application (SF-424)		Financial Report (SF-425)	
Federal	\$90,000	Total Expenditures	\$120,000
State	\$30,000	Less: Program Income	<u>\$4,000</u>
Program Income	\$4,000	Adjusted Total Outlays	\$116,000
Total	\$120,000	Federal (75%)	\$87,000
		State (25%)	\$29,000
Amount Obligated in FAIMS: \$90,000		Notice that \$3,000 of the Obligation remains unliquidated	

Deductive Method – Misapplied Program Income (Excess Allowable Costs)

Application (SF-424)		Financial Report (SF-425)	
Federal	\$90,000	Total Expenditures	\$160,000
State	\$30,000	Less: Program Income	<u>\$4,000</u>
Program Income	\$4,000	Adjusted Total Outlays	\$156,000
Total	\$120,000	Federal (75%)	\$90,000
		State (25%)	\$30,000
		State (Excess Allowable)	\$36,000
Amount Obligated in FAIMS: \$90,000			

Deductive Method – Properly Applied Program Income (Excess Allowable Costs)

Application (SF-424)

Federal	\$90,000
State	\$30,000
Program Income	\$4,000
Total	\$120,000

**Amount Obligated in FAIMS:
\$90,000**

Financial Report (SF-425)

Total Expenditures	\$160,000
Less: Excess Allowable	<u>\$40,000</u>
Adjusted Total Outlays	\$120,000
Less: Program Income	<u>\$4,000</u>
Adjusted Total Outlays	\$116,000
Federal (75%)	\$87,000
State (25%)	\$29,000
State (Excess Allowable)	

REMEMBER!

When using the deductive method, cost overruns must be deducted from expenditures before deducting the program income

Methods of using Program Income (cont'd)

- Additive
 - Gross program income is added to the funds committed to the award
 - Should be estimated in grant application
 - Must be approved in award
 - Amounts in excess of approved amount shall be used in accordance with deductive method
 - Must be used prior to requesting reimbursement (drawdown)

Additive Method

Application (SF-424)		Financial Report (SF-425)	
Federal	\$90,000	Total Expenditures	\$124,000
State	\$30,000	Less: Program Income	\$4,000
Program Income	\$4,000	Adjusted Total Outlays	\$120,000
Total	\$124,000	Federal (75%)	\$90,000
		State (25%)	\$30,000
Amount Obligated in FAIMS: \$90,000		All Obligated Funds are Liquidated	

Methods of using Program Income (cont'd)

- Cost Share Method
 - Gross program income is used to finance part or all of the non-federal matching requirement
 - Must be approved in award

Application (SF-424)		Financial Report (SF-425)	
Federal	\$90,000	Total Expenditures	\$120,000
State	\$30,000	Federal (75%)	\$90,000
Program Income	\$4,000	Match Required	\$30,000
Total	\$120,000	Less: Program Income	\$4,000
		State	\$26,000
Amount Obligated in FAIMS: \$90,000		All Obligated Funds are Liquidated	

Program Income Banking

Program income is consider “banked” when a State (grantee) does not spend program income prior to drawing additional funds from the same financial assistance grant program or delays applying it to another grant in the same grant program.

Compliance Issues Relating to Program Income Banking

- Payment requirements of 2 CFR 200
- The Cash Management Improvement Act
- Use of program income requirements in 50 CFR 80.124

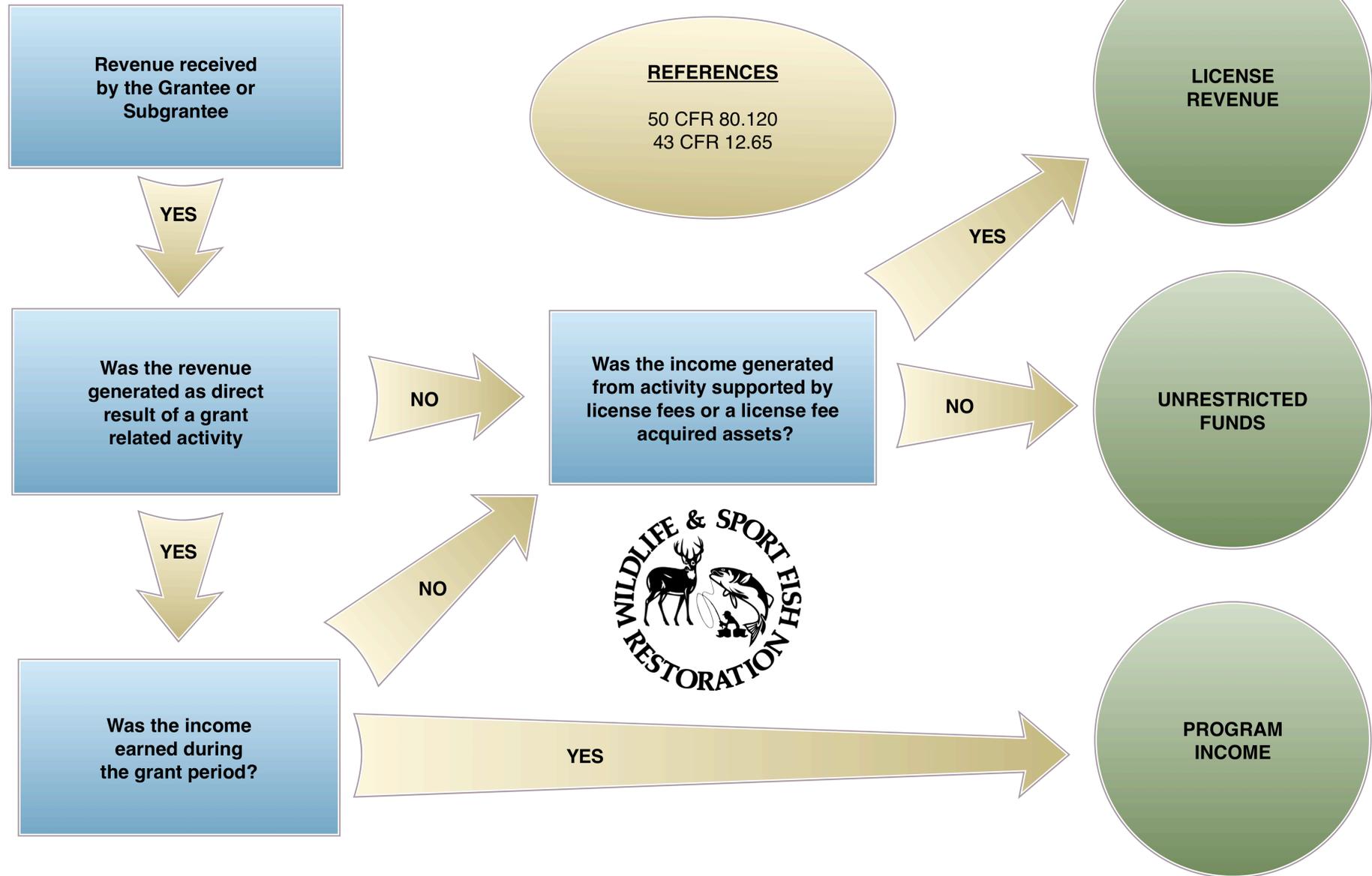
Program Income earned on a grant must be spent within the grant period it was earned prior to making requests for payments. If a grant closes with undisbursed program income, the State and the WSFR Regional Office must agree to a method that complies with all applicable guidance.



Learning Points

- ✓ Program income is defined as gross income received during the grant period generated by a grant supported activity
- ✓ There are no Federal requirements governing the disposition of program income earned after the end of the award period, unless the terms of the award or WSFR Program regulations provide otherwise
- ✓ The three methods of program income disposal are deductive, additive and cost share.
- ✓ Program income may not be banked. Disposal of program income must occur prior to requesting additional payments from the same grant program.
- ✓ Records must be maintained on program income received and these records retained for 3 years from the close of the grantee's fiscal year in which the income is used

**Income Determination
Wildlife and Sport Fish Restoration Programs**



Real Property - Proceeds from the disposal of real property are not program income. Proceeds from the disposal of real property must be returned to the applicable program. Consult the FWS Regional Office for instructions. The disposal of real property requires prior approval from the FWS. (50 CFR 80.137)

Barter Transactions - The exchange of goods or services for other goods or services without the use of cash. Barter transactions are to handled in accordance with 50 CFR 80.98.

Governmental Revenues - Taxes, special assessments, levies, fines, and other such revenues raised by a grantee or subgrantee are not program income unless the revenues are specifically identified in the grant agreement or Federal agency regulations as program income. (2 CFR 200.307(c))

5

Objectives:

1. Define in-kind match
2. Discuss when donated items and services are allowable costs
3. Determine how to properly value in-kind match
4. Identify the documentation requirements for in-kind match

In-Kind Match

In-kind match refers to a donated service or non-cash contribution made by parties other than the grantee toward the accomplishments of the program goals.

To qualify under the guidance the non-cash contributions must meet the requirements listed below.

- Be documented in project records
- Not used to match another grant
- Provided for in the approved budget when required by the Federal awarding agency; and
- Necessary and reasonable for the accomplishment of project or program accomplishments objectives
- Allowable costs under 2 CFR 200 Subpart E- Cost Principles
- Valued according to guidelines found in 2 CFR 200.306
- Not paid from other Federal funds (Non-Federal source)
- Must occur within the effective dates of the grant. (land as match is an exception)



2 CFR 200.306



Exercise: Valuing In-Kind Match

Use **2 CFR 200.306** to determine the valuation of the following in-kind services. You may also need to consult **2 CFR 200 Subpart E** to determine the allowability of a cost.

1. Bobby Joe Hunter (an individual) is a volunteer instructor for the State's Hunter Education program. How would the agency value Bobby Joe's donation?

[2 CFR 200.306\(e\).Entry level LE? Who on staff does or would do this function? Rates](#)

[or third-party volunteers must be consistent with those paid by State for similar work.](#)

[A reasonable amount of fringe may be include.](#)

2. You enter into an agreement for the State prison to provide labor for grass mowing and cleanup at a State hatchery funded by a Sport Fish Restoration hatchery operations grant. The prison does not charge the State agency for the labor. Can the State agency claim the labor as in-kind? What if the prison were Federal?

[Yes, the donation is to be valued at the a reasonable market price. Typically minimum wage](#)

[Rate. If this was a Federal prison the donation could not be counted since it comes from a](#)

[Federal source. 2 CFR 200.306](#)

3. A conservation minded law firm decides to participate in the State's breeding bird survey. The survey is an activity in one of the State's approved State Wildlife Grants. Is the contribution in-kind? How would the contribution be valued?

[Yes, however you may not value the rate at the lawyers hourly rate. The work is not for similar](#)

[to the work they perform. Must value the donation at what the State would paid plus fringe.](#)

[2 CFR 200.306\(e\)](#)

4. A heavy equipment company donated the use of a dozer and an operator to a State boat access construction project funded by a Sport Fish Restoration grant. Are the donations allowable? If yes, then how would the donation be valued and documented?

[Yes current market value. What does the company typically charge for the service? State must](#)

[ensure rate is actually a market rate. Auditors will scrutinize this transaction.so make sure you](#)

[Have done the due diligence and have everything documented. 200.306\(f\) and \(g\)](#)



Exercise: Valuing In-Kind Match (Cont.)

5. The State agency has a stockpile of gravel purchased last year using State funds. They wish to use the gravel on an expansion of a parking lot on a State Wildlife Management Area (WMA) they have planned for next year. WMA parking lots are maintained using a Wildlife Restoration operations and maintenance grant. Can the cost of the gravel be an in-kind donation to the grant?

Yes most appropriate way to handle this charge would be through preaward costs. The State

Is not third-party to the grant. 2 CFR 200.209. If the State maintains stockpile of such items

Should be charged at their recognized pricing method see 2 CFR 200.453(b)

6. The State is conducting a waterfowl research project on property recently donated by private citizen. The research project is part of an approved Wildlife Restoration grant. Can the value of the property be used as match for the research project?

No, it is hard to imagine a scenario where renting the land is necessary to accomplish a

research project. Since the State owns the property the rental match is not necessary or

Reasonable (2 CFR 200.403)

7. Amy Aquatica is a volunteer in the State's aquatic resource education. She typically spends and documents 100 hours of preparatory time for each course. Can the State count the time she spent prepping for the course as in-kind match? Are there any concerns?

Yes, predatory time is allowable, but is 160 hours necessary to accomplish the

objectives of the grant? (2 CFR 200.403) If the time is not required it will be a disallowed cost.

Documenting In-Kind Volunteer Time

- Must be verifiable from the records of grantees and subgrantee records.
- Volunteer services will be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

Improper documentation of in-kind match is one of the most frequent OIG audit findings.

Date Elements Required on Volunteer Time Sheet

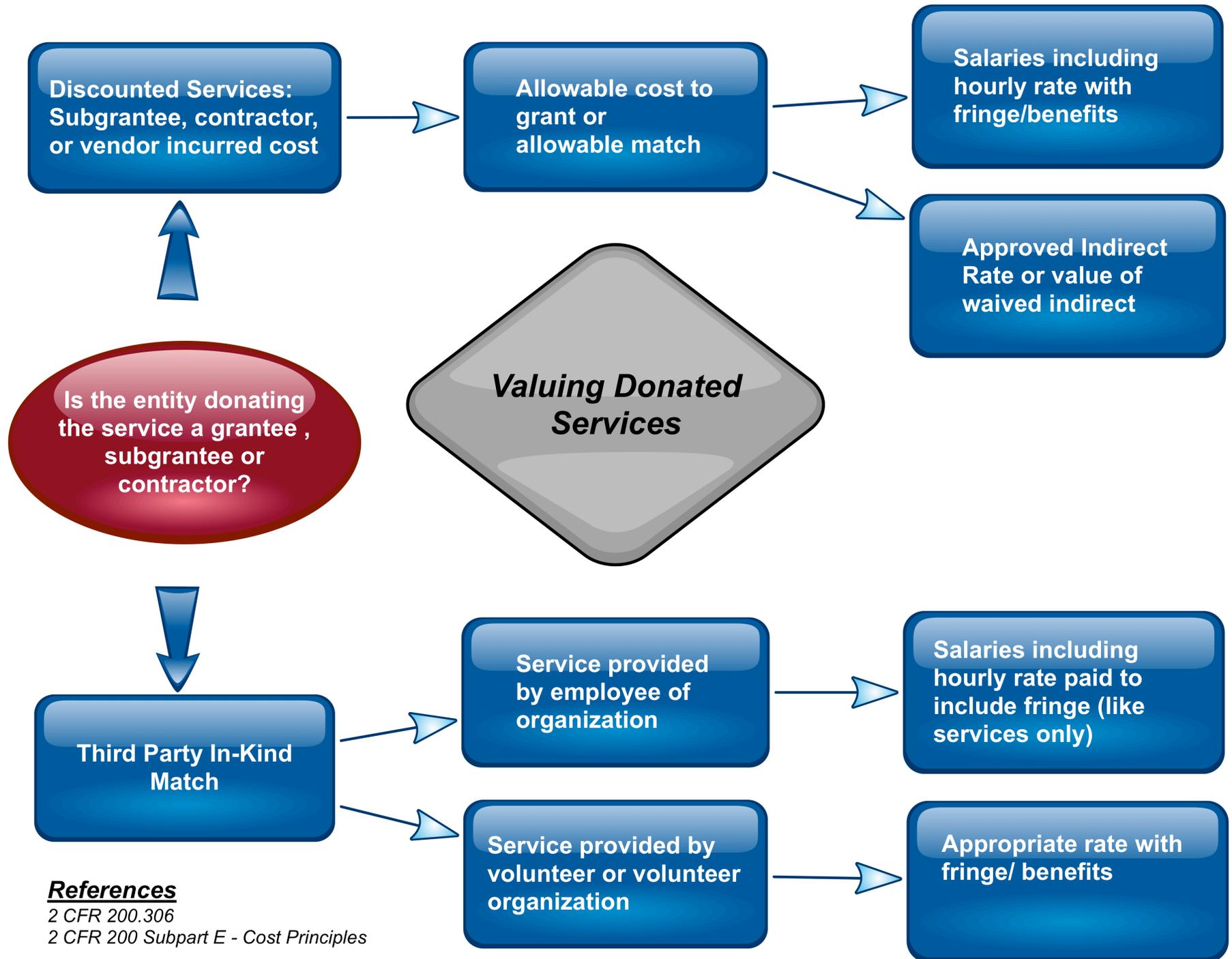
- Volunteer name
- Name of activity
- Date of activity
- Hours worked
- Miles driven
- Volunteer signature
- Supervisory concurrence



Learning Points

- ✓ In-kind match must meet the same criteria as other costs charged to the grant: allowable and necessary to accomplish grant activities.
- ✓ In-kind match must be properly valued according to 2 CFR 200.
- ✓ In-kind match must be adequately documented in grantee or subgrantee records.

VALUING DONATED SERVICES



References

2 CFR 200.306

2 CFR 200 Subpart E - Cost Principles

6

Objectives:

1. Properly complete the Federal Financial Report.

	Exercise: Preparing a Federal Financial Report
-----------------------------------------------------------------------------------	-------------------------------------------------------

1. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Share: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: None
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$403,000 (does not include In-kind)
In-kind Match = \$0
Program Income: \$0 (earned)

2. FFR due by 9/30/09 (Final).

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Share: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: None
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$175,000 (does not include In-kind)
In-kind Match = \$45,000 (documented)
Program Income (deductive): \$100 (earned)

3. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (deductive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$435,000 (does not include In-kind)
Program Income: \$10,000 (earned)
In-Kind: \$0



Exercise: Preparing a Federal Financial Report (cont'd)

4. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (approved in additive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$435,000
Program Income: \$10,000 (earned)
In-Kind: \$0

5. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (\$200,000 obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (deductive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$310,000 (does not include in-kind)
Program Income: \$10,000 (earned)
In-Kind Match: \$100,000 (documented)

6. FFR due by 9/30/09 (Final).

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Share: \$300,000 (\$200,000 obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (additive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$310,000 (does not include In-kind)
Program Income: \$10,000 (earned)
In-Kind Match: \$100,000 (documented)

	Exercise: Preparing a Federal Financial Report
-----------------------------------------------------------------------------------	-------------------------------------------------------

7. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (fully obligated)
State Share: \$100,000
Effective date: 7/1/08– 6/30/09
Estimated Program Income: \$10,000 (additive method)

Total Expenditures: \$150,000 (does not include In-kind)
Program Income: \$10,000 (earned)
In-Kind Match: \$95,000 (documented)

8. FFR due by 9/30/09 (Final)

Approved Award: W-18-D-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000
State Share: \$100,000
Period of Award: 7/1/08 – 6/30/09

Total Expenditures: \$435,000
Disallowed costs from a recent OIG audit of W-18-D-5: \$10,000
Program Income: \$0.00
In-Kind Match: \$0.00



Learning Points

- ✓ A completed Federal Financial Report (FFR) is required for each grant.

7

Objectives:

1. Describe the records and documents that must be maintained for real and personal property purchased with federal funds and with state license fee revenues
2. Explain the regulations regarding use, monitoring and managing real and personal property purchased with federal funds and license fee revenues
3. Discuss the options for disposing of real property and personal property purchased with federal funds and license fee revenues

Real Property

One, several, or all interests, benefits and rights inherent in the ownership of a parcel of land or water

- Fee and leasehold interests
- Rights attached to parcels, regardless of ownership (e.g. conservation easements), or
- Resources beyond the parcel, such as water and mineral rights

Parcel includes air space above, ground below, or anything physically and firmly attached by natural process or human action, e.g. standing timber, buildings, roads, fences, etc

Personal Property

Anything tangible or intangible that is not real property

- Tangible personal property includes
 - Objects (e.g. equipment or supplies) that are moveable without damage to themselves, the land or structure to which they are attached, or the path of removal
 - Soil, rock, gravel, minerals, gas, oil, or water after excavation or extraction from the surface or subsurface
 - Commodities derived from trees or other vegetation after harvest or separation from the land
 - Annual crops before or after harvest
- Intangible personal property includes
 - Intellectual property such as patents and copyrights, and
 - Licenses revocable at the landowner's discretion, or that terminate at the landowner's death or when ownership changes

Equipment is tangible, nonexpendable, personal property having a useful life over one year and an acquisition cost of \$5,000 or more per unit

Determining Reasonable Cost

WSFR may determine that the cost of real property acquired by a grantee or subgrantee is reasonable as long as the price paid was the result of an approved valuation method.

Price is the amount that a particular purchaser agrees to pay and a particular seller agrees to accept under the circumstances of the transaction.

Value is an opinion of the worth of a property at a given time according to a specific definition of value.

Methods of Valuation

Appraisal Method

- A certified general appraiser uses the Uniform Standards of Professional Appraisal Practice (USPAP) and conditions in 49 CFR 249 for buyers using Simplified acquisition procedures
 - Develops opinion of value of the real property, prepares appraisal report (**must be self-contained**)
- Grantee is required to direct the appraiser to use the Uniform Appraisal Standards for Federal Land Acquisition (Yellow Book) for all Default acquisition procedures
- A review appraiser examines the market analysis and supports the appraiser's opinion of value

Appraisals need to be updated when value estimate no longer reflects the conditions in the local real estate market
***(Must use within 6 months or within life span designated)**

WSFR must be able to approve the qualifications of the appraiser and review appraiser before the grantee commits to using them. **Include the U.S.F.W.S as an intended user of the appraisal report.**

Both appraisers and review appraisers must be:

- State-certified general appraisers consistent with Title XI
- Certified by state or another state through reciprocity agreement
- Completed Appraisal Qualifications Board course (within last 10 years)
- Have training or significant experience in appraising land similar to the subject property
- No public record of disciplinary action by state regulatory agency
- Have experience as expert witness on real property valuation where condemnation authority has been exercised

Review Appraisers Only must have one of the following:

A. Have professional growth designation from American Society of Farm Managers and Rural Appraisers or American Society of Appraisers or state employee with documentation of professional growth beyond minimum requirements for state certified appraiser

B. Minimum Training and Experience

Have 32 classroom hours in the last 10 years of AQB-approved appraisal-review courses, which must be supported by a transcript or other documentation, and at least 12 technical review reports or self-contained/ summary appraisal reports within the last 3 years.

C. WSFR may approve a one-time nonrenewable waiver of the qualification standards in A and B (not to exceed 3 years) for a State-employed review appraiser if we receive:

(1) A commitment from the State agency that its review appraiser will meet the qualification standards in Alternatives A or B by a date not to exceed 3 years; and

(2) Documentation of significant professional growth by the review appraiser beyond the minimum requirements of a State-certified appraiser to include all of the following:

(a) A transcript or other documentation that the review appraiser received AQB-approved training relevant to appraisal review above the minimum requirements for a State-certified appraiser.

(b) A demonstration report (without confidential information) that shows proficiency in appraisal review.

Land as Match

WSFR may approve the market value of land to be used as match for real property acquisition, facilities acquisition and construction activities, provided the land is necessary and reasonable to accomplish the project objectives.(2 CFR Part 225)

- A site specific-acquisition project may use donated land value within the defined project area if it is suitable to the land acquisition purpose
- An acquisition project with objectives based on specific habitat types by location in the State may use donated land which meets the plan
- For a construction project, only the amount of land required may be counted for in-kind matching purposes

Valuation of Land as Match

- Grantee must identify a parcel of land that they will use as match in a grant
- Grantees must use an approved valuation method to determine the market value for the parcel
- The grantee incorporates that value into a grant application as match for the grant

Remaining Land Value as Match

If the value of a parcel of land is more than needed for match, the State may use remaining unused value on a subsequent grant, if

- A covenant is placed on the deed ensuring entire parcel will be used in perpetuity for the purposes of applicable grant program
- Purpose does not conflict with purpose of the original grant
- Value of the match is an allowable and applicable cost
- Value not used as match for any other Federal grant
- State maintains records to track the remaining value available for match

Land used as match becomes subject to the regulations of WSFR or SWG Programs, as applicable, at the time the State uses any portion of the parcel value as match. NOFP is required for all land used as match.

Who May Hold Title?

For WR and SFR, only a state may hold title to an ownership interest. More than one entity may hold title to an ownership interest in real property for non-WSFR programs if the entities holding title are a grantee or subgrantee. Additionally, more than one entity (grantee and sub-grantee) may hold a non-ownership interest in the WR, SFR, SWG and Cooperative Endangered Species programs. (50 CFR 80.130) (handout # 3-4)

Managing and Monitoring Real Property

During the open grant period the grantee must monitor the grant and sub-grant supported activities to assure compliance with all applicable Federal, State and local requirements. Additionally, the grantee must comply with any conditional statements specified in the award letter.

After the grant period the grantee or subgrantee has several post-grant responsibilities relating to real property acquisition grants:

- A monitoring plan must be in place for the period after the acquisition
- The real property must continue to serve the purpose for which it was acquired, either in perpetuity or for the length of the legal agreement
- Any commercial or recreational activities that interfere with this purpose must not be occurring on the property
- The objectives of the grant or cooperative agreement are achieved

The grantee should establish a Real Property Monitoring System. The cornerstone of a good monitoring program is a strong land inventory system and informed leadership and staff. The information the system contains assists the State in performing its compliance monitoring

Suggested Elements of Monitoring Compliance for Real Property

Monitor Land Use for:

- Allowable Recreational Activities
 - Allowable Commercial Activities
 - Interference
-
-
-

Managing and Monitoring Real Property

Control....what mechanisms will you use to maintain:

- Ownership?
- Management Control ?

Real property disposal is not program income, but is treated in the same manner

A grantee or subgrantee may not allow an activity or facility that would interfere with the fulfillment of the grant objectives. Interfere means that activities impede, hinder or obstruct the achievement of grant objectives in any manner (50 CFR 80.135)

Income....how will you apply it?

- Proper accounting and disposal of income
- Disposal of Income from Sale or Transfer of Real Property Rights with:
 - A Federal Interest
 - A License Fee Interest
 - Neither Federal or License fee interest (unrestricted funds)

Real Property Acquired with Federal Funds (2 CFR 200.311)

Disposal of real property acquired with federal funds requires prior approval from the Regional Director, even if the grant is closed. Grant terms and Regional Office may prescribe additional disposal requirements.

For Wildlife Restoration and Sport Fish Restoration Grants

The grantee must follow the procedures described in 522 FW 20 and 2 CFR 200.311 when disposing of real property acquired under the Wildlife Restoration and Sport Fish Restoration Acts.

When the grantee and Service Regional Director agree real property is no longer needed for the authorized purpose, the grantee (or subgrantee) will request disposition instructions from the WSFR. The instructions will provide for one of the following alternatives:

Disposal of real property constitutes a federal action under NEPA and for other Federal compliance purposes. There is no Cat Ex for disposal of real property interests.

Retention of Title

Grantee retains title after compensating the awarding agency for their percentage of participation in the original purchase, at current fair market value. The net proceeds from the disposition may be used as an offset to the cost of the replacement property.

Sale of Property

Property may be sold at current market value (as determined by an approved valuation method) and the awarding agency compensated by the percentage of their participation in the cost (less reasonable selling and fix up expenses). When a grantee or subgrantee is directed to sell property, sales procedures shall provide for competition to result in the highest possible return.

Transfer of Title

Transfer title to the awarding agency or to a designated or approved third party. The grantee (or subgrantee) shall be paid an amount calculated by applying the grantee (or subgrantee) percentage of participation in the original purchase, at the current fair market value



All Other WSFR Grant Programs

For real property acquired under all other WSFR grant programs, the grantee and subgrantee must use the following disposal procedures:

If real property is no longer needed or useful to achieve the approved grant objectives

The grantee and subgrantee must provide written justification demonstrating why the property no longer serves the purpose for which it was acquired and request disposal instructions from the Service Regional Director. The Service Regional Director is the final arbiter of when grantee or sub-grantee real property is no longer needed or useful to achieve the approved grant objectives.

The Service Regional Director may approve the disposal of real property and must provide the grantee and subgrantee with disposal instructions in accordance with 43CFR 12.71.

If real property still serves the purpose for which it was acquired

The State may not dispose of real property acquired under the authority of the Wildlife Restoration Act or Sport Fish Restoration Act. Title to the property must remain vested in the State, and the State fish and wildlife agency must maintain full management control over the real property.

For all other programs, the grantee may not dispose of the real property. It however, may transfer the real property to a WSFR approved entity (subgrantee) to ensure property continues to serve the purpose for which it was acquired.

Draft Lands Chapter Part 522 - 6 IV

Notes:



Exercise: Real Property

Using the Toolkit review **2 CFR 200.311, 2 CFR 200.307(d), 50 CFR 80.130, 522 FW 10, 522 FW 20, 522 FW 21, 522 FW 22, 522 FW 24** to answer the questions below.

1. What restrictions apply to a parcel of land that a State uses as match in a WSFR grant?

The entire parcel described in the grant proposal becomes subject to rules and regulations of the programs at the time a State uses any portion of the value of the parcel as match. State must incorporate a covenant on the deed ensuring it will use the entire parcel in perpetuity for the program purposes . **SM Part 522 24.6.**

2. Under what conditions may land, purchased with federal funds be sold, traded or its purpose changed? What about license revenues?

When State believes the land no longer serves the purpose for which acquired, State must receive approval from Regional Director for disposal. Fair market value must be received for the property and the federal share of proceeds must be returned to the grant program or replace with property of equal value/ benefit. Proceeds are returned using program income method. Includes mineral rights. 522 FW 6.7(C), **43 CFR 12.71 (b) and (c), 522 FW 20, 50 CFR 80.135-137**

Lands purchased with license revenue must remain in control of the State Fish & Wildlife agency or revenue returned to agency or diversion occurs. 522 FW 20. Includes mineral rights. No approval of WSFR required.



Exercise: Real Property (Cont.)

3. Who is responsible for determining whether or not recreational or commercial activities are allowed on land and/or facilities acquired developed or managed with federal monies? What factors are considered to make the decision?

Must not interfere with the purpose of the land or facility.

The State agency shall make the determination.(522 FW 22 - Commercial)

(522 FW 21 – Recreational) State funds – stay in control of F&W agency.

4. A state wildlife agency purchased a fee title (ownership) interest in a parcel of land adjacent to a state park with Enhanced Hunter Education funds for the purpose of building a shooting range. Under terms of a legally binding MOA, the state park will manage and maintain the range for its expected useful life. The state wildlife agency intends to give title to the parcel of land to the state park as soon as construction of the shooting range is complete. Is this allowable?

For WR, SFR, EHE only a state may hold title to an ownership interest.

More than one entity may hold title to an ownership interest in real property for **non-WSFR** programs if the entities holding title are a grantee or subgrantee **(50 CFR 80.130)**

5. What are the concerns when revenue is generated by activities supported by grant funds or on lands acquired with grant funds? License revenues?

Activities supported by grant funds, activities listed in grant (open grant) is

considered program income and must be used in accordance with

43 CFR 12.65. Income generated from land purchased with federal funds

(open grant) program income, (closed grant) treated as license revenue.

522 FW 19. Also, special conditions per grant program.

Other activities by State Fish & Wildlife agency supported by license

revenue must be used by F & W agency.



Exercise: Real Property (Cont.)

6. What are the two acceptable types of appraisals that are used for WSFR land acquisitions and what factors determine when each type must be used.

USPAP or UASFLA is used for the simplified acquisition process. UASFLA

(yellow book) only is required for the default acquisition process

(normally when eminent domain is exercised).

See acquisition procedures handout

7. The Governor of Protection transferred a tract of land purchased with license revenue to the State Department of Transportation to be used to store heavy equipment. Is this a concern? Explain.

The control of the land must be fully restored to the State fish and wildlife

agency or the property must be replaced using non license fee and non

federal funds. The replacement property must be of equal fair market prices

and have equal benefits as the original property. The State has a reasonable

amount of time to correct the issue. It may take up to 3 years from the

date of notification. This is sometimes a long process. **522 FW 20**

Equipment

- Tangible and nonexpendable personal property
- Useful life > 1 year
- Cost ≥ \$5,000 per unit

A grantee may use its own definition of equipment provided that such definition would at least include all equipment defined above

General Guidance for Federal Awards (2 CFR 200.313(b))

(b) States: A State will use, manage, and dispose of equipment acquired under a Federal award by the State in accordance with State laws and procedures.

Equipment Acquisition (2 CFR 200.439)

- General purpose equipment is unallowable as direct charges, except where approved in advance by the awarding agency
 - Special purpose equipment is allowable as direct costs, provided that items with a unit cost of \$5000 or more have the prior approval of the awarding agency
-
-

WSFR Position

- Approval of the grant constitutes WSFR approval of the direct charging of equipment to the grant
 - The grant may be conditioned as a result
-
-



Exercise: Personal Property - Equipment

Using the Toolkit, review **2 CFR 200.313** to answer the questions below.

1. What laws and procedures does the State follow in the use, management and disposal of personal property? What about other grantees?

The follow their State procedures **12.72 (b)**. Other grantees follow c- e.

State should maintain inventory including location, funding source, price, serial number, etc. Records should be maintained until 3 yrs after final disposition. High dollar equipment purchased on a grant may have a conditional statement placed on award with further requirements.

2. The State conducts a physical inventory of fixed assets once every three years. Is this adequate under Federal guidelines? What is the requirement?

Depends on what the State guidelines are, but a physical inventory should be conducted every two years for proper internal control. (**43 CFR 12.77**)

43 CFR 12.72 (b)

3. The State of Protection acquired a fish shocking boat with a federal grant. The boat is no longer needed for the grant and they wish to dispose of it. The boat has a current fair market value of \$8,000. What are the requirements if the grant is still open? Would requirements change if disposal occurred after the grant expired?

During open grant State may use the boat on another WSFR funded project or..... boat may be sold or disposed of but if fair market value is over 5K state must compensate the program using program income method.

After grant expires it may be disposed of using State procedures method.

According to **12.72** State has no further requirements and the funds do not have to be returned. However, a condition may be placed on the grant with equipment use and disposal instructions.



Exercise: Personal Property – Equipment (Cont.)

4. The State is consolidating its vehicle fleet into a centralized system. Under the proposal the current fleet of fish and wildlife agency vehicles will be transferred to a newly created department called Fleet Management Services. Some of the vehicles were purchased using license fees and several were acquired using a federal grant that is now closed. The fish and wildlife agency will be required to lease vehicles from Fleet Management Services in the future. What concerns does this raise in relation to the WSFR Program.

Could be diversion issue if vehicles will be used for non fish and game agency purposes. Can't lease vehicles that the agency already paid for unless compensated at fair market value. Is the lease rate appropriate?

5. Equipment purchased on a federal grant is occasionally loaned to the State Parks Section for use on a State Park while the grant is still open. May this be done under Federal guidelines? Under what circumstances, may the equipment be used outside the project?

No the equipment must be used on the project for which it was acquired. The equipment may be used on other WSFR projects as long as it does not interfere with the accomplishment of the project for which it was acquired. **(522 FW 1.16 B)**

6. If the equipment in question five was purchased with license revenue, does it raise any concerns?

Yes. The use of this equipment without compensation may represent a diversion of license funds. States should have an inventory to account for equipment purchases, use and disposal with license fees.



Learning Points

- ✓ Real property records should include a summary of land costs. Purposed for which the real property was acquired, grant program, grant number, rate of federal participation, date of purchase, map/location, title vesting evidence and other interests that may have been purchased as part of real property such as timber, oil/gas, grazing rights, etc.
- ✓ Real property must be monitored to ensure it continues to serve the purpose for which it was originally purchased and control is maintained by the grantee
- ✓ Program income issues often arise as a result of real property
- ✓ Real property may be disposed of when it no longer serves the intended purpose with the prior approval of WSFR Program
- ✓ States use, manage and dispose of personal property (equipment) according to State laws and procedures. Other grantees and subgrantees follow sections c through e of 2 CFR 200.313
- ✓ Grant awards may contain special terms and conditions on use and disposal of equipment
- ✓ States should maintain an inventory of equipment showing the purchase price, date of purchase, funding source and other pertinent accounting information
- ✓ Use and location of equipment should be tracked and monitored throughout the useful life

Simplified Acquisition Procedures

Step 1 - Buyer obtains WSFR approval to acquire one of the following types of real property interests:

- Fee Simple
- Fee with exception to title
- Partial interest

Step 2 - Buyer obtains WSFR approval of the qualifications of the appraiser and review appraiser

Step 3 - Buyer obtains an estimate of market value and bases it on:
(a) an appraisal report and appraisal review report,
(b) a waiver valuation report, ...to use waiver valuation the estimate of market value must be less than \$25,000 and the valuation of the property must not be complicated., or
(c) a report estimating the value of real property subject to auction

Step 4 - Buyer gives the owner the following documents before making an offer:
(a) A written notice that the buyer will not be able to acquire the property if negotiations do not result in an agreement, and
(b) A written statement of the amount that the buyer believes is the market value of the property.

Step 5 - Buyer negotiates a purchase price of no more than the amount determined by the estimate of market value as determined by a WSFR approved valuation method

Step 6 - Buyer and seller enter into a purchase agreement.

- Buyer conducts a due-diligence inspection of the property
- Buyer arranges for a boundary survey if necessary
- Buyer arranges for a title search and the subsequent issuance of a title insurance policy or a certificate of title

Step 7 - Seller delivers the deed or other conveyance document to the buyer in exchange for payment of the negotiated price. Buyer pays seller's eligible expenses incidental to transfer following 49 CFR 24.106

Step 8 - Buyer records the deed or other instrument transferring title or other real property interest, and a Notice of Federal Participation.

Step 9 - Buyer follows 49 CFR 24.105 to acquire tenant-owned improvements

Step 10 Buyer follows 49 CFR 24, Subparts C–F, to provide relocation assistance to any qualifying tenant(s). Neither sellers nor government tenants receive relocation benefits under the simplified acquisition procedures

Default Acquisition Procedures

Step 1 - Buyer obtains WSFR approval to acquire one of the following types of real property interests:

- Fee Simple
- Fee with exception to title
- Partial interest

Step 5 - The buyer establishes just compensation and gives the owner:

- (a) the written offer, and
- (b) a summary of the basis of the offer (see 49 CFR 24.102(d-g)). The offer of just compensation must not be less than the estimated market value in an approved waiver-valuation report or an approved appraisal report as confirmed or modified by an approved appraisal-review report. The offer of just compensation must also take into account the value of allowable damages or benefits to any remaining property. If the acquisition of only a portion of the real property would leave the owner with an uneconomic remnant, the buyer must offer to buy the uneconomic remnant along with the portion of the property needed for the project.

Step 2 - The buyer gives the owner of the real property a Notice of Intent to Acquire. This tells the owner of the buyer's interest in acquiring the real property and basic protections available to the owner under 49 CFR 24 (see 49 CFR 24.102(b) and 24.203(d)).

Step 6 - The seller delivers the deed or other conveyance document to the buyer in exchange for payment of an amount based on:

- (a) the offer of just compensation, or
- (b) one of the exceptional valuation procedures which WSFR must approve in advance.

The buyer pays the seller's eligible expenses incidental to transfer following 49 CFR 24.106.

Step 3 - Buyer obtains WSFR approval of the qualifications of an appraiser and review appraiser

Step 7 - If the buyer has started a condemnation action, the buyer deposits with the court, for the benefit of the owner, an amount not less than the buyer's approved waiver valuation or approved appraisal of the fair market value supported by an appraisal review or the court award of compensation

Step 4 - The buyer obtains an appraisal of the real property (as confirmed or modified by an appraisal review) if the informal estimate of market value is more than \$10,000 OR if the valuation is complicated. Otherwise, the buyer obtains a waiver valuation of the real property. We may approve a threshold up to \$25,000 for using a waiver valuation if the buyer offers the owner the option of having the property appraised and the owner declines.

Step 8 - Buyer records the deed or other instrument that transfers title or other real property interest, and a Notice of Federal Participation.

If the buyer obtains an appraisal and appraisal review, they must conform to the Uniform Appraisal Standards for Federal Land Acquisition (UASFLA).

WSFR must approve the appraisal and appraisal-review reports (or waiver valuation report) before the buyer moves to Step 5.

Step 9 - The buyer follows 49 CFR 24.105 to acquire any tenant-owned improvements.

Step 10 - The buyer provides relocation assistance to a qualifying seller or tenant(s) following 49 CFR 24, Subpart C-F. A governmental entity is not eligible for relocation assistance as a seller or tenant (see 49 CFR 24.202, 24.301, 24.401, and 24.501, and the definitions of person and displaced person at 49 CFR 24.2(a)(9) and 49 CFR 24.2(a)(21)).

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Objectives:

1. Identify and discuss the regulations grantees must follow for administrative, audit, and cost principles
2. Describe the various methods used to track and report grant expenditures and reimbursements
3. Discuss the importance of internal controls
4. Define allowable costs to grants according to cost principles and program requirements
5. Discuss the difference between direct and indirect costs
6. Describe indirect costs rates, proposals and plans
7. Discuss the limitation on rates for statewide central services required by the WR and SFR Acts
8. Discuss the level of accountability for grant awards, matching or cost sharing, and budgeting

Financial Management

The Financial management system of each non-Federal entity must provide for the following

- Identify in all its accounts Federal awards received and expended
 - CFDA
 - Federal award identification number and year
 - Name of Federal awarding agency
 - Name of pass-through entity, if any.
- Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements
- Records that identify adequately the source and application of funds for federally-funded activities
- Records that identify adequately the source and application of funds for federally-funded activities
- Comparison of expenditures with budget amounts for each Federal award
- Written procedures to implement the requirements of §200.305 payment
- Written procedures for determining the allowability of costs in accordance with Subpart E —Cost Principles of this part and the terms and conditions of the Federal award



2 CFR 200.302

Internal Controls

- Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award
- Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards
- Evaluate and monitor the non-Federal entity's compliance with statute, regulations and the terms and conditions of Federal awards
- Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings
- Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, state and local laws regarding privacy and obligations of confidentiality.



2 CFR 200.303

Audits

Subpart F of 2 CFR 200 sets forth standards for obtaining consistency and uniformity among Federal agencies for the audit of non-Federal entities expending Federal awards

- A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit
- Under \$750,000 exempt from Single Audit requirement, but may be selected for program audit
- Regardless of audit status records must be available for review or audit by appropriate officials of the Federal agency, pass-through entity and Government Accountability Office (GAO)
- The pass-through entity is responsible for establishing requirements. As necessary, to ensure by for-profit subrecipients

Notes:



2 CFR 200 Subpart F – Audit Requirements



Exercise: Examining the Cost Principles

Use **2 CFR 200.400** and **2 CFR 200 Subpart E** to answer the questions.

1. What are the factors affecting the allowability of costs? (2 CF 200.403)

[2 CFR 200.403](#)

[1- Be necessary and reasonable 2- Adhere to limitations in the cost principles for type and limits 3- Be consistent between federal and non-federal charges 4- Be consistent direct and indirect 5- In accordance with GAAP 5- Not included as a cost or match for another Federal funded program 6- Be adequately documented.](#)

2. The State fish and game agency conducts an agency-wide reduction-in-force (RIF) as required by their state legislature, eliminating 30 positions. The agency would like to charge the severance payments of its RIF'd employees to the applicable grants the employees worked on prior to being laid off. Is this an allowable cost? What are the restrictions? Are there any other considerations?

[2 CFR 200.431\(i\)\(2\)\(ii\) Compensation-Fringe Benefits. Yes allowable but prior approval by the Federal awarding agency or cognizant agency for indirect cost, as appropriate, is required.](#)

3. The Hunter Education Coordinator is planning a meeting for all volunteer instructors to provide updated agency procedures and plans. Training sessions will be held in conjunction with the meeting. Are costs associated with providing meals and snacks at the meeting and reimbursement of travel costs to volunteer instructors allowable costs to a federal award?

[2 CFR 200.432 Conferences. Yes, it is an allowable costs but cost must be necessary conference hosts/sponsors must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award.](#)



Exercise: Examining the Cost Principles

4. The State Fish and Wildlife agency is planning to purchase land and an office building to use as their headquarters office. Is the purchase price of the land and building an allowable cost to a federal award?

Yes, however the cost of the land and building must be properly allocated between federal and non-federal objectives. For example law enforcement or public relations
2 CFR 403(d) must be allocable

5. A State agency uses vehicles and heavy equipment while performing grant work. What are the acceptable methods for charging the associated costs to the grant?

2 CFR 200.436 , If not acquired with Federal funds, then the cost of acquisition of acquisition can be recovered via depreciation. The operational cost of equipment can be recovered as a direct or indirect cost. See equipment use letter clarifying the guidance

6. A heavy equipment company donated the use of a dozer and an operator to a State boat access construction project funded by a Sport Fish Restoration grant. Are the donations allowable? If yes, then how would the donation be valued and documented?

2 CFR 200. 306 Yes, this is a third party donation. The donation would be valued at market Prices.

7. The State purchases a mobile display booth for \$ 8,000. The display booth will be used at National Hunting and Fishing Days and other public events. The display booth displays information regarding the State's research funded with Wildlife Restoration funds, hunting regulations and promotion of the State's online licensing system. Management wants to charge the cost 100% to the statewide research grant for wildlife. Would this be allowable?

No, law enforcement (regulations) and general agency promotion are ineligible activities under 50 CFR 80.54. The eligible part of the display could be allocated to the applicable Federal award. 2 CFR 403(d)

Composition of Cost

Total cost

The total cost of Federal awards is comprised of the allowable direct cost of the program, plus its allocable portion of allowable indirect costs, less applicable credits.

Classification of costs

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances either as a direct or an indirect cost.

$$\begin{array}{r} \text{Direct Costs} \\ + \\ \text{Indirect costs} \\ - \\ \text{Credits} \\ = \\ \text{Total Cost} \end{array}$$

Direct Costs

Direct costs are those that can be identified specifically with a particular final cost objective.

- Typical direct costs chargeable to Federal awards are
 - Compensation of employees for the time devoted and identified specifically to the performance of those awards
 - Cost of materials acquired, consumed, or expended specifically for the purpose of those awards
 - Equipment and other approved capital expenditures
 - Travel expenses incurred specifically to carry out the award
-
-
-



Indirect Costs

Indirect costs are those incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited without effort disproportionate to the results achieved.

Indirect costs are normally charged to Federal awards by the use of an indirect cost rate. A separate indirect cost rate(s) is usually necessary for each department or agency of the governmental unit claiming indirect costs under Federal awards.

Typical examples of indirect costs may include

- State/local-wide central service costs
- General administration of the grantee department or agency, accounting and personnel services performed within the grantee department or agency
- Depreciation or use allowances on buildings and equipment
- Costs of operating and maintaining facilities

What is an Indirect Cost Rate?

An “indirect cost rate” is a device for determining in a reasonable manner the proportion of indirect costs each program should bear. It is the ratio (expressed as a percentage) of the indirect costs to a direct cost base.

An indirect cost rate is developed by preparing a cost allocation plan or an indirect cost rate proposal.



2 CFR 200.414

Obtaining an Approved Indirect Cost Rate

- Prepare an indirect cost rate proposal for a given period (ICRP)
 - Includes the rates proposed and supporting documentation
 - A copy of the financial data upon which the rate is based
 - The approximate amount of direct base costs incurred under Federal awards
 - An organizational chart for the agency during the period which the proposed rate will apply
 - A Certificate of Indirect Costs
- Submit ICRP to cognizant Federal Agency
 - The cognizant Federal agency is determined by the Office of Management and Budget's (OMB) Federal Register Notice 51 FR 552. If the grantee agency is not listed then the cognizant Federal agency is the agency providing the greatest amount of funds
- Cognizant Federal agency reviews and negotiates rate
- Rate is agreed upon and approved for that period
 - The grantee is required to submit a new Indirect Cost Rate Proposal for future periods

Indirect cost rates must be negotiated annually with your cognizant Federal agency



Limitation on State Central Services

50 CFR 80.53

Administrative costs in the form of overhead or indirect costs for State central services outside of the State fish and wildlife agency must be in accord with an approved cost allocation plan and shall not exceed in any one fiscal year three per centum of the annual apportionment.

Additional guidance can be found in the policy memorandum titled "3% Central Services Limitation (WR/SFR)" located in the Toolkit

Calculation of Statewide Central Services Limitation

The State of Protection has an approved SWCAP for allocating the cost of providing centralized computer, purchasing and accounting services to all State (operating) departments and agencies.

The State of Protection has determined that the central services cost allocable to Protection Department of Fish and Wildlife is \$575,000.

Protection Department of Fish and Wildlife is developing an indirect cost rate proposal to obtain an approved indirect cost rate to recoup indirect costs from Wildlife and Sport Fish Restoration awards.

Calculate the limit according to 50 CFR 80.53:

$$11,000,000 \text{ (Annual Apportionment)} \times 3\% \text{ (Max \% Allowed)} = 330,000 \text{ Limit}$$

Indirect costs included in indirect cost rate proposal:

Protection Dept of Fish and Wildlife - Indirect costs	15,000,000
Statewide Central Services (<i>3% Limit</i>)	+ <u>330,000</u>
Total Indirect Cost Pool	<u>15,330,000</u>

Indirect Rate Calculation:

Total Indirect Cost Pool	15,330,000
Direct Cost Base (<i>Salaries and Fringe</i>)	/ <u>150,000,000</u>
Indirect Rate	10.2%

Types of Indirect Rates

- Provisional Rate – This is a temporary rate established for a period of time and based on estimated costs until a final rate can be determined. A provisional rate is often sought by grantees that have no prior federal grants or contracts. The provisional rate, which is based on estimated costs, is later revised to a final rate
- Final Rate – The rate established after an organization’s actual costs for an operating period are known
- Predetermined Rate – This is a rate established for a specified period (usually 1 to 3 years) and it is not subject to adjustment. This rate is used when financial data demonstrate a reasonable assurance that a reimbursement rate is likely to remain stable based on the grantee’s actual costs, both previous and forecasted
- Fixed Rate with Carry-Forward: This is a permanent rate established for a future (prospective) period of time. The grantee is reimbursed at this rate, but after actual costs have been determined, the difference between fixed and actual is carried forward to a future period in order to adjust the fixed rate for under or over recovery of indirect costs
- Special Rate: Special rates may be developed to deal with unique situations. They are often used by colleges and universities when indirect costs are different for on-campus and off-campus activities

Selecting the Type of Indirect Base

- Salaries
- Salaries and Fringe Benefits
- Total Modified Total Direct Costs (TMDC)
 - Less Distorting items
 - Capital Expenditures
 - First \$25,00 of subgrants and contracts

The direct cost base selected should result in each award bearing a fair share of indirect costs in reasonable relation to the benefits received from those indirect cost

The Calculation

$$(\text{Base}) * (\text{Rate}) = \text{Total Indirect Costs}$$

Applying the Indirect Cost Rate

Approved indirect cost rates are included in the grant application package in the estimated budget as part of the grant costs. The approved rate is applied against the base (all direct costs, direct salaries or direct salaries plus fringe depending on the base approved in the indirect cost rate proposal). Please note, when using a total direct cost rate, you must subject distorting items from your base prior to apply the rate. Some examples of distorting items would be pass-through funds and capital expenditures.

As direct costs are incurred and charged to the approved grant award the approved indirect cost rate is applied to determine the total grant costs.

The total cost of the grant award may then be reimbursed based on the federal / state cost share (75/25). The indirect rate will also be documented on the Financial Status Report SF-425.

Indirect cost rate proposals are typically prepared by State fiscal year. When an award crosses State fiscal years, more than one rate will apply

If more than one indirect rate applies during the grant period the appropriate rate should be used.

The 10.2% would then be applied against total direct salaries and fringe from protect costs, since the only salaries and fringe were included in the total direct costs.

In our previous example for the Protection Department of Fish and Wildlife: Fisheries Research Activities F - 12-R-10

	Direct Costs	Indirect Costs	Total Costs
Salaries	245,000		245,000
Fringe Benefits	55,000		55,000
Base Indirect Costs		300,000	
Travel	20,000		20,000
Supplies	80,000		80,000
Approved Indirect Rate 10.2%		30,600	30,600
Total	400,000	30,600	430,600

The 10 Percent Rule

The Federal awarding agency **may, at its option**, restrict the transfer of funds among direct cost categories or programs, functions and activities for Federal awards in which the Federal share of the project exceeds the Simplified Acquisition Threshold and the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the total budget as last approved by the Federal awarding agency.

The Federal awarding agency cannot permit a transfer that would cause any Federal appropriation to be used for purposes other than those consistent with the appropriation.

The Current Federal
Simplified Acquisition
level is \$150,000

Budget Changes Required Federal Approval

- The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval in accordance with 2 CFR 200 Subpart E—Cost Principles or applicable program regulation
- Unless described in the application and funded in the approved Federal awards, the subawarding, transferring or contracting out of any work under a Federal award. This provision does not apply to the acquisition of supplies, material, equipment or general support services
- Changes in the amount of approved cost-sharing or matching provided by the non-Federal entity

No other prior approval requirements for specific items may be imposed unless a deviation has been approved by OMB



Learning Points

- ✓ Grantees must follow applicable administrative, audit and cost principles when accounting for Federal financial assistance awards
- ✓ States expend and account for grant funds in accordance with State laws and procedures
- ✓ Costs charged to Federal awards must be allowable and in accordance with applicable cost principles
- ✓ Direct costs are those costs that can be identified specifically with a particular cost objective such as a project, service or other activity
- ✓ Indirect costs are those costs incurred for a common or joint purpose and cannot be readily identified with a particular cost objective
- ✓ An indirect cost rate is the ratio or percentage of an organization's total indirect costs (overhead/administrative costs) to its direct cost base. The rate is used by a non-federal entity to distribute indirect costs to individual Federal awards by applying the rate to either total direct or modified direct costs of the award
- ✓ Grantees submit indirect cost rate proposals and receive the approved indirect cost rate to the cognizant Federal agency. An indirect cost rate cannot be used unless approved
- ✓ States must ensure that indirect costs for statewide central services are limited to 3% of the apportionment for WR and SFR programs
- ✓ Matching or cost sharing must be met at the sub-account (sub-activity) level for grants containing funds at the project level

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Objectives:

1. Define subrecipient and vendor
2. Describe the characteristics used to determine subrecipients versus vendors
3. Recognize different rules and regulations apply when passing grant funds to subrecipients
4. Review the grantee's responsibilities and the regulations to be followed when using a subrecipient

Background

In implementing WSFR grant programs, grantees may contract with outside entities to perform grant related functions or activities.

Depending on the relationship between the grantee and entity and certain characteristics of goods received or services performed an entity may be considered a subrecipient or a vendor.

Federal regulations differ for subrecipients and vendors. In order to comply with the correct regulations a determination between subrecipient or vendor must be made.

Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency. (2 CFR 200.93)

Subrecipient and Vendor Determinations

The non-Federal entity may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities. Therefore, a pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor. The Federal awarding agency may supply and require recipients to comply with additional guidance to support these determinations provided such guidance does not conflict with this section.



2 CFR 200.330

Subrecipient vs. Vendors

Subrecipient (Federal award):

Subrecipient:

When the entity

- Determines who is eligible to receive Federal financial assistance
- Has its performance measured against whether the objectives of the Federal program are met
- Has responsibility for programmatic decision making
- Has responsibility for adherence to applicable Federal compliance requirements, and
- Uses the Federal funds to carry out a program of the organization as compared to providing goods or services for a program of the pass-through entity

Contractors:

When the entity

- Provides the goods and services within normal business operations
- Provides similar goods or services to many different purchasers
- Operates in a competitive environment
- Provides goods or services that are ancillary to the operation of the Federal program, and
- Is not subject to compliance requirements of the Federal program.

Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward (see §200.92 Subaward).



Exercise: Components of a Subrecipient Agreement

Using 2 CFR 200.331 answer the question below

1. What are the required elements for pass-through entities to include in their agreement with subrecipients?

Subrecipient name (which must match registered name in DUNS); Subrecipient's DUNS

Number, Federal Award Identification Number, Federal Award Date

Subaward Period of Performance Start and End Date

Amount of Federal Funds Obligated by this action

Total Amount of Federal Funds Obligated to the subrecipient

Total Amount of the Federal Award

Federal award project description, as required to be responsive to the Federal Funding

Accountability and Transparency Act (FFATA)

Name of Federal awarding agency, pass-through entity, and contact information for awarding official

CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement

Identification of whether the award is R&D

Indirect cost rate for the Federal award

Above are some of the required items for a complete list see 2 CFR 200.331

Compliance Requirements

In accepting Federal funds the State agrees to comply with all applicable Federal laws, regulations and policies. This relates to complying with program, public and administrative requirements.

The State must ensure that their subrecipients also comply. Most if not all compliance requirements flow down to the subrecipient level. In addition, subrecipients must comply with State rules and regulations.

Program Regulations

Program regulations are passed down from the State to the subrecipient. This includes eligibility requirements, allowable activities and any other program regulations. These requirements may be listed or referenced in the agreement.

Examples:

Boating Infrastructure Grant Program – requires facilities to be reasonably accessible and open to the general public.

Clean Vessel Act – Limits charges for use of facilities.

Public Policy Requirements

Public policy requirements are imposed on grant recipients and subrecipients. These requirements are executive orders of the President, laws enacted by Congress and regulations issued by Federal agencies.

The requirements may be listed or referenced in the agreement or the State may have the subrecipient sign a statement of assurances similar to the Statement of Assurances the State submits to the Federal agency.

The State should make a determination as to which public policy requirements are applicable to their grant program and incorporate these into the subrecipient agreement.

Examples:

American Disabilities Act

Civil Rights Act

Uniform Relocation Assistance and Real Property Acquisition Policies Act

Historic Preservation Act

Compliance Requirements (cont'd)

Audits

All grantees that expend \$750,000 or more of Federal awards in a fiscal year must have a single audit according to 2 CR 200..

Subrecipients falling under this regulation and having findings affecting the State (primary grantee) must submit the final single audit report to the State for review. If an audit is required but there were no findings affecting the State, the subrecipient must submit a letter stating the audit was performed and there were no findings affecting the State.

See 2 CFR 200.331 on requirements for monitoring audits of subrecipients or arranging for audits

The State is responsible for determining whether the subrecipient meets the \$750,000 threshold and, if so, submits the required audit report and corrective action plan or letter. This may be used as one of the monitoring tools.

A State may choose to arrange for a limited scope audit to monitor subrecipients that are not subject to the Single Audit Act.

Site Visits

Site visits allow State personnel to inspect facilities and operations for compliance, review documentation and records, and view progress.

The State may consider including information on site visits in the subrecipient agreement and develop monitoring policies and procedures for staff use. In addition States should document the findings or recommendations following the site visit.

Document Reviews

States may review of documentation and reports to monitor subrecipients

- Review payment request (may include supporting documentation)
- Compliance documents
- Financial reports
- Performance or Progress report



Learning Points

- ✓ When contracting with an outside entity to perform grant related functions or activities, the grantee must determine the nature of the relationship
- ✓ Typically a vendor provides goods or services to the grantee organization in contrast to a subrecipient that provides services to the public or for carrying out the grant program
- ✓ Subrecipients follow the requirements and cost principles specific to their organization type. For example, non-profit organizations follow OMB Circulars A-110, A-122 and A-133
- ✓ Grantees are responsible for identifying and providing the subrecipient with information concerning requirements, monitoring, etc., in the agreement
- ✓ Grantees are responsible for monitoring subrecipients for performance and compliance with federal regulations as well as any State regulations

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Instructors

Phil King
Wildlife & Sport Fish Restoration
U.S. Fish and Wildlife Service (NCTC)
698 Conservation Way
Shepherdstown, WV 25443

Phone: (304) 876-7469
Fax: (304) 876-7757

Email: phil_king@fws.gov

Phil joined the Wildlife and Sport Fish Restoration (WSFR) training team as an instructor in April 2009. He works as an instructor developing and delivering grant management training courses.

Prior to joining WSFR, Phil was the Federal Aid Coordinator for the Ohio Department of Natural Resources (ODNR), Division of Wildlife for 8 years. Phil served a total of 21 years with ODNR holding positions as Hunter Education Coordinator, Project WILD Coordinator, Becoming an Outdoors Woman Coordinator and State Park Naturalist.

Phil received an A.A.S. degree in Recreation and Wildlife from Hocking College in Nelsonville, Ohio.

Scott Knight
Wildlife & Sport Fish Restoration
U.S. Fish and Wildlife Service (NCTC)
698 Conservation Way
Shepherdstown, WV 25443

Phone: (304) 876-7465
Fax: (304) 876-7757

Email: scott_knight@fws.gov

Scott is currently the National Training Coordinator for WSFR Programs – Information Management Branch. Since March of 2005, he has worked as an instructor developing and delivering grant management training courses.

Prior to working with WSFR, Scott was the Business Manager for the Wildlife Resources Section of West Virginia Division of Natural Resources (WVDNR) for 10 years. He served as the Fiscal Coordinator for Federal Assistance projects, administrator for the Hunting and Fishing License Unit, and project leader for West Virginia's online hunting and fishing license system and the in-house point-of-sale system.

Scott holds a Bachelor's degree in Accounting from West Virginia State University. Prior to joining the WVDNR, Scott served in the military as a communications specialist including service during the Gulf War (1991).

Instructors

Chris Matthieson
Wildlife & Sport Fish Restoration
U.S. Fish and Wildlife Service (NCTC)
698 Conservation Way
Shepherdstown, WV 25443

Phone: (304) 876-7880
Fax: (304) 876-7757

Email: chris_matthiesen@fws.gov

Chris has been with the Wildlife and Sport Fish Restoration (WSFR) Program's training team since August 2011. He works as an instructor developing and delivering grant management training courses.

Prior to WSFR, Chris spent three years with Texas Parks and Wildlife (TPWD) as a federal grants accountant. While with TPWD he managed several grants from WSFR and other federal grant programs, as well as being the designated point of contact for federal grant management assistance to TPWD staff and subgrantees.

Ryan Oster
Wildlife & Sport Fish Restoration
U.S. Fish and Wildlife Service (NCTC)
698 Conservation Way
Shepherdstown, WV 25443

Phone: (304) 876-7926
Fax: (304) 876-7757

Email: ryan_oster@fws.gov

Ryan just recently joined the Wildlife and Sport Fish Restoration (WSFR) Program's training team in September 2014.

Prior to WSFR, Ryan worked for 14 years with the Kentucky Department of Fish and Wildlife Resources (KDFWR). During his tour of duty, he worked as a District Fisheries Biologist managing the state's premiere fisheries at Kentucky and Barkley Lakes. He also oversaw all warm-water sport fish research projects focusing on innovative research to improve the state's resources. During his last eight years, he served as the Federal Aid Coordinator for the fisheries division. He is an avid angler and enjoys spending his free time on the water chasing anything that swims.

11

Completing the Federal Financial Form (SF-425)

Wildlife and Sport Fish Restoration Program

Version 3.0



FEDERAL FINANCIAL REPORT

(Follow form instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted	2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)	Page 1	of pages
3. Recipient Organization (Name and complete address including Zip code)			
4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)	6. Report Type <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final
		7. Basis of Accounting <input type="checkbox"/> Cash <input type="checkbox"/> Accrual	

1	Federal Agency and Organizational Element to Which Report is Submitted	Enter the name of the Federal agency and organizational element identified in the award document or as instructed by the agency.
2	Federal Grant or Other Identifying Number Assigned by Federal Agency	For a single award, enter the grant number assigned to the award by the Federal agency. For multiple awards, report this information on the <i>FFR Attachment</i> . <i>Do not complete this box if reporting on multiple awards.</i>
3	Recipient Organization	Enter the name and complete address of the recipient organization including zip code.
4a	DUNS Number	Enter the recipient organization's Data Universal Numbering System (DUNS) number or Central Contract Registry extended DUNS number.
4b	EIN	Enter the recipient organization's Employer Identification Number (EIN).
5	Recipient Account Number or Identifying Number	Enter the account number or any other identifying number assigned by the recipient to the award. This number is for the recipient's use only and is not required by the Federal agency.
6	Report Type	Mark appropriate box. <i>Do not complete this box if reporting on multiple awards. Marking the "Final" box will cause the grant to be closed and no further draws can be made against the grant.</i>
7	Basis of Accounting (Cash/Accrual)	Specify whether a cash or accrual basis was used for recording transactions related to the award(s) and for preparing this FFR. Accrual basis of accounting refers to the accounting method in which expenses are recorded when incurred. For cash basis accounting, expenses are recorded when they are paid.

Grant and Reporting Period Dates

8. Project/Grant Period From : (Month, Day, Year) To: (Month, Day, Year)	9. Reporting Period End Date (Month, Day, Year)
-------------------------------------------------------------------------------------------	------------------------------------------------------------------

8	Project/Grant Period, From: (Month, Day, Year)	<p>Indicate the period established in the award document during which Federal sponsorship begins and ends.</p> <p>Note: Some agencies award multi-year grants for a project period that is funded in increments or budget periods (typically annual increments). Throughout the project period, agencies often require cumulative reporting for consecutive budget periods. Under these circumstances, enter the beginning and ending dates of the project period not the budget period.</p> <p><i>Do not complete this line if reporting on multiple awards.</i></p>
	Project/Grant Period, To: (Month, Day, Year)	See the above instructions for “Project/Grant Period, From: (Month, Day, Year).”
9	Reporting Period End Date: (Month, Day, Year)	Enter the ending date of the reporting period. For quarterly, semi-annual, and annual interim reports, use the following reporting period end dates: 3/31, 6/30, 9/30, or 12/31. For final <i>FFRs</i> , the reporting period end date shall be the end date of the project or grant period.

Do not complete this line if reporting on multiple awards.

In box 8 indicate the grant period specified in the notice of award letter. The notice of award establishes the beginning and ending dates for the award.

Enter the ending date of the reporting period in box 9. For quarterly, semi-annual, and annual interim reports, the reporting period end dates will always be either 3/31, 6/30, 9/30, or 12/31. For final Federal Financial Report, the reporting period end date shall be the end date of the project or grant period. Ensure that you account for any revisions to the original grant.

Federal Cash

10. TRANSACTIONS

Federal Cash (To report multiple grants, also use FFR Attachment):
a. Cash Receipts
b. Cash Disbursements
c. Cash on Hand (line a minus b)

10	Transactions Enter cumulative amounts from date of the inception of the award through the end date of the reporting period specified in line 9. Use Lines 10a through 10c, Lines 10d through 10o, or Lines 10a through 10o, as specified by the Federal agency, when reporting on single grants. Use Line 12, Remarks, to provide any information deemed necessary to support or explain <i>FFR</i> data.
10a	Cash Receipts Enter the cumulative amount of actual cash received from the Federal agency as of the reporting period end date.
10b	Cash Disbursements Enter the cumulative amount of Federal fund disbursements (such as cash or checks) as of the reporting period end date. Disbursements are the sum of actual cash disbursements for direct charges for goods and services, the amount of indirect expenses charged to the award, and the amount of cash advances and payments made to subrecipients and contractors. For multiple grants, report each grant separately on the <i>FFR</i> Attachment. The sum of the cumulative cash disbursements on the <i>FFR</i> Attachment must equal the amount entered on Line 10b, <i>FFR</i> .
10c	Cash On Hand (Line 10a Minus Line 10b) Enter the amount of Line 10a minus Line 10b. This amount represents immediate cash needs. If more than three business days of cash are on hand, the Federal agency may require an explanation Use Line 12, Remarks, explaining why the drawdown was made prematurely or other reasons for the excess cash.

The **Federal Cash** section is intended for use **only** in situations where federal funds are provided to the recipient in advance of incurred expenses rather than on a cost reimbursement basis.

The cumulative amount of actual cash received from the federal agency is recorded on line 10(a). This amount includes all of the Federal funds on deposit, imprest funds, and undeposited Treasury checks.

Line 10(b) requires entry of the cumulative amount of federal funds disbursed. Disbursements are the sum of actual cash disbursements for direct charges for goods and services, indirect charges, and cash payments or advancements made to subrecipients or contractors.

Federal Expenditures

Federal Expenditures and Unobligated Balance:	
d. Total Federal funds authorized	
e. Federal share of expenditures	
f. Federal share of unliquidated obligations	
g. Total Federal share (sum of lines e and f)	
h. Unobligated balance of Federal funds (line d minus g)	

10d	Total Federal Funds Authorized	Enter the total Federal funds authorized as of the reporting period end date.
10e	Federal Share of Expenditures	Enter the amount of Federal fund expenditures. For reports prepared on a cash basis, expenditures are the sum of cash disbursements for direct charges for property and services; the amount of indirect expense charged; the value of third-party in-kind contributions applied; and the amount of cash advance payments and payments made to subrecipients. For reports prepared on an accrual basis, expenditures are the sum of cash disbursements for direct charges for property and services; the amount of indirect expense incurred; the value of in-kind contributions applied; and the net increase or decrease in the amounts owed by the recipient for (1) goods and other property received; (2) services performed by employees, contractors, subrecipients, and other payees; and (3) programs for which no current services or performance are required. Do not include program income expended in accordance with the deduction alternative, rebates, refunds, or other credits. (Program income expended in accordance with the deduction alternative should be reported separately on Line 10o.)
10f	Federal Share of Unliquidated Obligations	Unliquidated obligations on a cash basis are obligations incurred, but not yet paid. On an accrual basis, they are obligations incurred, but for which an expenditure has not yet been recorded. Enter the Federal portion of unliquidated obligations. Those obligations include direct and indirect expenses incurred but not yet paid or charged to the award, including amounts due to subrecipients and contractors. On the final report, this line should be zero unless the awarding agency has provided other instructions. <i>Do not include any amount in Line 10f that has been reported in Line 10e. Do not include any amount in Line 10f for a future commitment of funds (such as a long-term contract) for which an obligation or expense has not been incurred.</i>

Federal Expenditures (Cont.)

Federal Expenditures and Unobligated Balance:	
d. Total Federal funds authorized	
e. Federal share of expenditures	
f. Federal share of unliquidated obligations	
g. Total Federal share (sum of lines e and f)	
h. Unobligated balance of Federal funds (line d minus g)	

10g	Total Federal Share (Sum of Lines 10e and 10f)	Enter the sum of Lines 10e and 10f.
10h	Unobligated Balance of Federal Funds (Line 10d Minus Line 10g)	Enter the amount of Line 10d minus Line 10g.

The Federal Expenditures and Unobligated Balance section of the report provides for reporting the federal funds authorized, expended, obligated but not yet paid and any remaining unobligated balance.

Line 10(d), the total federal share authorized is the amount of **funds obligated** for the grant not the approved federal share. Remember, if your grant was not fully obligated (deficit or subject to availability of funds) it will not be the same as the approved grant amount. Be sure to include any amendments.

On line 10(e) record the federal cost share of disbursements for all direct charges for goods and services and indirect charges to the award. **Do not** include any portion of program income expended in this section. Program income expended is reported on Line 10(m) for the deductive method and line 10(n) for the additive method. **Do not** include any portion of third party in kind contributions. Department of Interior guidance 43 CFR 12.64(a) Administrative and Audit Requirements and Cost Principles for Assistance Programs, prohibits third party in-kind as part of the Federal share.

Line 10e

INCLUDES

The federal share of expenditures for:

- Direct charges for goods and services
- Indirect expenses

DOES NOT INCLUDE

- Any federal program income
- Refunds, rebates or other credits
- Third party in-kind contributions

Federal Expenditures (Cont.)

Federal Expenditures and Unobligated Balance:	
d. Total Federal funds authorized	
e. Federal share of expenditures	
f. Federal share of unliquidated obligations	
g. Total Federal share (sum of lines e and f)	
h. Unobligated balance of Federal funds (line d minus g)	

10g	Total Federal Share (Sum of Lines 10e and 10f)	Enter the sum of Lines 10e and 10f.
10h	Unobligated Balance of Federal Funds (Line 10d Minus Line 10g)	Enter the amount of Line 10d minus Line 10g.

The Federal share of unliquidated obligations, on line 10(f) is obligations and expenses incurred, but not yet paid under a cash basis accounting system or expenses and obligations incurred, but not yet recorded under an accrual based accounting system.

These obligations include direct and indirect expenses incurred, but not yet paid or not yet charged to the award including amounts due to sub-recipients and contractors. This line should be zero if it is a final report. Do not include any amount in Line 10(f) previously recorded in Line 10(e).

The unobligated balance of federal funds is the remaining unused funds. If this is a **Final** report, the remaining funds will be de-obligated and disposed of according to specific grant program regulations.

Recipient Share (Cont.)

Recipient Share:	
i. Total recipient share required	
j. Recipient share of expenditures	
k. Remaining recipient share to be provided (line i minus j)	

10i	Total Recipient Share Required	Enter the total required recipient share for reporting period specified in line 9. The required recipient share should include all matching and cost sharing provided by recipients and third-party providers to meet the level required by the Federal agency. This amount should not include cost sharing and match amounts in excess of the amount required by the Federal agency (for example, cost overruns for which the recipient incurs additional expenses and, therefore, contributes a greater level of cost.
10j	Recipient Share of Expenditures	Enter the recipient share of actual cash disbursements or outlays (less any rebates, refunds, or other credits) including payments to subrecipients and contractors. This amount may include the value of allowable third party in-kind contributions and recipient share of program income used to finance the non-Federal share of the project or program. Note: On the final report this line should be equal to or greater than the amount of Line 10i.
10k	Remaining Recipient Share to be Provided (Line 10i Minus Line 10j)	Enter the amount of Line 10i minus Line 10j. If recipient share in 10j is greater than the required match amount in Line 10i, enter zero.

The **Recipient's share required** (the non-federal matching share required) should be recorded on line 10(i). The non-federal matching required is based on the amount of recipient share required to match the total Federal share recorded on line 10(d). *(An example calculation is on the next page)*

The amount recorded on line 10(i) should not include cost share and match amounts in excess of the match amount required (excess allowable costs, overmatch, cost overruns). Line 10(j) includes actual cash disbursements by recipients, payments to sub-recipients and contractors, and in-kind contributions such as volunteer hours and excess allowable costs. If line 10j exceeds line 10i, record a zero on line 10(k). Line 10(k) should never be negative as noted in the FFR instructions.

Remember!

Grantees may not be reimbursed for in-kind contributions. The total value of in-kind contributions is recorded in the recipient share portion of the form on

Recipient Share (Cont.)

Recipient Share:	
i. Total recipient share required	
j. Recipient share of expenditures	
k. Remaining recipient share to be provided (line i minus j)	

How to Calculate the Required Recipient Share (Grant not Fully Obligated):

The total Federal Share obligated is \$50,000 (line 10d). The Federal participation ratio is 75% (Wildlife Restoration). The amount entered on line 10(i) would be \$16,666.67.

How to Calculate the Required Recipient Share (Grant not Fully Obligated):

Step 1 – Determine the Adjusted Project Costs

$(\text{Federal Share Obligated} / \text{Federal Participation Rate}) = \text{Adjusted Project Costs}$

Example:

$$\$50,000 / 75\% = \$66,666.67$$

Step 2 – Determining the Recipient Share Required

$(\text{Adjusted Total Project Costs} - \text{Total Federal Share}) = \text{Recipient Share Required}$

$$\$66,666.67 - \$50,000 = \$16,666.67$$

Program Income

Program Income:		
I. Total Federal program income earned		
m. Program income expended in accordance with the deduction alternative		
n. Program income expended in accordance with the addition alternative		
o. Unexpended program income (line I minus line m or line n)		

10l	Total Federal Program Income Earned	Enter the amount of Federal program income earned. Do not report any program income here that is being allocated as part of the recipient's cost sharing amount included in Line 10j.
10m	Program Income Expended in Accordance With the Deduction Alternative	Enter the amount of program income that was used to reduce the Federal share of the total project costs.
10n	Program Income Expended in Accordance With the Addition Alternative	Enter the amount of program income that was added to funds committed to the total project costs and expended to further eligible project or program activities.
10o	Unexpended Program Income (Line 10l Minus Line 10m or Line 10n)	Enter the amount of Line 10l minus Line 10m or Line 10n. This amount equals the program income that has been earned but not expended, as of the reporting period end date.

The program income section of the report is used to track federal program income used in the additive and deductive methods. Enter the total amount of federal program income earned during the grant period on line 10(l).

The federal program income expended during the grant period used in accordance with the deductive method (the amount used to reduce total project costs) is shown in row 10(m).

Federal program income used in accordance with the additive method (the amount added to funds committed to the total project costs and expended to further eligible projects or program activities) is included in line 10(n). Use of the additive method for program income must be approved as part of the grant award.

Undisbursed Cost Share

If the Cost Share method is approved for use, record only the income in excess of the estimated approved amount in line 10(l). Income disposed of in the cost method is recorded on line 10(j).

Indirect Expenses

	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
11. Indirect Expense							
				g. Totals:			

11	Indirect Expense: Complete this information only if required by the awarding agency and in accordance with agency instructions.	
11a	Type of Rate(s)	State whether indirect cost rate(s) is Provisional, Predetermined, Final, or Fixed.
11b	Rate	Enter the indirect cost rate(s) in effect during the reporting period.
11c	Period From; Period To	Enter the beginning and ending effective dates for the rate(s).
11d	Base	Enter the amount of the base against which the rate(s) was applied.
11e	Amount Charged	Enter the amount of indirect costs charged during the time period specified. (Multiply 11b. x 11d.)
11f	Federal Share	Enter the Federal share of the amount in 11e.
11g	Totals	Enter the totals for columns 11d, 11e, and 11f.

This section of the report records the indirect costs charged to the grant by your agency. To charge indirect costs the agency must have an approved indirect cost plan. Indicate the type of rate (provisional, predetermined, final or fixed) and the amount of the base against which the rate is applied (salaries, total costs, etc.) Enter in 11e the amount of indirect costs charged during the period specified (line 11b X 11d) and calculate the federal share (usually 75% or 50%) of the amount in 11e.

Multiple Indirect Rates

If more than two rates were used during the grant period all rates must be shown. To document more than two rates you may attach an additional document with the required information.

Remarks

<p>12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:</p>

12	Remarks	Enter any explanations or additional information required by the Federal sponsoring agency including excess cash as stated in line 10c.
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Use the Remarks section on line 12 to explain or record additional information such as credits and sub-account accounting details.

If the space provided is insufficient, you may attach additional sheets.

Signature and Contact Information

<p>13. Certification: By signing this report, I certify that it is true, complete, and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)</p>	
a. Typed or Printed Name and Title of Authorized Certifying Official	c. Telephone (Area code, number and extension)
b. Signature of Authorized Certifying Official	d. Email address
	e. Date Report Submitted (Month, Day, Year)

13a	Typed or Printed Name and Title of Authorized Certifying Official	Enter the name and title of the authorized certifying official.
13b	Signature of Authorized Certifying Official	The authorized certifying official must sign here.
13c	Telephone (Area Code, Number and Extension)	Enter the telephone number (including area code and extension) of the individual listed in Line 13a.
13d	E-mail Address	Enter the e-mail address of the individual listed in Line 13a.

An authorized representative of the grantee must sign the SF-425.

Examples: Preparing a Federal Financial Report

1. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Share: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: None
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$403,000 (does not include In-kind)
In-kind Match = \$0
Program Income: \$0 (earned)

2. FFR due by 9/30/09 (Final).

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Share: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: None
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$175,000 (does not include In-kind)
In-kind Match = \$45,000 (documented)
Program Income (deductive): \$100 (earned)

3. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (deductive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$435,000 (does not include In-kind)
Program Income: \$10,000 (earned)
In-Kind: \$0

Examples: Preparing a Federal Financial Report

4. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (fully obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (approved in additive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$435,000
Program Income: \$10,000 (earned)
In-Kind: \$0

5. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (\$200,000 obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (deductive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$310,000 (does not include in-kind)
Program Income: \$10,000 (earned)
In-Kind Match: \$100,000 (documented)

6. FFR due by 9/30/09 (Final).

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Share: \$300,000 (\$200,000 obligated)
State Share: \$100,000
Estimated Program Income: \$10,000 (additive method)
Effective date: 7/1/08– 6/30/09

Total Expenditures: \$310,000 (does not include In-kind)
Program Income: \$10,000 (earned)
In-Kind Match: \$100,000 (documented)

Examples: Preparing a Federal Financial Report

7. FFR due by 9/30/09 (Final)

Approved Award: W-18-HS-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000 (fully obligated)
State Share: \$100,000
Effective date: 7/1/08– 6/30/09
Estimated Program Income: \$10,000 (additive method)

Total Expenditures: \$150,000 (does not include In-kind)
Program Income: \$10,000 (earned)
In-Kind Match: \$95,000 (documented)

8. FFR due by 9/30/09 (Final)

Approved Award: W-18-D-6
Total Grant Award: \$400,000
Federal Award Amount: \$300,000
State Share: \$100,000
Period of Award: 7/1/08 – 6/30/09

Total Expenditures: \$435,000
Disallowed costs from a recent OIG audit of W-18-D-5: \$10,000
Program Income: \$0.00
In-Kind Match: \$0.00