



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington, D.C. 20240

AUG 11 2010



In Reply Refer To:
FWS/AWSR/AWSR-POP/045821

Memorandum

To: Chief, Wildlife and Sport Fish Restoration Division, Regions 1-8
From: Assistant Director, Wildlife and Sport Fish Restoration Program *Hannibal Bolton*
Subject: Supplemental Guidance for Administering Wildlife Restoration Grants - the Council to Advance Hunting and the Shooting Sports

The purpose of this memorandum is to provide supplemental program guidance for consistent administration of Pittman-Robertson Wildlife Restoration grant proposals submitted by State fish and wildlife agencies to fund the Council to Advance Hunting and the Shooting Sports (CAHSS).

The attached guidance answers common questions related to grant processing, administration, and post award monitoring of the CAHSS project for States that submit a grant proposal to the U.S. Fish and Wildlife Service's Wildlife and Sport Fish Restoration Program (WSFR) Regional offices. Types of questions addressed are: financial and performance reporting, program and subprogram funding sources, eligible activities, and matching funds.

If you have questions or concerns on this guidance, please contact me or Glen Salmon, Deputy Assistant Director, WSFR at (703) 358-2409.

Attachment



SUPPLEMENTAL GUIDANCE FOR GRANT ADMINISTRATION - THE COUNCIL TO ADVANCE HUNTING AND THE SHOOTING SPORTS

Below are some common questions and answers regarding grant administration and processing for States that submit a grant proposal to the U.S. Fish and Wildlife Service's Wildlife and Sport Fish Restoration Program (WSFR) to support a national Council to Advance Hunting and the Shooting Sports project.

Q1. What is the Council to Advance Hunting and the Shooting Sports (CAHSS)?

A1. CAHSS was incorporated in 2009 as a nonprofit Section 501(c)(3) corporation. As stated in the CAHSS bylaws, the nonprofit corporation is a charitable and/or educational organization formed for the following purposes:

- 1) To support research, management and program activities towards building participation of the public into the shooting and hunting sports traditions.
- 2) To determine societal obstacles to success and share that information with the public to educate them on the profound contribution that has been made by shooting and hunting.
- 3) To maintain and continue to grow financial support from Federal excise taxes from the shooting and hunting industry for State wildlife agencies' responsibilities for the conservation efforts and wildlife management and participation of the public into the hunting and shooting sports traditions; and to work with the States to grown financial support from other sources; and
- 4) To educate industry, shooters, hunters, outdoor enthusiasts and the general public about the exceptional values to the natural resources and to society that would accrue from sustained support for hunting, trapping, recreational shooting sports, wildlife conservation, and wildlife management.

Q2. What types of activities is CAHSS planning to engage in?

A2. As identified in the charter, CAHSS is working on several different activities related to wildlife conservation, hunting, trapping, and the shooting sports. Primarily, the CAHSS serves as a clearinghouse for information related to wildlife conservation, hunting, trapping, and the shooting sports and provides it to States, Commonwealths, and territories (States). The CAHSS will identify other activities later, such as strategic evaluations of recruitment and retention techniques and programs, conducting user surveys, developing materials for distribution and other activities that meet their organizational goals.

Q3. Does CAHSS have a formal relationship with the Association of Fish and Wildlife Agencies (AFWA)?

A3. Yes. The AFWA is the Registered Agent for CAHSS.

Q4. How does CAHSS propose to fund national activities?

A4. The CAHSS has encouraged States to fund a national project through Wildlife Restoration grants approved through WSFR regional process.

Q5. Is CAHSS an entity eligible to receive Wildlife Restoration funding from State fish and wildlife agencies?

SUPPLEMENTAL GUIDANCE FOR GRANT ADMINISTRATION - THE COUNCIL TO ADVANCE HUNTING AND THE SHOOTING SPORTS

A5. Yes. CAHSS was incorporated in 2009 as a nonprofit Section 501(c)(3) corporation. As stated in the CAHSS bylaws, the nonprofit corporation is a charitable and/or educational organization for the purposes stated in Q1.

Q6. Does CAHSS engage in activities that promote or otherwise attempt to influence legislation?

A6. No. As a nonprofit Section 501(c)(3) corporation, CAHSS and its Directors are prohibited from taking any substantial action in promoting or otherwise attempting to influence any legislation nor do they participate in or intervene in any political campaign on behalf of or in opposition to any candidate for public office.

Q7. Is there any national oversight of the CAHSS effort?

A7. AFWA and the Directors of State fish and wildlife agencies oversee CAHSS. Additionally, a national Technical Advisory Committee is being formed of State and Federal grant managers and WSFR and AFWA representatives to review issues related to Federal grants, such as allowable costs, financial and performance reporting, and maintaining eligibility standards.

Q8. What grant type identifier will the CAHSS activity be?

A8. The grant type identifier is coordination or "C" (example – W-1-C Segment 1).

Q9. Is there a recommended CAHSS grant template available?

A9. Yes, the Assistant Director (AD) for the WSFR, Executive Director of AFWA, the national Technical Advisory Committee, and the CAHSS approved a grant template. States should use this grant template to draft a project proposal to request Federal Wildlife Restoration funds. The President of AFWA sent out the CAHSS grant template to States on July 9, 2010.

Q10. What is the grant period for this grant proposal?

A10. The recommended grant period is five years, to start September 1, 2010 and end on August 31, 2015. However, States have the option to submit a grant proposal annually or for multiple year grants. However, all grant periods should have the same effective start date of September 1 and end date of August 31 to facilitate reporting. It is unknown at present if CAHSS will continue to be funded through individual State grants after August 31, 2015

Q11. What is the effective date for this grant proposal?

A11. To satisfy national performance and financial reporting requirements for this project, all grants should be effective on September 1 of each year, as outlined in the approved grant template sent out to States on July 9, 2010, by the AFWA President. Grants with effective dates other than September 1 should not be approved for funding until the following year.

Q12. What is the reporting period for this grant proposal?

A12. To achieve consistency in national project accomplishment reporting and to satisfy Federal annual, interim and final performance and financial reporting requirements for the State grants funding the project, all grants should specify a reporting period of September 1 through August

**SUPPLEMENTAL GUIDANCE FOR GRANT ADMINISTRATION - THE COUNCIL TO
ADVANCE HUNTING AND THE SHOOTING SPORTS**

31 of each year. This was outlined in the approved grant template sent out to States on July 9, 2010 by the AFWA President.

Q13. What are the funding sources for the CAHSS grant proposal?

A13. States may select from one or more of these eligible funding sources: (1) Wildlife Restoration, (2) Section 4(c) Hunter Education and Safety (Basic hunter education), and (3) Section 10 Hunter Education and Safety (Enhanced hunter education).

Q14. What types of projects are eligible for funding?

A14. Projects must be substantial in character and design as outlined in 50 CFR 80 and eligible under the Pittman-Robertson Wildlife Restoration Act (16 U.S.C. 669-669k), as amended.

Q15. What activities are eligible for funding under this grant proposal?

A. Activities should follow the eligibility standards for Basic hunter education, Enhanced hunter education, and Wildlife Restoration funding sources, as outlined in 16 U.S.C. 669-669k, as amended and Wildlife Restoration program regulations (50 CFR 80).

Examples of eligible activities include, but are not limited to:

- (1) Wildlife Restoration – human dimension research dealing with wildlife conservation;
- (2) Basic hunter education – research on the efficacy of advanced hunter education programs on recruitment and retention program; and implementation of model recruitment and retention programs if the activities involve teaching skills, knowledge, and attitude necessary to be a responsible hunter; and,
- (3) Enhanced hunter education – implementation of model recruitment and retention programs.

Q16. Should the eligible activities be proportionate to the available funding sources?

A16. Yes. The annual CAHSS performance accomplishment report will indicate the funding sources of projects by subaccount funding. To the extent possible, the CAHSS will coordinate with the Technical Advisory Committee to ensure that activities, contracts, and expenditures are appropriate for the respective funding sources.

Q17. Where do the State matching funds for membership fees and other costs come from?

A17. As outlined in the proposed Membership Agreement distributed by AFWA , the CAHSS has a process to identify cooperators and secure eligible nonfederal matching funds to support them. The CAHSS will secure nonfederal match through various means, including, but not limited to

- Grant awards to the CAHSS from private foundations, individuals, or corporations;
- Membership in-kind or cash to the CAHSS;
- CAHSS contributions, including unrecovered indirect costs (43 CFR 12.923(b));
- Cooperator contributions identified by CAHSS; or

SUPPLEMENTAL GUIDANCE FOR GRANT ADMINISTRATION - THE COUNCIL TO ADVANCE HUNTING AND THE SHOOTING SPORTS

- Contributions from industry and non-governmental partners.

The CAHSS does not guarantee that sufficient match will be generated to meet member match requirements or that projects will be adequately funded. States will need to coordinate with CAHSS to determine if match is available for their proposal. Therefore, individual States may need to indicate that a nonfederal source of match for the proposed grant proposal may come from other sources, such as license or other agency revenues.

Q18. How do States know if activities engaged in by the CAHSS are appropriate for Wildlife Restoration funding?

A18. The Technical Advisory Committee consisting of State Coordinators, AFWA, and WSFR Grant Managers will review grant-supported work to ensure that the CAHSS engages in eligible Wildlife Restoration activities when those sources of funds are used. Fees paid by the State fish and wildlife agency for membership in CAHSS are an eligible grant cost for funding under Wildlife Restoration, Basic hunter education and/or Enhanced hunter education or a combination of these three sources.

Q19. Can outside entities carry out the CAHSS activities?

A19. Yes. CAHSS may use contracts, purchase agreements and other financial instruments to achieve the stated purposes. In addition, the national Technical Advisory Committee will review work activities to ensure that the costs are allowable under OMB A-122, Cost Principles for Non-Profit Organizations and meet Wildlife Restoration eligibility requirements in 50 CFR 80.

Q20. When can a State begin spending funds on CAHSS related activities covered under this grant proposal?

A20. As with any Wildlife Restoration grant, States should not incur expenses prior to approval by the Regional WSFR Division Chief. In addition to a grant proposal based on the template provided by AFWA, a contractual agreement, such as a Membership Agreement between the State and CAHSS, is needed to support a Grant proposal. The signed Membership Agreement should accompany the grant proposal documents or be submitted to the Regional WSFR Office before the State spends any funds.

Q21. Does a State need to fulfill compliance requirements?

A21. Yes. The State should submit supporting documents to fulfill environmental compliance (National Historical Preservation Act, National Environmental Policy Act, and Section 7 Interagency Consultation) and any other Federal laws, regulations, and policies tied to accepting Federal funds. States should review 523 FW 1: Federal Aid Compliance Requirements for more information on what they need to comply with to receive Federal funding. States can also contact their respective Regional WSFR Office with questions related to compliance. As an example, paying membership fees in a technical or professional organization could be determined as a categorically excluded activity for the purposes of NEPA as described in 516 DM 2.3A(2).

Q22. How should the State report annual, interim, and final performance information?

SUPPLEMENTAL GUIDANCE FOR GRANT ADMINISTRATION - THE COUNCIL TO ADVANCE HUNTING AND THE SHOOTING SPORTS

A22. For the purposes of the national CAHSS project, which is funded by separate Wildlife Restoration grants, one national report on CAHSS accomplishments can fulfill the requirement for each State that submitted a grant proposal that is substantially similar to the template approved by the Assistant Director, WSFR, and distributed by AFWA.

Q23. How will the performance reports be submitted to and approved by WSFR?

A23. The CAHSS will prepare a national performance report on activities accomplished during an annual period of September 1 through August 31 by November 30 of each year. This performance report, signed by the responsible CAHSS representative, will be sent annually by December 15 to: 1) the AD, WSFR; 2) each participating State fish and wildlife agency; and, 3) the AFWA and WSFR representatives on the Technical Advisory Committee. The State is not required to send in additional copies of the performance report to the Regional WSFR offices.

Q24. What information must be included in the performance report?

A24. The annual, interim, or final performance reports will include: list of accomplishments, an activity cost breakdown by Wildlife Restoration subprogram, and any significant deviations from annual work plans developed by CAHSS.

Q25. How is the national performance report approved by WSFR?

A25. The national report will be subject to final approval of the AD, WSFR after review by the Technical Advisory Committee. Each performance report will be reviewed by the Technical Advisory Committee for accuracy and completeness of information. The Technical Advisory Committee will make a recommendation for an approval or a conditional approval with a summary of information needed to meet performance report standards. The national CAHSS performance report approved by the AD, WSFR will meet State requirements for an annual, interim, or final performance report, as addressed in 50 CFR 80 or the Interim Guidance for Financial and Performance Reporting memorandum dated May 15, 2009 (<http://wsfrprograms.fws.gov/subpages/toolkitfiles/intgdrpt.pdf>).

Q26. How should the State report annual, interim, or final financial information?

A26. The State should prepare an annual, interim, or final financial status report based on the costs incurred by the individual State agency and submits it to their Regional WSFR Office. Financial status reports must be submitted as addressed in 50 CFR 80 or the Interim Guidance for Financial and Performance Reporting memorandum dated May 15, 2009 (<http://wsfrprograms.fws.gov/subpages/toolkitfiles/intgdrpt.pdf>).

Q27. What is required to amend a CAHSS grant?

A27. Each State is responsible for the submission of grant amendments following guidance in 50 CFR 80 and 43 CFR 12.

Q28. Is membership in CAHSS an eligible grant cost?

A28. Yes. As stated in OMB Circular A-87, Attachment B (28), Memberships, subscriptions, and professional activity costs, "Costs of a governmental unit's memberships in business, technical, and professional organizations are allowable". The CAHSS is a technical and professional

SUPPLEMENTAL GUIDANCE FOR GRANT ADMINISTRATION - THE COUNCIL TO ADVANCE HUNTING AND THE SHOOTING SPORTS

organization with purposes that advance eligible Wildlife Restoration purposes and, therefore, CAHSS membership fees are eligible costs using Wildlife Restoration, Basic hunter education or Enhanced hunter education or a combination of these three sources.

Q29. Under what conditions would the membership fee in CAHSS be ineligible as a grant cost?

A29. As stated in response to Q28, Federal funding can be used to pay for membership fees. However, CAHSS must meet the conditions stated in the signed State Membership Agreement. In each State Membership Agreement, Attachment A, Scope of Services, CAHSS agrees to comply with all laws, regulations, and policies applicable to federal assistance grant programs. This includes, but is not limited to, compliance with laws, regulations, and policies listed on applicable assurances statement (SF 424B or SF 424D). Further, CAHSS is prohibited from lobbying actions that influence or attempt to influence any officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

Q30. Will the CAHSS project be audited as other Wildlife Restoration grants are audited?

A30. Yes. State fish and wildlife agencies are audited on 5-year intervals. If the State agency has a CAHSS grant open during the 2-year period covered by the audit, the CAHSS grant is subject to review by the auditors.

Note to Reviewers

- This memorandum transmits guidance to Wildlife and Sport Fish Restoration Program (WSFR) regional staff for consistent administration and processing of Pittman-Robertson Wildlife Restoration grants to fund the Council to Advance Hunting and the Shooting Sports (CAHSS).
- This guidance answers common questions related to pre- and post award grant administration of State grant proposals submitted to support the national CAHSS project. The CAHSS project is proposed to strategically address national issues related to hunting and the shooting sports and to be funded by willing State partners, most of which propose to use Wildlife Restoration grant funds. This multiple grant funding approach has not been used in the past and it is critical that the project is implemented in a timely manner through a consistent administrative process. A representative group of WSFR staff, including four regional Hunter Education Grant Specialists, a regional WSFR Division Chief and two Washington Office Policy and Programs Division employees were involved in the development and review of the guidance.

Contact: Joyce Johnson, Chief, Policy and Programs, (703) 358-2231 or Tom McCoy, the Wildlife Restoration Coordinator at (703) 358-1849.