We received 112 comments from Survey #1, 14 comments from Survey #2, 196 comments on the Grants Manual, and 11 additional comments from the Ombuds Workgroup team.

These comments were split to separate topics, resulting in 453 comments.

Each comment was coded with one or more topics, shown in the list below.

We retained similar comments, where one respondent provided the same comment in multiple locations, or separate respondents provided identical comments.

If a comment was coded with more than one topic, it appears on each topic's page within this document.

Topics	Addressed	Pending	Total
Additional Support	1	3	4
Advances	3	5	8
Approvals / Exceptions	7	15	22
Audience		4	4
Award Start Dates		1	1
Basis of Rule		4	4
Benefits	2	1	3
Biennium Hard Stop		6	6
BMP splitting vs. lumping		3	3
Capital Assets	2	7	9
CAPP		4	4
Clothing / Apparel / PPE	3	3	6
Construction	2	2	4
Cost Share	8	33	41
Debarment	2	4	6
DIP	7	6	13
Editing / Organization	39	67	106
Electronic Signatures	5	1	6
Foreign Transaction Fees	1		1
Individual Grant Programs	4	10	14
Labor Rates		4	4
Meals		15	15
Mortgage		5	5
Overhead / Indirect	1	2	3
Peer-to-Peer Rentals	1	2	3
Philosophical Approach	4	17	21
Process of Rule Making / Revision	1	9	10
Scope of GM	3	15	18
Speaker Fees and Travel, Stipends		4	4
Taxes		4	4
Timing of Expenditures / Vouchering	25	26	51
Training, Tuition, Education		10	10
Travel	3	14	17
Vocab: Expenditure vs. Expense, etc.	2	18	20
Vouchering - Processes and Docs	11	12	23
WSCC - CD Interactions	5	6	11
z. Other	18	4	22
Total Mentions of Each Topic	**160**	**346**	**506**

Topic: Additional Support

Unique ID #	Comment	Status	Response to Date
258	Would be good to have regular training on this or a frequently asked question section so that people new to the grants and contracts roles at their respective CDs can get up to speed faster.	Addressed	SCC fiscal staff can train districts at anytime, please reach out to fiscal staff or your RM to get something scheduled.

Unique ID #	Comment	Status	Response to Date
217	Perhaps links to completed vouchers and cost-share contracts so new CD staff can see examples of a "good one." ;)	Pending	
296	It should reference materials or training support for new CD employees.	Pending	
537	Visuals: checklists, flowcharts, timelines for essential processes in order to visualize and demonstrate roles and flow of information in each significant process - Support: Ability to submit specific questions - Chatbot: Implement an online chatbot which can provide Q&A support of the manual	Pending	

Topic: Advances

Unique ID #	Comment	Status	Response to Date
200	Given our expanded projects, it would be helpful to allow for cash advances on a case-by-case basis outside of the traditional cost share/DIP process. For example, our septic reimbursements under our RCPP don't follow the typical process but are implemented on the ground.	Addressed	We can work through this with the exception process for 25-27, we are looking at expanding advance payments categories in 27-29
253	We had some issues with our RCPP advance request and the limitations the Commission had on their end with how RCPP was structured (TA vs Cost Share). Should this be mentioned in the manual or the online form? Also, the advance form asks for total value of projects under contract. If someone is entered into CPDS, does that constitute being under contract?	Addressed	We can work through this with the exception process for 25-27, we are looking at expanding advance payments categories in 27-29
268	Review options to prioritize cash flow for CDs.	Addressed	Comment Only

Unique ID #	Comment	Status	Response to Date
318	Updates to the advance payment policy for large equipment purchases and other types of advances outside of cost share/DIP	Pending	
369	Is it possible to add large equipment purchases to the advance policy? If the CD uses program funding to purchase an expensive piece of equipment, having an advance would help with cash flow or eliminate the need for a line of credit.	Pending	SCC is considering this change to our advance payment policy. Currently, we allow an exception request to be brought forward outlining why the advance is needed.
442	Form for advance payment references "projects currently under contract" but manual references the cost share or DIP allocation. Are these describing the same thing? Does "under contract" reference the contract between SCC and the CD or the CD and the cooperator? *	Pending	The projects currently under contract refers to the cost share or DIP allocation SCC has awarded to the district project implementation and is remaining in the grant to spend at the time the advance payment is requested.
451	Given our expanded projects, it would be helpful to allow for cash advances on a case-by-case basis outside of the traditional cost share/DIP process. For example, our septic reimbursements under our RCPP don't follow the typical process but are implemented on the ground.	Pending	We allow exceptions to our Advance Payment policy on a case by case basis. Please reach out to your RM for fiscal staff to request an exception with the explanation of why the exception is necessary.
475	Advance payments: I recommend SCC look at the RCO advance payment policies to help guide this. Their policy is located in Manual 8 pages 25-28. Their policy allows for short-term advances (3 months of coverage) that have to be reconciled within 120 days. This covers short-term issues and doesn't allow for advances to sit for long periods of time. Currently we can request a cash advance and hold it for a year or more creating issues with reconciliation over long periods of time.	Pending	We will be reviewing our advance payment policy in the next update, in additional to exploring this will also be looking at the allowable activities allowable for advances to expand beyond just cost share and DIP. We are currently limited in how our system allows advance payments due to financial database abilities.

Unique ID #	Comment	Status	Response to Date
175	(split 2 of 3) The ability to ask for exceptions to the cost share limit.	Addressed	Exceptions are allowed and we will be adding more guidance in the 27-29 manual on the exception process.
289	(split 3 of 3) The relatively prompt payments and flexible task budgets.	Addressed	Comment Only
337	Equipment purchase (pg 35) -> "allowable expense if included in the scope of work OR have prior written authorization from the financial staff OR program manager for all equipment purchases totaling over $2000". I like it this way, provides flexibility and shows trust for how we spend money. The commission sometimes seems to overstep slightly in wanting to authorize our expenses.	Addressed	Great!
355	Cost share appeals QUESTION - Does this only apply to districts?	Addressed	No, technically it can also apply to counties or other entities that have been awarded cost share funding.
469	Travel and Transportation: "Out of country and out of state travel must be approved in advance of the travel taking place." Can you clarify in the manual that this is for flights or extended travel, or put some qualifiers on it? We regularly travel to the Portland metro area for training or if we go to Underwood CD, we drive down to Portland and pay a toll to cross back over on the Hood River bridge. This policy would make those costs require approval. Perhaps there could be a threshold at which out-of-state travel requires approval?	Addressed	We have updated language to specify areas that are exempt from this "travel to counties and/or cities in the states of Idaho and Oregon that are contiguous to the border between Washington-Idaho or Washington-Oregon, or b) out-of-state employees traveling within the same state as their official workstation for travel reimbursement shall not be considered out-of-state." (per SAAM pg 1048)
492	Allowable Reimbursable Expenditures: 1/25 - Compensation for subcontracted personnel services... it's unclear if this is for any subcontract or just subcontracts for administrative work relating to staff. Regardless, having the contract be included in the addendum is a bit extra, and I don't think is actually enforced. Project plans change, and it's not feasible to have all subcontracting outlined in the addendum.	Addressed	While we understand this feels administratively burdensome, however because they are a contracted employee, there is no composite rate on file for the subcontracted personnel, that is how we verify the rate being charged to the grant.
527	Timing of Expenditures -> Exceptions are mentioned, but they refer to expenses the open period (i.e. fiscal years) not the calendar month. What about the "one-time exceptions" given from SCC staff under varying circumstances. We understand that this was born out of the SCC's audit recommendations, but the manual doesn't explain what it means and how it may affect the district.	Addressed	updated language to help with concerns with expenditures and we will add the exception process and any impact to the CD

Unique ID #	Comment	Status	Response to Date
150	Manual is solid, but I would like to request a policy change - that ~10% of total grant budget amount can be shifted to another line item without WSCC pre-approval - which is the case with many federal/state grants.	Pending	
170	(split 3 of 4) Bottom line, I would like us to be able to ... have assurances that we don't have to ask for permission to do everything we already included in grant agreements	Pending	
185	Compensation for subcontracted personnel services... it's unclear if this is for any subcontract or just subcontracts for administrative work relating to staff. Regardless, having the contract be included in the addendum is a bit extra, and I don't think is actually enforced. Project plans change and it's not feasible to have all subcontracting outlined in the addendum.	Pending	

186	Compensation for subcontracted personnel services: need to remove the requirement of it being within the grant addendum or contract. There is currently no way to accurately indicate this in the addendum form. In addition, this creates a huge administrative burden to WSCC to micromanage project implementation, specifically with DIP projects. Districts need the flexibility to make a decision whether staff time or contracted services is the appropriate/most efficient use of funds. A prime example is losing a staff member that was going to do the implementation but there is not enough time to complete the project with a new hire, so the decision is made to contract it out in the short term to complete the project. If it is a matter of cash vs payroll in your own system, that is not part of the addendum, but could be added with an added budget amendment component. Typical practice is up to 10% of total grant award can be shifted before a formal amendment is required.	Pending	
218	Perhaps this doesn't need to be in the manual, but should be linked within - clearer guidance on what is/isn't allowed re: the procedures of cost share. Allowable changes to a cost share contract. Refer to authorized district signatories when that is WSCC's requirement vs. Board when that is their requirement. We can determine what's allowed/required for board vs authorized signer via our policy, but for ages I thought cost share contracts required a board signature because all the WSCC material refers to needing that.	Pending	
244	Make sure there is clear definitions for language used for professionals

Make sure policy, requirements are clear. It gets confusing is procedures and BMP referenced and is not a requirement, so some think it is a requirement.

Make sure there is consistency, and all have the same interpretation of requirements, so all districts are treated equally, and there is a system for exemptions clearly visable. | Pending | |
| 257 | Policy change ~10% of total grant budget amount can be shifted to another existing line item without WSCC pre-approval | Pending | |
| 264 | It's not so much about the manual. It's about day to day practices and restrictions implemented by SCC finance staff. Our addendums include equipment, trainings, travel that are approved. The additional requirements for approval, that include more and more information and justifications has become so burdensome and time consuming. We have not been under this much scrutiny in previous years or by other state agencies. It's become untenable.

I've asked clarifying questions to finance staff via email but haven't receive responses. | Pending | |
| 265 | The current system of review and approval is very labor intensive that concentrates it all onto one or two people. That was fine in the past when Districts were less active. This paradigm needs to shift. There needs to be more reliance on clear grant applications and approved expenses to allow Districts to operate within the confines of those criteria to reduce the number of day to day management questions that Fiscal and Program staff have to engage on. Their time should be reserved to unique situations that require judgement and interpretation. | Pending | |
| 304 | Please also remove any requirements for CDs to get pre-approval from Commission Staff for expenditures about a certain amount (i.e. $2,000 for engineering equipment purchases). | Pending | |

468	Training - we should be allowed to authorize training and travel up to a certain amount. It is administratively burdensome to get approval for every out of state training. If a training requires a flight, or is over $2,000, we should get approval. Otherwise we should be able to authorize them.	Pending	
476	AND Mechanisms to empower Districts to make informed decisions about conditionally allowable expenses and reduce the amount of approvals necessary by program and financial staff. The goal of any administrative rule should be to maximize good use of funds while minimizing administrative costs for both the grantor and grantee. Many of the changes in this manual are to tighten down requirements and push CDs to ask for permission from SCC staff more often. The manual should be clear enough that a District can make an appropriate decision without SCC staff input. There are also elements within this manual that are better fit in a Conservation District Governance document such as a more detailed CAPP 1.	Pending	We will be working to add language to address multi biennium contracts (Motion was made at the March 2025 meeting, the same meeting this was sent out for comment)
528	Training and Education: This is not universally allowed, need to update the rules to the actual practice or adjust the actual practice. Some funding programs are capital and only allow training when approved. Others don't require it. Need to update this to reflect the reality. Long-term we need to move towards a less micromanaged approach to training. I suggest shifting the burden of this approval process to the application/addendum phase. Have Districts provide a training budget and have them operate freely within it (assuming it is appropriate to the grant). We would need to update the forms to reflect that and process to accommodate that change. It would reduce the number of unique requests to financial staff.	Pending	
530	(split 2 of 2) Where there is room for an exception, it should be clearly stated in the description of the policy, not in the FAQs, for example, the cost share cap exception.	Pending	
545	Allow local governance by allowing local boards to manage purchasing decisions well over the $2,000 threshold that is currently set by SCC staff.	Pending	

Unique ID #	Comment	Status	Response to Date
143	(split 3 of 3) In places it is confusing due to: - not always clear the audience (role) sections are written for	Pending	
429	QUESTION - sixth question - Who is the audience for this? Some of this makes it sound like it is intended for the cooperator. And the SCC doesn't set cost-share rates or amounts, just the per landowner/cooperator maximum per year.	Pending	The audience for this frequently asked question is conservation districts or other entities that may be receiving SCC funds. In the next update of the manual we will review this to see if this is the best place for this information or if it fit's better someplace else.
437	There are many sections in here that only apply to CDs and would not apply to any of the other types of groups that utilize commission funds. In a future update I suggest reworking this manual to make it entity neutral. This should be focused on how recipient of WSCC funding should manage their contract, not their organization. For most CDs, WSCC is not the only funding source and we are subject to many laws and are consistently audited on them that make the guidance in this document unnecessary.	Pending	The SCC Grants and Contracts Procedure Manual applies to all SCC grants as well as SCC contracts. This manual provides rules for both CDs and entities that enter into contracts with SCC. While many sections do only apply to CDs, there are many areas that overlap with our contracts we issue and this manual need to address SCC's rules for both.
498	Is this manual used for contractors too? If so, suggest making sure the "Districts and Counties Must Pay First" title is generalized to something like "entities" to make it neutral to type.	Pending	Yes, it is used for counties and other contracted organizations outside of counties.

Unique ID #	Comment	Status	Response to Date
311	Start date of grants - all grants are amendments to our master contract. SCC should be able to set whatever start date, regardless of when we receive the specific award email from finance staff, to anytime within the effective dates of the master contract.	Pending	

Topic: Basis of Rule

Unique ID #	Comment	Status	Response to Date
206	Links to which policy source the information came from. Especially with finance, we have the State Auditors Office, MRSC, and RCW's.	Pending	
291	Focus on reviewing the justification and reference points for finance policy.	Pending	
295	It should include explicitly requirements by statute and by WSCC policy with citations.	Pending	
549	Identify what is specifically required by law with reference to that law. Conversely, identify policy that is created by SCC staff.	Pending	

Topic: Employee Benefits

Unique ID #	Comment	Status	Response to Date
430	Handling Reimbursement for Employer-Paid Benefits - Addition of the word "must" to the following sentence: "These funds [should] must be set aside in a separate account." The way that benefit accruals are handled is a District policy, not dictated by a grantor. It is the District's responsibility to ensure that funds are available to pay their liabilities. However, it is well within SAO guidance to use a formula to set aside a percentage of liabilities, and having them in a separate account is well beyond the scope of a granting agency. Additionally, see the general comments section for comment about including district governance requirements in the grants manual.	Addressed	The districts is required to track accrued leave liabilities and manage reimbursement of funds for employer paid benefits against those liabilities. We will make sure the manual states this clearly.
431	Handling Reimbursement for Employer-Paid Benefits: My interpretation of this is that we will be required to hold a second account to house leave balances. This is not required by the state auditor and is not enforceable by the SCC. We are required to track leave balances and report them as liabilities and are expected to cover those liabilities when they are used but there are no requirements as to how we are supposed to manage those funds. Are SCC financial staff reviewing that all CDs, Counties and contractors adhere to this method? how are you going to enforce this on a contractor or a county?	Addressed	The districts is required to track accrued leave liabilities and manage reimbursement of funds for employer paid benefits against those liabilities. We will make sure the manual states this clearly.

Unique ID #	Comment	Status	Response to Date
201	Handling Reimbursement for Employer-Paid Benefits There is some guidance listed is not commonly used by districts. Specially these two: • These funds should be set aside in a separate account. • Use the funds in the separate account to cover the costs of the employee's leave time when their time cannot be charged to a contract. This should be changed to "these funds should be tracked and set aside for these specific expenses". Most districts do not have a benefits bank account where they transfer money to and pay out of. This is an administrative headache and not utilized. Can also simplify the two lines about legal risks to one.	Pending	

Unique ID #	Comment	Status	Response to Date
266	There are many minor issues with the manual and a few big ones. A huge issue, however, is the lack of ability for grants to span beyond a biennium. This is a major flaw in the Commission's granting structure and hamstrings our work. Even with money from the same source given to two different agencies, the Commission can only allow 2-year funding while other state agencies can allow for 3-5+ year grants. Capital funds are typically reserved for construction projects, and I have no doubt that capital funds for large-scale construction projects do not have the same biennium cut off for expenses that WSCC funds have. Even our RCPP matching funds which roll over from one biennia to another and have big cost share projects, have to be wrapped up before the end of each biennium, causing major delays or scrambles in summer construction windows.	Pending	
277	(The grants manual ...) It should include the allowance for multi-biennia contracting	Pending	
315	The way the manual is written, there is no way to implement multi-biennium contracts. Add something to allow for that when indicated by program guidelines.	Pending	
378	The changes identified in this update do not fully address the ongoing concerns that Districts were encountering in the last biennium. A few factors that are missing include: Mention of multi-biennium contracts that were proposed at the March 2025 commission meeting. I suggest adding a paragraph about this in section 2.	Pending	SCC will be working on adding additional language that will outline the multi-biennium contracts that will be allowed specifically for the RGP grant program as we roll out this process.
379	The way the manual is written, there is no way to implement a trial for multi-biennium contracts (as suggested in the RGP guidelines). Suggest adding something to allow for that when indicated by program guidelines.	Pending	SCC will be working on adding additional language that will outline the multi-biennium contracts that will be allowed specifically for the RGP grant program as we roll out this process.
380	The way the manual is written, there is no way to implement a trial for multi-biennium contracts (as suggested in the RGP guidelines). Suggest adding something to allow for that when indicated by program guidelines.	Pending	SCC will be working on adding additional language that will outline the multi-biennium contracts that will be allowed specifically for the RGP grant program.

Topic: BMPs - Splitting vs. Lumping

Unique ID #	Comment	Status	Response to Date
309	Requiring that each BMP have a Appendix B and cost be broken out seperately. Problem is when a contractor completes jobs they don't break out or bill by BMP. Contractors bill by the project completed. BMPs work together to complete a project.	Pending	
364	Don't split a single labor contract into multiple BMPS.	Pending	SCC awards per BMP which is why the awarded amount per BMP may not be exceeded. In order to ensure this, we require an Appendix B form per BMP.
365	Consider flexibility in combining BMPs on an appendix B when the practices are so interwoven, it becomes difficult for a contractor to distinguish between activities. Forest Health practices (limb up, thin, and treat the material) are three separate codes, but a contractor does all the work at once and bounces between them. Or the pipeline, trough, heavy use area. Or work with district staff to use something other than an NRCS standard so that it covers all the work being accomplished, but doesn't split it up so detailed. The separation of BMPs in these examples is also difficult for budgeting. If the thinning goes "over budget" because the contractor allocated more time to thinning that pruning trees up, landowners miss opportunities for reimbursement because one BMP "went over" while another "went under", but it really is just the allocation of hours from the contractor.	Pending	SCC awards per BMP which is why the awarded amount per BMP may not be exceeded. In order to ensure this, we require an Appendix B form per BMP. We do have a mechanism to update allocated amounts per BMP if there is an issue that arises where the costs per BMP are not in alignment when the Contract for Cost Share was signed.

Unique ID #	Comment	Status	Response to Date
334	Ineligible: depreciation of equipment (is this their way of nixing set rates from the district end?)	Addressed	Depreciation is not an eligible expense on any SCC grant.
337	Equipment purchase (pg 35) -> "allowable expense if included in the scope of work OR have prior written authorization from the financial staff OR program manager for all equipment purchases totaling over $2000". I like it this way, provides flexibility and shows trust for how we spend money. The commission sometimes seems to overstep slightly in wanting to authorize our expenses.	Addressed	Great!

Unique ID #	Comment	Status	Response to Date
154	SCC interpretation of eligible capital expenses is unique. Example: many other capital funded grant programs allow for "design only" grants. This is likely because these designs lead to the actual construction of the capital project. SCC does not allow for "design only" grants. Similarly, if a plan is necessary to implement a capital	Pending	
318	Updates to the advance payment policy for large equipment purchases and other types of advances outside of cost share/DIP	Pending	
369	Is it possible to add large equipment purchases to the advance policy? If the CD uses program funding to purchase an expensive piece of equipment, having an advance would help with cash flow or eliminate the need for a line of credit.	Pending	SCC is considering this change to our advance payment policy. Currently, we allow an exception request to be brought forward outlining why the advance is needed.
428	What about maintenance for these? (equipment and ATV/UTVs)	Pending	Thanks for flagging this. We will work to include full guidance for maintenance of equipment and ATV/UTVs in the next update.
545	Allow local governance by allowing local boards to manage purchasing decisions well over the $2,000 threshold that is currently set by SCC staff.	Pending	
550	Allow CD's to charge a rental rate to grant programs for use of equipment owned by the CD to cover the cost of fuel, maintenance, wear items, insurance, and replacement costs. This is allowed for landowners in cost share	Pending	
553	Disposition of tangible personal property (p77). This changes the past ownership structure of CD purchases with SCC funds. Items have always been purchased and owned by CDs. Why is SCC now retaining ownership through this new policy. Allow the local CD board to govern their own assets.	Pending	

Topic: CAPP

Unique ID #	Comment	Status	Response to Date
181	CAPP: Can we include the CAPP 1 criteria in the manual? It is updated less frequently than the SCC grant manual so far.	Pending	
270	(split 1 of 2) Throughout, there are references to overall District governance. Instead, reference the requirement to comply with CAPP guidelines to be eligible WSCC grants. District governance is outside of the scope of the Grant and Contract Policy and Procedure Manual. Sections include but are not limited to: Guidance from the Washington State Auditor's Office; Handling Reimbursement for Employer-Paid Benefits; Federal Audit Requirements, State Auditor Requirements; Audit Findings or Management Letter; Records Retention.	Pending	
413	Throughout, there are references to overall District governance. Instead, reference the requirement to comply with CAPP guidelines to be eligible WSCC grants. District governance is outside of the scope of the Grant and Contract Policy and Procedure Manual. Sections include: Section 2: Grants and Contracts - Guidance from the Washington State Auditor's Office Section 4: Reimbursable Expenses - Handling Reimbursement for Employer-Paid Benefits, Section 10: Other Requirements - Federal Audit Requirements, State Auditor Requirements, Audit Findings or Management Letter, Records Retention.	Pending	Thank you for your comment. Further discussion on this may occur as part of the ombuds group in the future.
476	AND Mechanisms to empower Districts to make informed decisions about conditionally allowable expenses and reduce the amount of approvals necessary by program and financial staff. The goal of any administrative rule should be to maximize good use of funds while minimizing administrative costs for both the grantor and grantee. Many of the changes in this manual are to tighten down requirements and push CDs to ask for permission from SCC staff more often. The manual should be clear enough that a District can make an appropriate decision without SCC staff input. There are also elements within this manual that are better fit in a Conservation District Governance document such as a more detailed CAPP 1.	Pending	We will be working to add language to address multi biennium contracts (Motion was made at the March 2025 meeting, the same meeting this was sent out for comment)

Topic: Clothing / Apparel / PPE

Unique ID #	Comment	Status	Response to Date
330	Clothing/apparel: Can this be moved up to an allowable expense with a more comprehensive definition of "promotion purposes". My guess is that apparel cannot be purchased if we are giving it away at events. But if we purchase clothes for staff that will not be given away we should be able to make the purchase without additional approvals. What criteria would SCC staff utilize to deny this purchase? If the criteria is whether the grant program itself would allow it, there are many operation/IM only items that are in the allowable section that do not require pre-approval.	Addressed	Correct. The district may purchase clothing under some operating grant programs with the district logo to identify CD staff or PPE, but may not purchase clothing to give out for promotional purposes.
331	Conditionally eligible reimbursable expenses: 1/25 (clarified) Clothing/apparel: Clothing for the purpose of identification or safety should be allowed on all grants where staff are paid to be in the field. The way it's written, it's unclear whether clothing for safety is allowed on capital grants but conditionally allowed on operating grants. Or if it is only conditionally allowed on operating grants but not allowed on capital.	Addressed	Correct. The district may purchase clothing under some operating grant programs with the district logo to identify CD staff, but may not purchase clothing to give out for promotional purposes.
332	QUESTION - related to district logo clothing. So it is eligible for identifying staff representing district but not for promotion of district?	Addressed	Correct. The district may purchase clothing under some operating grant programs with the district logo to identify CD staff, but may not purchase clothing to give out for promotional purposes.

Unique ID #	Comment	Status	Response to Date
183	Clothing/apparel: This needs to be updated to be allowable and not limited to "safety gear". Having a way to identify your staff in the field is extremely important for more than just safety. These expenses are fully allowable in the SAAM. I agree a policy should be required, similar to travel, light refreshments and cost share. Both Travel and Light Refreshments are in the fully allowable section but have a policy requirement before they can be used.	Pending	
184	Clothing/apparel: This should be allowed for all grants when identifying staff or providing safety gear. The way it's written, it's unclear if clothing for safety is allowed on capital grants but conditionally allowed on operating grants. Or if it is only conditionally allowed on operating grants but not allowed on capital.	Pending	
287	Clothing/Apparel - unclear if logo wear as PPE is allowable ONLY under operating grants.	Pending	

Topic: Construction

Unique ID #	Comment	Status	Response to Date
394	Conditionally eligible expenditures: Construction costs: This is a very confusing expenditure description. There are no construction costs listed as "allowable" or "ineligible". Stating "Construction costs not otherwise allowable" doesn't make sense. Are you referring to cost share? DIP funding? Building a building? Hard to provide a clear suggestion to improve this language when it isn't clear what this applies to.	Addressed	Thank you for flagging this. We have added clarification to this section. This section was intended for pilot or demonstration projects outside of a DIP or Cost Share funded project.
396	It would help to clarify what you mean by construction costs. For example, is construction under a DIP something different?	Addressed	Thank you for flagging this. We have clarified this in the manual.

Unique ID #	Comment	Status	Response to Date
106	Construction costs: this one is very confusing. What does this mean? Is it referencing that cost share/DIP is not allowed unless it is specific approved in the scope? If so, the language about pre-approved and included in the scope of work/budget is not consistent with practice. IM grant does not have an application but projects can be funded within it. In many applications we are not required to name individual projects, typically the name of the project isn't even known by WSCC until the payment request.	Pending	
189	Construction costs: this one is very confusing. What does this mean? Is it referencing that cost share/DIP is not allowed unless it is specific approved in the scope? If so, the language about pre-approved and included in the scope of work/budget is not consistent with practice. IM grant does not have an application but projects can be funded within it. In many applications we are not required to name individual projects, typically the name of the project isn't even known by WSCC until the payment request.	Pending	

Unique ID #	Comment	Status	Response to Date
175	(split 2 of 3) The ability to ask for exceptions to the cost share limit.	Addressed	Exceptions are allowed and we will be adding more guidance in the 27-29 manual on the exception process.
245	Update cost share limit for associate supervisors.	Addressed	corrected in manual for 25-27
333	COMMENT - in paragraph starting sourcing materials, What about the value of equipment time and operation? Our policy is to use the local FSA rates for the various types of equipment. Also, if a cooperator hires someone to perform services, we go by the actual amount paid but require proof of payment. This needs to be addressed somewhere here.	Addressed	Correct. The equipment time and operation are valued at the local FSA rate or other method outlined in the Equipment Usage section in Chapter 8. If the cooperator hires someone to perform the services, simply include the invoice on the Appendix B and it will be reimbursed at the invoiced amount paid for services.
340	Methods of Payment states that CDs must pay participants directly, please add language that an exception is made if assignment of payment is utilized.	Addressed	I have added a sentence in the manual to reflect this. Thank you for bringing the clarification to our attention.
342	Additional Policy: The first sentence isn't clear: "SCC funds used for cost share assistance shall remain in effect."	Addressed	I have clarified this sentence.
386	1/25: Documents Required with Reimbursement Requests for Cost Share & DIPs: we've been told several times that the landowner's name must be at the top of the Cultural Resources statement but it's not in the manual or on the CR form. Can the CR form be amended to have fields for the CPDS #, cooperator name, and practices?	Addressed	Thank you for bringing this to our attention. We have updated the Cultural Resources Complied Statement Form to reflect the suggestions.
395	QUESTION - eighth question - regarding when implementing a plan, Who makes this determination? Do we have to provide a copy of the conservation plan to SCC? What if someone signs up for CREP and another unrelated practice but may or may not fully implement a complete conservation plan?	Addressed	Thank you for flagging this. We have clarified in the manual.
436	The restriction of cost share on federal lands only shows up in the Q&A. The "publicly-owned property eligibility" section clearly lists Federal as one possible ownership type but does not restrict it. Is there a legal restriction of state funds being used to pay the feds directly?	Addressed	The restriction of a limit on federal land was removed for BI25-27. I have corrected the Q&A to reflect this. Thank you for brining this to our attention.

Unique ID #	Comment	Status	Response to Date
104	BMP installation using materials owned by a participant- there needs to be more explanation of what backup documentation is. IE state that backup documentation is the 3 local bids and their average.	Pending	
105	BMP Installation Using Material Already Owned by Participant	Pending	
113	The cost share appendix B form need to be updated to include match funding from other sources.	Pending	
114	The individual contributed services form needs to have a box for the date it was signed by the cooperator since your staff requires that date.	Pending	
129	More details are needed regarding completed cost-share contracts and authorized signatures. At one point the Chair, who signs for the board, was not allowed to sign the approval block and the certification of completion block. The initialing requirements are also not clear to me.	Pending	

132	(split 3 of 3) Section 8: Cost Share A missing element in the manual is incentive payments. For some specific types of projects the formal cost share process is a burden. It is virtually the same administrative cost to provide cost share on $800 and $80,000. Ideally, we would be able to verify implementation and send a check without collecting receipts, etc. We would have to follow rules around issuing 1099s in that case. This is a longer term goal that I would like to fully explore.	Pending
145	Cost-Share Cost of BMPs determinations - District established rates Materials on Hand - over paying for materials Participant as Contractor - other bids vs cost-share rates, seems like section is incomplete	Pending
163	Publicly-Owned Property: What is the reasoning for the 50% cost share rate? How often is Cost Share on publicly owned land actually used? I don't think many public entities will accept payments from other entities like this.	Pending
178	Approved Practice Types - Alternative practices approved by a PE licensed by the State of Washington. - Examples of this, or a link to examples would be helpful for when exploring new practices. Additionally what about practices that aren't on the NRCS BMP list and aren't practices needing engineering?	Pending
179	Approved Practice Types: Is there a provision about non-engineering practices that may be approved? Some elements do not require an engineer but could be outside of the NRCS BMP list, either too new to be adopted or something NRCS doesn't typically do in an urban setting.	Pending
190	Cost Share Payment Policies: Suggest creating a new section called "Cost Share Payments Policies" and include methods of payment, partial payment, assignment of payments, retroactive payments and anything else related to payments into that section.	Pending
207	Cost Share Q&A: Is this best in the manual or as a separate section on the website that is referenced? Would be easier to add Q&As generated throughout the year to the list if it wasn't required to go through the Commission board for approval	Pending
218	Perhaps this doesn't need to be in the manual, but should be linked within - clearer guidance on what is/isn't allowed re: the procedures of cost share. Allowable changes to a cost share contract. Refer to authorized district signatories when that is WSCC's requirement vs. Board when that is their requirement. We can determine what's allowed/required for board vs authorized signer via our policy, but for ages I thought cost share contracts required a board signature because all the WSCC material refers to needing that.	Pending
225	Remove 50% cost share on public land. This should be allowed to be up to 100%, as with all other District cost share.	Pending
227	Sales of property during practice design life/contract life - How do we calculate the depreciating value of the practice? Is this an internal policy we have to make?	Pending
228	A missing element in the manual is incentive payments. For some specific types of projects the formal cost share process is a burden. It is virtually the same administrative cost to provide cost share on $800 and $80,000. Ideally, we would be able to verify implementation and send a check without collecting receipts, etc. We would have to follow rules around issuing 1099s in that case. This is a longer term goal that I would like to fully explore.	Pending
256	What is the procedure for participants who default on the Contract for Cost Share Funds? If a participant does default on the terms of the Contract for Cost Share Funds, you must attempt to recover the amount of the cost share (depreciated based on design life). How do we know what this should be? Is it a District internal policy?	Pending

274	(split 2 of 3) The above-listed topics aren't a high priority for our district now. I like to see the following prioritized: Cost share contract checklist	Pending	
366	Approved Practice Types Is there a provision about non-engineering practices that may be approved? Some elements do not require an engineer but could be outside of the NRCS BMP list, either too young to be adopted or something NRCS doesn't typically do.	Pending	SCC is always open to a conversation to develop SCC approved practices for specific needs that meet the criteria of a grant.
367	Approved Practice Types: Recommend adding examples of urban-specific practices (e.g., street tree planting, rain gardens) to better reflect urban/suburban conservation work.	Pending	SCC is always open to a conversation to develop SCC approved practices for specific needs that meet the criteria of a grant. We fund three types of practices: NRCS approved practices, SCC approved practices and practices that are engineering by a licensed Engineering in the state of WA that meet the criteria of an SCC grant program.
387	Publicly-Owned Property Eligibility section states a maximum 50% cost-share rate for practices installed on property that is defined as title to the property held by federal, state, local government, etc. First, the federal and state government don't have 'title' to property so that may be problematic in many situations. Secondly, this policy conflicts with a later policy regarding projects implemented by a cooperator who is leasing property. We believe it should be clearly stated in this section that if the project is being implemented by a leasee or permitee the normal cost-share rates shall apply. This is frequently done in our area with livestock producers who implement projects to protect water quality from grazing activities and they must bear the burden of cost for all aspects of the project and maintenance. These private citizens should be eligible for the same cost-share rates regardless of the project location.	Pending	Thank you for bringing this to our attention. We will flag this for continued work for the ombuds group. In the meantime, if you have a Cost Share or DIP project, you can always reach out to the regional or program manager to request an exception to our policy on this.
402	(split 2 of 2) Participant as Contractor QUESTION - second bullet - referring to the two additional bids, What is the rationale for this? If the cost-share amount is based on NRCS practice costs, what difference should it make? Seems to me that this would only be necessary if the cost-share recipient contests the cost estimate, in which case they would need to get bids to justify a different cost estimate.	Pending	Thank you for flagging this. We will continue to explore other terms with the ombuds group. The requirement for the participant to acquire additional bids for the work is to show to the CD and the SCC that the participant's cost/charge for the work is reasonable. The SCC does not require that NRCS payment rates or cost estimates are utilized – only that practices are installed to NRCS practice standards.
435	A missing element in the manual is incentive payments. For some specific types of projects the formal cost share process is a burden. It is virtually the same administrative cost to provide cost share on $800 and $80,000. Ideally we would be able to do some verification of implementation and send a check without collecting receipts, etc. We would have to follow rules around issuing 1099s in that case. This is a longer term goal that I would like to fully explore.	Pending	This is an item we will add to the list for review in the next update.
440	Cost Share Q&A Third question - This is not how we do it and never have. We come up with a cost estimate based off of NRCS practice rates or engineer's estimates. If a cooperator wants to contest the estimate, they have to get three bids, and we go with the lowest bid amount if it is higher than our estimate. The cost-share rate (percent) is set by policy or board action.	Pending	This frequently asked question pertains to how to include in-kind contributions towards the project's total cost as part of a cost-share project. It does not dictate to a CD how to estimate a project's total cost or even if a CD will allow in-kind contributions from a landowner towards a project.
444	Later on - cost share, landowners use rental rates provided by FSA or average of 2 bids from local market.	Pending	This is correct. We have included multiple ways for rental rates for equipment to be used on SCC projects.
446	Partial Payment of Cost Share Award QUESTION - referring to first paragraph and partially completed, What? Partially completed practices aren't eligible period. All practices must be complete and meet NRCS or engineer specs to be eligible for reimbursement.	Pending	This is referring to if two BMP's are awarded, and the district is seeking reimbursement when only one is completed and the second is still in process of completion.
450	Cost Share Assistance Rate of Reimbursement 1/25 (clarified): Remove 50% cost share on public land. This should be allowed to be up to 100%, as with all other District cost share, based on local priorities. I see that later in the section is says you can ask for an exception. I would suggest saying "Cost share on publicly owned land is generally limited to 50% reimbursement, see Publicly-Owned Property Eligibility [link heading] for details."	Pending	This topic is under discussion with SCC leadership.
466	Assignment of Payment: this form is quite confusing and could be streamlined and made more intuitive. We use it regularly and it's a great tool.	Pending	We have heard this feedback and will look at making a sample form to link into the manual for the next update.

481	Fix the Appendix B form. The percentage box doesn't calculate well and needs adjustments each time. The Materials section should say 'Materials and Contracted Labor'. Instructions are not correct.	Pending	We will correct the calculation at the bottom and repost.
490	Contract for Cost Share Funds: Have a checklist linked here. There was a sheet they provided with the top ten things, that could be helpful to reference. Also, in general, the information around cost share is very outdated and needs an update. Even just a checklist would be helpful.	Pending	We will work on a checklist for the next update.
496	Cost sharing questions/answers we would recommend these be removed from the manual so staff can edit/add to them - the first question should reference the question later regarding appealing the cost share policy. Likewise, the question about cost sharing with another public entity should also reference the appeal question. Also restating that all FAQ/Q&As should be linked in the manual but housed elsewhere so they can be edited.	Pending	Yes, in the next update we will work to differentiating policy from procedure from guidance.
505	COMMENT - regarding the complied statement form, I request that we be able to upload it into CPDS instead of scanning and emailing. If you're going to require us to use it, I think it's only fair that you use it, too.	Pending	You can absolutely upload all of the project information into the documents tab in CPDS. The Contract for Cost Share, Cultural Resources Complied Statement, Appendix B and receipts may all be uploaded into CPDS at any time. However, to speed up ease of processing the multitude of voucher payments on cost share and DIPS, a copy is required to be submitted when vouchering.
543	If possible, it would greatly reduce administrative burden for SCC, CDs and landowners if cost-share budgets could be estimated AND paid based on NRCS practice rates or engineers estimate. Relates to comment 410 but requests action and change to allowing payment based on NRCS practice costs lists.	Pending	

Topic: Debarment

Unique ID #	Comment	Status	Response to Date
470	Debarment and Suspension: "Must PRINT" please update to "maintain an electronic record". We do not print but we do PDF the results and save them in the electronic file. Print implies a paper copy.	Addressed	We have updated to say: Debarment and Suspension: "Must PRINT or save electronic record".
478	Same comment as an above section: Are we required to print the SAM report? Can we save it as a PDF and put it in our electronic files?	Addressed	We will change to say: Debarment and Suspension: "Must PRINT or save electronic record"

Unique ID #	Comment	Status	Response to Date
107	Debarment: Manual says "any" contracts while District Operations Brief #9-2013 (and second paragraph) states contracts over $25,000. Need to align the brief and the manual language.	Pending	
108	Debarment: There is also a repeat of these requirements in the cost share section. Put this topic in 1 place and refer back to it to prevent inconsistency.	Pending	
196	Debarment and Suspension:This is a repeat from earlier in the manual. Suggest simplifying it to reference the earlier section to prevent inconsistencies.	Pending	
197	Debarment: Manual says "any" contracts while District Operations Brief #9-2013 (and second paragraph) states contracts over $25,000. Need to align the brief and the manual language. There is also a repeat of these requirements in the cost share section. Put this topic in 1 place and refer back to it to prevent inconsistency.	Pending	

Topic: DIP

Unique ID #	Comment	Status	Response to Date
500	after prevailing wager requirements, add and any other public works project compliance requirements.	Addressed	The language has been updated to include "and any other public works project compliance requirements"
433	There is now a DIP detail sheet that was created, it needs to be added in here.	Addressed	Added a section on DIP
361	Main comment is that we need to make sure it is consistent with the general rules that apply to cost share, or reference them appropriately.	Addressed	Added a section on DIP
350	Also recommend reviewing the District Digest Q&As as well as any records of procedural questions to incorporate	Addressed	We will add to Q & A and include those Q & A in the District Digest & Financial Times Newsletters
285	Conservation District Staff Installing/Constructing Projects: The last bullet point, we don't understand this sentence: "All hours must be charged to the grant monthly." Do you mean that all hours worked under the grant must be vouchered on a monthly basis?	Addressed	Yes, that is correct. I have clarified this sentence in the manual.
127	DIP Vouchering	Addressed	DIP chapter was added for 25-27
250	COMMENT - Second half of second paragraph - Would another example be purchasing plants (from the PMC) and hiring the services of a WCC crew, but the cooperator installs the fence? One downside of DIPs is the bidding and public works requirements, but those wouldn't apply when purchasing through WACD and an agreement with Ecology for WCC crew work.	Addressed	Not sure what language in the manual this comment is referring to. Suggest commenter connect with their Regional Manager if they would like to discuss these thoughts further.

Unique ID #	Comment	Status	Response to Date
252	"Administrative hours, project oversight, and general staff time must be charged to the TA portion of the award, not the DIP allocation" pg 81. "for actual implementation of the BMP" How does this work for DIPs that are purely contracted out? Or in instances where the grant does not have an allocated TA bucket? Fine for WFF and NRI, but RGP set up had an application process where you applied for projects and each application became an outcome. In those latter cases, we've been charging staff time to implement the project by setting up the contractor, coordinating the engineer, which is also "implementation" just not directly of the BMP.	Pending	We have made updates to the RGP application to address this.
288	Cost Sharing and CPDS - Reduce the requirements for inputting cooperators into CPDS for DIPS. Particularly for grouped activities such as chipping. Perhaps set a threshold of $2,000/property or less doesn't need to be in CPDS. Inconsistencies in CPDS requirements between programs.	Pending	
351	In the "what you will learn about" list it mentions partial payments as a topic but it is never covered.	Pending	
368	Same comment as Cost Share Q&A, move it to a spot on the website as reference so we can add more info as we go.	Pending	
438	Reduce the requirements for inputting cooperators into CPDS for DIPS. Particularly for grouped activities such as chipping. Perhaps set a threshold of $2,000/property or less doesn't need to be in CPDS. Inconsistencies in CPDS requirements between programs.	Pending	All projects are required to be entered into CPDS, regardless of dollar amount.
467	Further detail or clarify the decision-making criteria used to determine eligible practices, specifically addressing urban conservation practices that are increasingly implemented by our district.	Pending	SCC is always open to a conversation to develop SCC approved practices for specific needs that meet the criteria of a grant. We fund three types of practices: NRCS approved practices, SCC approved practices and practices that are engineering by a licensed Engineering in the state of WA that meet the criteria of an SCC grant program.

Topic: Editing / Organization

Unique ID #	Comment	Status	Response to Date
112	Table of Contents: There are broken links and missing items within the table of contents	Addressed	links were corrected/added for 25-27
140	Scenario examples and Cost-Share Q&A - But some may need to be reviewed/updated	Addressed	they were reviewed and will be reviewed each BI
152	Organization and clarity. To be fair, I could say the same thing about multiple agency grant manuals.	Addressed	Comment Only
203	Any special grant programs should be housed on a webpage on the commission website and just linked here. When new programs are added, the link would remain the same.	Addressed	These items were cleaned up for the 25-27 manual
213	Navigation: - Simplifying navigation within the Manual to make it easier to read and jump to various sections. Some options may include a link or a button on each page that would take you back to the TOC or possibly have Bookmarks on the right side of the screen for easy navigation. - There is a section missing from the table of contents (Section 9), and I don't think the TOC was updated prior to going to print as there are headers present in the TOC that aren't present in the manual. The dates on the website and in the document aren't consistent (for example the website says the manual was updated in July 2023, the effective date on the cover of the manual is July 2024, the adopted date is May 2023, and the footer date is June 2023. - We dislike not knowing where we are in the manual other than a page number. There should be a header or footer stating which section each page is: every page of the Manual should have a header that lists the section # and title so that you can easily tell which section you're reviewing.	Addressed	These items were cleaned up for the 25-27 manual
222	All of the special grant programs in this manual have their own program guidelines. This section should simply be a reference section to the appropriate guidelines. It could be a comprehensive list of all existing guidelines. I also refer back to my suggestion that this manual needs to be the foundation for the rest of the grant programs, including Implementation. The funding landscape is too complex to try to develop a manual that includes every possible scenario in a single spot. This manual should be the rule-set that all of the other grant programs follow	Addressed	language was updated for 25-27 manual
250	COMMENT - Second half of second paragraph - Would another example be purchasing plants (from the PMC) and hiring the services of a WCC crew, but the cooperator installs the fence? One downside of DIPs is the bidding and public works requirements, but those wouldn't apply when purchasing through WACD and an agreement with Ecology for WCC crew work.	Addressed	Not sure what language in the manual this comment is referring to. Suggest commenter connect with their Regional Manager if they would like to discuss these thoughts further.
255	Table of Contents: There are broken links and missing items within the table of contents	Addressed	This has been updated for 25-27
267	There is an error in the Table of Contents for subcontracting (Error! Bookmark not defined.) which is a little distracting.	Addressed	This has been updated for 25-27
335	Cost sharing with a public entity question, it says "except federal." Are we not allowed to cost share with a federal agency? It doesn't say that Federal agencies are not allowed above in the Publicly-Owned Property Eligibility section	Addressed	Districts may partner with federal partners with no cost share cap other than the district's approved cost share reimbursement rate.
336	Scenarios --> "must be vouchered when the invoice is paid by the district". For contractors, we pay them at the board meeting...? So should their May work, that gets a check written in June, actually go in the June voucher that we make in July?	Addressed	For work done in May that is invoiced to the district and the district pays it in June, should go on the June voucher that is due to SCC on July 10th.
343	Utilities: Do we need to call out all specific utilities or can it be a more general definition with a "such as" using the examples in here.	Addressed	I have made this change. Thank you!

344	Eligible: equipment rental (rental rates consistent with conservation district rates or market) - so we can use a rental rate, or we can only use a rental rate if we literally go and rent something?	Addressed	If the local FSA rate is not available, the district can use and average of two local bids from an equipment rental company, the NRCS rate, or the district can adopt their own equipment usage rates based on local rates and board resolution.
349	CPDS QUESTION - First paragraph where it refers to recipients, by recipient, do you mean grant recipient or cost share recipient?	Addressed	In this paragraph, we are referring to the cost share recipient (landowner).
352	Federal Audit Requirements COMMENT - second paragraph "The major audit policy" - This wording is confusing. What major audit policy are you referring to?	Addressed	Language edited for clarity.
353	Grant and Compliance Oversight: SCC always requests all backup documentation for each billing. This paragraph is communicating that we don't have to send everything? What documents are you not requesting that this section would impact?	Addressed	Language edited for clarity.
358	Staff or Expenditures shared between two conservation districts: would this apply to services provided between districts, i.e. cultural resources? Does Cascadia CD need to provide all 36 interagency services agreements to SCC at the beginning of the biennium?	Addressed	No, this only applies when districts share staff directly between each district, not for interagency agreements.
383	(split 1 of 2) BARS manual is in the glossary twice

Subscriptions in the glossary does not match the definition in the "allowable expenses" section. The glossary refers to newspapers, etc. and allowable expenses focuses on software. It should be both.

The following items only exist within the glossary and are not mentioned in the document: GAAP, Governmental Funds, Packing Slip, Privately Owned Vehicles, Purchase Card, Request for Proposals, Request for Applications, Sales Receipt

You can remove the page that is meant for notes from the manual. I dont think it is used. | Addressed | Thank you – the duplicate has been removed. |
384	Composite Rate Forms - states it's necessary every January, but earlier in Section 4, the January requirement is crossed out.	Addressed	Thank you for bringing this to our attention. We have corrected this.
385	COMMENT - referring to CREP, if it's only CREP, it's either on the website or it isn't. If this applies to more than one program, that would make sense. Spell out CREP. b. GRAMMATICAL - consider changing language to - Other special purpose grant programs may include their own unique cost sharing policies. An example of this is the CREP Program, which has policies spelled out in that program's programmatic guidelines, the contract, and often on SCC website. Contact SCC financial staff or the grant program manager for additional information on special grant programs.	Addressed	Thank you for bringing this to our attention. We have made edits to the manual to include your comment.
397	COMMENT - fifth question - In this case, I think you want to say bids from contractors. Quotes from vendors would only apply to materials.	Addressed	Thank you for flagging this. We have corrected this in the manual.
399	Cost Share for Conservation District Associate Supervisors and District Staff - the last paragraph is out of place ("SCC's Individual Contributed Services Form must be submitted to document donated labor time. If the volunteer's...")	Addressed	Thank you for flagging this. We have removed it.
404	Grants and Contracts: Update the first sentence in section to remove "both". There are three items in that sentence.	Addressed	Thank you for pointing this error out. I have removed it.
405	Scenarios - Travel Vouchers --> Must be vouchered after travel has commenced? Likely intend to use the word concluded? What happens if someone incurs mileage on June 30th? How do we reimburse them on the day they are traveling?	Addressed	Thank you for pointing this error out. I have updated the wording to concluded. For travel concluding June 30th, the travel expense would need to be vouchered for within the correct fiscal year.

Unique ID #	Comment	Status	Response to Date
408	QUESTION - where do costs associated with website hosting and data archiving ga and are they eligible?	Addressed	Thank you for pointing this out. We have added to the communications section.
410	Task Order and Work Order: Suggest updating timelines to reflect that each task order has it's own deadlines for work completed.	Addressed	Thank you for the comment. We have added language that each task order or work order has it own timeline.
417	Vouchering: Paragraph 2. Language is a little confusing still. Recommend separating it into 2 paragraphs. The first about when a voucher is due, something like "Vouchers each month are due on the 20th day of the following month" Then a second paragraph "Expenditures reported in any month must be vouchered within 60 days and could be reported on any month that falls within that period" With them together they almost contradict each other.	Addressed	Thank you! We will review and edit/separate as needed to make it more clear.
418	Equipment Usage: Would suggest editing this sentence to add the text in caps: If the local FSA rate is not available OR REPRESENTATIVE OF AREA RATES, the district can use an average of two local bids from an equipment rental company, the NRCS rate, or the district can adopt their own equipment usage rates based on local rates and board resolution.	Addressed	Thank you, we have made this adjustment.
434	State auditor requirements QUESTION - where it says expenses for an audit are grant reimbursement allowable expenses, We can use any grant to pay for an audit?	Addressed	The only SCC grant that can be used to pay for audit expenses is the Implementation grant. This clarification has been added into the manual.
486	In this section, you'll learn about..." doesn't match what's in the sections below.	Addressed	We will redo the section titles and sub sections once the revisions are finalized.
494	Eligible: fuel for ATV/UTV as no mileage rate available	Addressed	Yes, fuel for ATV/UTV usage is an allowable expense as no mileage rate is established for this type of equipment.
499	Vouchering: it is unclear how the July 10 deadline is applied for biennium programs. As far as the manual says, July 10 is the due date for all vouchers regardless of it being operating or capital.	Addressed	Yes, that is correct. All vouchers are due 7/10.
510	I like that I can understand the language and it's fairly easy to find the answers. Definitely easy to navigate.	Addressed	Comment Only
516	The hot links to supporting information are very helpful.	Addressed	Comment Only
517	Fairly straightforward to find the section you are looking for.	Addressed	Comment Only
518	The current manual is fairly easy to navigate and is simple in language and complexity. It also uses examples as good tools to use.	Addressed	Comment Only
520	The layout and search function from the table of contents.	Addressed	Comment Only
526	(split 1 of 3) The active links within the manual, as well as the ability to jump straight to the applicable section from the TOC.	Addressed	Comment Only
529	I don't dislike anything. Elements can always be clearer based on user input.	Addressed	Comment Only

Unique ID #	Comment	Status	Response to Date
103	Audit Findings or Management Letter: The sentence on "monthly payment requests with all supporting documentation being required" is a redundant element. It is always required regardless of audit results. Is this supposed to mean something different?	Pending	
105	BMP Installation Using Material Already Owned by Participant	Pending	

110	Throughout the document it is unclear as to what is a recommendation and what is required and required by whom. The document would be more helpful if it was separated out into a guideline document on required laws CD's should be following, ie prevailing wages, and a document on SCC policy along with source of authorization to implement and justifications for those policies.	Pending	
116	Topics are covered in several different areas, making it difficult to access the information easily and quickly.	Pending	
141	(split 1 of 3) It is outdated, incomplete, In places it is confusing due to: - too wordy: important words get lost in haystack of non-critical words or using words to describe math where tabular data would be more clear - unclear examples - Double Negative Affirmatives - uncleear examples - unclear context/eligibility for application of policy/form/exception - information required in required documentation	Pending	
155	Some areas seem duplicative, or like the information could possible be located in multiple sections, so takes checking both sections to ensure you have the information. There could be a bit more specificity about allowable expenses in some of the sections.	Pending	
156	Some of the wording is not clear as mentioned in my earlier comments.	Pending	
158	The formatting and length of the manual.	Pending	
160	The manual has been built up over a long time and there are duplications, potential contradictions, and the structure is not that logical. Regrouping of topics and reassessment of why specific policies currently in place are necessary.	Pending	
173	The list of allowable expenses doesn't match the reality. Many of these expenses are not allowed for the various funding programs. Anything that is not allowed on one of the funding programs needs to be moved to conditionally allowed. This grant manual seems focused on the Implementation grant and then expects all of the other program guidelines to modify it. It should be the other way around. This should be the base that is allowed for everything, and then having other program guidelines modify this manual. I suggest limiting the allowable expense list to things that will always be accepted in all grant programs and putting the rest in conditionally allowed expenses stating that it depends on the grant guidelines. Then the other guidelines need to have allowable expenses components as well to tie back to this manual.	Pending	
176	All Q/A sections should be linked in the manual, but not actually housed within the manual. Then staff can update and provide guidance regularly without having to change the manual.	Pending	
177	Appeals: Pg 14 - "Please refer to the MRSC guidelines for bidding, etc...." These two sentences feel out of place in this section. Maybe a stand-alone "Bidding, Purchasing, and Contracting" or input in Section 10.	Pending	
180	Audit Findings or Management Letter: The sentence on "monthly payment requests with all supporting documentation being required" is a redundant element. It is always required regardless of audit results. Is this supposed to mean something different?	Pending	
182	Can Remove the notes section in the manual	Pending	

190	Cost Share Payment Policies: Suggest creating a new section called "Cost Share Payments Policies" and include methods of payment, partial payment, assignment of payments, retroactive payments and anything else related to payments into that section.	Pending
191	Contract for Cost Share Funds: I would suggest renaming this to "required documentation" and include all subheadings that are specific to documentation for payment of cost share.	Pending
192	Cost Share Policy: This section needs to be renamed to "Cost Share Prioritization Recommendations" or something like this. This isn't really a policy but prioritization criteria.	Pending
193	Cost sharing questions/answers - the first question should reference the later question that describes the cost share cap exception request.	Pending
194	SCC Grant and Contract Compliance Oversight: Providing and maintaining voucher backup is always required for each voucher, this is an unnecessary component here. Just the "reserves the right to visit" type language. The records availability and SCC inspection component is also stated in other places	Pending
204	Advertising: need to re-word this to make it methodology neutral. Methods of advertising has been changing over time and specifying the method will be difficult to keep up. Suggest the language as: Advertising: Allow for the following purposes: *use existing list*	Pending
205	Applicability: clarity in applicability/context for who/when a process/procedure applies - Uniformity: consistency throughout manual in statiing each Policy and explaining/demonstrating its respective Purpose, Desired Outcomes (measurables), Criteria (Conditions, Context, Exceptions), Procedure, Required Documentation, Required Data - References: consistency in references to (names of) specific documentation/forms	Pending
207	Cost Share Q&A: Is this best in the manual or as a separate section on the website that is referenced? Would be easier to add Q&As generated throughout the year to the list if it wasn't required to go through the Commission board for approval	Pending
214	Office and Operating Supplies: There is no line specifically for project supplies such as plant material, etc. Suggest creating a Supplies and Materials category and including office and operating supplies as examples as well as project costs.	Pending
215	Reference material: Why is this a specific item? Wouldn't it fit under the supplies/materials category?	Pending
216	Overall, this section doesn't feel like it fits the term compliance or its own section. It seems most of the content has to do with either reimbursable expenses or getting paid, but really only monitoring compliance, recovery of payments, and CAPP relate to compliance. Additionally, the first section "In this section, you'll learn about..." doesn't match what's in the sections below.	Pending
230	Donated Labor/Real Property: Suggest shifting all of the sections on what will count as the participant part of cost share to a new section focused on the matching part of cost share.	Pending
231	Existing Policy: This section needs to be renamed. This doesn't really describe what is in the text underneath it. All of this is duplicative.	Pending
235	Suggest grouping Equipment Usage, Work Crews, CD Staff, Unique Situations, Materials already owned by participant, participant as contractor, and others focused on how things get done into one section.	Pending
239	There are two maintenance and operations sections.	Pending

244	Make sure there is clear definitions for language used for professionals Make sure policy, requirements are clear. It gets confusing is procedures and BMP referenced and is not a requirement, so some think it is a requirement. Make sure there is consistency, and all have the same interpretation of requirements, so all districts are treated equally, and there is a system for exemptions clearly visable.	Pending	
247	Audit Findings or Management Letter : I am not sure what this section is trying to communicate except that audit findings must be communicated with your regional manager. CDs are already sending all of their monthly payment requests with full backup to SCC, and according to record retention requirements they are required to keep the documentation for 6 years after the grant ends. By default SCC financial staff are always reviewing every month's payment requests. Is there a scenario where they aren't? Please clarify what SCC financial staff may do after an audit finding.	Pending	Language edited for clarity.
251	COMMENT - Maybe for the next version of this manual we think about reorganizing things so that there isn't so much duplication and the document can be shortened substantially. Because most of this appears to be a repeat of what I've already reviewed a couple of times earlier in the manual, I won't do it again in this section.	Pending	The SCC Ombuds group is looking into streamlining the manual for better information flow and less duplication.
254	We recommend reformatting the manual into smaller more digestible booklets, like RCO's grant manual or PEBB's benefits 24/7 manual.	Pending	
281	2.Clarify the specific information that needs to be provided for each grant	Pending	
300	It should include a clear concise framework for all grants, identifying in a table consistencies and unique requirements, which should be further details.	Pending	
307	Please format the document to be read on the computer, not like a printed book.	Pending	
310	Sections should be cross referenced to make future updating simple	Pending	
348	General Comment - consider not using contractions for words...i.e aren't.	Pending	In the next update we will be working with the Ombuds group as well as others including contractors and facilitators to dig into the manual, reorganize and rework the manual. We will make reviewing all terminology is included in that review process.
376	Lastly, as was mentioned in the ombudsman meeting and the March 2025 WSCC meeting, this manual needs to be pulled apart, reorganized and put back together again. It should be updated such that a newly hired finance person could read the manual and successfully be able to document and request payment. Right now, essential elements that need to be known up front end up at the end of a section or too many chapters down the line. I look forward to participating in future rounds of updates.	Pending	SCC is working with an OMBUDS group of financial staff and district managers over the next biennium to revise this manual and reorganize the content with the goal of BI27-29 to go live. We recognize there is a large workload to overhaul the manual and are grateful to those who have joined the OMBUDS group to help SCC improve policies and streamline the manual. The final version of the consultant's report from our first meeting will be in the SCC Commission packet for the June meeting.
388	Allowable expenses: Suggest putting the meaning of the asterisk at the top of the section, not the bottom. OR creating a table/section that is CD only so that other entities can ignore the section.	Pending	Thank you for flagging this.
400	"Location of BMPs" stipulates how cost-shar is handled in urban areas vs. rural farms and ranches. The first bullet should be reduced to, "Cost sharing may be used in urban areas the same as all other areas in a conservation district service area. Projects funded in urban areas must meet the same requirements as those funded elsewhere." When you say urban and agricultural land areas, you are leaving out many land use types we all do work on.	Pending	Thank you for flagging this. We will continue to explore other terms with the ombuds group.

409	1/25 - Make dates in manual consistent. Currently dates on the website and in the document aren't consistent. For example, the website says the manual was updated in July 2023 (https://www.scc.wa.gov/files/grant-and-policy-manual), the effective date on the cover of the manual is July 2024, the adopted date is May 2023, and the footer date is June 2023.	Pending	Thank you for pointing this out. We will make sure to work with our communications team to ensure all of the dates are the same on our website and on the manual.
419	Envirothon - this is only mentioned in the glossary, no where else in the manual. Should either include in the manual or remove from glossary.	Pending	Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.
420	GAAP - this is only mentioned in the glossary, no where else in the manual. Should either include in the manual or remove from glossary.	Pending	Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.
421	Open Contract - only mentioned in glossary, not the manual. - Privately Owned Vehicle - only mentioned in glossary, not the manual.	Pending	Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.
422	Purchase Card - only mentioned in glossary, not the manual.	Pending	Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.
423	Request for Applications - COMMENT - I don't recall seeing this in the manual. If it isn't in here, why put it in the glossary?	Pending	Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.
424	RFA - only mentioned in glossary, not the manual.	Pending	Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.
425	RFP - only mentioned in glossary, not the manual.	Pending	Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.
426	Direct Costs: This definition should be at the start of this section, not the end. Ideally there would be a big heading called "Direct Costs" which includes this definition and all of the content in this section. Followed by a big heading that says "Indirect Costs" which includes the overhead calculation content.	Pending	Thank you. We will look at clarifying the language.
427	Sponsorships: Can likely remove the last sentence. An additional funding source would not relate back to the capital funded grant and would follow that specific funding source's rules. i.e. We have a riparian grant program that includes the potential for sponsorship but bring in Ecology to fund the sponsorship, SCC would not be involved in the decision whether the sponsorship was eligible. Or is this saying that if you can get a second sponsor that the expense would then be eligible under the program?	Pending	Thank you. We will look at clarifying the language.
452	Overall, this section doesn't feel like it fits the term compliance or its own section. It seems most of the content has to do with either reimbursable expenses or getting paid, but really only monitoring compliance, recovery of payments, and CAPP relate to compliance. - In this section, you'll learn about..." doesn't match what's in the sections below.	Pending	We are happy to flag this and explore alternative terms with the ombuds group.
454	Speaker - the tone of this definition feels odd given that the manual is now making speaker fees ineligible for reimbursement. Supplemental Funding - only mentioned in glossary, not the manual.	Pending	We are including more terms in the manual even if it is ineligible, as often times we are asked to define the ineligible expenditures. Thank you, yes we know if is not specifically referenced in the manual, however it is a term used in SCC grant programs so we included in the glossary.

458	Composite Rate Forms COMMENT - This is the third time I've seen this same information about composite rates	Pending	We are working to reduce the duplication in the manual.
465	Fuel Consumed: Does this definition include the cost of small engine fuel such as brushcutters, chainsaws, etc.?	Pending	We have allowed this, we have updated our manual to make this more clear that these would also be included as allowable.
477	Employee Composite Rates: It should be near the top as this is the number one expense for programs.	Pending	We will be working with the ombuds group to reorganize and streamline the manual in our next update.
485	Sentence that starts with Exceptions.... (capitalize exceptions). Update to say, "Any expenditures that fall outside of this criteria may be approved on a case-by-case basis." Please add language either here or in it's own section about the process to request an exception.	Pending	We will include this in the next update as this is guidance on this as it is a procedure.
487	Districts and Counties Must Pay First and Payment of Allowable Costs - there is some duplication between these two sections which are sequential.	Pending	We will review and edit as needed.
491	Staff or expenditures shared between two conservation districts: New language states: "The Agreement must identify which CD is the primary and receives payment from the second CD for staff services." Many of us share staff or expenses, and there is no primary or secondary. Please edit to remove or expand that sentence.	Pending	We will work to update guidance to clarify what district is the employer of the staff member vs who receives the services of the staff member or who is contract for the services in the next update.
497	COMMENT - in section starting A SAM... Seems like I read all this somewhere else in this manual. Might want to think about reorganizing for a future version to avoid duplicative language and shorten the document.	Pending	Yes, in the next update we will work to reorganize the manual and reduce duplication.
503	1/25 - Navigation (clarified): Update the TOC. Simplify navigation within the manual to make it easier to read and jump to various sections. Add footer with section title and link it so it jumps back up to the TOC.	Pending	Yes, we plan to update the table of contents once we finalize the comments and updates after manual is reviewed and approved by the Commission in June before the manual goes live July 1, 2025.
504	Run a grammar check on the whole manual. There are many spots with incorrect verb agreement, mixing tenses, etc.	Pending	Yes, we will run a grammar check on the manual and our communications team will be reviewing for copy editing as well.
507	Cultural Resources: Suggest rewording the "Cultural Resources work must be done...." To "A review for cultural resources requirements must be completed before implementation may begin. For potentially ground disturbing activities (list can be found here), an archaeologist must be consulted and a cultural resource complied statement (and all of the required consultation) must be completed before implementation can begin." Not all work will require cultural resources "work" which I take to mean survey. I think it makes sense to outline the process required. Step 1 - review practice list to determine ground disturbing potential. Step 2 - if not disturbing, complete CR complied statement and move on. If it is ground disturbing, consult with an archaeologist to see if full consultation is necessary. Step 3 - start consultation process with first 30 days. Step 4 - IF necessary, complete survey and finish second 30 day consultation. Step 5 - completed CR complied statement.	Pending	Your comments have been shared with Jean Fike, she welcomes your help in improving clarity of the CR instructions

508	Cultural Resources: Suggest rewording the "Cultural Resources work must be done...." To "A review for cultural resources requirements must be completed before implementation may begin. For potentially ground disturbing activities (list can be found here), an archaeologist must be consulted and a cultural resource complied statement (and all of the required consultation) must be completed before implementation can begin." Not all work will require cultural resources "work" which I take to mean survey. I think it makes sense to outline the process required. Step 1 - review practice list to determine ground disturbing potential. Step 2 - if not disturbing, complete CR complied statement and move on. If it is ground disturbing, consult with an archaeologist to see if full consultation is necessary. Step 3 - start consultation process with first 30 days. Step 4 - IF necessary, complete survey and finish second 30 day consultation. Step 5 - completed CR complied statement.	Pending	Your comments have been shared with Jean Fike, she welcomes your help in improving clarity of the CR instructions
541	Links: Cross-References to relevant policies/procedures - Online Availability: Use of web-based tech to store manual as articles which can be updated as needed and searched rather than relying on a PDF which may or may not have been updated since downloaded	Pending	
551	Page 8 of the manual states that all grants have a 2-letter abbreviation. That is no longer true. Many have 3 letter abbreviations.	Pending	
552	Page 51 of the manual has a sentence that was cut off at the bottom of the page.	Pending	

Unique ID #	Comment	Status	Response to Date
109	Electronic Signatures: Clarify specially what is required of CONSERVATION DISTRICTS for electronic signatures. Current manual states WSCC policy but it is my understanding that most of that only applies to WSCC staff. Ex. Master contract requires wet signature, all other documents require wet signature unless CD has a policy for electronic signatures	Addressed	We have linked our policy to the manual which includes a listing of which SCC documents allow each type of signature.
134	Signature requirements	Addressed	language was updated in 25-27 manual
199	Electronic Signatures: Clarify specially what is required of CONSERVATION DISTRICTS for electronic signatures. Current manual states WSCC policy but it is my understanding that most of that only applies to WSCC staff. Ex. Master contract requires wet signature, all other documents require wet signature unless CD has a policy for electronic signatures.	Addressed	language was updated for 25-27 manual
356	Thank you for accepting electronic signatures on the master contract. Will SCC accept electronic signatures on the authorized signature form?	Addressed	No, the Authorized Signature Form requires a wet signature. There is a chart in the manual to outline what items may be electronically signed vs where an electronic signature is allowable on page 11 under Electronic Signatures.
439	QUESTION - regarding wet signature, does the form with wet signatures get sent to the SCC or retained at the district (or other entity) office? This sections needs clarification	Addressed	The wet signature on the Authorized Signature form stays with the district, the scanned copy gets emailed to SCC. A table is linked on page 11 that provides a listing of which documents we will accept electronic signatures for.

Unique ID #	Comment	Status	Response to Date
129	More details are needed regarding completed cost-share contracts and authorized signatures. At one point the Chair, who signs for the board, was not allowed to sign the approval block and the certification of completion block. The initialing requirements are also not clear to me.	Pending	

Topic: Foreign Transaction Fees

Unique ID #	Comment	Status	Response to Date
398	Ineligible Expenditures: Foreign transaction fees: in cases where the only high quality option for a small tool is located in Canada, we cannot bill that cost to the grant? Prime example is that Forestry Suppliers Archaeologist Screens fall apart almost immediately. There is a company in BC that sells high quality ones, no other real suppliers in the US, but there is a foreign transaction fee when purchasing from them.	Addressed	Thank you for flagging this. We have moved it to the conditionally allowable section in our manual.

Unique ID #	Comment	Status	Response to Date
133	Any special grant programs should be housed on a webpage on the commission website and just linked here. When new programs are added, the link would remain the same.	Addressed	this was addressed in program guidelines and 25-27 manual update
203	Any special grant programs should be housed on a webpage on the commission website and just linked here. When new programs are added, the link would remain the same.	Addressed	These items were cleaned up for the 25-27 manual
219	Consolidation to include all of the programmatic guidelines.	Addressed	links were added for 25-27
305	Please ensure all finance and program staff are familiar with the entirety of the grants manual so WSCC is creating programs with understanding of how other existing programs work.	Addressed	We have been doing RM/Program and finance staff to expand everyone's knowledge. We are also working on a program improvement process.

Unique ID #	Comment	Status	Response to Date
126	Could clarify a bit more about what implementation dollars can be used for.	Pending	
135	So many new programmatic guidelines are coming out with new funding opportunities and they are not always included in the manual. It would be nice to have it all consolidated.	Pending	
149	lack of consolidation with new funding pools and programs	Pending	
151	Organization and administration of grant aren't consistent from grant to grant. - outcome organization - eligible expenses like CR that result in increase in award amount (amendment - after expense incurred) for some grants but not others - eligible expense list not applicable to all grants	Pending	
168	(split 2 of 4) Bottom line, I would like us to be able to implement grants with rules that span all grant programs	Pending	
173	The list of allowable expenses doesn't match the reality. Many of these expenses are not allowed for the various funding programs. Anything that is not allowed on one of the funding programs needs to be moved to conditionally allowed. This grant manual seems focused on the Implementation grant and then expects all of the other program guidelines to modify it. It should be the other way around. This should be the base that is allowed for everything, and then having other program guidelines modify this manual. I suggest limiting the allowable expense list to things that will always be accepted in all grant programs and putting the rest in conditionally allowed expenses stating that it depends on the grant guidelines. Then the other guidelines need to have allowable expenses components as well to tie back to this manual.	Pending	
279	3.Creating consistency across grants, such as a consistent outline and content for each grant in the Grants Manual oThis seems like more of a want more than a need. Consistency is good, but we shouldn't handcuff a program in the name of consistency. Keep flexibility whenever possible. oEach program is created by its own unique statute or proviso. Therefore, they may need to have different rules/requirements, prioritize flexibility. Don't add additional requirements in the name of consistency.	Pending	

371	(split 6 of 6, also re-organized by topic) Consistency is important and currently there is little to none between programs when it comes to allocation of funds and development of outcomes.	Pending	SCC is working with an OMBUDS group of financial staff and district managers over the next biennium to revise this manual and reorganize the content with the goal of BI27-29 to go live. We recognize there is a large workload to overhaul the manual and are grateful to those who have joined the OMBUDS group to help SCC improve policies and streamline the manual. The final version of the consultant's report from our first meeting will be in the SCC Commission packet for the June meeting.
524	(split 2 of 2) And try to make requirements consistent from grant to grant (e.g. which outcomes can include TA, goods and services, projects, etc.).	Pending	
535	(split 2 of 2) And try to make requirements consistent from grant to grant (e.g. which outcomes can include TA, goods and services, projects, etc.).	Pending	

Topic: Labor Rates

Unique ID #	Comment	Status	Response to Date
202	Hourly donated labor rate, where does this dollar figure come from? Could we instead refer to the Washington or Federal volunteer labor rate?	Pending	
308	Raise the labor rate for cost share.	Pending	
357	Labor Rate: Is the labor rate not being updated for 2025-27? The value of volunteer time determined by an independent organization has determined that volunteer labor is currently worth $34.79. Value of Volunteer Time - Independent Sector The value of labor has gone up regardless and should increase. Another suggestion is a CPI adjusted rate that is updated annually. Is it possible for a district to exceed the $25 rate in policy? If so, please add that option to the manual.	Pending	No, the labor rate will remain at $25 per hour for the next biennium. SCC and the OMBUDS group will be discussing this for the next manual update.
363	1/25: Participant Labor Rate: Where does $25 come from? Could we instead refer to the Washington or Federal volunteer labor rate? $25 is pretty low.	Pending	SCC and the OMBUDS group will be discussing this for the next manual update.

Unique ID #	Comment	Status	Response to Date
118	Meal Per Diem Reimbursement: Contractors, volunteers, and district partners are not eligible for per diem reimbursement. This is in paragraph 1 on this topic but this seems to either not be enforced or not true. When we hire an out of the area contractor, we will and have covered travel expenses up to per diem amounts. This is common practice with contractors. We do require them to provide receipts so that they are verified appropriate.	Pending	
187	Conference and meeting costs: Meals with meetings would need to be added here, if it is moved from ineligible to allowed. In addition, how many conferences/meetings are put on that do not have a meal as part of it?	Pending	
209	Meals with Meetings: this restriction needs to be reassessed moving forward. Meals with meetings can be essential tools to encourage participation of the public and historically underserved populations. Meals with meetings are allowed under the SAAM manual in section 70.15 with specific criteria. The requirements are not much different than the light refreshments requirements. A specific case is training events, when hosting training events we need to be able to provide a convenient way to provide a lunch for an all day training and to cover those costs. Especially If attendees may not have funding to reimburse their own staff or volunteers for meals.	Pending	
210	Meals with Meetings - This is an allowable expense in the SAAM and should be allowed for Districts. If put on a training that covers a meal time, or at least an all day training/meeting, we should be allowed to provide lunch.	Pending	
211	Meals with Meetings: this restriction needs to be reassessed moving forward. Meals with meetings can be essential tools to encourage participation of the public and historically underserved populations. Meals with meetings are allowed under the SAAM manual in section 70.15 with specific criteria. The requirements are not much different than the light refreshments requirements. A specific case is training events, when hosting training events we need to be able to provide a convenient way to provide a lunch for an all day training and to cover those costs. Especially If attendees may not have funding to reimburse their own staff or volunteers for meals.	Pending	
237	Meal Per Diem Reimbursement: Contractors, volunteers, and district partners are not eligible for per diem reimbursement. This is in paragraph 1 on this topic but this seems to either not be enforced or not true. When we hire an out of the area contractor, we will and have covered travel expenses up to per diem amounts. This is common practice with contractors. We do require them to provide receipts so that they are verified appropriate.	Pending	
240	Meal Per Diem Reimbursement: Contractors, volunteers, and district partners are not eligible for per diem reimbursement. This is in paragraph 1 on this topic but this seems to either not be enforced or not true. When we hire an out of the area contractor, we will and have covered travel expenses up to per diem amounts. This is common practice with contractors. We do require them to provide receipts so that they are verified appropriate.	Pending	
298	Meals with meetings	Pending	
299	Meals with meetings - this is allowed by SAAM, it should be allowed for all-day trainings or meetings.	Pending	
320	Meal Per Diem Reimbursement: What about Americorps? They act as staff but are contracted staff. What about 1099 contract employees? Also serving as staff but may not be on a W2 payroll.	Pending	AmeriCorps is allowed, as long as your district travel policy allows this and a travel voucher is included.
321	Meal Per Diem Reimbursement: The restrictions on this exclude AmeriCorps members. Can this be opened up to staff, interns, and volunteers volunteering over some amount per week to the District?	Pending	AmeriCorps is allowed, as long as your district travel policy allows this and a travel voucher is included. An intern is a district employee so they would be eligible for meal reimbursement.
324	Cost Eligibility - Ineligible Expenditures: 1/25: Meals with Meetings - This is an allowable expense in the SAAM and should be allowed for Districts. If put on a training that covers a meal time, or at least an all day training/meeting, we should be allowed to provide lunch.	Pending	At this time we can not allow meals with meetings, we will flag this for the next update.

325	Meals with Meetings: Are specifically allowed in the SAAM manual, which is referenced in the Goods and services section of this document. Section 70.15 sets conditions where meals with meetings can be reimbursed. There are no legal restrictions on CDs to have meals with meetings with regards to training, and meetings that are integral to a business purpose meeting. MRSC has a link to a 1987 Attorney General's office memo on it, and it does not limit us. https://mrsc.org/getmedia/7c69510c-5971-4f29-ab0e-9056793a33 90/w3ag051487.pdf It must be justified, in a similar manner as our light refreshments form, which does include meals on it. I would like the justification for this limitation within our grants manual. I understand that capital grants might be more limited in this regard, but operating does not have the same restrictions.	Pending	At this time we can not allow meals with meetings, we will flag this for the next update.
328	Meal Per Diem Reimbursement: "Those eligible for per diem reimbursement must pay for the costs and then be reimbursed by the district or entity." This is the opposite of how we are told to operate for Commission members on District-hosted tours, because it's administratively burdensome to handle a bunch of travel vouchers with a meal on it. Perhaps this line could be removed?	Pending	Because the requirement to document an employee is eligible for meal reimbursement, the start and end time needs to be documented on the A-20, however, in the example given, the Commissioners were all in travel status attending the meeting.
460	Our comments are regarding the required preauthorization form for Light Refreshments, mentioned on page 32. Completing this form for preapproval creates undue burden. The level of detail requested (quantities of specific refreshments, name of the catering company) is not something that any other agency requests. The questions about the equipment rental cost and meeting room rental seem extraneous - we are not aware of any requirement to have such facilities costs pre-approved. It is often difficult to ascertain the exact numbers of participants, and therefore the specific quantities of refreshments, far enough in advance to process for pre-approval. Typically we finalize the expected attendance the day of or day prior to an event, then purchase beverages and refreshments at that time. Requiring this level of detail on the form hampers our ability to route it for review and approval in timely fashion before the meeting, and predisposes last minute and rushed submission. We note that the SAAM guidance (Section 70.10.40, https://ofm.wa.gov/sites/default/files/public/legacy/policy/70.10.pd f) does not require this level of detail for pre-approval. The required components are the attendees (organizations or individuals) and the purpose of the meeting. We propose that the form be revised to include only the following fields, structured as short answer questions unless otherwise specified: a. Date of meeting b. Purpose of meeting (check-boxes as currently structured) c. Anticipated number of participants d. Organizations, agencies, or affiliations represented amongst participants e. Describe how meals and/or light refreshments is an integral part of the meeting f. Types of Beverages to be served g. Estimated total cost of beverages h. Types of Refreshments to be served i. Estimated total cost of refreshments j. If meals (breakfast, lunch, dinner) will be provided, list estimated number of each and dates on which they	Pending	We can look at this during the ombuds work group. This was based off of guidance we received from the auditor's office in our last audit 5 years ago.

Topic: Mortgage Payments

Unique ID #	Comment	Status	Response to Date
284	Allow mortgage payments as reimbursable	Pending	
301	Mortgage payments - why is this not allowable suddenly?	Pending	
482	Rental of office space: Please refer to my mortgage payment question. Why is rental OK but not mortgage. Also, the stipulation on not exceeding the cost of similar facilities would be impossible to enforce or check. It is almost impossible to compare two rental locations and the cost at the beginning of the lease might be comparable but the terms might cause it to exceed another location. Will the Commission force a CD to move their office by disallowing rental costs that are deemed "too expensive" compared to a building down the street?	Pending	We will flag this and continue to explore for if mortgages are allowed. No the commission will not force a CD to move.
483	Mortgage Payments: Why is this not eligible but leases are? Mortgage payments for buildings owned by Districts apply equally to all programs like leases.	Pending	We will flag this and continue to explore internally.
484	New additions include: 1. Mortgage payments - Why is this ineligible? What if the District wants to purchase an office building and takes out a loan to do so, how is this any different than rent?	Pending	We will flag this and continue to explore.

Topic: Overhead / Indirect

Unique ID #	Comment	Status	Response to Date
432	Computing Conservation District Overhead Costs - would be worth putting in here that the rate is 25%.	Addressed	The example shows how to calculate overhead using a 25% rate. We did not want to specific a specific rate and included general information so if we update the rate, we do not need to update the manual each time.

Unique ID #	Comment	Status	Response to Date
102	Allowable Reimbursable Expenses - Overhead vs Direct Expenses	Pending	
138	What is eligible to be charged to overhead. I know this is not covered by the SCC but as the governing agency it would be important for a new hire to understand. According to the SCC manual, subscriptions, insurance, office supplies, and communications are all reimbursable expenses. These were previously explained to me as overhead expenses.	Pending	

Topic: Peer-to-Peer Rentals

Unique ID #	Comment	Status	Response to Date
403	Peer or Peer Rental (I think this is supposed to say peer TO peer not peer or peer): Edited this sentence to clarify that the Commission won't reimburse more than per diem: Original: The nightly rate plus associated fees must not exceed the per diem rate for the area. --> edited: REIMBURSEMENT FOR the nightly rate plus associated fees WILL not exceed the per diem rate for the area."	Addressed	Thank you for point this out. I have corrected it to read "Peer to Peer Rental". I have updated the sentence to reflect your revision.

Unique ID #	Comment	Status	Response to Date
283	Align peer to peer rentals with the linked guidance.	Pending	
445	Peer or Peer Rental - The edits state: "When there are multiple employees staying at the facility...The district must pay for the cost of the rental with agency card and one employee cannot incur the total cost of the rental and be reimbursed for the cost" à What is the intent of this policy? What if multiple employees choose to reserve accommodations together that are slightly above per diem? Past policy would allow them to submit receipts and be reimbursed up to per diem amounts by the District. This addition seems unnecessary.	Pending	This is OFM guidance - We have added to link into the manual. https://ofm.wa.gov/sites/default/files/public/resources/travel/Risks_associated_with_Peer-to-Peer_property_rentals.pdf (item 3 Economic & fiscal responsibility risks)

Topic: Philosophical Approach

Unique ID #	Comment	Status	Response to Date
146	Doesn't address current, new, and ongoing issues. Great to have it, it's needed, but it's inefficient.	Addressed	Comment Only
337	Equipment purchase (pg 35) -> "allowable expense if included in the scope of work OR have prior written authorization from the financial staff OR program manager for all equipment purchases totaling over $2000". I like it this way, provides flexibility and shows trust for how we spend money. The commission sometimes seems to overstep slightly in wanting to authorize our expenses.	Addressed	Great!
523	(split 1 of 2) Anything you can do to streamline procedures and make it easier to understand and meet requirements on our own billing schedule would help.	Addressed	updated language to help with concerns with expenditures
534	(split 1 of 2) Anything you can do to streamline procedures and make it easier to understand and meet requirements on our own billing schedule would help.	Addressed	Comment Only

Unique ID #	Comment	Status	Response to Date
167	(split 2 of 2) Include a commitment from WSCC to work to support locally led conservation, locally led decision making and an effort to assist in accomplishing CD goals.	Pending	Comment Only
224	Reimbursable expenses should align with the SAAM manual fully. There are multiple instances where the SAAM manual allows an expense but this one does not. Why are there additional restrictions being placed on Districts?	Pending	
232	Standards: Manual states, "Funds must be expended and accounted for in accordance with state laws, the State Auditor's Office Budget, Accounting and Reporting System Manual (BARS), the SAAM manual, policies, and procedures." According to OFM and SAO, a state granting agency can choose to not require adherence to SAAM, as CDs don't have to follow SAAM guidance. Given the value of the flexibility of Districts, it would seem beneficial to allow for many of the things we're asking for that are outside of the scope of SAAM but within state law.	Pending	
263	(split 1 of 4) In the short term, there are some specific policy issues that could be resolved in time for the next biennium, but we also need to move forward with long-term reforms of the granting system. This includes the whole cycle of funding requests, program rules, grant applications, funding approval, project expense approval, voucher submissions, budget tracking, and more.	Pending	

273	(split 2 of 2) The priority issue for us is that the manual has become increasingly restrictive and requires more micromanagement from WSCC fiscal staff who are already significantly overcapacity. I am not advocating a blank check; I completely understand that government funding requires checks and balances and the ability to pass audits. However, the fact is that the relationship between WSCC and districts is not like that of RCO or ECY. WSCC exists to support districts. Districts are audited every three years, and are the only entity statewide that collectively completes its annual financial report on time. We know how to handle projects and money efficiently, effectively, and responsibly. Let us do that without more burdens than we already have.	Pending	
282	5.Rewrite the Grants Manual using plain language for non-finance professionals oGood for communication, but this is my lowest priority because the substance of the policies and requirements are the most important.	Pending	
292	Guidelines should work for both WSCC and CDs, this document is a tool defining how we work collaboratively.	Pending	
293	Identify alternatives to current finance policy that will allow for more efficiency and innovation for CD conservation services and programs.	Pending	
302	My main priority is to look at the content of the manual to identify unnecessary bottle necks, requirements and inefficiencies. There are many instances where the manual is more restrictive than state standards, processes that create extra work for both SCC staff and district staff and generally hamper conservation on the ground and waste money. None of the priorities listed address the concerns or issues that are commonly brought up it up. This process needs to include a summary of most common exceptions, biggest time requirements, and areas where commission policy differs from state accounting standards.	Pending	
303	Overall, The grants manual needs to be as simple and clear as possible, requiring only what's necessary for CDs. The overall approach to grant and contract management needs to be streamlined and complementary to CDs in a way that respects our autonomy and unique conservation needs. Every requirement or "best practice" needs to be considered for whether it unnecessarily adds to our administrative burdens.	Pending	
312	The grants manual needs a fundamental rewrite to keep up with the growth and sophistication of CDs, community needs and opportunities for innovation. It needs to be paired with new internal processes and technologies to streamline grant management, application and reporting. It should not include arbitrary guidelines or caps put in place by program managers to help with project ranking or workload management. It should err on the side of flexibility and innovation, with appropriate penalties or liabilities if misused. It should not create unnecessary process or burden for WSCC or CD staff.	Pending	

317	This survey does not address priority concerns that have been continually brought to SCC leadership and finance staff. Ranking the "priorities" offered would generate results that produce a false narrative. My suggestion is that we deal with the unnecessary burdens the manual places on Districts.	Pending	
370	(split 2 of 6, also re-organized by topic) Overall, the Grant and Contract Policy and Procedure Manual provides the outline and details needed to implement grants and contracts. At the same time, the systems being used are outdated. Allowing this group to continue the efforts that were started will be important for the 2027-2029 biennium and beyond. That work will be impacted by technology and data management changes. The approach to delivering WSCC programs to Districts needs to change. There has been significant growth in programs and funding in the past 3 years. It is critical that WSCC and Districts work together to find solutions and streamline processes where possible.	Pending	SCC is working with an OMBUDS group of financial staff and district managers over the next biennium to revise this manual and reorganize the content with the goal of BI27-29 to go live. We recognize there is a large workload to overhaul the manual and are grateful to those who have joined the OMBUDS group to help SCC improve policies and streamline the manual. The final version of the consultant's report from our first meeting will be in the SCC Commission packet for the June meeting.
381	These guidelines should be thoroughly rewritten through an interactive process with your primary customer, conservation districts, after Commission staff have had ample opportunity to understand the ramifications of these rules and how they are applied in a local CD office. Furthermore, CD staff and supervisors should be afforded the opportunity to learn more about the restrictions and rules being placed upon Commission staff in an effort to better understand each other's needs	Pending	SCC will be working on adding additional language that will outline the multi-biennium contracts that will be allowed specifically for the RGP grant program.
411	Stop making policies for the error or misuse of funds by one or even just a couple of conservation distircts. The vast majority of CDs operate very complex operations and do so with minimal to no findings and management letters from the state auditor's office. This should be strongly considered why training to determine whether a policy is actually necessary. Punish those who do wrong instead of burdening those of us who are doing right.	Pending	Thank you for your comment. Further discussion on this may occur as part of the ombuds group in the future.
412	The guiding principles of these rules should be based in statute, not what maybe feels better to an auditor or someone outside of the world in which we work. The first rule of thumb in determining if a new policy or clarification of the policy is to be implemented is, "how will this change improve efficiency of conservation district operations, preferably to make their work less burdensome.". If it can't meet that standard clearly, the rule should be rethought.	Pending	Thank you for your comment. Further discussion on this may occur as part of the ombuds group in the future.
538	(split 2 of 4) We need to have more transparency and less manual actions.	Pending	

Unique ID #	Comment	Status	Response to Date
540	(split 4 of 4) Thank you for being willing to engage us on this process. I am looking forward to this continuing beyond this spring and making this an ongoing workgroup into the future.	Addressed	Comment Only

Unique ID #	Comment	Status	Response to Date
137	The manual needs a dispute resolution process to allow CD's to a process to revise the manual and refute decision making that counters local efficiency, effectiveness and applicability.	Pending	
166	(split 1 of 4) I can't begin to recount the number of items I have sent WSCC staff requesting fixes to the grant policies. I've already submitted them in mulitple formats and I hope beyond hope that those requests and suggestions will be included because they are written down somewhere.	Pending	
226	Review more often. Have supplements to it.	Pending	
236	This manual has been remodeled each biennium and reads exactly like that. Is it time to tear it down and rebuild? Not enough time this biennium but maybe we need to start looking at that as a goal for next biennium (to be adopted 7/1/2027). SCC has grown and the methods used need updated which could/should coincide with a manual update/overhaul. Emailed vouchers, documentation submittal, DIP/Cost-Share project management (CPDS or new system).	Pending	
276	(The grants manual ...) ...should include… a process to allow for other innovations that may be developed and adopted quickly in the future.	Pending	
280	4.Integrating grant guidelines into the Grants Manual, ensuring information is cross-referenced oThis sounds great on the surface, but I would suggest caution. Guidelines may have the need to be more flexible than the procedures manual and may need a small change mid-biennium.	Pending	
297	It should require that sections are reviewed annually for understanding and updates to avoid the need for total overhaul in the future.	Pending	
319	We need a guideline process that goes well. That includes listening, but also getting the final product to the commissioners who will vote on these guidelines in a way and with enough time that they understand what they're voting for.	Pending	
374	(split 4 of 6, also re-organized by topic) The reality is the 45-day comment period does not allow time to make changes and incorporate feedback. Unfortunately, the timing meant the ability to incorporate recommendations for this biennium wasn't feasible.	Pending	SCC is working with an OMBUDS group of financial staff and district managers over the next biennium to revise this manual and reorganize the content with the goal of BI27-29 to go live. We recognize there is a large workload to overhaul the manual and are grateful to those who have joined the OMBUDS group to help SCC improve policies and streamline the manual. The final version of the consultant's report from our first meeting will be in the SCC Commission packet for the June meeting.

Unique ID #	Comment	Status	Response to Date
130	(split 1 of 3) Section 5: Special Grant Programs All of the special grant programs in this manual have their own program guidelines. This section should simply be a reference section to the appropriate guidelines. It could be a comprehensive list of all existing guidelines. I also refer back to my suggestion that this manual needs to be the foundation for the rest of the grant programs, including Implementation. The funding landscape is too complex to try to develop a manual that includes every possible scenario in a single spot. This manual should be the rule-set that all of the other grant programs follow	Addressed	language was updated for 25-27, some of this will also be addressed in the program improvement process
203	Any special grant programs should be housed on a webpage on the commission website and just linked here. When new programs are added, the link would remain the same.	Addressed	These items were cleaned up for the 25-27 manual
219	Consolidation to include all of the programmatic guidelines.	Addressed	links were added for 25-27

Unique ID #	Comment	Status	Response to Date
110	Throughout the document it is unclear as to what is a recommendation and what is required and required by whom. The document would be more helpful if it was separated out into a guideline document on required laws CD's should be following, ie prevailing wages, and a document on SCC policy along with source of authorization to implement and justifications for those policies.	Pending	
135	So many new programmatic guidelines are coming out with new funding opportunities and they are not always included in the manual. It would be nice to have it all consolidated.	Pending	
161	The manual removes decision making from the local conservation district board of supervisors. Much of the content of the manual should be a guideline or suggested resource for CD's rather than a final rule. For instance, a local CD should be able to: adopt it's own rental rates for equipment, set it's own landowner labor rate, prioritize and approve IM grant spending on capital acquisitions like equipment.	Pending	
164	(split 1 of 2) Separate the manual into suggested practices and requirements from WSCC with documentation and justification for the required policies.	Pending	

173	The list of allowable expenses doesn't match the reality. Many of these expenses are not allowed for the various funding programs. Anything that is not allowed on one of the funding programs needs to be moved to conditionally allowed. This grant manual seems focused on the Implementation grant and then expects all of the other program guidelines to modify it. It should be the other way around. This should be the base that is allowed for everything, and then having other program guidelines modify this manual. I suggest limiting the allowable expense list to things that will always be accepted in all grant programs and putting the rest in conditionally allowed expenses stating that it depends on the grant guidelines. Then the other guidelines need to have allowable expenses components as well to tie back to this manual.	Pending	
207	Cost Share Q&A: Is this best in the manual or as a separate section on the website that is referenced? Would be easier to add Q&As generated throughout the year to the list if it wasn't required to go through the Commission board for approval	Pending	
270	(split 1 of 2) Throughout, there are references to overall District governance. Instead, reference the requirement to comply with CAPP guidelines to be eligible WSCC grants. District governance is outside of the scope of the Grant and Contract Policy and Procedure Manual. Sections include but are not limited to: Guidance from the Washington State Auditor's Office; Handling Reimbursement for Employer-Paid Benefits; Federal Audit Requirements, State Auditor Requirements; Audit Findings or Management Letter; Records Retention.	Pending	
278	1.Clearly define policy vs procedure, best practice vs requirement in the Grants Manual o It is critical that we eliminate unnecessary steps and requirements. Additional requirements increase staff time requirements and increase the potential for mistakes. Not doing so would make this entire process moot. o "Clearly define policy vs procedure, best practice vs requirement" will help identify unnecessary steps and streamline the workload. o Knowing the "why" will reduce District Staff frustration	Pending	

286	Currently the grants manual applies to all entities submitting for funding from SCC. That fails to reflect the unique relationship between SCC and CD's created by RCW 89.08. The intention of RCW 90.08 is to empower locally led decision making in conservation. Given 89.08, CAPP and the legislative authority of local CD boards there is opportunity to reduce the state wide prescriptive guidance in the Grant and Contract Procedure Manual that reduces CD's operational flexibility, increases administrative costs and increases timelines to put conservation on the ground. I advocate that for CD's, policy that isn't specifically required and can be referenced be removed. Local boards have the good governance to manage financial resources without the added time and cost of SCC micromanaging. An examples of micromanagement is the requirement for SCC to determine if out of state travel is approved. Some may champion that more policy means more accountability, but the accountability that CD's have through our local boards, relationships with local communities, relationships with local legislators, CAPP, the state auditors office is far more significant that a book of policy that shifts decision making up to a few individuals and out of the hands of the local government. The Grant and Contracts Procedure Manual should be reviewed in full and written to empower CD's to be as efficient and effective as possible.	Pending	
294	It should include but not require a set of best practices, as exceptions and adaptations maybe be needed in unique situations and to remain nimble.	Pending	
413	Throughout, there are references to overall District governance. Instead, reference the requirement to comply with CAPP guidelines to be eligible WSCC grants. District governance is outside of the scope of the Grant and Contract Policy and Procedure Manual. Sections include: Section 2: Grants and Contracts - Guidance from the Washington State Auditor's Office Section 4: Reimbursable Expenses - Handling Reimbursement for Employer-Paid Benefits, Section 10: Other Requirements - Federal Audit Requirements, State Auditor Requirements, Audit Findings or Management Letter, Records Retention.	Pending	Thank you for your comment. Further discussion on this may occur as part of the ombuds group in the future.
476	AND Mechanisms to empower Districts to make informed decisions about conditionally allowable expenses and reduce the amount of approvals necessary by program and financial staff. The goal of any administrative rule should be to maximize good use of funds while minimizing administrative costs for both the grantor and grantee. Many of the changes in this manual are to tighten down requirements and push CDs to ask for permission from SCC staff more often. The manual should be clear enough that a District can make an appropriate decision without SCC staff input. There are also elements within this manual that are better fit in a Conservation District Governance document such as a more detailed CAPP 1.	Pending	We will be working to add language to address multi biennium contracts (Motion was made at the March 2025 meeting, the same meeting this was sent out for comment)

Topic: Scope of Grants Manual

495	1/25 - Frequently asked questions need to be removed from the manual. They can be linked in the manual, but they aren't policy, and having them in the manual means staff can't edit them without going to the Commission and a 45-day comment period.	Pending	Yes, in the next update we will work to differentiating policy from procedure from guidance.
496	Cost sharing questions/answers we would recommend these be removed from the manual so staff can edit/add to them - the first question should reference the question later regarding appealing the cost share policy. Likewise, the question about cost sharing with another public entity should also reference the appeal question. Also restating that all FAQ/Q&As should be linked in the manual but housed elsewhere so they can be edited.	Pending	Yes, in the next update we will work to differentiating policy from procedure from guidance.
547	Make the manual specific to conservation districts and take advantage of the good governance CDs have and SCC to CD relationship through 89.08. This can reduce administrative burden and oversight by empowering the local CD board to be the governance structure it was meant to be. Counties and other entitiess can be handled through a modified or supplemental grants manual.	Pending	

Unique ID #	Comment	Status	Response to Date
314	Speaker fees and any travel costs associated with hiring a speaker for an event - does this mean someone putting on a training for staff? Or just a motivational speaker?	Pending	
392	2. Speaker fees and any travel costs associated with a speaker - This is quite restrictive and means we can't pay for hosting our own trainings. According to the definition in the glossary, a "Speaker is a person who presents information, ideas, or stories to an audience at an event. These can be any event, such as conferences, seminars, workshops, or webinars. Speakers are often experts in their fields and may include professionals, academics, or motivational leaders. Moreover, their primary goal is to educate, inspire, or entertain the audience, making the content relatable and accessible." This seems like an important eligible cost to improve the training and education of our district employees. What is the thought process behind this?	Pending	Thank you for flagging this. This is a topic we are looking at internally and will continue with the ombuds group.
393	Speaker Fees: Why are speaker fees specifically excluded? Speakers can be sources of producer education around program topics. They can also be a draw to get more attendance and more reach. At the minimum this expense should be conditionally allowed. The definition of speaker in the glossary talks about them as a very positive thing, but are specifically excluded here.	Pending	Thank you for flagging this. This is a topic we are looking at internally and will continue with the ombuds group.
443	3. Host stipends for producers holding workshops - We need a way to pay for the labor provided to producers who host workshops. If a stipend isn't eligible, would an hourly rate be?	Pending	This is an item we will add to the list for review in the next update. At this time it is not eligible.

Topic: Taxes

Unique ID #	Comment	Status	Response to Date
172	1099 - G issuance, suggest either shifting to a "other considerations" section that catches a few other random elements or leaving it stand alone after the payments part.	Pending	
233	Tax Related Information (1099-MISC) - Align 1099 information (page 10) with actual guidelines (not all payments over $600 need a 1099) or else just put a notice that Districts must follow federal regulations for issuing 1099 forms and note the operations brief on 1099 issuance for cost share.	Pending	
272	(split 2 of 2) And the 1099-MISC guidance is incorrect.	Pending	
488	1/25 - Tax Related Information (1099-MISC) - Align 1099 information (page 10) with actual guidelines (not all payments over $600 need a 1099) or else just put a notice that Districts must follow federal regulations for issuing 1099 forms and note the operations brief on 1099 issuance for cost share.	Pending	We will review and edit as needed.

Unique ID #	Comment	Status	Response to Date
117	Vouchering ~ I have received conflicting guidance from SCC financial staff to that which is in the manual, specifically when an invoice is eligible - invoice date vs date of payment	Addressed	language was updated for 25-27 manual, we have been doing RM/Program manager & fiscal staff training to ensure guidance is consistent
119	Vouchering: The manual is unclear how the July 10 deadline is applied for biennium programs. Would this impact timing of expenses too?	Addressed	
123	(split 2 of 2) We think a "month's billing period" should be defined and determined by the CD, and in our case, board meeting to board meeting would be most conducive to our billing period and tracking. June would be an exception in order to close out the grants.	Addressed	language was updated for 25-27 manual
124	(split 2 of 2) We think a "month's billing period" should be defined and determined by the CD, and in our case, board meeting to board meeting would be most conducive to our billing period and tracking. June would be an exception in order to close out the grants.	Addressed	language was updated for the 25-27 manual
148	It's not really part of the manual, exactly. It's more about policy. Costs aren't reimbursable until paid and everything needs paid by the end of the fiscal year which requires some extra processes on our end at the end of each June in order to ensure our costs are reimbursed.	Addressed	Comment Only
212	Need to allow for cross-month billing. Some districts are still completing manual vouchers, errors happen and expenses are missed. Good accounting practices will catch this and if the grant period is still open, we need to be allowed to submit it for reimbursement. Just because of human error, we shouldn't proceed as if the expense was not eligible in the first place. It is normal practice across state agencies for eligible expenses to be paid regardless of when they are provided on a voucher.	Addressed	language was updated for 25-27 manual
243	Vouchering: The manual is unclear how the July 10 deadline is applied for biennium programs. Would this impact timing of expenses too?

Expenses timing: The most common question we have been dealing with in 2024 is the timing of expenses. When does the work occur versus when is the expense incurred. These are two different moments. i.e. A contractor works January to March and sends the district a bill in April. The CD pays the bill in April. The work itself occurred in Jan-Mar but it the expense was incurred in April. The manual needs to clarify how to handle a contractor who completes work and bills on a quarterly basis. Cash-basis states that date of incurred costs = the check payment date, not the date of activities or the invoice date.

Expenses from within the grant period: Currently the manual is extremely restrictive requiring expenses that occurred in May to be vouchered on the May voucher. All other state agencies accept expenses throughout the grant contract perio. This is an unnecessary burden to WSCC fiscal staff. I suggest changing the requirement to be "within the contracting period". This would solve my travel comments below. A prime example is that cost share the exception. We can cross fiscal years with expenses no problem. In this case, we have a contract with a landowner to do work and as long as it is after the start date and before the end date, expenses are OK. How is a company that is a contractor any different? It is the same issue with all of the other types of expenses. The service occurs at some point in the past and we can't pay it until we have verified it and have it in hand. That means the expense might incur in a different month.

Fiscal year end: incurred vs occurred issue again. Work is occurring in June but the expense isn't being incurred until July.... Why is there a special exception for only cost share, should be the same issue either way. | Addressed | language edited for clarity in 25-27. |

246	District Landowner Agreement-reimbursement requests to be submitted on a monthly basis. Should it state this is when expenditures have been incurred or do they want a monthly voucher regardless?	Addressed	It should state on a monthly basis when expenditures have been paid. I have corrected the sentence in this manual.
248	Voucher Payment Requests: Need to include the interpretation of when an expense incurs vs occurs.	Addressed	corrected in manual for 25-27
268	Review options to prioritize cash flow for CDs.	Addressed	Comment Only
289	(split 3 of 3) The relatively prompt payments and flexible task budgets.	Addressed	Comment Only
322	Fiscal Year - End -> must be paid and received by the district by June 30 - how does that work with us writing all the checks at July board meetings. Is board meeting the date when we "pay" someone or is it a different, earlier date.	Addressed	An expenditure is paid when you print/generate the check. For example you would need to cut/make your check payment on or before 6/30.
329	Vouchering --> states that expenditures must be vouchered for within 60 days of the district paying. This insinuates it's actually is okay for us to go outside the voucher month. If we pay for something on April 16, we could still voucher for it 60 days later in June for May expenditures.	Addressed	Correct. The district has 60 days to voucher for a cost once it has been paid by the district to receive reimbursement from SCC. This does not apply to fiscal year end which has its own section listing out the requirements.
359	Timing of Expenditures --> Does any District use the county or city as their treasurer? The italicized portion after "An exception to expenditure recognition..." seems more confusing than informative, particularly since their fiscal year would end December 31st anyway.	Addressed	No, we are not aware of any districts currently using the county or city as their Treasurer.
360	Would an action that occured in June, and became an expenditure in July be eligible for reimbursement with a biennium project?	Addressed	Not clear what an "action" is. More follow up is needed to understand what the district is asking.
377	This sounds pretty onerous if it wasn't part of the contract. Based on how I read this, a final report could be requested at the end of the grant with only ten days after it ends to prepare and submit it	Addressed	SCC makes every effort to include any required reporting when sending the award notification to the district.
472	From 1/25, but clarified and simplified - Overall, the biggest point of confusion in the manual has been around the timing of expenditures and how that interfaces with the fiscal year-end. Timing and eligibility of expenses are referenced or addressed throughout the manual. We understand no expenses can be reimbursed from a prior fiscal year, however, there has been significant confusion over the definition of an expense. For example, say we, as a cash-basis entity, use funding from a two-year SCC grant to hire a company to complete a survey. We hire them in May of FY1 of the biennium, they complete work in May and June, and bill us in July (FY2 of the biennium), and we pay the invoice in July. Please clearly state in the manual that an eligible expense with this timing would be acceptable.	Addressed	We understand the confusion our policy caused this last biennium requiring the expenses to be vouchered for in the month they were incurred. The language has been revised in the current manual and addressed in this version going live July 1, 2025 if approved at the Commission meeting. We revised the language to say. "All expenditures must be vouchered for within 60 days of the district paying the expenses." This is true for all expenses except June Fiscal Year end vouchers. "All expenditures must be paid and received by the district by June 30th. This includes, but is not limited to, any expenditures that occur through credit card purchases, purchase accounts, vendors, and contractors."
499	Vouchering: it is unclear how the July 10 deadline is applied for biennium programs. As far as the manual says, July 10 is the due date for all vouchers regardless of it being operating or capital.	Addressed	Yes, that is correct. All vouchers are due 7/10.
512	It included the fact that purchases made on a credit card are not considered paid until the credit card statement is paid which was previous point of contention.	Addressed	Comment Only
523	(split 1 of 2) Anything you can do to streamline procedures and make it easier to understand and meet requirements on our own billing schedule would help.	Addressed	updated language to help with concerns with expenditures
527	Timing of Expenditures -> Exceptions are mentioned, but they refer to expenses the open period (i.e. fiscal years) not the calendar month. What about the "one-time exceptions" given from SCC staff under varying circumstances. We understand that this was born out of the SCC's audit recommendations, but the manual doesn't explain what it means and how it may affect the district.	Addressed	updated language to help with concerns with expenditures and we will add the exception process and any impact to the CD
532	The monthly billing period doesn't work for us, and we need to be able to voucher for all the expenditures we've paid at the most recent board meeting.	Addressed	updated language to help with concerns with expenditures and we will add the exception process and any impact to the CD
533	We don't have major problems with the manual, but we need to be able to voucher for all expenditures once they've been paid at board meetings (see last comment).	Addressed	Comment Only
534	(split 1 of 2) Anything you can do to streamline procedures and make it easier to understand and meet requirements on our own billing schedule would help.	Addressed	Comment Only

542	"• For example, SCC cannot pay charges such as salaries, mileage and/or goods and services incurred July 1-31 on a September voucher" Why can Ecology operate on a quarterly reimbursement basis but the Commission has to be so stringent with every expense? Can vouchers be requested monthly, but allow, as policy, a missed expense to be submitted within 3 months, without an exception needed? This would reduce the number of exceptions, the number of emails back and forth, and give district finance staff some breathing room. If an expense is later than 3 months, give an exception or deny the cost.	Addressed	SCC changed for the 25-27 that expendures can be reimbursed with in 60 days of

Unique ID #	Comment	Status	Response to Date
101	"Fiscal year end and final request for payment • Final requests for payment, grant or contract close out form, supporting materials, supplemental reports, and signatures, must be submitted within ten (10) days after the end of the fiscal year. "Final vouchers are required by July 10th of each year to abide by the deadline established by the Office of Financial Management." Using the term 'final' - it refers to when the grant is closing, but the finance staff requires that vouchers for ALL grants to be submitted by July 10th each year, even when the grant has another year left. Either clearly state that ALL vouchers are due by July 10th and eliminate the word 'final', or just ask for the vouchers by the 10th for grants that close out June 30th, and let districts get the rest in by the 20th, as usual.	Pending	
115	"Revenues are recognized only when cash is received and expenditures are recognized when chargeable against the report year's budget appropriations as required by state law. This generally results in revenues being recognized when delivered to the government or government's agent and expenditures being recognized when paid. Warrants and checks are considered paid when issued." I agree with this policy and have followed it, asking for reimbursement only after we've paid the expense. However, for travel/training costs, this causes challenges as we have to hang on to documentation and carry the debt for months until reimbursement. Specifically, I'd like to see registration and airfare to be included in a voucher after it's been paid but before travel/training has happened. The reasoning - the registration and airfare has to happen sometimes months in advance and has been paid for, which meets OFM requirements for reimbursement. It's rare for an employee to be unable to attend, and even more rare for an event to be cancelled. In those rare instances, the district could deduct the cost of registration and airfare from the next voucher.	Pending	
120	Fiscal Year end and final request for payment: The second line about requests for additional documentation is confusing. It makes it seem like if WSCC staff do not request additional documents within 30 days, it will be considered late. Should be reworded to reflect that districts are required to respond to requests for additional documents by the 30th of July or it may be considered late and may not be authorized for payment.	Pending	
121	(split 1 of 2) Training, classes and conferences that are upcoming (haven't occurred yet) but are paid should be reimbursable once paid. "Product in hand" is the registration.	Pending	

122	(split 1 of 2) Training, classes and conferences that are upcoming (haven't occurred yet) but are paid should be reimbursable once paid. "Product in hand" is the registration.	Pending	
125	(split 1 of 2) A voucher was rejected and had to be revised because we billed for a conference registration when the expenditure was paid, but before the conference occurred. Response from SCC Staff: With conferences or trainings, you have to voucher for them after they occurred. So even though it was paid in November, it wouldn't be considered reimbursable until after December 5th (the last day of the conference). Conferences and trainings are an exception to the expenditure guidelines. Where in the manual is this guidance addressed? The manual references travel vouchers needing to be submitted after travel has occurred, but not training costs. What about for two year grants or even 5 year grants (RCPP) where training may need to be purchased in one FY but completed in another FY or biennium?	Pending	

144	All payments made and received by June 30 not necessary and unique to SCC.
	            -This means we have to stop working in June.
	            -Example: If a contractor finishes a job on June 15th, we might not see an invoice from them until July 1. We could make payment on our typical AP run on July 10th. However, it might be another month before we can settle up the L&I release and retainage payment. Again, 90 days past the grant end date is what RCO allows.
		Pending	

147	Final vouchers by July 10th is unnecessary - RCO gives 90 days so this must not be an OFM requirement	Pending	
153	Required monthly vouchering. This is not necessary and a waste of public funding. RCO requires a minimum of one voucher per year, so this must not be an OFM requirement.	Pending	
208	Master Contract: The basis is our master contract, we need to make sure the language in the manual aligns with the master contract. Key language regarding timing of expenses (section 3 comments) 1.Compensation. Payment for allowable costs shall be made on a reimbursable basis only. Requests for reimbursement will be submitted monthly. Approved eligible costs incurred by the District will be considered to have been paid by the District under this contract at the time the District seeks reimbursement from the Commission. How does this compare with the manual?	Pending	
221	Payment of Allowable Costs (pg 8): "An expense must be vouchered for within the same fiscal year that the expense was incurred..." This is also threaded throughout the manual in other sections (pg 18) Section 3 Compliance-Fiscal Year-End "No expenses can be reimbursed from a prior fiscal year." Not all districts have the same fiscal year as the SCC and therefore it can get confusing when reviewing the manual. It would be helpful to have the manual state something of this nature and then reiterate that it's the SCC's fiscal year that must be adhered to in the scenarios mentioned.	Pending	

234	The definition of an allowable cost (expense and period of performance) begins under Payment of Allowable Costs on page 8 and is threaded throughout the manual. According to this paragraph and many throughout, an expense is considered an expense when the item is paid by the District (see SAAM manual and cash-basis accounting) and is eligible if within the period of performance outlined in the project agreement. So long as both the work and the payment occur within the grant period, there is no reason why an invoice with work completed in, for example, June of 2024 but paid by the District in July of 2024 would be ineligible for reimbursement. Additionally, even if the expense was paid for by a District in FY1 of a biennium for a two-year agreement, according to SAAM, the expense doesn't become an expense to WSCC until we send it for voucher. It makes sense why WSCC wouldn't want to have to field tons of vouchers with expenses from months and months ago, however sometimes expenses are missed. As long as the expenses are within the period of performance and the manual allows it, there is no issue from OFM's perspective.	Pending	
238	Timing of Expenditures (also see section 6 below): This section goes into great detail about expenditures and the basis of accounting. However, this further cements the issue of paying for expenses where the service was rendered in (for example) June of 2024, but the invoice was paid in July 2024 (i.e. crossing an FY but not a biennium). In a biennial grant the expense does not exist for the Commission until we submit it to the Commission. Even if the expense shows June contractor work, if it wasn't paid by the District until July, it is an August expense (when we submit the voucher) for the Commission. And despite the detail in this section and in those below, it doesn't mention the simple issue of showing the date paid on a proof of payment receipt. This one issue cost Districts and WSCC dozens if not hundreds of hours over the last biennium, and was such a simple fix that should have been clearly communicated in the manual and disseminated to Districts immediately when these issues came to light.	Pending	
242	Travel: Can we open the policy up so that we can group multiple months of travel to deal with travel that crosses a month or when there are very few miles on a travel voucher for an individual month? Why are required to process paperwork for a $3 reimbursement when we could combine it with 2 or 3 months to make it worth the cost for processing. As with all other expenses in cash-basis accounting, travel reimbursement is not incurred until we pay the employee. If we wait to pay 3 months of travel expenses, that should be OK since the expense wasn't incurred to the District until the employee asks for reimbursement.	Pending	
249	Voucher Payment Requests: This section goes into great detail about the timing of expenses, with more examples than in Section 3, however based on all of the examples, there still appears to be no reason why an invoice received by the District in, for example, late July with work completed in May/June, paid for the District in August, couldn't be vouchered for with a 2 year grant. For example, "No expenses can be reimbursed from a prior fiscal year. All expenses must be paid for and received in the fiscal year they were incurred regardless of funding source." If the definition of an expense for Districts is when they pay the expense, why can't we pay for work on the timeline above? For a cash-basis entity, until we pay the expense, the expense does not exist. And for WSCC, until we send you a voucher, the expense does not exist. There is no reason for it to be included in your FY close out from the previous year as it doesn't exist for you until the FY in which you receive the expense.	Pending	
259	The monthly billing period doesn't work for us, and we need to be able to voucher for all the expenditures we've paid at the most recent board meeting.	Pending	
261	We don't have major problems with the manual, but we need to be able to voucher for all expenditures once they've been paid at board meetings (see last comment).	Pending	

262	Districts have grants with dozens of agencies, many of them state. When a grant period of performance crosses fiscal years or biennia, there is no cut-off that we've ever heard of for submitting expenses, so long as the expense is within the grant period. We have specifically researched this issue, and I'm happy to provide responses and examples from the SAO, ECY, RCO, and other state agencies that have no cut off for fiscal year and/or biennium ends. The answers districts have received from WSCC thus far are lacking at best, patronizing at worst. We understand how to effectively manage our funding and projects within dozens of granting agency's rules and guidelines, oftentimes simultaneously for different aspects of the same project. We recognize the restrictions of a state agency, because we also have to abide by similar rules but so far we've been told to essentially trust this restriction with no solid backing for why, no actual conversation, no sense that work is being done by WSCC to push this issue with OFM, if that's where this guidance is coming from. WSCC needs understand that this restriction isn't just an inconvenience but it flat out doesn't align with our experience with grants from any other state agency.	Pending	
316	There has been much confusion about contracted work that is completed in FY1 of a biennium and paid for in FY2 of the biennium for a two year grant. Please explicitly state that for grants that span two fiscal years, contracted work executed in one FY but not paid until the next IS eligible for reimbursement.	Pending	
373	(split 5 of 6, also re-organized by topic) This creates the potential for problems. My biggest fear as a District Manager is if the District was to incur the costs for a project and the expenses on a voucher were rejected. When project caps are $100,000, this could bankrupt a District. Most Districts don't have the funds to cover expenses if denied which leaves us vulnerable. While I feel there has been significant effort by Commission staff to address concerns and issues that have been identified, there is still a lot of work to be done. This update to the Grant and Contract Policy and Procedure Manual is the first step of a complete overhaul to the grant system.	Pending	SCC is working with an OMBUDS group of financial staff and district managers over the next biennium to revise this manual and reorganize the content with the goal of BI27-29 to go live. We recognize there is a large workload to overhaul the manual and are grateful to those who have joined the OMBUDS group to help SCC improve policies and streamline the manual. The final version of the consultant's report from our first meeting will be in the SCC Commission packet for the June meeting.
441	For travel, registration and airfare payment happens sometimes months in advance of the training or meeting. Those expenses are 'in hand' and should be allowed to be submitted for reimbursement in the month they are paid for. The reason for the travel is rarely canceled and those attending rarely change plans. Allow CDs to include registration and airfare in the voucher the month they are purchased. If necessary, a refund can be added to the next voucher. This was an effective procedure years ago.	Pending	This is a requirement of SAAM and auditor's office.
448	Retroactive Payments Prohibited: I would suggest editing this sentence "All cost share funding must be vouchered for and completed by the end of the fiscal year if funded through operating funds or the end of the biennium if funded through capital funding." It should state that all cost share funding must be completed and vouchered for by the end of the grant effective date or end of the biennium, whichever comes first.	Pending	This section is referring to the retroactive payments – payments made prior to the board chair or individual authorized to sign and date the Contract for Cost Share (signature line #3) as approved. Any costs incurred before this date are considered retroactive and not allowed to be reimbursed as part of the cost share.
471	'Within 10 days of the expiration date of a closing grant, all financial, performance, and other reports required under the grant or contract are due to SCC.' Why create a stressful situation by requiring all documentation submitted within 10 days? Ecology allows 90 days. Federal grants allow at least 90 days. Why is there no trust that we are paying first and asking for reimbursement after? That's the rule, we follow it.	Pending	We understand the 10 day timeframe is a tight turnaround, however, that is required for SCC to have time processes the reimbursement and if applicable submit billings to other agencies and/or manage our appropriations. SCC makes every effort to ensure that returned funding is minimized and to also meet OFM deadlines. In the last biennium end close-out the SCC staff processed an average of 287 vouchers each fiscal month.
489	Timing of Expenditures: Basis of accounting section is confusing. Open periods only apply in a 13 month scenario which for a county is January. It wouldn't impact state fiscal year funding. This is also an extremely rare or non-existent scenario for conservation districts. Suggest you remove the section about open periods and just reference that there may be special conditions for entities who use counties are their treasurer.	Pending	We will review this and edit as needed.

493	With biennium funded projects, would the 60 day expenditure window apply?	Pending	Yes, except for fiscal year end which has its own requirements.
502	1/25 - (clarified) Fiscal Year-End - There has been much confusion about contracted work that is completed in FY1 of a biennium and paid for in FY2 of the biennium for a two year grant. Please explicitly state that for grants that span two fiscal years, contracted work executed in one FY but not paid until the next IS eligible for reimbursement.	Pending	Yes, this is allowable. We will work to clarify language in the manual with the ombuds group.

Unique ID #	Comment	Status	Response to Date
115	"Revenues are recognized only when cash is received and expenditures are recognized when chargeable against the report year's budget appropriations as required by state law. This generally results in revenues being recognized when delivered to the government or government's agent and expenditures being recognized when paid. Warrants and checks are considered paid when issued." I agree with this policy and have followed it, asking for reimbursement only after we've paid the expense. However, for travel/training costs, this causes challenges as we have to hang on to documentation and carry the debt for months until reimbursement. Specifically, I'd like to see registration and airfare to be included in a voucher after it's been paid but before travel/training has happened. The reasoning - the registration and airfare has to happen sometimes months in advance and has been paid for, which meets OFM requirements for reimbursement. It's rare for an employee to be unable to attend, and even more rare for an event to be cancelled. In those rare instances, the district could deduct the cost of registration and airfare from the next voucher.	Pending	
121	(split 1 of 2) Training, classes and conferences that are upcoming (haven't occurred yet) but are paid should be reimbursable once paid. "Product in hand" is the registration.	Pending	
122	(split 1 of 2) Training, classes and conferences that are upcoming (haven't occurred yet) but are paid should be reimbursable once paid. "Product in hand" is the registration.	Pending	
125	(split 1 of 2) A voucher was rejected and had to be revised because we billed for a conference registration when the expenditure was paid, but before the conference occurred. Response from SCC Staff: With conferences or trainings, you have to voucher for them after they occurred. So even though it was paid in November, it wouldn't be considered reimbursable until after December 5th (the last day of the conference). Conferences and trainings are an exception to the expenditure guidelines. Where in the manual is this guidance addressed? The manual references travel vouchers needing to be submitted after travel has occurred, but not training costs. What about for two year grants or even 5 year grants (RCPP) where training may need to be purchased in one FY but completed in another FY or biennium?	Pending	
241	Training and Education: This is conditionally allowable by grant program and subject to a value test by WSCC for costs. Suggest allowing costs up to a certain amount ($4,000/person/grant?) and allowing for exceptions. Ideally would shift to allowing training costs as described within all grants.	Pending	
327	Training and Education: Restating the request... to address the blanket ineligibility of tuition. Suggest allowing costs up to a certain amount ($2,000/grant?) without SCC approval.	Pending	At this time, we cannot incorporate this recommendation but will flag it for the ombuds group. As this change would require SCC to open up all program guidelines.

463	Tuition: Where is the line determining tuition vs training and education? Would a fee for a class put on by WSU Extension be considered tuition? Is it more than one class in a series? Dictionary definition is: a sum of money charged for teaching or instruction by a school, college, or university. The are several really good certificate programs that provide excellent training on riparian, forestry, and others that would greatly benefit WSCC programs that would be excluded. Would you consider the AgForestry Leadership program tuition?	Pending	We have added clarification in the manual to clarify tuition (fee for a class/course for credits vs training and education). AgForestry would be considered and allowable expenditure as a training or certificate course under the Implementation grant.
464	4. Tuition - this is so broad and needs clarification. For example, we have used SCC grant funds to pay for tuition at a local community college for a drone course for our FH grant. That would be ineligible under the new manual. Perhaps you could clarify that tuition for a degree program isn't eligible? Or tuition over $4,000(?) per year?	Pending	We have added clarification in the manual to tuition vs training and education. Yes, a drone course would be eligible and we have clarified our guidance.
468	Training - we should be allowed to authorize training and travel up to a certain amount. It is administratively burdensome to get approval for every out of state training. If a training requires a flight, or is over $2,000, we should get approval. Otherwise we should be able to authorize them.	Pending	
528	Training and Education: This is not universally allowed, need to update the rules to the actual practice or adjust the actual practice. Some funding programs are capital and only allow training when approved. Others don't require it. Need to update this to reflect the reality. Long-term we need to move towards a less micromanaged approach to training. I suggest shifting the burden of this approval process to the application/addendum phase. Have Districts provide a training budget and have them operate freely within it (assuming it is appropriate to the grant). We would need to update the forms to reflect that and process to accommodate that change. It would reduce the number of unique requests to financial staff.	Pending	

Unique ID #	Comment	Status	Response to Date
354	Out of State/Country Travel: Will SCC fiscal staff be responsible for communicating the appropriate Breakfast/Lunch/Dinner rates for the travel destination? Federal Per Diem includes a $5 incidentals element that Washington State splits between the three meals. This is where most of the errors occur and could use either a general rule of thumb (i.e. $1 to breakfast, $2 to Lunch and Dinner) or direct guidance from SCC Finance staff before travel occurs.	Addressed	No, SCC does not determine the per diem rates. We provide the link to the OFM created map to follow for in state travel. For out of state/country travel, the GSA website provides the information.
406	Travel vouchers: travel-related expenditures vouchers after it has commenced (started) or after it has been completed? What about travel that crosses months (leave on the 31st and continue traveling in the next month)? Can we combine 2 months of travel onto one reimbursement form?	Addressed	Thank you for pointing this error out. I have updated the wording to concluded. For travel, please keep each month of travel separate when possible.
469	Travel and Transportation: "Out of country and out of state travel must be approved in advance of the travel taking place." Can you clarify in the manual that this is for flights or extended travel, or put some qualifiers on it? We regularly travel to the Portland metro area for training or if we go to Underwood CD, we drive down to Portland and pay a toll to cross back over on the Hood River bridge. This policy would make those costs require approval. Perhaps there could be a threshold at which out-of-state travel requires approval?	Addressed	We have updated language to specify areas that are exempt from this "travel to counties and/or cities in the states of Idaho and Oregon that are contiguous to the border between Washington-Idaho or Washington-Oregon, or b) out-of-state employees traveling within the same state as their official workstation for travel reimbursement shall not be considered out-of-state." (per SAAM pg 1048)

Unique ID #	Comment	Status	Response to Date
115	"Revenues are recognized only when cash is received and expenditures are recognized when chargeable against the report year's budget appropriations as required by state law. This generally results in revenues being recognized when delivered to the government or government's agent and expenditures being recognized when paid. Warrants and checks are considered paid when issued." I agree with this policy and have followed it, asking for reimbursement only after we've paid the expense. However, for travel/training costs, this causes challenges as we have to hang on to documentation and carry the debt for months until reimbursement. Specifically, I'd like to see registration and airfare to be included in a voucher after it's been paid but before travel/training has happened. The reasoning - the registration and airfare has to happen sometimes months in advance and has been paid for, which meets OFM requirements for reimbursement. It's rare for an employee to be unable to attend, and even more rare for an event to be cancelled. In those rare instances, the district could deduct the cost of registration and airfare from the next voucher.	Pending	
118	Meal Per Diem Reimbursement: Contractors, volunteers, and district partners are not eligible for per diem reimbursement. This is in paragraph 1 on this topic but this seems to either not be enforced or not true. When we hire an out of the area contractor, we will and have covered travel expenses up to per diem amounts. This is common practice with contractors. We do require them to provide receipts so that they are verified appropriate.	Pending	

237	Meal Per Diem Reimbursement: Contractors, volunteers, and district partners are not eligible for per diem reimbursement. This is in paragraph 1 on this topic but this seems to either not be enforced or not true. When we hire an out of the area contractor, we will and have covered travel expenses up to per diem amounts. This is common practice with contractors. We do require them to provide receipts so that they are verified appropriate.	Pending	
240	Meal Per Diem Reimbursement: Contractors, volunteers, and district partners are not eligible for per diem reimbursement. This is in paragraph 1 on this topic but this seems to either not be enforced or not true. When we hire an out of the area contractor, we will and have covered travel expenses up to per diem amounts. This is common practice with contractors. We do require them to provide receipts so that they are verified appropriate.	Pending	
242	Travel: Can we open the policy up so that we can group multiple months of travel to deal with travel that crosses a month or when there are very few miles on a travel voucher for an individual month? Why are required to process paperwork for a $3 reimbursement when we could combine it with 2 or 3 months to make it worth the cost for processing. As with all other expenses in cash-basis accounting, travel reimbursement is not incurred until we pay the employee. If we wait to pay 3 months of travel expenses, that should be OK since the expense wasn't incurred to the District until the employee asks for reimbursement.	Pending	
286	Currently the grants manual applies to all entities submitting for funding from SCC. That fails to reflect the unique relationship between SCC and CD's created by RCW 89.08. The intention of RCW 90.08 is to empower locally led decision making in conservation. Given 89.08, CAPP and the legislative authority of local CD boards there is opportunity to reduce the state wide prescriptive guidance in the Grant and Contract Procedure Manual that reduces CD's operational flexibility, increases administrative costs and increases timelines to put conservation on the ground. I advocate that for CD's, policy that isn't specifically required and can be referenced be removed. Local boards have the good governance to manage financial resources without the added time and cost of SCC micromanaging. An examples of micromanagement is the requirement for SCC to determine if out of state travel is approved. Some may champion that more policy means more accountability, but the accountability that CD's have through our local boards, relationships with local communities, relationships with local legislators, CAPP, the state auditors office is far more significant that a book of policy that shifts decision making up to a few individuals and out of the hands of the local government. The Grant and Contracts Procedure Manual should be reviewed in full and written to empower CD's to be as efficient and effective as possible.	Pending	
314	Speaker fees and any travel costs associated with hiring a speaker for an event - does this mean someone putting on a training for staff? Or just a motivational speaker?	Pending	
323	Not allowing contractors to collect per diem for travel is a burden to communities that do not have robust contracting firms. We bring in experts for design purposes and they may need to travel in for a few days to collect field data, why are they not allowed to be reimbursed for travel costs? This would severely limit our ability to implement projects if we have to limit contractor's ability to recover their costs.	Pending	At this time we can not allow contractors to get per diem, we will flag this for the next update.

326	Training and Education: Restating the request to add some base authorization for out-of-state travel that doesn't require a flight ... Suggest allowing costs up to a certain amount ($2,000/grant?) without SCC approval.	Pending	At this time, we cannot incorporate this recommendation but will flag it for the ombuds group. As this change would require SCC to open up all program guidelines.
392	2. Speaker fees and any travel costs associated with a speaker - This is quite restrictive and means we can't pay for hosting our own trainings. According to the definition in the glossary, a "Speaker is a person who presents information, ideas, or stories to an audience at an event. These can be any event, such as conferences, seminars, workshops, or webinars. Speakers are often experts in their fields and may include professionals, academics, or motivational leaders. Moreover, their primary goal is to educate, inspire, or entertain the audience, making the content relatable and accessible." This seems like an important eligible cost to improve the training and education of our district employees. What is the thought process behind this?	Pending	Thank you for flagging this. This is a topic we are looking at internally and will continue with the ombuds group.
393	Speaker Fees: Why are speaker fees specifically excluded? Speakers can be sources of producer education around program topics. They can also be a draw to get more attendance and more reach. At the minimum this expense should be conditionally allowed. The definition of speaker in the glossary talks about them as a very positive thing, but are specifically excluded here.	Pending	Thank you for flagging this. This is a topic we are looking at internally and will continue with the ombuds group.
443	3. Host stipends for producers holding workshops - We need a way to pay for the labor provided to producers who host workshops. If a stipend isn't eligible, would an hourly rate be?	Pending	This is an item we will add to the list for review in the next update. At this time it is not eligible.
468	Training - we should be allowed to authorize training and travel up to a certain amount. It is administratively burdensome to get approval for every out of state training. If a training requires a flight, or is over $2,000, we should get approval. Otherwise we should be able to authorize them.	Pending	
544	Allow local governance and oversight by leaving out of state travel decisions to the local board. Or explain why a board of 5 local citizens can't be trusted to make travel decisions for their staff.	Pending	

Unique ID #	Comment	Status	Response to Date
271	(split 1 of 3) The above-listed topics aren't a high priority for our district now. I like to see the following prioritized: Terminology regarding expenditures vs expenses	Addressed	Comment Only
382	(split 2 of 2) Expenses and Expenditures are used throughout the document. The definition for expenses appears to be focused on accrual-based accounting. Expenses, under this definition, would also never be reported to SCC and would only appear in a District's accounts payable. Expenditures, as defined in the glossary, are the primary item that would appear in any payment request. A specific example is on Page 13, "Prior Authorization for Grants" under the 2nd bullet in the second paragraph the sentence says: "Expenses claimed under the prior authorization must be supported by documentation of staff time and proof of expenses incurred and submitted to SCC with the first reimbursement request under the grant." In the case of the glossary definition of expenses we would not be submitting any expenses until they became an expenditure. I recommend updating expenses to expenditures. This would be consistent with how CDs operate and what SCC would receive in a payment request.	Addressed	Thank you – the duplicate has been removed.

Unique ID #	Comment	Status	Response to Date
111	Program Codes: Can we work on reclassifying them so they are more unique? Need to update the list too. RPP, RP, RGP are too close. Suggest a linked document with the program code list with descriptions of each program. Maybe the smartsheet list?	Pending	
142	(split 2 of 3) In places it is confusing due to: - meaning of May/Must Can/Will	Pending	
220	Program Codes: Can we work on reclassifying them so they are more unique? Need to update the list too. RPP, RP, RGP are too close. Suggest a linked document with the program code list with descriptions of each program. Maybe the smartsheet list?	Pending	
290	Definitions of expenditures/expenses - because of how these are defined, and how districts operate on a cash-basis, the actual application of these rules is extremely unclear. E.g., when is an expense an expense? The term "expense" is used throughout the manual to imply a cost that has been paid by the entity, and is used interchangeably with the terms expenditure and cost. But they have different definitions in the glossary. I get that this seems pedantic, but it has major implications for eligible costs and is foundational to the entire manual. In the glossary, the term "expense" is defined as "Decreases in net total assets. Expenses represent the cost of operation incurred during the current period regardless of the timing of the related disbursements." The inclusion of "incurred during the current period regardless of the timing of the related disbursements" is the definition of an encumbrance, and does not apply to Districts. While Expenditure is defined differently, as "Decreases in net current financial resources. Expenditures include disbursements and accruals of the current period. Expenditures do not include encumbrances." The difference in definition between expense and expenditure has major implications for the timing of expenses. We believe it is acceptable to use the two terms interchangeably; however, they must be defined the same way.	Pending	
346	General comment - consider replacing BMP with the term practice, practices, or suite of practices as appropriate.	Pending	In the next update we will be working with the Ombuds group as well as others including contractors and facilitators to dig into the manual, reorganize and rework the manual. We will make reviewing all terminology is included in that review process.

347	General comment - the term entity is used throughout and seems awkward. Maybe just something like "funding recipient" or "grant/contract awardee".	Pending	In the next update we will be working with the Ombuds group as well as others including contractors and facilitators to dig into the manual, reorganize and rework the manual. We will make reviewing all terminology is included in that review process.
389	"Expense" appears for the first time under "Districts and Counties Must Pay First." The term expense is used throughout the manual to imply a cost that has been paid by the entity, and is used interchangeably with the term expenditure and cost. However, in the glossary, the term "expense" is defined as "Decreases in net total assets. Expenses represent the cost of operation incurred during the current period regardless of the timing of the related disbursements." The inclusion of "incurred during the current period regardless of the timing of the related disbursements" is the definition of an encumbrance, and does not apply to Districts. While Expenditure is defined differently, as "Decreases in net current financial resources. Expenditures include disbursements and accruals of the current period. Expenditures do not include encumbrances." The difference in definition between expense and expenditure has major implications for the timing of expenses. We believe it is acceptable to use the two terms interchangeably, however they must be defined the same way.	Pending	Thank you for flagging this. In our next round of updates we will carefully consider which term we use and update the entire manual for consistency.
390	Same comment on expenditures vs expenses. Both show up throughout the manual, please update to make it consistently the same thing.	Pending	Thank you for flagging this. In our next round of updates we will carefully consider which term we use and update the entire manual for consistency.
391	In this manual there are a mixture of terms: Costs, Expenditures and Expenses. The definition for expenses appears to be focused on accrual-based accounting. Expenses, as defined in the glossary, would also never be reported to SCC and would only appear in a District's accounts payable. Expenditures, as defined in the glossary, are the primary item that would appear in any payment request. A specific example is on Page 13, "Prior Authorization for Grants" under the 2nd bullet in the second paragraph the sentence says: "Expenses claimed under the prior authorization must be supported by documentation of staff time and proof of expenses incurred and submitted to SCC with the first reimbursement request under the grant." In the case of the glossary definition of expenses we would not be submitting any expenses until they became an expenditure. I recommend updating expenses to expenditures. This would be consistent with how CDs operate and what SCC would see.	Pending	Thank you for flagging this. In our next round of updates we will carefully consider which term we use and update the entire manual for consistency.
401	(split 1 of 2) Participant as Contractor COMMENT - referring to participant, there are so many other less ambiguous terms we could use.	Pending	Thank you for flagging this. We will continue to explore other terms with the ombuds group. The requirement for the participant to acquire additional bids for the work is to show to the CD and the SCC that the participant's cost/charge for the work is reasonable. The SCC does not require that NRCS payment rates or cost estimates are utilized – only that practices are installed to NRCS practice standards.
453	Landowner - may also be referred to as producer.	Pending	We are happy to flag this and explore terms with the ombuds group.
455	Best Management Practice - COMMENT - The NRCS refers to them simply as conservation practices.	Pending	We are working on terms with the Ombud's group.
456	Participant - COMMENT - I prefer cost-share recipient, since participant can mean so many different things.	Pending	We are working on terms with the Ombud's group.
457	Cooperator - would add "producer" to the list of who they can include.	Pending	We are working on terms with the Ombud's group.
459	Program Codes: Can we work on reclassifying them so they are more unique? Need to update list too. RPP, RP, RGP are too close. Suggest a linked document with the program code list with descriptions of each program.	Pending	We can add this to the list fore review, however typically it's been an abbreviation of the name of the grant program.
474	GRANT - QUESTION - when referring to cooperative agreements, What is a cooperative agreement? Maybe include it's definition above. It's not included within the interagency agreement definition.	Pending	We will add the term to the glossary.
479	COMMENT - consider including the term Entities. You use this term throughout. Either don't use it or include it in the glossary.	Pending	We will continue to review terms with the Ombud group.
480	Cooperator - QUESTION - where it refers to eligible participant, Eligible for what? Are entities that receive RPPP or SFF funds from the SCC considered cooperators? Do cooperators work directly with the SCC? Don't some cooperators get funding SCC from counties?	Pending	We will continue to review terms with the Ombud group.

Unique ID #	Comment	Status	Response to Date
131	(split 2 of 3) Section 6: Documents Required with Reimbursement Requests: Need to add a requirement that each bill must be marked with a paid date. This single issue resulted in a lot of wasted administrative time at both WSCC and CDs and is an easy solve.	Addressed	language was updated for 25-27 manual
198	Documents Required with Reimbursement Requests (pg 43) for Cost Share & DIPs: we've been told several times that the landowner's name must be at the top of the Cultural Resources statement, but it's not mentioned in the manual. The Form itself asks for the Practice/Project and the CPDS number is generally what's input there. Is it possible to amend the form and add a field at the top of the page?	Addressed	language was updated for 25-27 manual
223	Documents Required with Reimbursement Requests: Need to add a requirement that each bill must be marked with a paid date. This single issue resulted in a lot of wasted administrative time at both WSCC and CDs and is an easy solve.	Addressed	language was updated for 25-27 manual
338	Thank you for removing the no activity requirement.	Addressed	Happy to remove it!
339	Voucher Payment Requests - No deadline given for voucher submittal. There is a lot of duplication from section 3 here, would suggest linking to Section 3 for voucher detail.	Addressed	I have added a link to Section 3 for further details as suggested. Thank you!
341	Documents required w/Reimbursement-> DIPs mentioned here, maybe say "monthly invoicing only required if project costs incurred that month"	Addressed	I have added this clarification to this section. Thank you!.
362	Credit Card statements submitted only once/month instead of duplicates with every voucher.	Addressed	Please include the statement with each voucher if necessary to show payment. This will speed up the processing of grant payments.
386	1/25: Documents Required with Reimbursement Requests for Cost Share & DIPs: we've been told several times that the landowner's name must be at the top of the Cultural Resources statement but it's not in the manual or on the CR form. Can the CR form be amended to have fields for the CPDS #, cooperator name, and practices?	Addressed	Thank you for bringing this to our attention. We have updated the Cultural Resources Complied Statement Form to reflect the suggestions.
447	Vouchering --> states "contracts may bill monthly, quarterly, or upon completion". Is this talking about contracts between districts and contractors? If so, how does that work with their preference for having everything in the voucher be from the voucher for that month?	Addressed	This refers to contracts SCC enters into with entities other than districts. Many contracts are written with a deliverable scope and payments are made upon completion of a certain deliverable.
449	Pg 53 - "subcontracts and interlocal agreements must be included when vouchering for reimbursement for the first time" Which subcontracts and interlocal agreements? Do you want every agreement the CD is a party to or just the one's related to this particular voucher? Please clarify.	Addressed	This statement only refers to the subcontract and interlocal agreement that is related to the grant that is being vouchered for.
531	Why are the CC statements now needed, when they haven't been in the past? Is this a one-time thing or a new requirement? If the reasoning could come along with the request, or preferably communicated before, it's very helpful. A clear directive from SCC Finance that the statements are now required is needed. Or, better yet, maybe a letter on file from each district that says 'yes, expenses, including CC purchases, are paid before included in a voucher for reimbursement'. It's an additional burden to have to include statements in every voucher pdf for each employee every month. The 'final voucher' thing addressed in a previous section of the survey.	Addressed	updated language to help with concerns with expenditures and we will add the exception process and any impact to the CD

Unique ID #	Comment	Status	Response to Date
104	BMP installation using materials owned by a participant- there needs to be more explanation of what backup documentation is. IE state that backup documentation is the 3 local bids and their average.	Pending	
136	Technical requirements for Voucher documentation, submission	Pending	
159	The manual also is based on the existing financial billing methodology that could be greatly improved through modernization.	Pending	
165	(split 1 of 2) Voucher Support Form - Detail and summary page Posing this question back to WSCC finance staff - are there any common issues that could be addressed in this format to speed up processing? Consistent naming conventions, formatting, etc.? re-ordering columns? If changes are suggested, we need to include Springbrook in the conversation since they have mimicked the format of both the detail and summary pages.	Pending	
169	(Split 2 of 2) Fiscal Year end and final request for payment: The second line about requests for additional documentation is confusing. It makes it seem like if WSCC staff do not request additional documents within 30 days, it will be considered late. Should be reworded to reflect that districts are required to respond to requests for additional documents by the 30th of July or it may be considered late and may not be authorized for payment.	Pending	
195	Credit Cards (pg 18) - More clearly state that the Credit Card Statement AND the supporting receipt/document must accompany the voucher.	Pending	
275	(split 3 of 3) The above-listed topics aren't a high priority for our district now. I like to see the following prioritized: Would love to see the budget spreadsheet & A19 labeled with the grant # and date	Pending	
372	(split 3 of 6, also re-organized by topic) The amount of documentation provided IN a voucher is crazy. There are better mechanisms that can be incorporated into the system to provide the Commission the required information in an efficient manner.	Pending	SCC is working with an OMBUDS group of financial staff and district managers over the next biennium to revise this manual and reorganize the content with the goal of BI27-29 to go live. We recognize there is a large workload to overhaul the manual and are grateful to those who have joined the OMBUDS group to help SCC improve policies and streamline the manual. The final version of the consultant's report from our first meeting will be in the SCC Commission packet for the June meeting.
461	COMMENT - Likewise, it would be helpful for us if the budget spreadsheets and A19s were named accordingly when sent to us, rather than simply named "BudgetSpreadsheet" and "A19."	Pending	We can reach out to our contractor to see if this is a possibility.
462	1/25 (edited for clarity) - Scenarios - Credit Cards - Do we need to include the credit card statement in our vouchers? Still doesn't state that anywhere. More clearly state that the Credit Card Statement AND the supporting receipt/document must accompany the voucher.	Pending	We do not require the credit card statements to be submitted with the voucher if the date paid and method of payment is shown clearly on the invoice. If that information is not available on the invoice, a copy of the credit card statement would be asked for to validate the expense.
506	QUESTION - Why can't we upload completed cost share agreements and cultural resources forms as documents into CPDS instead of scanning and emailing them? You already look at CPDS for photos and other stuff.	Pending	You can absolutely upload all of the project information into the documents tab in CPDS. The Contract for Cost Share, Cultural Resources Complied Statement, Appendix B and receipts may all be uploaded into CPDS at any time. However, to speed up ease of processing the multitude of voucher payments on cost share and DIPS, a copy is required to be submitted when vouchering.
539	(split 3 of 4) As just one example, District financial staff should be able to upload expenses to a portal for review and approval by Fiscal staff.	Pending	

Unique ID #	Comment	Status	Response to Date
128	I feel WSCC finance staff are changing how grants are administered financially throughout the biennium due to unknown, or at least poorly communicated reasons, and as such each grant program is administered differently than each other and mass confusion has reigned supreme for the past 18 months. Requests to fix the problems mid-biennium have gone almost completely unheeded. It isn't that there isn't enough detail in the current manual. Rather, the problem lies in how grant finance, and sometimes grant management staff, interpret the policies or they have unilaterally changed how they interpret the rules to be different than how we have done things for years without actually changing the policy or showing those affected why the change is actually REQUIRED BY LAW, versus someone's statement similar to, "It would be great if....".	Addressed	we have been doing RM/Program manager & fiscal staff training to ensure guidance is consistent
157	That it isn't what is actually being used to administer grants.	Addressed	Comment Only
171	(split 4 of 4) ... when something comes up that we didn't think of ahead of time that the Commission staff are first trying to find ways to help us do what we want versus conducting an inquisition as to why we didn't think of some process or expense two years prior and trying to justify every penny as if we too don't have public boards that scrutinize every move and state auditors that ask the same questions. You know, like trust us maybe?	Addressed	Comment Only
188	Consistency on how it is used by SCC staff.	Addressed	We have been doing RM/Program managers and fiscal staff trainings to expand everyone's knowledge for consistency.
260	Access to WSCC staff who administer this is critical and helps us to be really successful in implementing WSCC contracts and grants.	Addressed	Comment Only

Unique ID #	Comment	Status	Response to Date
139	It's being thrown in the trash hopefully because very little of it still actually stands true so I can't give employees proper guidance on what is allowed. So we don't refer to it anymore and just go begging Commission staff for permission or prepare ourselves for an onslaught of criticism and bad juju if we did something without the required triplicate approvals.	Pending	
229	SCC staff and manual need to be congruent.	Pending	
269	(split 1 of 2) It is frustrating that the email for this survey went out without a due date, especially as we only have one week to complete it. I only saw there was a due date when I opened the survey.

Unfortunately, none of these listed options are really priorities for our district, or anyone else's, as far as I can tell. Districts have discussed major issues in this manual until we are blue in the face, and the priorities listed here are not the main issues. Some of these things have been mentioned, for sure. But these are not the priority issues. This survey further reinforces that WSCC is listening, but you are not hearing us. | Pending | |

313	The inconsistency between finance, guidelines and actual implementation and interpretation of grants has been unclear over several biennium and consistency across WSCC would be a significant improvement to managing the WSCC grants	Pending	
375	(split 1 of 6, also re-organized by topic) At the WSCC meeting in September 2023, (3 months into the biennium) I let Commission staff know that the Asotin County Conservation District staff was willing to help with "overhauling" the Grants Procedure Manual. Obviously, there were more pressing issues at the time and it was down the priority list. Fast forward one year and it was very disappointing to hear that Commission staff was working on updates internally. There wasn't a plan to engage Districts for input outside the formal comment periods. Many Districts expressed concern, and I appreciate that the Executive Director formed a group of managers and fiscal staff to "review the current Grant and Contract Policy and Procedure Manual and work together with us on improvements". This group met in February and had a great meeting. There were several ideas and concerns brought up which were already addressed in the updates that Commission staff made internally. It validated that the Commission and Districts are on the same page about many things that haven't worked well. I am still waiting to receive a copy of the report from the consultant who facilitated the meeting as it should capture all the items identified by the workgroup.	Pending	SCC is working with an OMBUDS group of financial staff and district managers over the next biennium to revise this manual and reorganize the content with the goal of BI27-29 to go live. We recognize there is a large workload to overhaul the manual and are grateful to those who have joined the OMBUDS group to help SCC improve policies and streamline the manual. The final version of the consultant's report from our first meeting will be in the SCC Commission packet for the June meeting.
381	These guidelines should be thoroughly rewritten through an interactive process with your primary customer, conservation districts, after Commission staff have had ample opportunity to understand the ramifications of these rules and how they are applied in a local CD office. Furthermore, CD staff and supervisors should be afforded the opportunity to learn more about the restrictions and rules being placed upon Commission staff in an effort to better understand each other's needs	Pending	SCC will be working on adding additional language that will outline the multi-biennium contracts that will be allowed specifically for the RGP grant program.

Unique ID #	Comment	Status	Response to Date
162	It is a manual to reference as a starting point.	Addressed	Comment Only
174	It serves as a thorough starting point to manage grants with.	Addressed	Comment Only
345	Must the agreements be one-way? What if two districts share staff and sometimes District A pays for Staff A from District B, but then District B pays for Staff B from District A. In this case neither are primary. Wouldn't the invoices cover the documentation of which way the money is flowing?	Addressed	In the instances we have seen, the districts that share employees have picked one lead district that bills the other for the shared time.
407	Payroll - Aren't we getting rid of the January 1 comp rate update requirement?	Addressed	Thank you for pointing this out. I have removed the January 1st reference.
414	First of all, thank you for all the effort that has gone into this project. Probably like many district managers, I never seem to have the time to give you the feedback you deserve for doing this work. I had my financial staff member go through this, and she said the changes looked good and didn't have any comments.	Addressed	Thank you!
415	This likely has been an unhelpful comment. Thank you again to the SCC for giving us this process. I value the SCC fiscal staff for their willingness to work through the guidelines. I appreciate my fellow CD peers who are spending their valuable time on the committee. I am thankful for our RMs, who we continually put in difficult positions as our direct voices to the SCC.	Addressed	Thank you! We appreciate all of the feedback to help improve our processes as we continue to grow.
416	We appreciate everyone's efforts to work through this manual and update it.	Addressed	Thank you! We appreciate all of the feedback to help improve our processes as we continue to grow.
501	I'm not sure if you've gotten a lot of comments or just a few. There were definitely issues that needed to be resolved that were discussed during manager/ED meetings, and our RM's got an earful that they were bringing forward on our behalf. I feel that the SCC heard us and formed a committee to help implement changes. For me, once that was done, I had confidence that the right people were having the right dialogue, and something better was going to come out the other side.	Addressed	Yes, the OMBUDS group will be working throughout the 25-27 biennium to overhaul the Grant and Contract Procedure Manual with a goal of having the updated version of the manual going live on July 1, 2027.
509	It provides information regarding policies and procedures.	Addressed	Comment Only
511	It's a helpful tool to reference when unique scenarios come up.	Addressed	Comment Only
513	It is a good resource.	Addressed	Comment Only
514	It provides a platform that allows us to get great work done.	Addressed	Comment Only
515	Gets my adrenaline going. Makes me feel alive.	Addressed	Comment Only
519	Lots of adaptive management has gone into this. I know it's always there to answer our questions and refer our staff to. Thank you!	Addressed	Comment Only
521	It's fine.	Addressed	Comment Only
522	It is a source for general policies and procedures.	Addressed	Comment Only
525	It's always a good go-to when questions arise!	Addressed	Comment Only
536	I think the manual is extremely effective.	Addressed	Comment Only

Topic: "z. Other"

Unique ID #	Comment	Status	Response to Date
306	Please follow the guidance currently and previously provided by Mason Conservation District.	Pending	
473	It is easier for us to give feedback through the committee members, and maybe more importantly, through our RMs. Those conversations are a "one-stop shop" for many things that impact our districts. SCC operations and guidelines being a popular topic. We have confidence in those people, which gives us the opportunity to focus on other things. And there are a lot of other things.	Pending	We value all feedback and the RM's are a great place to provide it to. Fiscal and RMs meet frequently to discuss issues, comments and suggestions to policies and procedures.
546	Define a process that CD's and legislators can use to directly pass funds through to CDs without additional SCC process and requirements. For example, if a legislator puts funds for fire recovery into the budget for a CD, those funds go directly to the CD for the those purposes.	Pending	
548	Allow overtime decisions to be made at the local level to empower the best management of resources. Federal laws do not prohibit paying overtime or qualify a position to receive overtime. Federal law requires minimum wage and overtime payment to specific positions. The cost of overtime can be much cheaper than alternative ways to meet a conservation need.	Pending	