



Boldly Grown Farm, Skagit County

Progress Report – Ombuds Working Group

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Table of Contents

Background	2
Timeline	2
Approach	3
Decision-making relationship	3
Reviewing all feedback comments	3
Recommendations	3
What is a recommendation?	3
Topic area status	4
Next Steps	5
Appendix A - Ombuds Working Group members, Tiger Teams, and topic areas	6
Appendix B - Comments received for completed topic areas	8
Appendix C - Recommendations and implementation leads for completed topic areas	30

Background

The Washington State Conservation Commission (SCC) Grant and Contract Policy and Procedure Manual (Grants Manual) outlines information and requirements on program policy and procedure for requesting reimbursements from SCC. In consultation with program guidelines, it serves as a guide for conservation districts to determine what is eligible for reimbursement.

In early 2025, the Ombuds Working Group (working group) was launched in response to stakeholder requests for a more transparent, participatory, and comprehensive revision process of the Grants Manual. The working group membership is comprised of conservation district staff throughout the state with SCC staff supporting meeting logistics, project progress, engagement efforts, and feasibility reviews.

The working group has been addressing feedback received through a robust engagement effort on a variety of topics by providing recommendations to SCC staff. The goal is to have a Grants Manual update that reflects the collaborative effort, is clear, helpful, and strengthens the overall grants administration process.

Timeline



Approach

Through multiple feedback channels including surveys, online comments, and broad engagement, SCC staff collected more than 500 comments in 2025 on the Grants Manual. To effectively manage the breadth of input, comments were categorized into 39 topic areas. Five Tiger Teams, comprised of Ombuds Working Group members, were formed to analyze feedback and develop recommendations that considered legal and administrative requirements. Twenty-eight topic areas were assigned to Tiger Teams, nine are being addressed by the entire working group, and two were resolved prior to the working group.

Tiger Team members and contact information can be found in Appendix A.

Decision-making relationship

The [IAP2 Spectrum of Public Participation](#) is a framework that uses five levels of involvement to define decision-making roles and relationships with stakeholders. The working group's relationship with the Grants Manual update is classified at the collaboration level, meaning that their recommendations will be implemented to the fullest extent possible.

As implementation progresses, SCC staff may need to diverge from specific recommendations if new information becomes available and will keep the community informed if that need arises.

Reviewing all feedback comments

The goal of this collaborative effort is to address all comments received. Some comments were resolved prior to the working group as part of the 2025 Grants Manual revision. The working group is reviewing and considering all other comments received and addressing most with recommendations. However, after consideration, the working group identified a small number of comments that would or could not be addressed with a recommendation.

The list of all comments received for fully-addressed topics areas can be found in Appendix B.

Recommendations

What is a recommendation?

This process has centered on engaging key stakeholders to address every comment received and identify preferred solutions in the form of recommendations.

A recommendation is a proposed action developed in response to stakeholder feedback and working group review. Recommendations may correspond to specific stakeholder comments or address broader themes identified across multiple comments. Feedback may be addressed through recommendations that advance different approaches than those suggested by individual commenters. Overall, recommendations represent the working group's considered response to comments with the information available.

The recommendations developed by the working group are advisory. During implementation, they may be refined, combined, deferred, superseded, or discontinued following additional review, stakeholder engagement, operational planning, legal review, technology considerations, resource availability, or Commission decision making.

Topic area status

Each of the 39 topic areas are assigned a status to track progress. Status categories and definitions are:

- **Addressed:** Topic areas that have a full comment review and an approved set of recommendations from a Tiger Team or the entire Ombuds working group.
- **In-progress:** Topic areas that the Tiger Teams and Ombuds working group are still working to review and address through recommendations.

Topic area status as of August 27, 2026	
Addressed	14
In progress	25

Tiger Team	Topic Area	Status as of August 27, 2026
Cost Share & District-Implemented Project (DIP)	BMP splitting vs. lumping	In progress
	Cost share	In progress
	DIP	In progress
	Labor rates	Addressed
Fruit Basket	Benefits	Addressed
	Capital assets	In progress
	Clothing / Apparel / PPE	Addressed
	Construction	In progress
	Mortgage	Addressed
	Overhead / Indirect	Addressed
	Overtime	Addressed
	Training / Tuition / Education	In progress
Policy	Advances	In progress
	Approvals / Exceptions	Addressed
	Authorized signatures	Addressed
	Award start dates	In progress
	Biennium hard stop	In progress
	Timing of expenditure / vouchering	In progress
Process & Help	Additional support	In progress
	CAPP	In progress
	Debarment	Addressed
	Individual grant programs	Addressed
	Taxes	In progress

	Vouchering – process and documents	In progress
Travel	Honoraria, stipends, and speaker fees	In progress
	Meals	In progress
	Peer-to-peer rentals	In progress
	Travel	In progress
Unassigned / Entire Ombuds Working Group	Audience	In progress
	Cultural resources	In progress
	Editing and organization	In progress
	Electronic signatures	Addressed
	Foreign transaction fees	Addressed
	Philosophical approach	In progress
	Presentation of policies and procedures	In progress
	Shared staff and ILAs between conservation districts	In progress
	Vocabulary	Addressed
	SCC – conservation district interactions	In progress
	Other	Addressed

All recommendations and implementation leads for the 14 fully addressed topic areas can be found in Appendix C.

Next Steps

The Ombuds Working Group recommendations are advanced to designated Implementation Leads. These Implementation Leads are identified alongside recommendations in Appendix C.

Tiger Teams will continue to develop recommendations through November 2026. Progress reports will be published monthly, shared via email and online, with fatal flaw feedback opportunities available through an online form and discussions.

After that, staff will incorporate recommendations to the fullest extent possible into a revised Grants Manual draft for Commissioners to review, potentially modify, and approve for public comment. This progress report will also be updated to a final version at that time.

Appendix A

Ombuds Working Group members, Tiger Teams,
and topic areas

Ombuds Working Group

Cost Share & DIP Tiger Team	
<i>Members</i> • Lora Liegel, SCC Regional Manager, lliegel@scc.wa.gov • Loren Meagher, Central CD, District Executive, lorenm@centralcd.org • Megan Stewart, Asotin CD, District Executive, megan@asotincd.org	<i>Topics</i> • BMPs - Splitting vs. Lumping • Cost Share • DIP • Labor Rates
Fruit Basket Tiger Team	
<i>Members</i> • Josh Giuntoli, SCC Regional Manager, jgiuntoli@scc.wa.gov • Rhonda Nydegger, Mason CD, District Finance, rnnydegger@masoncd.org • Ryan Williams, Cascadia CD, District Executive, RyanW@cascadiacd.org	<i>Topics</i> • Employee Benefits • Capital Assets • Clothing / Apparel / PPE • Construction • Mortgage • Overhead / Indirect • Overtime • Training, Tuition, Education
Policy Tiger Team	
<i>Members</i> • Mike Baden, Spokane CD, District Staff, mike-baden@spokanecd.org • Jennifer Boie, Palouse CD, District Executive, jenniferb@palousecd.org • Scott Noble, SCC Regional Manager, snoble@scc.wa.gov • Zorah Oppenheimer, Clark CD, District Executive, zoppenheimer@clarkcd.org • Heather Wendt, WACD, hwendt@wadistricts.org	<i>Topics</i> • Advances • Approvals / Exceptions • Authorized Signatures • Award Start Dates • Biennium Hard Stop • Timing of Expenditures / Vouchering
Process & Help Tiger Team	
<i>Members</i> • Jennifer Berry, Snohomish CD, District Finance, jberry@snohomishcd.org • Sarah Jones, Snohomish CD, District Finance, sjones@snohomishcd.org • Krystal Sadler, Foster Creek CD, District Finance, financials@fostercreekcd.org • Tami Stubbs, SCC Regional Manager, TStubbs@scc.wa.gov	<i>Topics</i> • Additional Support • CAPP • Debarment • Individual Grant Programs • Taxes • Vouchering - Processes and Docs
Travel Tiger Team	
<i>Members</i> • Allisa Carlson, SCC Regional Manager, ACarlson@scc.wa.gov • Brandy Reed, Whatcom CD, District Executive, b.reed@whatcomcd.org • Cori Turntine, Spokane CD, District Finance, cori-turntine@sccd.org	<i>Topics</i> • Honoraria, Stipends, and Speaker Fees • Meals • Peer-to-Peer Rentals • Travel
SCC Team: Sarah Groth (sgroth@scc.wa.gov), Tara Long (tlong@scc.wa.gov), Jessica Wilson (jwilson@scc.wa.gov), Courtney Woods (cwoods@scc.wa.gov)	
Workgroup-Wide Topics	
• Audience • Cultural Resources • Editing / Organization / Vocabulary • Electronic Signatures	• Philosophical Approach • Presentation of Policies & Procedures • Shared Staff and ILAs between CDs • WSCC - CD Interactions
Topics with no pending feedback: Foreign Transaction Fees, Other	

Appendix B

Comments received for completed topic areas

Approvals / Exceptions

Resolved prior to OWG

Unique ID #	Comment	Response Prior to OWG	Completion Date
F337	<i>Grant Manual Comments</i> (Split 1 of 2) 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.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F150	<i>11. What do you dislike most about the current Manual?</i> 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.	Tiger Team: SCC Policy
F170	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> (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	Tiger Team: SCC Policy
F185	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Tiger Team: SCC Policy
F186	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Tiger Team: SCC Policy
F244	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> (Split 1 of 2) Make sure... there is a system for exemptions clearly visible.	Tiger Team: SCC Policy
F257	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> Policy change ~10% of total grant budget amount can be shifted to another existing line item without WSCC pre-approval	Tiger Team: SCC Policy
F264	<i>13. Are there any additional comments or suggestions you would like to provide about the manual?</i> (Split 1 of 2) 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.	Tiger Team: SCC Policy

Unique ID #	Comment	Workgroup / Committee Assignment
F265	<i>13. Are there any additional comments or suggestions you would like to provide about the manual?</i> 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.	Tiger Team: SCC Policy
F449	<i>Grant Manual Comments 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.</i>	Tiger Team: SCC Policy
F476	<i>Grant Manual Comments 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.</i>	Tiger Team: SCC Policy
F492	<i>Grant Manual Comments 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.</i>	Tiger Team: SCC Policy
F527	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Tiger Team: SCC Policy
F530	<i>(5b) Please specify (which sections/topics you find unclear, confusing or difficult to understand) (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.</i>	Tiger Team: SCC Policy
F584	<i>Grant Manual Comments (Split 2 of 2) Please add language either here or in it's own section about the process to request an exception.</i>	Tiger Team: SCC Policy

Authorized Signatures

Resolved prior to OWG

Unique ID #	Comment	Response Prior to OWG	Completion Date
F439	<i>Grant Manual Comments</i> 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	The text on page 44 was edited in the July '25 manual update to clarify that the District retains the version of the Authorized Signature form with wet signatures while the scanned copy gets emailed to SCC.	2025

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F625	12/25 - 1/26 Comment Period (Split 2 of 2) This has nothing to do with Comment 101, but your form would not allow me to add something new. There are about 10 comments expressing confusion about authorized signatures. This form is inefficient. Every time a staff member changes, a board member changes, or we simply forget to add someone to the form, we must route a new form around and have many people sign it. Yes, one could argue that we are not required to have so many different people sign it. That is true—and if that is the argument, I would use it as further evidence that the Commission continues to enact policies that make conservation districts inefficient. I am not signing every employee's timesheet, yet to be reimbursed by the Commission, every supervisor who signs a timesheet that includes WRG CC funding must have their signature on this form. If we limit the number of people on the signature form, then we must wait for that person to return from vacation, illness, or another absence, thereby impeding our ability to effectively put projects on the ground. Finally, by requiring all of these supervisory employees to sign the form, they are now given authority to sign a variety of other documents in situations where they were never intended to be authorized signers. This significantly increases the opportunity for fraud or other deleterious activities and could substantially increase liability for both the district and the Commission. Having this form creates opportunities for such problems.	Tiger Team: SCC Policy

Considered, alternate or no recommendation made

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F561	<i>12/25 - 1/26 Comment Period</i> (Split 1 of 2) This has nothing to do with Comment 101, but your form would not allow me to add something new. There are about 10 comments expressing confusion about authorized signatures. My comment is simply to remove/delete/eliminate the authorized signature form entirely. No other entity requires anything even remotely similar to this form. It is not legally required, it is bad practice, it is inefficient, and the form inappropriately authorizes individuals to have permissions they should not have. There are no legal requirements for such a form. If there were a legal requirement, I am sure Ecology, RCO, DNR, and others would have similar forms. They do not, and they have never required any such document in my 30 years of conservation district work. Please remove the requirement for this form and policy. It is old, outdated, unnecessary, cumbersome, and inefficient.	Tiger Team: SCC Policy	Elected not to advance	This form and process are part of SCC's audit compliance and public funds safeguarding strategy. Separation of duties and internal controls are a best practice for all governments. Multiple state agencies require documentation identifying authorized representatives for grant administration. The Tiger Team did not recommend eliminating this process or advancing a recommendation to correct the misunderstanding about how standard this process is. Instead, recommendations focused on improving the efficiency and accuracy of the process and associated tools.

Benefits

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F201	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Tiger Team: Fruit Basket
F430	<i>Grant Manual Comments</i> 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.	Tiger Team: Fruit Basket
F431	<i>Grant Manual Comments</i> 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?	Tiger Team: Fruit Basket

Clothing / Apparel / PPE

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F183	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Tiger Team: Fruit Basket
F184	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Tiger Team: Fruit Basket
F287	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> Clothing/Apparel - unclear if logo wear as PPE is allowable ONLY under operating grants.	Tiger Team: Fruit Basket
F330	<i>Grant Manual Comments</i> 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.	Tiger Team: Fruit Basket
F331	<i>Grant Manual Comments</i> 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.	Tiger Team: Fruit Basket
F332	<i>Grant Manual Comments</i> QUESTION - related to district logo clothing. So it is eligible for identifying staff representing district but not for promotion of district?	Tiger Team: Fruit Basket

Debarment

Resolved prior to OWG

Unique ID #	Comment	Response Prior to OWG	Completion Date
F470	<i>Grant Manual Comments</i> 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.	July '25 manual version updated in one part to say: Debarment and Suspension: "Must PRINT or save electronic record".	2025
F478	<i>Grant Manual Comments</i> 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?	July '25 manual version updated in one part to say: Debarment and Suspension: "Must PRINT or save electronic record".	2025

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F107	<i>(5a) Please specify which sections/topics (you find unclear, confusing or difficult to understand)</i> 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.	Tiger Team: Process and Help
F108	<i>(5a) Please specify which sections/topics (you find unclear, confusing or difficult to understand)</i> 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.	Tiger Team: Process and Help
F196	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> Debarment and Suspension: This is a repeat from earlier in the manual. Suggest simplifying it to reference the earlier section to prevent inconsistencies.	Tiger Team: Process and Help
F197	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Tiger Team: Process and Help
F566	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> Re: 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.	Tiger Team: Process and Help

Electronic Signatures

Resolved prior to OWG

Unique ID #	Comment	Response Prior to OWG	Completion Date
F109	<i>(5a) Please specify which sections/topics (you find unclear, confusing or difficult to understand)</i> 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	Language was updated in the July '25 manual update. See section "Electronic Signatures" on page 10, where there is a linked policy including a list of documents that allow electronic signature vs require a wet signature.	2025
F134	<i>(5b) Please specify (which sections/topics you find unclear, confusing or difficult to understand)</i> Signature requirements	Language was updated in the July '25 manual update. See section "Electronic Signatures" on page 10, where there is a linked policy including a list of documents that allow electronic signature vs require a wet signature.	2025
F199	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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.	Language was updated in the July '25 manual update. See section "Electronic Signatures" on page 10, where there is a linked policy including a list of documents that allow electronic signature vs require a wet signature.	2025
F356	<i>Grant Manual Comments</i> Thank you for accepting electronic signatures on the master contract. Will SCC accept electronic signatures on the authorized signature form?	No, the Authorized Signature Form requires a wet signature. Language was updated in the July '25 manual update. See section "Electronic Signatures" on page 10, where there is a linked policy including a list of documents that allow electronic signature vs require a wet signature.	2025

Foreign Transaction Fees

Resolved prior to OWG

Unique ID #	Comment	Response Prior to OWG	Completion Date
F398	<i>Grant Manual Comments</i> 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.	We moved this to the conditionally allowable section in our manual effective July '25.	2025

Individual Grant Programs

Resolved prior to OWG

Unique ID #	Comment	Response Prior to OWG	Completion Date
F133	(5b) Please specify (which sections/topics you find unclear, confusing or difficult to understand) SFF materials purchases	This was addressed with updates to program guidelines in 2025.	2025

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F130	(5b) Please specify (which sections/topics you find unclear, confusing or difficult to understand) (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	Tiger Team: Process and Help
F149	11. What do you dislike most about the current Manual? lack of consolidation with new funding pools and programs	Tiger Team: Process and Help
F154	11. What do you dislike most about the current Manual? 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 project then the planning should be eligible under a capital program. At this point, if the answer to any of this is "its because of the color of capital funding we receive", then the answer is inadequate. This is what SCC told us about SCC RGP vs RCO Riparian. We all know that the money came from the exact same pool of funding. If the answer is the "color of money" then help us understand by showing us the proof in statute/OFM requirements.	Tiger Team: Process and Help
F173	12. What improvements or changes would you recommend to make the manual more effective? 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.	Tiger Team: Process and Help
F203	12. What improvements or changes would you recommend to make the manual more effective? 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.	Tiger Team: Process and Help

Unique ID #	Comment	Workgroup / Committee Assignment
F222	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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	Tiger Team: Process and Help
F279	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual 3. Creating consistency across grants, such as a consistent outline and content for each grant in the Grants Manual</i> o This 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. o Each 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.	Tiger Team: Process and Help
F280	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual 4. Integrating grant guidelines into the Grants Manual, ensuring information is cross-referenced</i> o This 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.	Tiger Team: Process and Help
F281	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual 2. Clarify the specific information that needs to be provided for each grant</i>	Tiger Team: Process and Help
F300	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> It should include a clear concise framework for all grants, identifying in a table consistencies and unique requirements, which should be further details.	Tiger Team: Process and Help

Considered, alternate or no recommendation made

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F111	<i>(5a) Please specify which sections/topics (you find unclear, confusing or difficult to understand) 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?</i>	Tiger Team: Process and Help	Elected not to advance	Existing system limitations and legislative naming conventions constrain available program codes. The Tiger Team did not wish to advance a recommendation to try changing any of the codes. The Tiger Team felt there is adequate documentation of the codes through the list of program codes in the manual, the list of programs in Chapter 5, and links to programmatic guidance with more information. At this time they did not suggest creating another list.
F126	<i>(5b) Please specify (which sections/topics you find unclear, confusing or difficult to understand) Could clarify a bit more about what implementation dollars can be used for.</i>	Tiger Team: Process and Help	Elected not to advance	Maintaining flexibility is preferable. Prescriptive lists could unintentionally restrict appropriate uses or require frequent revisions.

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F219	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> Consolidation to include all of the programmatic guidelines.	Tiger Team: Process and Help	Preferred alternative	Embedding detailed program requirements in the manual would make updates difficult and increase the likelihood that information becomes outdated between manual revisions. Instead, the Tiger Team recommended linking to programmatic guidelines and removing duplication in the manual, and encouraged improvements to the programmatic guidelines.
F220	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> 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?	Tiger Team: Process and Help	Elected not to advance	Existing system limitations and legislative naming conventions constrain available program codes. The Tiger Team did not wish to advance a recommendation to try changing any of the codes. The Tiger Team felt there is adequate documentation of the codes through the list of program codes in the manual, the list of programs in Chapter 5, and links to programmatic guidance with more information. At this time they did not suggest creating another list.
F459	<i>Grant Manual Comments</i> 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.	Tiger Team: Process and Help	Elected not to advance	Existing system limitations and legislative naming conventions constrain available program codes. The Tiger Team did not wish to advance a recommendation to try changing any of the codes. The Tiger Team felt there is adequate documentation of the codes through the list of program codes in the manual, the list of programs in Chapter 5, and links to programmatic guidance with more information. At this time they did not suggest creating another list.
F135	<i>(5b) Please specify (which sections/topics you find unclear, confusing or difficult to understand)</i> 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.	Tiger Team: Process and Help	Elected not to advance	The Tiger Team felt that embedding detailed program requirements in the manual would make updates difficult and increase the likelihood that information becomes outdated between manual revisions.

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F151	11. What do you dislike most about the current Manual? 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	Tiger Team: Process and Help	Legal or Statutory	Different funding sources, provisos, and legislative requirements require program-specific rules. Complete standardization is not feasible. The Working Group focused instead on better organization and communciation of program-specific requirements.
F168	12. What improvements or changes would you recommend to make the manual more effective? (split 2 of 4) Bottom line, I would like us to be able to implement grants with rules that span all grant programs	Tiger Team: Process and Help	Legal or Statutory	Different funding sources, provisos, and legislative requirements require program-specific rules. Complete standardization is not feasible. The Working Group focused instead on better organization and communciation of program-specific requirements.
F371	Grant Manual Comments (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.	Tiger Team: Process and Help	Legal or Statutory	Different funding sources, provisos, and legislative requirements require program-specific rules. Complete standardization is not feasible. The Working Group focused instead on better organization and communciation of program-specific requirements.
F524	13. Are there any additional comments or suggestions you would like to provide about the manual? (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.).	Tiger Team: Process and Help	Legal or Statutory	Different funding sources, provisos, and legislative requirements require program-specific rules. Complete standardization is not feasible. The Working Group focused instead on better organization and communciation of program-specific requirements.
F535	13. Are there any additional comments or suggestions you would like to provide about the manual? (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.).	Tiger Team: Process and Help	Legal or Statutory	Different funding sources, provisos, and legislative requirements require program-specific rules. Complete standardization is not feasible. The Working Group focused instead on better organization and communciation of program-specific requirements.

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F546	<i>Email comment</i> 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.	Tiger Team: Process and Help	Legal or Statutory	When SCC administers funding, it remains accountable for compliance and stewardship and standard SCC processes will continue to apply. The Tiger Team instead recommended improving tools outside the Grants Manual to support Districts seeking/receiving earmarked funding.
F567	<i>Grant Manual Comments</i> (Split 2 of 2) Inconsistencies in CPDS requirements between programs.	Tiger Team: Process and Help	Legal or Statutory	Program-to-program differences in CPDS requirements stem from different funding and program requirements, and cannot be completely resolved. The Workgroup instead recommended improving CPDS (or replacement) usability.
F619	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> (Split 2 of 2) <i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> Inconsistencies in CPDS requirements between programs.	Tiger Team: Process and Help	Legal or Statutory	Program-to-program differences in CPDS requirements stem from different funding and program requirements, and cannot be completely resolved. The Workgroup instead recommended improving CPDS (or replacement) usability.

Labor Rates

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F202	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> (Split 1 of 2) Hourly donated labor rate, where does this dollar figure come from?	Tiger Team: Cost Share and DIP
F308	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> Raise the labor rate for cost share.	Tiger Team: Cost Share and DIP
F357	<i>Grant Manual Comments</i> (Split 1 of 4) Labor Rate: Is the labor rate not being updated for 2025-27?	Tiger Team: Cost Share and DIP
F363	<i>Grant Manual Comments</i> (Split 1 of 3) 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.	Tiger Team: Cost Share and DIP
F573	<i>11. What do you dislike most about the current Manual?</i> A local CD should be able to set it's own landowner labor rate.	Tiger Team: Cost Share and DIP
F613	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> (Split 2 of 2) Could we instead refer to the Washington or Federal volunteer labor rate?	Tiger Team: Cost Share and DIP
F614	<i>Grant Manual Comments</i> (Split 3 of 3) 1/25: Participant Labor Rate: \$25 is pretty low.	Tiger Team: Cost Share and DIP
F615	<i>Grant Manual Comments</i> (Split 2 of 3) 1/25: Participant Labor Rate: Could we instead refer to the Washington or Federal volunteer labor rate?	Tiger Team: Cost Share and DIP
F616	<i>Grant Manual Comments</i> (Split 2 of 4) Labor Rate: Another suggestion is a CPI adjusted rate that is updated annually.	Tiger Team: Cost Share and DIP
F617	<i>Grant Manual Comments</i> (Split 4 of 4) Labor Rate: Is it possible for a district to exceed the \$25 rate in policy? If so, please add that option to the manual.	Tiger Team: Cost Share and DIP
F618	<i>Grant Manual Comments</i> (Split 3 of 4) Labor Rate: 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.	Tiger Team: Cost Share and DIP

Mortgage

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F482	<i>Grant Manual Comments</i> (Split 1 of 2) Rental of office space: Please refer to my mortgage payment question. Why is rental OK but not mortgage.	Tiger Team: Fruit Basket
F483	<i>Grant Manual Comments</i> Mortgage Payments: Why is this not eligible but leases are? Mortgage payments for buildings owned by Districts apply equally to all programs like leases.	Tiger Team: Fruit Basket
F484	<i>Grant Manual Comments</i> 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?	Tiger Team: Fruit Basket

Considered, alternate or no recommendation made

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F284	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> Allow mortgage payments as reimbursable	Tiger Team: Fruit Basket	Legal or Statutory	Federal cost principles, state requirements, and recent consultation with the Attorney General's Office and OFM indicate that mortgage payments are not allowable direct grant expenditures because they finance long-term ownership rather than time-limited grant activities. The Working Group concluded that there is not a reasonable legal or regulatory basis to adopt this policy change.
F301	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> Mortgage payments - why is this not allowable suddenly?	Tiger Team: Fruit Basket	Elected not to advance	There has been no change to mortgage payment rules for many years. The manual was edited in 2025 to clarify the long-standing policy.

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F620	<i>Grant Manual Comments</i> (Split 2 of 2) Rental of office space: 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?	Tiger Team: Fruit Basket	Elected not to advance	The situation of a district appearing to have excessively expensive space rental/lease costs has not come up in years. The Commission is not actively analyzing these costs during voucher review, and should these costs appear unusually high, the Commission would work with the District and their RM to understand the situation. The WSCC does not have the authority to force Districts or other funding recipients to relocate their office space. Given the unlikelihood of this occurring, the Tiger Team did not identify a need to respond with a recommendation to change the manual or supporting processes.

Overhead / Indirect

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F102	<i>(5a) Please specify which sections/topics (you find unclear, confusing or difficult to understand) Allowable Reimbursable Expenses - Overhead vs Direct Expenses</i>	Tiger Team: Fruit Basket
F432	<i>Grant Manual Comments</i> Computing Conservation District Overhead Costs - would be worth putting in here that the rate is 25%.	Tiger Team: Fruit Basket

Considered, alternate or no recommendation made

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F138	<i>(5b) Please specify (which sections/topics you find unclear, confusing or difficult to understand) 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.</i>	Tiger Team: Fruit Basket	Preferred alternative	The Commission intentionally does not regulate how funding recipients spend overhead funds once they have been earned. Guidance and training are preferred to creating new policy defining what costs are eligible to charge to overhead.
F568	<i>Feb '26 Ombuds Workgroup Meeting</i> Re: Overhead, how is the 25% calculated and is there an option to change it?	Tiger Team: Fruit Basket	Elected not to advance	The current rate is reasonably aligned with other agency rates (e.g., Federal de minimis 15%, Ecology 30%). Reopening the policy to consider changing the rate could create risk that the current rate would be reduced rather than increased. The Tiger Team did not advance recommendations to explain the basis of the rate or to increase it.
F569	<i>Feb '26 Ombuds Workgroup Meeting</i> Re: Overhead, is there an option for allowing Districts with a NICRA to charge that rate instead?	Tiger Team: Fruit Basket	Elected not to advance	The current rate is reasonably aligned with other agency rates (e.g., Federal de minimis 15%, Ecology 30%). Reopening the policy to consider changing the rate could create risk that the current rate would be reduced rather than increased. The Tiger Team did not advance recommendations to explain the basis of the rate or to increase it.

Overtime

Considered, alternate or no recommendation made

Unique ID #	Comment	Workgroup / Committee Assignment	Reason "Considered, alternate or no recommendation made"	Brief explanation
F548	<i>Email comment</i> 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.	Tiger Team: Fruit Basket	Elected not to advance	Funding Recipients are responsible for determining whether employees are eligible to work or receive overtime under applicable employment laws and local personnel policies. SCC's role is limited to determining whether overtime charged to SCC funding is allowable, properly documented, and reasonable. The Tiger Team did not identify any issue with current SCC policy that would warrant changes to the manual or reimbursement requirements.

Vocabulary

Addressed through recommendation(s)

Unique ID #	Comment	Workgroup / Committee Assignment
F346	<i>Grant Manual Comments</i> General comment - consider replacing BMP with the term practice, practices, or suite of practices as appropriate.	Ombuds Workgroup as a whole
F401	<i>Grant Manual Comments</i> (split 1 of 2) Participant as Contractor COMMENT - referring to participant, there are so many other less ambiguous terms we could use.	Ombuds Workgroup as a whole
F453	<i>Grant Manual Comments</i> Landowner - may also be referred to as producer.	Ombuds Workgroup as a whole
F455	<i>Grant Manual Comments</i> Best Management Practice - COMMENT - The NRCS refers to them simply as conservation practices.	Ombuds Workgroup as a whole
F456	<i>Grant Manual Comments</i> Participant - COMMENT - I prefer cost-share recipient, since participant can mean so many different things.	Ombuds Workgroup as a whole
F457	<i>Grant Manual Comments</i> Cooperator - would add "producer" to the list of who they can include.	Ombuds Workgroup as a whole
F480	<i>Grant Manual Comments</i> 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?	Ombuds Workgroup as a whole

z. Other

Resolved prior to OWG

Unique ID #	Comment	Response Prior to OWG	Completion Date
F162	<i>10. What do you like most about the current Manual?</i> It is a manual to reference as a starting point.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F174	<i>10. What do you like most about the current Manual?</i> It serves as a thorough starting point to manage grants with.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F306	<i>Please let us know any other priority concerns relating to the Grant and Contract Procedure Manual</i> Please follow the guidance currently and previously provided by Mason Conservation District.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F414	<i>Grant Manual Comments</i> 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.	Thank you! We appreciate all of the feedback to help improve our processes as we continue to grow.	2025
F415	<i>Grant Manual Comments</i> 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.	Thank you! We appreciate all of the feedback to help improve our processes as we continue to grow.	2025
F416	<i>Grant Manual Comments</i> We appreciate everyone's efforts to work through this manual and update it.	Thank you! We appreciate all of the feedback to help improve our processes as we continue to grow.	2025
F509	<i>10. What do you like most about the current Manual?</i> It provides information regarding policies and procedures.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F511	<i>10. What do you like most about the current Manual?</i> It's a helpful tool to reference when unique scenarios come up.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F513	<i>10. What do you like most about the current Manual?</i> It is a good resource.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F514	<i>10. What do you like most about the current Manual?</i> It provides a platform that allows us to get great work done.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F515	<i>10. What do you like most about the current Manual?</i> Gets my adrenaline going. Makes me feel alive.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F519	<i>10. What do you like most about the current Manual?</i> 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!	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F521	<i>10. What do you like most about the current Manual?</i> It's fine.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F522	<i>10. What do you like most about the current Manual?</i> It is a source for general policies and procedures.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F525	<i>10. What do you like most about the current Manual?</i> It's always a good go-to when questions arise!	Comment reviewed by SCC Staff. Thank you for the feedback.	2025
F536	<i>12. What improvements or changes would you recommend to make the manual more effective?</i> I think the manual is extremely effective.	Comment reviewed by SCC Staff. Thank you for the feedback.	2025

Appendix C

Recommendations and implementation leads for
completed topic areas

Overview

What is a Recommendation?

A recommendation is a proposed action developed in response to stakeholder feedback and Ombuds Working Group review. Recommendations may correspond to specific stakeholder comments or address broader themes identified across multiple comments. Feedback may be addressed through recommendations that advance approaches different than those suggested by individual commenters. Overall, recommendations represent the Ombuds Working Group's considered response to the information available.

Recommendation Types

Recommendations are intended to improve the Grants & Contracts Policy Manual and related processes through:

- Developing or enhancing training, technical assistance, communications, or other support for Conservation Districts and/or Commission staff.
- Creating or revising supporting documents, forms, templates, guidance, or other tools.
- Editing the Grants Manual without changing policy or practice (for example, correcting, reorganizing, or clarifying language)
- Establishing or modifying Commission policy or practice. These recommendations may also require updates to guidance, forms, tools, training, or other supporting resources.

Advisory Nature of Recommendations

The recommendations developed by the Ombuds Working Group are advisory. During implementation they may be refined, combined, deferred, superseded, or discontinued following additional review, stakeholder engagement, operational planning, legal review, technology considerations, resource availability, or Commission decision making.

Ombuds Working Group Concurred Recommendations
Fully Addressed Topics

Updated 8/27/2026

Topic: Approvals and Exceptions

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-135	Encourage Program Managers to explore providing funding applicants / recipients with more detailed guidance on the level of detail desired on applications/addenda to avoid needing additional approvals later.	6/12/26	Program Managers	Target date to be determined*
R-136	Encourage Program Managers to consider providing funding recipients information about funding origin (ala ECY grants) and detailed guidance about which of the funding may be shifted within the award and what can be spent/what can't.	6/12/26	Program Managers	Target date to be determined*
R-137	Encourage the Tech Transformation Team to explore options in the new platform for allowing awarded funding amounts on intermediate outcomes to be exceeded up to a set threshold.	6/12/26	Tech Transition Team	Target date to be determined*
R-138	Encourage Program Managers to consider updating program-specific guidance to include details of allowable expenses on each program. Also to consider including the rationale/foundation for allowable expenses, e.g., funding type (capital vs. operating), state fiscal policy, proviso, etc.	6/12/26	Program Managers	Target date to be determined*
R-139	Add specific and detailed guidance to clarify what information and level of detail is required to obtain an out-of-state travel approval.	6/12/26	SCC Finance	July 2027
R-140	If an application / addendum request mentions out-of-state travel, the award issued by SCC should clearly state whether or not out-of-state travel is awarded. If there is insufficient information or detail provided to approve, the award could state that the out-of-state travel is conditionally approved and that further documented approval is required prior to travel.	6/12/26	SCC Finance	July 2027

**Implementation timeline depends on staff capacity. The manual revision is the highest priority, so resources outside of the manual may not be finished until after July 2027.*

***Recommendation advanced directly to Implementation without full Working Group review / concurrence.*

Ombuds Working Group Concurred Recommendations

Updated 8/27/2026

Fully Addressed Topics

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-141	Add content to manual to clearly define approval versus exception and to outline the process for each (including when to request, who to include in request, information needed, who will be involved in decision process, etc).	6/12/26	SCC Finance	July 2027
R-142	Change policy to eliminate blanket requirement for pre-approval to issue subcontracts and to eliminate requirement that copies of contracts be submitted to SCC. Edit section "Compensation for subcontracted personnel services" (p. 27), to remove first two bullet points.	6/12/26	SCC Finance	July 2027
R-145	Edit section heading and lead paragraph under "Compensation for subcontracted personnel services" as follows: Original: "Compensation for subcontracted personnel services. Including wages, salaries, and supplementary compensation and benefits — paid currently or accrued — for services rendered under the contract, including compensation for employees of the conservation district." Suggested revision: "Compensation for subcontracted services. Costs for services rendered under contracts, including interagency agreements, are eligible for reimbursement. Eligible subcontract costs include but are not limited to personnel costs (e.g., wages, salaries, supplementary compensation, and benefits — paid currently or accrued), travel, and/or supplies."	6/12/26	SCC Finance	July 2027
R-146	Add text to manual like: "Exception requests will be considered on the basis of state and SCC fiscal policy, state mandated fiscal notes, programmatic guidelines, considerations of equity amongst funding recipients and strategic distribution of funding, and assessment of risk management and/or administrative management issues"	6/12/26	SCC Finance	July 2027
R-147	Institute practice that, when approval or exception requests are denied, SCC Finance will document the reason for disapproval to the requestor.	6/12/26	SCC Finance	July 2027

**Implementation timeline depends on staff capacity. The manual revision is the highest priority, so resources outside of the manual may not be finished until after July 2027.*

***Recommendation advanced directly to Implementation without full Working Group review / concurrence.*

Ombuds Working Group Concurred Recommendations
Fully Addressed Topics

Updated 8/27/2026

Topic: Authorized Signatures

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-134	Encourage the Tech Transformation Team to explore options in the new platform to allow mid-biennium changes to the authorized signature form to be handled via addendum adding new signatures only, rather than an entirely new replacement form with new signatures from everyone covered by the form. Consider modifying the form to include a section of individuals with authority to approve changes to signatories.	6/26/26	Tech Transformation Team	Target date to be determined*
R-144	Modify policy to allow signatures on the Authorized Signatures form to be collected via e-sign or as wet signatures as desired by the funding recipient.	6/26/26	SCC Leadership Team	July 2027
R-157	Encourage the Tech Transformation Team to explore process and structure options for collecting authorized signatures in the new platform, engaging Districts for their input.	6/26/26	Tech Transformation Team	Target date to be determined*

Topic: Clothing, Apparel, PPE

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-192	Encourage Program Managers to update each program guideline to specifically include whether clothing/PPE is allowed.	7/31/2026	Program Managers	Target date to be determined*
R-193	Show in a table which programs do or do not allow clothing purchases. This information could be added to the existing Common Expenditures table within the manual, or be separate (in manual or in an FAQ).	7/31/2026	Program Managers	Target date to be determined*

**Implementation timeline depends on staff capacity. The manual revision is the highest priority, so resources outside of the manual may not be finished until after July 2027.*

***Recommendation advanced directly to Implementation without full Working Group review / concurrence.*

Ombuds Working Group Concurred Recommendations

Updated 8/27/2026

Fully Addressed Topics

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-194	Provide additional clarification about the definition of “promotional purposes”. Suggested language: “Promotional purchases is defined as clothing purchased as “give-aways” for events, landowner recognition, and other instances where items are given to people who are not representing the District as staff or volunteers.”	7/31/2026	SCC Finance	July 2027
R-200	Address in FAQ / Q&A the question of “what criteria are applied to approve or deny a clothing / apparel purchase”. Suggested language: “The criteria for approving a clothing / apparel purchase are (1) Does the funding source allow the purchase; (2) Are the items purchased not promotional; (3) Do the items purchased benefit the purpose of the funding and support the activities of the grant.”	7/31/2026	Regional Managers	Target date to be determined*

Topic: Debarment

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-109	Encourage the Regional Managers to consider updating the debarment-related DO Brief #9-2013 - Suspension & Debarment (contains broken links; outdated text)	4/24/26	Regional Managers	Target date to be determined*
R-110	Edit to remove duplication of Suspension and Debarment sections, currently on pages 14-16 and pages 53-55	4/24/26	SCC Finance	July 2027
R-111	Edit text around link on pages 15 and 54, which currently shows “Violations of RCW 39.12.065(3) can be found here.” Instead, display clearly that the link leads to the Debarred Contractors List from Dept of Labor & Industries. E.g., “Violations of RCW 39.12.065(3) can be found on the Debarred Contractors List from Dept of Labor & Industries”.	4/24/26	SCC Finance	July 2027
R-112	Edit Grant Manual to reduce regurgitation of external guidance about debarment. See proposed revision here (to replace text currently on pages 14-16 and pages 53-55).	4/24/26	SCC Finance	July 2027

*Implementation timeline depends on staff capacity. The manual revision is the highest priority, so resources outside of the manual may not be finished until after July 2027.

**Recommendation advanced directly to Implementation without full Working Group review / concurrence.

Ombuds Working Group Concurred Recommendations

Updated 8/27/2026

Fully Addressed Topics

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-149	Encourage the Regional Managers to consider providing more District support resources about debarment, outside the grants manual. This could be part of something larger, or stand-alone. Potentially useful elements could include: • Explanation of what is required in files to document debarment (and avoid audit finding) • Any other FAQs related to this • Sample completed SAM verification (with annotations highlighting and commenting about required elements) • Sample completed LNI verification (with annotations highlighting and commenting about required elements) • Video walk-through and/or screenshot-by-screenshot instructions of how to complete the SAM and LNI verifications • Sample certification language to include in a contract • Sample stand-alone certification of eligibility	6/26/26	Regional Managers	Target date to be determined*
R-150	Update the debarment-related information in the Cost Share Process presentation PDF here: https://www.scc.wa.gov/cd/grants-contracts-and-finance (on the “Procedure Manual tab) to bring it up to date (correct SAM information / screenshots) and align to the manual and other current resources.	6/26/26	SCC Finance	Target date to be determined*
R-151	Correct the link to the CFR on pages 15 & 54 in this phrase: “the nonfederal entity must verify that the entity, as defined in 2 CFR section 180.995...”. The link goes to the definition of “Principal”, should be to section 180.985 “Person”.	n/a**	SCC Finance	5/13/26

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Updated 8/27/2026

Topic: Electronic Signatures

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-180	Update SCC Electronic Signature policy to align language in policy to the Grants Manual audience being funding recipients, not just Districts • Change “Local Government Documents” to “Funding Recipient Documents” • Consider shifting anything specific to Districts to a separate section, e.g. Advance Payment Agreement, Master Contracts • Look at “Timesheets (districts)” - should the “(districts)” be dropped? Or changed to “(funding recipients)”?	7/31/2026	SCC Leadership Team	July 2027
R-181	Update SCC Electronic Signature policy to reflect current practices. For example, the Authorized Signature Forms List doesn’t reflect that some addendums now require signature from both SCC and recipient	7/31/2026	SCC Leadership Team	July 2027

Topic: Employee Benefits

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-116	Encourage Regional Managers to consider publishing guidance (e.g., FAQs) for comp rates, outside the manual. This resource could include topics such as: • How to use the comp rate form • Items from bullet points to be removed from “Handling Reimbursement for Employer-Paid Benefits” manual section • Best practice suggestions about what elements should be covered in a District policy around employee benefits, plus examples	5/29/26	Regional Managers	Target date to be determined*

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Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-117	Edit Manual section on “Handling Reimbursement for Employer-Paid Benefits” (p. 33). Retain paragraph text only and shift bullet points to a separate resource for Districts.	5/29/26	SCC Finance	July 2027

Topic: Individual Grant Programs

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-121	Encourage the Tech Transformation Team, in their planning for CPDS replacement, to consider improving user experience around understanding (a) that, because different programs have different requirements, the system will look and behave differently for different programs, and (b) how to navigate inputting/selecting covered resource concerns and BMPs across different programs. Ensure that there are supporting materials or training to help users in these areas.	6/12/26	Tech Transformation Team	Target date to be determined*
R-122	Encourage Program Managers to explore publishing some FAQs about design-only grants, covering why SCC currently doesn’t have any and how they are being considered for future budget requests. (Recommend incorporating into existing resources, not creating new stand-alone resource.)	6/12/26	Program Managers	Target date to be determined*
R-123	Encourage Program Managers, in the process of revising the programmatic guidelines (outside the manual), to prioritize a consistent format with core content elements present for all programs. Encourage the inclusion of information about any program-specific conditionally allowable expenditures (what they are and any special pre-approvals or documentation needed) or ineligible expenditures, as well as any special reporting requirements or policies that vary from the standards in the main policy manual.	6/12/26	Program Managers	Target date to be determined*

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Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-124	Encourage Program Managers to consider publishing FAQ (or other written materials) to address the following questions (draft responses are just an example): - Why do different programs have different eligible activities and expenditures, reporting requirements, and policies? <i>Because they are funded from different sources and that funding comes to SCC distinct requirements (e.g., in proviso language and/or program guidelines)</i> - How do I find the eligible activities and costs, reporting requirements, and policies for my funding? <i>We recommend starting with the general information in the Grants Manual, then looking at the program-specific information in the programmatic guidelines.</i> - How do the eligible activities and costs, reporting requirements, and policies in the Grants Manual and in program-specific guidelines relate to each other? If they are different, which should I follow? <i>The Grants Manual is meant to communicate general policies and procedures across all funding for SCC. There may be a case where a specific program has requirements that differ from the general SCC practices. If the program-specific guidelines differ from what is in the Grants Manual, follow what is in the program-specific guidelines. Please ask the Program Manager if you have any questions.</i>	6/12/26	Program Managers	Target date to be determined*
R-125	Encourage Regional Managers to consider publishing something outside the Grants Manual (e.g. FAQ) to respond to questions about awards of state money to specific CDs. For example: Q. Can a state legislator award funds directly to a CD through SCC? A. Yes. The state can earmark funding for a specific CD just as it may earmark funds for specific programs or projects. In this case, SCC will work with the CD to award the funding. SCC standard policies and procedures would apply, as well as anything specific to the funding as awarded by the state. Q. Can a state legislator award funds directly to a CD without going through SCC? A. SCC has no requirement that state funds must pass through the SCC to CDs. CDs are welcome to work with their legislators to have funds awarded without passing through SCC.	6/12/26	Regional Manager Team	Target date to be determined*

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Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-128	Edit Section 5 “Capital Grant Programs” section on page 37. The link to the capital budget instructions is confusing and seems irrelevant for funding recipients. If funding recipients actually need to do anything with this, add more information and support for whatever needs to be done with it, and consider shifting to programmatic guidelines.	6/12/26	SCC Finance	July 2027
R-130	Correct the “Common Expenditures” table for Implementation / “Out of State / Country Travel” which appears incorrect in the Expenditures table. Currently reads “Yes - out of state w/no prior approval”; remove “no” prior approval.	n/a**	SCC Finance	5/13/26
R-131	Update the intro in section 5 to emphasize variations across programs. - Original text: SCC offers grant programs funded through both Operating and Capital funding. Each program is subject to specific proviso language and program guidelines. The eligible expenditures vary based on the funding type and the guidelines for each grant. For more details, please refer to the table of common expenditures starting on page 40 of this document. - Suggested revision: SCC offers grant programs funded through both Operating and Capital funding. Each program is subject to specific proviso language and program guidelines and may have unique eligible activities and costs, reporting requirements, and policies in addition to the general SCC funding policies in this manual. Please see the quick reference table of common expenditures starting on page 40 of this document and refer to the individual program guidelines for more details.	6/12/26	SCC Finance	July 2027
R-158	Revise section 5 to reduce and simplify. Do not repeat detailed information about each grant program that is covered in programmatic guidelines, instead provide a link to the programmatic guidelines. Retain the allowable reimbursable expenditures table in the manual.	6/26/2026	SCC Finance	July 2027

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Updated 8/27/2026

Topic: Labor Rates

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-164	Document somewhere in FAQs or supporting materials outside Grants Policy Manual that Districts may pay participants a higher labor rate, covering the difference from a non-SCC funding source.	7/31/2026	Regional Managers	Target date to be determined*
R-166	Increase the labor rate in 2027, at least to acknowledge overall inflation since it was originally set at \$25 (or \$22?).	7/31/2026	SCC Finance	July 2027
R-167	WSCC should establish a methodology for reviewing and setting the labor rate at least each biennium. The updated approach should: • Include benchmarking based on relevant data sources (e.g., labor rates used by other agencies, available data on volunteer labor costs); • Account for inflation at least each biennium, and consider an automatic inflationary increase in the second year of the biennium; and • Be documented for transparency and consistency.	7/31/2026	SCC Finance	July 2027
R-168	WSCC should actively revisit their labor rate cap each biennium, confirming that it is still appropriate in current economic conditions.	7/31/2026	SCC Finance	July 2027

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Updated 8/27/2026

Topic: Mortgage

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-119	Encourage the Regional Managers to consider publishing guidance (e.g. FAQs) outside the manual to educate Districts that they may use overhead to pay for mortgage including interest (perhaps including reference / link to federal rules for indirect-eligible costs).	5/29/26	Regional Managers	Target date to be determined*
R-120	Encourage the Regional Managers to consider publishing guidance outside the manual to address this question, for example a FAQ such as: “Q: Why aren’t mortgage payments allowable direct costs? <i>A: Mortgage payments are not allowable because they represent long-term financing and equity acquisition. SCC grants are intended to reimburse time-limited programmatic costs incurred during a grant period and are not designed to finance real property ownership or debt service.</i> ”	5/29/26	Regional Managers	Target date to be determined*

Topic: Overhead / Indirect

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-103	Request that CTD explore developing an on-demand training on this topic in CTD LMS. Use Federal CFR 200 Indirect rule book as guidance.	4/24/26	CTD	Target date to be determined*
R-104	Encourage the Regional Managers to consider developing a procedure resource about overhead/indirect that covers how to calculate overhead/indirect on vouchering, what to include, etc. Utilize the examples that are currently in the manual.	4/24/26	Regional Managers	Target date to be determined*

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Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-111	Edit Grant Manual to simplify the section on overhead to focus on the policy. Utilize the first two paragraphs under “Computing Conservation District Overhead Costs” as the policy, remove the rest. If appropriate, include the maximum set rate in the policy manual and update every biennium if needed.	4/24/26	SCC Finance	July 2027
R-195	Add text to Grants Manual addressing “Overhead Rates on Federal Funding” and “Overhead Rates for Recipients with a NICRA”. Suggested text: - Overhead Rates on Federal Funding: Overhead rates on Federal funding will be determined based on federal policy (2 CFR 200.332(b)(4)) and award-specific terms. - Overhead Rates for Recipients with a NICRA: Some funding recipients may have a Negotiated Indirect Cost Rate Agreement (NICRA) established with a federal agency. As a federal agreement, this does not pertain to state funding. These recipients are still bound by the SCC cap of 25% overhead costs on state grant funding.	7/31/26	SCC Finance	July 2027

Topic: Overtime

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-118	Encourage the Regional Managers to consider compiling supporting resources outside the manual on the topic of Overtime, including: - Understanding rules about OT (federal and/or state) - Differences between exempt / non-exempt employees, eligibility - How to document OT in vouchers - Best practices for District policies (including examples of policy) - Links to external resources, e.g., Labor & Industries, Department of Labor	6/12/26	Regional Manager Team	Target date to be determined*

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Topic: Vocabulary

Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-247	Update glossary entry as follows: “Cooperator is a participant that works with a conservation district or other funding recipient/sponsor to conserve natural resources. Cooperators can include agricultural producers, farmers, ranchers, landowners, land managers, lessees, land trusts, and other partners.”	8/19/2026	SCC Finance	July 2027
R-248	Update glossary entry as follows: “Landowner is the legal owner of the property.”	8/19/2026	SCC Finance	July 2027
R-249	Update glossary entries as follows: (a) A Cost Share Participant is an individual or entity that, by signing the Contract for Cost Share Funds, accepts the cost-share funding and commits to install the BMPs in the contract. A cost share participant may be the owner of the land, a lessee or operator, or a cooperator of the district.” (b) A DIP participant is the legal owner of the property that signs the DIP landowner agreement allowing the installation of BMPs on the property. (c) Participant may refer to a Cost Share Participant or DIP Participant, depending on context.	8/19/2026	SCC Finance	July 2027
R-250	Update manual text to: (a) Use “Participant” where it is clear from context whether it is referring to Cost Share Participant or DIP Participant (b) Specify “Cost Share Participant” or “DIP Participant” where additional specificity is required.	8/19/2026	Manual Editor	July 2027

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Rec Code	Recommendation	OWG Meeting Approval Date	Implementation Lead	Implementation Target Date or Completion Date
R-251	Update glossary entry as follows: “Best management practice (BMP) is a conservation practice or suite of practices designed to protect the air, water, soil, animals, plants, and humans. BMPs must meet NRCS standards, or alternative practice designs approved by a licensed professional engineer. NRCS Practice Standards and Specifications are contained in the USDA NRCS Field Office Technical Guide (FOTG). SCC also maintains a list of approved practices eligible for cost share.”	8/19/2026	SCC Finance	July 2027
R-252	Update the section heading from “Participant as Contractor” to “Cost Share Participant as Contractor” (p. 62). Repeat “Cost Share Participant” in the first instance within the text of this section.	8/19/2026	Manual Editor	July 2027
R-253	Request that the professional editor review the following requests for clarity and assess whether they have been addressed in the updated version (potentially not explicitly): Q. Are entities that receive RPPP or SFF funds from the SCC considered cooperators? A. No, they would be considered funding recipients or sponsors. Q. Do cooperators work directly with the SCC? A. No, SCC does not contract directly with, nor directly pay, cooperators. Q. Don't some cooperators get SCC funding from counties? A. Yes, they do. Counties are considered a funding recipient/sponsor in the context of the grant manual.	8/19/2026	Manual Editor	July 2027
R-254	Request that the Manual Editor review all recommended vocabulary changes in context during their review of the manual.	8/19/2026	Manual Editor	July 2027

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