

THE **OUTSIDE** IS IN US ALL.

## Montana Recreational Trails Program 2024 Grantee Guidelines

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## GRANT MANAGEMENT OVERVIEW

## Project Period of Performance

Your RTP project period of performance and milestones are summarized in the chart below.

Milestone	Date	Important Notes
Project Start Date	July or August (When your agreement is signed)	You cannot incur RTP expenses or claim match dated before your project start date <sup>1</sup>
First Payment Request Deadline	March or April or the following year	Your first payment request is due 8 months after your project start date <sup>2</sup> . See <u>8-Month Reimbursement Requirement</u> .
First Status Report Deadline	March or April or the following year	Your first status report is due 8 months after your project start date along with your payment request.
Subsequent Payment Requests and Status Reports	Due every 8 months	Specific due dates are listed in the grantee Agreement Cover Sheet
Project Extension Request Deadline	60 days prior to the agreement expiration date	You must submit a grant extension request by this date. See <u>RTP Project Extension Requests</u> .
Project End Date	October 15, 2026	You cannot incur RTP expenses or claim match dated after the project end date.
Project Closeout	December 15, 2026	You must submit final reimbursement and final report in WebGrants by this date. See <u>Project Close Out</u> .

## **General Grantee Expectations**

The RTP Manager has developed a set of universal expectations for all grantees. You and your organization should be able to meet the expectations outlined below throughout the project lifecycle.

- Read and understand the deadlines, requirements, and guidance detailed in your RTP Agreement and in these Grantee Guidelines. You are responsible for meeting the deadlines associated with payment requests and status reports. You are also responsible for understanding <u>purchasing and Buy America requirements</u> as they relate to your RTP project. Ask the RTP Manager if you are unsure about anything you read in these documents.
- 2. Read all correspondence and updates from the RTP Manager during the grant cycle. The RTP Manager (as well as the grant management system) sends regular reminders and updates. Most correspondence is sent by email. Notify the RTP Manager immediately if you think you are not receiving correspondence.
- 3. **Keep your organization's contact information updated.** The RTP Manager will use the main contact information to send most email correspondence. It is your responsibility notify the RTP Manager when contact information changes, including your organization's address.

<sup>&</sup>lt;sup>1</sup> RTP project work related to design and engineering occurring up to 18 months before the project start date may be eligible match if included in your application budget at the time of submission. Check with the RTP Manager..

- 4. Notify the RTP Manager as soon as possible if there are significant changes to your project. Significant changes are those which might change your project scope and/or delay your project to the point where you may not meet RTP deadlines. The RTP Manager can work with you to develop a solution which works for you and meets RTP requirements as outlined in your RTP Agreement.
- 5. **Expend RTP funds and claim match only on items identified in your approved budget.** You cannot expend RTP funds on expenses that are not detailed in your budget and narrative. The RTP Manager must approve any proposed change BEFORE you incur expenses associated with the proposed change.

## WEBGRANTS (HTTPS://FUNDING.MT.GOV)

Throughout the grant period, grantees must use WebGrants (<u>https://funding.mt.gov</u>) to manage all grant activities. You will use WebGrants to submit reimbursement requests, submit status reports, and view your project's approved budget and contract documents. To make any budget or project amendment requests, you should contact the RTP Manager by phone or email before making a request via WebGrants. It is recommended grantees use Google Chrome when accessing WebGrants.

A How-To document on using WebGrants for registration, submitting reimbursement claims, and status reports can be found on the <u>RTP webpage</u>.

## FEDERAL AND STATE COMPLIANCE

## System for Award Management (SAM) Registration/Renewal

All RTP grantee organizations must be registered in the System for Award Management (SAM) and receive a CAGE code before signing their RTP Agreement. The organization must maintain an "active" status in the SAM to receive reimbursement from RTP. To stay "active" in the SAM, organizations must renew their SAM registration annually.

Your organization is responsible for ensuring it maintains an "active" status in the SAM throughout the RTP grant cycle. Your organization's SAM status will be monitored. If your organization becomes "inactive" in the SAM, you will not be able to receive reimbursement from RTP until your status becomes "active".

To check your SAM status and renew your registration, visit <u>www.sam.gov</u>.

### SAM Renewal Scams

Be aware of SAM renewal email scams. Once your organization is registered in the SAM, your organization's information is available to the public. Third-party organizations may solicit you and offer to complete your SAM renewal for a fee. Do not trust emails offering to renew your SAM status via a link. You can renew your organization's SAM registration free of charge through the sam.gov website.

## W-9 Requirement

You will be required to submit a W-9 form for your organization when you sign your RTP Agreement. Please verify the address on your organization's W-9 form matches what is on your organization's profile in our grant management system. If your organization's address changes during the grant cycle, you must contact the RTP Manager and provide an updated W-9 form.

## **Record Keeping**

Your organization may be required to provide state employees, Legislative Auditors, or their authorized agents access to any records necessary to determine compliance with the RTP Agreement and, upon request, provide Montana FWP with a copy of any such audit. Your organization is also required to create and retain all records supporting the RTP project for at least **three years** after the project end date.

## Site Visits

The RTP Manager or other agency staff may conduct both formal and informal site visits to ensure your RTP project is being/has been implemented as outlined in the RTP Agreement. Site visits serve a variety of purposes, including checking on a project's status, equipment purchases, meeting subrecipient, walking through any issues, and deepening understanding of larger recreational use patterns and goals of a geographic area.

## **REPORTING REQUIREMENTS**

## **Status Reports**

All grantees must submit semi-annual status reports, submitted via WebGrants, for the reporting periods and due dates listed within the grantee agreement cover sheet. A guidance document on how to submit a status report can be found on the <u>RTP Webpage</u>.

## Payment Requests (Claims) - Required every 8 months from Start Date

Payment requests (claims) must be submitted in WebGrants at least every eight (8) months throughout the project cycle. Each payment request must include proper documentation of the expenses being claimed for reimbursement, as well as at least 25% match on the payment request amount (or 20% of the total project cost for that claim, which equal the same number).

Once you submit a payment request, your 8-month clock starts again. You must submit each subsequent payment request within eight months of your last payment request until the project is closed. Work with the RTP Manager to strategically plan your payment requests if you expect long periods in which you will not expend project funds.

### Extension Request for 8-Month Reimbursement Deadline

**The 8-month payment request deadline is a hard, federal requirement.** Contact the RTP Manager immediately if you think you cannot meet your 8-month payment request deadline. Failure to submit a payment request by the RTP deadline may result in your project becoming "inactive" in the federal system and possibly losing its RTP funding.

## **Documentation Requirements**

## Reimbursement Documentation for General Expenses

The grantee must submit appropriate documentation for each line item being requested for reimbursement.

You must submit the following as attachments for your payment request for all expenses:

- 1. An invoice, bill, or receipt: This should include the vendor's name, description of service, service date, and amount due/paid. This should be an official document, preferably on the vendor's letterhead. If the document includes more than the RTP purchase(s), the RTP purchase(s) should be clearly identified.
- 2. Proof of payment by your organization: For all expenses, you must demonstrate the expense has cleared your organization's account. Acceptable documentation includes a cancelled check or a bank account statement with the RTP purchase(s) identified. If paying with a credit card, a credit card or bank account statement is required (non-essential information may be blacked out). Only the grantee organization can be reimbursed with RTP funds. The grantee organization cannot be reimbursed for payments incurred by another party, unless the grantee organization has reimbursed that party and obtained the proof of payment.

### Reimbursement Documentation for Salaries

If claiming reimbursement for employee salary, you must include proof of pay rate for each employee on each claim. This pay rate should be used consistently. Common forms of pay rate proof include paystubs and timesheets. Reports pulled from accounting software, if clearly applied to a specific project code, are also acceptable. The grantee should summarize the hours and rates each employee worked that pertained to the RTP project, along with what work was performed. Salary calculations should be clearly justified; in most cases, the use of a summary document is encouraged.

### Only 20% of the overall salary/labor costs can be reimbursed for trail-related project oversight.

The remaining labor costs are meant for on-the-ground trail efforts or education/ethics projects. Grant administration costs are deemed as indirect costs and are not considered an eligible use of RTP funds unless an indirect cost has been approved and claimed for the project. If an indirect cost rate is present, grant administration would fall within this category and no documentation is required.

### Reimbursement Documentation for Grooming

The RTP uses a trail groomer reimbursement methodology that employs an hourly rate based on average groomer expenditures. These rates are used in lieu of receipts for trail groomer expenses. For projects using the trail grooming reimbursement rates, the included expenses (see below) may not be reimbursed for exact cost or used as match.

### Expenses covered by the grooming reimbursement rate:

- Fuel
- Oil
- General maintenance and repairs (including labor)

## **Hourly Rates:**

- Utility sled used for trail grooming: \$20.00 per hour
- Large groomers (e.g., PistenBully): \$120.00 per hour

Grooming hours and mileage must be documented using daily grooming logs and monthly summary sheets.

The grooming rates above do not include the labor to operate the machine or other costs not associated with actual operation of the equipment. Depending on what you were approved for in your RTP project scope, you can claim grooming labor as a separate expenditure (if you are paying the operators) or as match at \$25/hour using the RTP's volunteer log.

**Grooming hourly rates can only be claimed when the groomer is in use on the trails and actively incurring mileage.** They cannot be claimed for hours during which the groomer is being moved to a location, being worked upon, or being maintained.

## Other Documentation Requirements

Below is a summary of other documentation that may be required depending on the type of payment request. Contact the RTP Manager with questions.

- Contract Documentation: If you are claiming reimbursement for any services for which your organization has entered into a contract, you must include the contract with the associated payment request(s).
- State Procurement Documentation: If you are claiming reimbursement for the purchase of a good or service over \$10,000, you must include justification that the State of Montana's Procurement Policy was followed with the associated payment request(s). See Appendix A.
- Build America & Build America, Buy America Documentation: If it appears the iron/steel components or contained within items to be purchased or any construction materials for the RTP project may exceed \$2,500 in value, you must provide documentation from the manufacturer that the materials/manufactured items in question is American-made or values less than \$2,500 before purchase with the associated payment request(s). See Appendix B.

### Reimbursement Documentation for Federal Agency Grantees

### USFS documentation for each payment request should include:

- 1. Bill for Collection
- 2. Bill Spending Detail Report
- **3.** Match Documentation
  - a. **Federal Match:** This can be documented in various ways. Be sure to clarify which portion of your match pertains to RTP on your match documentation. Include a statement about how your match supported the RTP project (e.g. "XX employee worked YY number of days at ZZ daily rate supervising the MCC crew that worked on this project").
  - b. **Non-Federal Match:** All Federal Grantees are required to have 5% of their total project costs come from nonfederal sources. This requirement is usually met using non-federal volunteer labor.

## MATCH REQUIREMENTS

## Match Requirement Calculation

Use either formula below to calculate your minimum match requirement.

## Match Requirement = (Payment request / 0.80) - Payment request

or

## Match Requirement = Payment request x 0.25

## Eligible match is generally any labor or expense falling under the RTP project scope (identified in the budget and funding narrative) and occurring during the project period of performance.

Grantees must maintain 20% match of the total project costs in order to be eligible for reimbursement claims. Match is culminative and will carry over to subsequent claims. While match must fall under the project scope, match does not have to correspond to the expense(s) for which you are requesting reimbursement. It is your responsibility to ensure match is not duplicated between payment requests.

The match documentation required for each payment request is the same as what is required for expenses. Unlike expenses, match expenses/labor can come from any source that is not also reimbursed by RTP funds. Most federal funding sources can be used as match on RTP projects.

You may also use donated professional labor or services as match. The service or labor rate and hours must be substantiated with an invoice from the business or professional entity. Paystubs may also be used to justify a professional rate. The hours attributable to the RTP project, corresponding value of work, and description of work performed must be clearly indicated on any documentation.

### Volunteer Labor as Match

Volunteer labor on an RTP project may be used as match with an accompanying volunteer log as documentation. The current volunteer rate for all RTP grants is \$25/hour.

## PROJECT MODIFICATION

## Changes to Project Budget and Scope

It is common for grantees to move funds between budget categories as a project unfolds and true costs are realized. You do not need to seek approval from the RTP Manager if a budget change is within your approved project scope and you reallocate categories within 10% of the amount of your budget.

### Minor Budget Changes

You may move up to 10% of your total project costs in actualized expenses between originally approved budget categories that do not change your scope of work without seeking approval from the RTP Manager.

**Example:** Your budget includes \$5,000 for grooming rate reimbursements and \$5,000 for equipment purchases. You later find that the equipment purchased only cost \$4,500 and, with a

heavy snow year, you determine that the extra \$500 is needed for additional grooming hours. You may reflect this change in your claim without approve (less than 10% change)

## Major Budget and Project Scope Changes

You must undergo a formal approval process if you anticipate moving funds between categories that exceed 10% of your total project budget, expending funds on something not included in your originally approved budget or project scope. Such changes must be thoroughly rationalized and vetted before they are approved, sometimes also requiring Federal Highway Administration approval. Major budget and project scope changes are generally only acceptable if an unforeseen issue is preventing you from completing your project as it was originally approved.

**Contact the RTP Manager as soon as possible if you anticipate a major change to your budget or project scope.** The formal RTP Project Amendment approval process must be completed and can take a few weeks. You may not incur expenses until the RTP Manager approves them.

## An example

Suppose you were originally funded \$15,000 for the construction of a 0.5-mile gravel trail in the South Section of a park. Between the time you submitted your application and the time you were awarded funding, a contractor committed to donating its own supplies and labor to construct that section of trail. Instead, you would now like to use the \$15,000 RTP award for the construction of a 0.5-mile gravel trail in the North Section of the park.

In this case, you would contact the RTP Manager immediately. Since the request represents a change of project scope (a new trail location), the RTP Manager would ask you to submit an amendment request. After adequately examining your amendment request and associated rationale, the RTP Manager would issue a formal approval or denial.

## **Project Extension Requests**

RTP projects may be extended up to **one year** past the original project end date. To be considered for a Project Extension, you must be able to justify your project faced an extenuating circumstance that prevented its completion as outlined in your RTP Agreement. Extenuating circumstances include natural disasters (wildfire, flood, etc.) and other major unforeseen events outside your control. Organizational turnover, a personal life event, or failure to anticipate changing project monetary needs, will not qualify as an extenuating circumstance.

Notify the RTP Manager as soon as you suspect a Project Extension might be necessary. You will need to submit a RTP Project Extension request no later than 60 days before your grant expiration date. The RTP Manager will consider the justification presented in your request and issue a formal approval or denial.

## PROJECT/GRANT CLOSE OUT

## **Final Payment Request**

You may request to close your project once you have submitted your final payment request. This can happen at any time during the project period. The RTP Manager will assume your project is ready for close out if all your RTP funds have been expended. You will be required to submit your final report at the same time you submit your final claim for the final claim to be eligible.

If you cannot expend all RTP funds with your final payment request, you must notify the RTP Manager that you would like to close your project. This is not encouraged. You should attempt to expend all RTP project funds with your final payment request down to the penny.

## **Final Status Report**

Once you have submitted your final payment request, you must submit a final status report to close out your project. The process for submitting a final status report is detailed in the <u>Reporting Section</u> of this document. The RTP Manager will notify you if anything further is needed to close your project.

## APPENDIX A: PROCUREMENT POLICY FOR PURCHASES OVER \$10,000

## **State Procurement Policy**

Entities planning to purchase services or materials over \$5,000 in value with RTP funds must follow state and federal procurement procedures before selecting a vendor. The procurement process must be adequately documented on the corresponding reimbursement request(s) or the expense may not be claimed for reimbursement or match. Contact the RTP Manager if you are unsure how requirements detailed below may pertain to your project.

## The Limited Solicitation Process

## • The purchase of a service or supplies valued between \$10,000 and \$99,999

This should include cost proposals, by phone, fax or written format, from at least three prospective vendors if possible and if cost effective. If there are fewer than three potential vendors available, that must be documented. Subrecipient must utilize the limited solicitation form available on the <u>RTP Webpage</u> include completed form with the payment request. A signed agreement with the chosen contractor must also be included with the payment request.

You should provide additional justification/detail if you did not choose the lowest acceptable quote or any other unusual circumstances arose (e.g. you could not obtain at least three viable quotes).

If a single vendor will do work on multiple components of a project that, taken collectively, total more than \$10,000, the bid process must also be followed.

## The Competitive Bid Process

## • The purchase of a service or supplies valued \$100,000 and greater

This requires a formal invitation for bids. Subrecipient will follow its own solicitation process to secure bids for the project but must include the following:

- a. Description of service and conditions applicable to the procurement;
- b. Description of evaluation criteria to be utilized;
- c. Adequate public notice before date set forth in the invitation for opening of bids;
- d. Record of each bid and relevant information including name of each bidder; information must be available to the public;
- e. Award must be made by written notice to the lowest responsible and responsive bidder whose bid meets the requirements and criteria set forth in the invitation for bids.
- f. Must be advertised in at least 2 newspapers for 3 weeks. One paper must be the seat of government and the other in the county where the work is to be performed

Subrecipient must forward documentation of this solicitation, results and a copy of the contract/agreement to the Trails Programs Office at the time of the payment request.

You should provide additional justification/detail if you did not award the contract to the lowest acceptable quote or other unusual circumstances arose (e.g., you did not obtain any bids and had to reach out to vendors).

## Sole Source Justification

Sole source procurement is permissible under the circumstances listed below. **Contact the RTP Manager** if your project will include sole source procurement to ensure you are using the correct procedure. Sole Source determination must be approved by the RTP Manager prior to incurring any expenses.

- The compatibility of current services or equipment, accessories, or replacement parts is the paramount consideration.
- There is no existent equivalent product; or
- Only one source is acceptable or suitable for the supply or service item.

## APPENDIX B: PURCHASING EQUIPMENT WITH RTP FUNDS

Equipment purchases you plan to make with RTP funds must be detailed and approved in your budget and funding narrative before the time of purchase. Equipment is defined as an article of nonexpendable, tangible property having a useful life of more than five years and with an acquisition cost that exceeds \$1,000.

Equipment purchased with RTP funds must be solely utilized to construct and maintain recreational trails or specific trail-related features for the life of the equipment. Your organization is responsible for proper maintenance and operation of RTP-funded equipment. Your organization is also responsible for liability insurance coverage for any equipment purchase over \$15,000. The insurance coverage shall be adequate to cover the replacement of the equipment for the term of the lifecycle assigned to it and documented in the RTP Agreement.

Small equipment purchases such as tools including, but not limited to, shovels, rakes, chainsaws, backpack sprayers, hardhats, axes, and pulaski's are ineligible expenses with Recreational Trails Program funds or matching funds

## Equipment Maintenance and Lifecycle Considerations

An equipment lifecycle may be assigned to a piece of equipment. The lifecycle will be a minimum of five years and may be as great as fifteen years. FWP may require your organization to return the RTP funds expended on a piece of equipment if it is found your organization sold or otherwise caused the equipment to not reach its useful life (by failing to carry adequate insurance coverage or properly maintain or operate the equipment, for example). If that happens, your organization may also be deemed ineligible for future RTP grants.

## Waiver of Buy America Requirements for De Minimis Costs and Small Grants.

DOT finds that it is in the public interest to issue a waiver of BABA's domestic preferences for iron and steel, manufactured products, and construction materials used in projects funded under DOT-administered financial assistance programs for iron, steel, manufactured products, and construction materials under a single financial assistance award for which:

The total value of the non-compliant products is no more than the lesser of \$1,000,000 or 5% of total applicable costs for the project; or

The total amount of Federal financial assistance applied to the project, through awards or subawards, is below \$500,000.

The waiver is applicable only to awards that are obligated or subawards that are made on or after the effective date of the waiver [August 16, 2023]. The waiver is applicable to subawards only if the subawards are made by a pass-through entity for a specific project.

# APPENDIX C: USING TRAVEL OR PERSONAL PROPERTY EXPENSES AS REIMBURSEMENT OR MATCH

## See the <u>RTP Website</u> for the most current travel & personal property reimbursement log.

Travel expenses to or from a RTP project site may be eligible for reimbursement under the Recreational Trails Program (RTP). The state rates shown below for mileage, per diem, and lodging are maximum amounts that can be claimed as expenses or match. Travel expenses must be approved in the subrecipient's budget prior to the date(s) of travel and proper documentation must be provided the time of reimbursement.

Eligible types of travel reimbursement:

- Vehicle mileage
- Meal allowance (per diem)
- Lodging
- Use of personal property (trailers, stock, etc.)

## Claiming Travel as Expenses or Match

All grantees must use the most current RTP Travel Form to claim reimbursement for travel expenses. Each individual's full name, date(s) of travel, times of travel, and purpose of travel must be recorded along with other information pertinent to the expense. The individual and a designee from the grantee organization must sign the travel form certifying the information is correct.

**Subrecipients should use the rate from the year in which the travel expense was incurred.** For example, if you have a 2021 RTP award but vehicle miles were driven in 2022, you should use the 2022 mileage reimbursement rate to calculate the expense.

## Vehicle Mileage

RTP funds can reimburse miles driven to or from an RTP project site. The RTP Travel Form must be used to document the miles being reimbursed.

## Meals

## Meals by Receipt for Trail Crews

Meals by receipt are the most common way to claim meal expenses for RTP projects. A grantee organization may be reimbursed for groceries purchased for RTP-funded trail crew meals. In this case, all itemized grocery receipts and proof of purchase(s) must be included with the payment request. The RTP Travel Form is not necessary for this type of expense, but the claim documentation should identify how the groceries were used to support the RTP project.

### Meals by Meal Allowance (Per Diem)

To be eligible for a meal allowance while traveling to/from a RTP project, an individual must be in a travel status for more than three continuous hours. The individual must also be at least 15 miles from the organization headquarters or home, whichever is closer. The RTP Travel Form must be used to document the meal allowances being requested.

If the individual travels each day from headquarters or home to a specific RTP work site(s) within the vicinity of their headquarters or home, they are not in a travel status.

## Lodging

RTP funds can be used to reimburse lodging costs when an individual is traveling to/from a RTP worksite. If your organization pays for an individual to stay overnight at a commercial facility (hotel, motel, Airbnb, etc.), you may claim out-of-pocket lodging expenses up to the maximum amounts shown below. You must include a receipt and proof of payment along with the RTP Travel Form.

If an individual stays overnight at a non-receipt able lodging facility (in a tent, camper, or trailer), you may claim \$12 per night for lodging expenses. However, when overnight accommodations are provided at the expense of a government entity (e.g. USFS, DNRC), reimbursement may not be claimed for lodging. The RTP Travel Form must be used to document the lodging expense(s) being requested.

## **Use of Property**

If an individual uses the property listed below specifically for a RTP project, you may claim the appropriate amount for property expenses. The RTP Travel Form must be used to document the property expense(s) being requested (Rates may be updated each legislative session).

Type of Property Reimbursement	Reimbursement: Per Day in Use
Motorized OHV or Boats	\$15.00
Non-Motorized OHV or Boat	\$5.00
Horse Trailer	\$15.00
Other Trailer	\$5.00
Horse (Pack Animal)	\$16.00