Pass-Through Grants Reimbursement Manual

Environment and Natural Resources Trust Fund (ENRTF)

Outdoor Heritage Fund (OHF)

Fiscal Year 2022 (July 1, 2021- June 30, 2022)

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# Changes In This Version

The Fiscal Year 2022 manual contains these changes from previous versions:

* Reimbursement documentation section: Details expedited reimbursement standards for grantees with a history of clean reimbursement requests.
* Background check section (new): addresses new ENRTF language regarding background check requirements for grantees working with youth.
* Prevailing wage section: Clarifies what prevailing wage documentation grantees must keep on file

# Introduction

The Grants Unit within the DNR Office of Management and Budget Services (OMBS)provides contract management services related to ENRTF and OHF pass-through grant projects. Contract management ensures oversight of reimbursement for project deliverables and meets the requirements of all state laws and policies including the Department of Administration’s Office of Grants Management (OGM) procedures. Contract management helps recipients with financial compliance and ensures project consistency with appropriation law, state statute, grants policies, and approved work/accomplishment plans.

This manual was developed to help grantees administer their pass-through appropriation(s) and to provide instruction on how to obtain reimbursements for eligible project expenses. However, it will not be able to address all issues and potential problems that may arise during the completion of the project. **For questions regarding the grant agreement and amendments or reimbursement requests, please contact the State’s Authorized Representative or your assigned Grants Specialist.** Contact information is at the end of this manual; it can also be found in the contract agreement and on the DNR pass-through grants [website](http://www.dnr.state.mn.us/grants/passthrough/index.html).

For questions regarding your ENRTF work plan, please contact Legislative-Citizen Commission on Minnesota Resources [(LCCMR) staff](http://www.lccmr.leg.mn/about/staff-index.html).

For questions regarding your OHF accomplishment plan, please contact Lessard-Sams Outdoor Heritage Council [(LSOHC) staff](http://www.lsohc.leg.mn/staff.html).

# Internal Controls

* The grantee is responsible for establishing and maintaining adequate financial internal control systems that follow generally accepted accounting and auditing principles.
* Grantees must establish a separate, non-interest bearing account for ENRTF/OHF funds.
* Any accounting issues not addressed in this manual are subject to state agency standards as interpreted by their internal auditors. All projects are subject to final audit.

# Monitoring

* OGM [Policy Number 08-10](http://mn.gov/admin/images/grants_policy_08-10.pdf) requires one monitoring visit during the course of the grant period on projects valued at over $50,000.
* All projects valued at over $250,000 require annual monitoring visits.
* Monitoring will take place either at the grantee’s office location, the DNR Central Office, or via phone. Grantees will be given adequate notice prior to monitoring.
* The focus of the visit will be financial controls, grants management and associated documentation and procedures.

# State Accounting System (SWIFT) Requirements

The DNR processes project reimbursement payments through a system managed by Minnesota Management and Budget (MMB). The preferred method of payment is through the use of an electronic funds transfer (EFT) directly into the grantee’s designated bank account. Electronic transfer reimbursements provide timely payments and prevent the loss of checks either in the mail or by misdirection. In order to set up the electronic transfer payment process, please contact MMB at 651-201-8106.

The grantee will also need to request a User ID to access the SWIFT e-Supplier portal to view payment information:

* Go to [Minnesota Supplier Portal](https://supplier.systems.state.mn.us/psc/fmssupap/SUPPLIER/ERP/c/NUI_FRAMEWORK.PT_LANDINGPAGE.GBL) (<https://supplier.systems.state.mn.us/psc/fmssupap/SUPPLIER/ERP/c/NUI_FRAMEWORK.PT_LANDINGPAGE.GBL>)
  + Click on the 'Register for an Account’ link.
  + Click the ‘Register as a Supplier’ button in the New Supplier section.
  + Complete the online form.
  + An email will be sent with the new User ID and password.
* Questions regarding this process can be sent to [efthelpline.mmb@state.mn.us](https://webmail2.state.mn.us/owa/redir.aspx?C=f52ab7ecd59f4a21b03141ccd201b207&URL=mailto%3aefthelpline.mmb%40state.mn.us).

## Project Reimbursement

Pass-through grants are reimbursement based. The grantee must pay for project expenses prior to seeking reimbursement. Eligible expenses are then reimbursed under the terms of the agreement with the State of Minnesota.

### Advance Payment

The DNR will only provide advance payment with prior approval as outlined in session law and the grantee’s agreement.

* LCCMR and/or LSOHC will need to approve all advances for the project through the work/accomplishment plan.
* This does not apply to land acquisitions, where the Grants Unit can transfer funds to the grantee one business day prior to the closing date through an EFT.
* All pre-closing documentation must be submitted at least **ten business days** in advance of the closing date in order to allow the Grants Unit to review the paperwork, notify the grantee of any missing or incomplete land acquisition documentation, and process the request.

### Reimbursement Timeframe

Grantees should expect to be reimbursed within 30 days of the DNR receiving a complete reimbursement request.

* If documentation to process the request is missing, or the request has discrepancies or incorrect information, the 30-day clock does not start until all necessary information has been submitted to the DNR.
* The timeframe does not apply to reimbursement requests that are not submitted on at least a quarterly basis.
* If work/accomplishment plan updates or progress reports are past due to either the LSOHC or the LCCMR, the DNR will withhold reimbursement payments for that project until the grantee is in compliance.

### Frequency of Submission

Grantees must submit reimbursement requests at least annually while grant work is being done and expenses have been incurred. If the grantee has not yet incurred costs, no reimbursement request is required.

### Final Reimbursement

* The final reimbursement will be paid out when the State determines that the Grantee has satisfactorily fulfilled all the terms of their grant agreement, unless otherwise excluded by the State in writing.
  + The State must complete a financial reconciliation on all grants over $50,000 prior to approving the final reimbursement request. If a final reimbursement request is also the first request, this may delay payment.
  + The final report must be approved by the LCCMR or the LSOHC prior to payment of the final reimbursement request unless the grantee receives prior approval from the DNR in coordination with LCCMR/LSOHC staff to waive that requirement.

# Reimbursement Payment Request Documents

The reimbursement payment request is comprised of four sections.

## Project Reimbursement Payment Request Form

This form must be completed and signed by an individual who is authorized by the organization to submit payment requests. It is required for all payment requests, including land or conservation easement acquisitions.

## Reimbursement Spreadsheet

The Reimbursement Spreadsheet provides information on the starting budget amounts, total reimbursements to date, current requested reimbursement amount, and the remaining balance of funds available.

* Each funding source has a different spreadsheet. Only use the ENRTF spreadsheet for LCCMR projects, and the OHF spreadsheet for all LSOHC projects.
* Line items (categories) on the spreadsheet must match the line items from the approved work /accomplishment plan budget.
* Only approved budget items (expenses) will be eligible for reimbursement.
* Please note the [guidance on allowable expenses documents](https://www.lccmr.leg.mn/pm_info/2019/2018-07-23_eligible_expenses.pdf) on the LCCMR’s website and the [budget line item definitions](http://www.lsohc.leg.mn/manager_info/index.html) on the LSOHC’s website.

### Project Activity Summary Spreadsheet

The Project Activity Summary Spreadsheet provides a detailed summary of all expenses on the reimbursement payment request. The spreadsheet highlights the transaction date, description of the charges, the amount requested, and the approved budget categories for each expense.

### Reimbursement Documentation

Each reimbursement payment request must include back-up documentation for all expenses. This documentation may include receipts, invoices, and time (payroll) records. The documentation should show that the expenses were allowable costs and happened within the time period of the payment request. Specific documentation is required for land acquisitions. Land acquisition reporting requirements are listed in the grant agreement, in Attachment E.

* All invoices must explicitly state the date(s) that the services were performed. The date must fall within the period of the reimbursement payment request.
* Documentation for salary expenses includes time or payroll records for the payment request period. All employees working on a project should track number of hours worked on the project.
  + Timesheet elements include the period worked (date range of work performed), name of the employee, rate of pay, hours worked, and benefit rate. The original time records must be available for review if requested.
  + All vacation (paid time off), sick, and holiday benefits are eligible for reimbursement on a proportional level. Please contact your assigned Grants Specialist for more information.
* The following information must be added to (or written on) the copies of receipts, invoices, time records or other documentation:
  + Budget line item the expense is being posted to, such as personnel, equipment, travel, etc.
  + Activity number the expense is being posted to (ENRTF only).
  + Check number or payment number that was used to pay for the receipt, invoice, or payroll. This number should match up with payment documentation such as a bank statement or other proof of payment.
  + If the documentation has expenses for more than one activity and/or budget item, mark which elements of the documentation are posted to the activity and budget item.
  + If the documentation has non-project expenses on it, be sure to circle the expenses being posted to the project along with the activity and budget item.

### Expedited Reimbursement Documentation

Grantees with a history of clean reimbursement requests and no findings on their most recent monitoring do not have to send in receipts for equipment, supplies, and travel with their payment requests. Grantees must continue to keep all receipts in your folders, for review at annual monitoring.

Grantees only send in invoices/receipts/other proof of expenses in these categories with payment requests:

* + Contracts
  + Land Acquisition
  + Capital Equipment
  + Expenses over the bidding threshold in all categories.

To access this policy, grantees must have:

* + no findings in their most recent monitoring, and
  + no questioned costs over their last four reimbursement requests, in a span at least six months.

Once grantees meet this standard, their grant specialist lets them know that they can stop sending in receipts. If a grantee has questioned costs or findings, the grant specialist may require full receipts on future payment requests.

### Submission of Reimbursement Payment Requests

Please send one copy of the reimbursement request to your designated Grants Specialist, via e-mail. Starting in Fiscal Year 2021 we will only accept electronic submissions for all grant reimbursements. Where possible, please ensure electronic documentation is in an accessible format.

# Documents to Be Kept on File

The grantee must maintain all project agreements, correspondence, and the records pertaining to project expenses requested for reimbursement in a separate project file. Project records are required for monitoring/audit purposes and must be readily available for review.

## Retention Period

All records related to the project must be retained for a minimum of six (6) years from the grant agreement end date, or the receipt and approval of all final reports, whichever is later. For OHF grants that have restoration and enhancement end dates, grantees may contact their grant specialist to discuss the possibility of a close-out amendment to set the end date for purposes of retention.

### Proof of Payment

The State requires proof of payment documentation to ensure that funds are being provided on a reimbursement basis.

The grantee must maintain proof of payment documentation and make it available when requested by the State. Proof of payment documentation may include:

* a copy of a bank statement with small photocopies of cleared checks
* an electronic bank statement
* a copy of cancelled check(s), or other certified financial records
* employee original time records and payroll documentation.

The State may conduct a proof of payment review during grant monitoring or for any reimbursement request submitted by the grantee throughout the grant period if necessary. No additional reimbursement requests for that project will be processed until the proof of payment for the request being reviewed is submitted and approved.

### Background Checks

All ENRTF grantees that conduct a project that provides children’s services, as defined in Minnesota Statutes Sec 299C.61 Subd.7, must perform criminal background checks for background check crimes, as defined in Minnesota Statutes, section 299C.61, Subd. 2, on all employees, contractors ,and volunteers who have or may have access to a child to whom children's services are provided. Grantees should keep this documentation in the project file, for review at annual monitoring.

# Vendors and Subcontractors

Subcontractors include other organizations and/or businesses that perform services identified in the work/accomplishment plan. Vendors provide supplies or materials to the project. Both must be selected based on contracting/purchasing procedures. Transparency, fiscal control, and accountability are key reasons why the State requires grantees to be thorough in the solicitation and selection of subcontractors and vendors.

*Each executed subcontract must include the amount of the subcontract, the length of the subcontract, and all elements of the grantee’s contract with the State.*

#### Contracting and Bidding for Municipalities

Municipalities as defined in Minnesota statute 471.345, subdivision 1 must follow the [Uniform Municipal Contracting Law.](https://www.revisor.mn.gov/statutes/cite/471.345)

#### Contracting and Bidding for Non-Governmental Organizations

Non-governmental organizations may either:

* submit a copy of their contracting policies for review to the State’s Authorized Representative, through the use of Attachment B (Non-Governmental Organization Subcontracting) to their grant agreement;
* or follow the contracting policies/procedures below.

##### Contracting and Bidding Thresholds and Process

* Any services and/or materials that are expected to cost $100,000 or more must undergo a formal notice and bidding process.
* Services and/or materials that are expected to cost between $25,000 and $99,999 must be competitively awarded based on a minimum of three (3) verbal quotes or bids.
* Services and/or materials that are expected to cost between $10,000 and $24,999 must be competitively awarded based on a minimum of two (2) verbal quotes or bids or awarded to a targeted vendor.
* Grantees must use a Request for Proposal (RFP)/Request for Quote (RFQ) process to competitively select professional and technical services.
* The advertisement for bid processes must allow for fair competition among potential qualified bidders.

##### Debarment

Grantee must not contract with vendors/subcontractors who are on the on [State’s debarment list](http://www.mmd.admin.state.mn.us/debarredreport.asp): <http://www.mmd.admin.state.mn.us/debarredreport.asp>.

##### Targeted Vendors

Grantees must take all necessary affirmative steps to assure that targeted vendors from businesses with active certifications through the entities below when possible. Please contact your grant specialist for assistance the first time you go through this process:

* [State Department of Administration's Certified Targeted Group, Economically Disadvantaged and Veteran-Owned Vendor List](http://www.mmd.admin.state.mn.us/process/search/)
* Metropolitan Council’s Targeted Vendor list: [Minnesota Unified Certification Program](https://mnucp.metc.state.mn.us/)
* Small Business Certification Program through Hennepin County, Ramsey County, and City of St. Paul: [Central Certification Program](https://www.stpaul.gov/departments/human-rights-equal-economic-opportunity/contract-compliance-business-development/central)

##### Conflict of Interest

The grantee must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees or board members engaged in the selection, award and administration of contracts. This written standard may be requested during monitoring.

##### Single/Sole Source

The State may waive bidding process requirements when it is determined there is only one legitimate or practical source for such materials or services and that grantee has established a fair and reasonable price. Single and sole source grants or contracts are used when only one entity is reasonably able to meet a grant’s intended purpose and objectives, due to their geographic location, specialized knowledge, relationships or specialized equipment.

To seek a single/sole source waiver, the grantee must complete a [Grant Single Source Justification Form](http://www.dnr.state.mn.us/grants/passthrough/fl/index.html), available on the pass-through grants website, and submit it to the State’s Authorized Representative for signature and approval. If approved, the Grantee must keep the executed copy on file.

##### Supporting Documentation

The grantee must maintain support documentation of the purchasing and/or bidding process utilized to contract services in their financial records, including support documentation justifying a single/sole source bid, if applicable.

Grantees must retain, in the project file:

* copies of the executed subcontract agreements
* a copy of the bid tabulation (if applicable),
* written documentation that describes the rationale for selection of the subcontractor, and
* documentation of the contract/bid approval if required by grantee internal controls (such as meeting minutes.)

This documentation may be reviewed during the monitoring visit or when requested by the State.

##### Prevailing Wage

For projects that include construction work of $25,000 or more, prevailing wage rules apply per [Minnesota Statue 177.41](https://www.revisor.mn.gov/statutes/?id=177.41) through [177.44](https://www.revisor.mn.gov/statutes/?id=177.44). Consequently, the bid request must state the project is subject to prevailing wage. These rules require that the wages of laborers and workers should be comparable to wages paid for similar work in the community as a whole. A prevailing wage form should accompany these bid submittals.

Grantees must retain documentation in the project file either of the prevailing wage forms, or a notice from the Department of Labor and Industry that the project is not subject to prevailing wage.

# Cost Category-Specific Requirements

## Equipment

Records for grantee-owned equipment used on a project must include the time actually used for the project and the computation used to arrive at the charged use rate. Use rates are subject to review by DNR.

#### Capital Equipment

Capital equipment purchased with grant funds must be:

* listed in the approved work/accomplishment plan prior to purchase
* tagged, maintained in an up-to-date directory, and available for review.

### Land Acquisitions

* Any project that is subject to the land acquisition reporting requirements of Attachment E (Land Acquisition and Reporting Procedures) will be held to the most current version of Attachment E.
* The Grants Unit can transfer funds to the grantee one business day prior to the closing date through an EFT.
* All pre-closing documentation must be submitted at least ten business days in advance of the closing date in order to allow the Grants Unit to review the paperwork, notify the grantee of any missing or incomplete land acquisition documentation, and process the request.

#### Fourth Year Land Acquisition

In order to be reimbursed for land acquisitions that occur in the fourth fiscal year, the grantee will notify the State that a binding purchase agreement has occurred before the end of the third fiscal year.

* Notify your grant specialist that you intend to have a binding agreement in place by June 30 of the third year.
* Provide proof of that agreement no later than July 15 of the fourth year.
* Failure to do so may significantly affect payment. In that case, notify your grant specialist as soon as possible of the binding agreement.

#### Use of Funds

For all acquisitions that require DNR services, the grantee must submit a Use of Funds letter, as outlined in their grant agreement, to pay for the DNR’s services. Funding must be available in the “DNR Land Acquisition Costs” (OHF) or the “Other DNR acquisition, reporting, and management”(ENRTF)budget line item in the approved work/accomplishment plan to pay for these costs.

Please see Attachment E of the grant agreement for step-by-step land acquisition procedures and requirements.

### Materials and Services

Materials and services are eligible expenses when they are purchased by the grantee to achieve outcomes/activities stated in the work/accomplishment plan and reflected in the approved budget. Typical examples of material/service purchases include hardware, paint, lumber, sand/gravel, concrete, landscape materials, and signs.

In order to request reimbursement for materials and services, the grantee must have an invoice from the vendor. The invoice and the copy sent in with the reimbursement payment request must be legible and include the following items:

* Name and address of the vendor;
* Date the item or service was purchased;
* Date the service was performed;
* Quantity of item(s) purchased or hours worked;
* Description of item(s) or services purchased;
* Unit price/Prorate;
* Total amount of the line item.
* Please also add the following information to the invoices:
  + The activity number that the expense is being posted to.
  + If a portion of an expense is being posted to more than one activity or budget line items, please include that information on the invoice (ENRTF only).
  + The budget line item (or category) the expense is being posted to. Examples include expenses identified as “travel”, personnel”, “equipment”, etc.

### Travel

Travel must be included in the approved work/accomplishment plan and budget in order to be eligible for reimbursement. Out of state travel is an ineligible expense for both ENRTF and OHF projects unless explicitly approved in the work/accomplishment plan.

Travel expenses must follow Commissioner’s Plan guidelines in order to be eligible for reimbursement. The [Commissioner's Plan Website](http://mn.gov/mmb/images/Commissioner%2527s%2520Plan%2520%255BComplete%2520Plan%255D.pdf) includes mileage and meal reimbursement rates and guidelines in Chapter 15 – Expense Reimbursement. Information on travel expenses can also be found on the [Travel Reimbursement and Documentation Guide](https://files.dnr.state.mn.us/assistance/grants/passthrough/travel-guide.pdf) available on the DNR Pass-Through grant website.

# Contact Information

Minnesota Department of Natural Resources

Office of Management and Budget Services, Grants Unit

500 Lafayette Road St. Paul, MN 55155-4010

[Pass-Through Grants Website](http://www.dnr.state.mn.us/grants/passthrough/index.html)

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# APPENDIX

# Reimbursement Request Checklist

The checklist contains the items that must be included with the reimbursement request. Please use the checklist to ensure that the payment request is complete.

**For all projects, the Grantee must submit the following:**

1. \_\_\_ **Section 1: Project Reimbursement Payment Request Form**

This document must be dated and signed by an appropriate representative for the grantee. Please complete the form and include the name of the project, the SWIFT purchase order number (300000XXXX), the sequence of the request (for example, the first request would be #1), and the period of time the request covers.

1. **\_\_\_\_Section 2: Reimbursement Spreadsheet**

The Reimbursement Spreadsheet will need to be customized to include the budget items and outcomes/activities from Attachment A, the approved work/accomplishment plan. This will help track budget line items to ensure funding is being expended by budget categories.

1. \_\_\_\_ **Section 3: Project Activity Summary Spreadsheet**

The Project Activity Summary Spreadsheet should include the date range of reimbursable activity, the transaction date, the approved budget category for each charge and the amount requested, along with a brief description of the reimbursable items.

1. \_\_\_\_ **Section 4:** **Reimbursement Documentation**

Submit copies of receipts, invoices, and time records (payroll).This information is necessary to determine if the expenses are eligible for reimbursement. Please write the activity number, budget item title and payment information (such as check number, bank statement) on the receipt/invoice document submitted. This information is needed to determine what part of the project the expenses are being directed to.

1. \_\_\_\_ **Section 5:** **Acquisition Documents (if applicable)**

Specific documentation is required for land acquisitions. Please see your grant agreement to view your land acquisition reporting requirements.