

Appendix J

DOCUMENT RETENTION, FUNDING, REIMBURSEMENT, AND CLOSE OUT REQUIREMENTS FOR ALL PROJECT CATEGORIES

A. DOCUMENT RETENTION IN SUPPORT OF EXPENDITURES – ALL CATEGORIES

With the exceptions noted below, all documents in support of project expenditures must be retained in the agency/entity project file. Such documents should be made available to help entities respond to questions regarding funding requests, for review during SNPLMA Program Manager project reviews, and for formal audit purposes. The exceptions to retention within the project file are:

- credit card statements,
 - travel vouchers,
 - time sheets, and
 - vehicle logs and reports.
- Although time sheets are not required, the project file should include a list of the agency/entity staff working on and charging labor to the project and their function relative to the project.

The excepted documents should be maintained in other appropriate agency/entity files as dictated by agency/entity policy.

- Although the excepted documents themselves are not retained in the project file, the annotated financial reports explaining these expenditures should be retained in the project file (see D.3.b. below).

Agencies and entities should be aware that they could be asked to produce the excepted documents during a formal audit.

B. TO INITIATE PROJECT FUNDING

1. **Secretary's Requirements for Expenditure of Funds:** All projects, regardless of the method of funding, must complete and receive approval of a Project Workplan and meet all other Secretary's Requirements for authorization to expend funds before project funds can be provided. (See "Secretary's Requirements for Authorization to Expend Funds.")
2. **General Requirements to Initiate Project Funding:** In addition to the requirement for an approved project workplan, agencies/entities must submit a written request to initiate funding for the project and submit required documentation.
3. **Quarterly Reporting Transmittal/Project Initiation Request Letter:** The request to initiate project funding must be submitted in writing on agency letterhead signed by an authorized manager and addressed to the SNPLMA Division. **The request should be submitted as part of a regularly scheduled quarterly reporting process whenever possible.** This can be done by

including the appropriate information in the quarterly report transmittal letter (see below and Appendix J-1). When initiating a new project, the transmittal letter should request workplan approval if not already approved in a prior quarter, request initiation of the appropriate financial instrument and include the required documentation outlined in B.5 below.

The quarterly reporting transmittal/project initiation request letter should include the following as indicated:

- a.** Confirm an understanding that the project information in the quarterly report, including the project workplan, will be shared with the public via the SNPLMA website.
- b.** Indicate the total amount requested for transfer, reimbursement, direct charge, or ASAP draw down (see section D. below for reimbursement requirements). Certify that the total/current amount requested for each project does not exceed the amount available. If requesting funds for multiple projects attach the Funding Request Report(s) table(s) from the database which identifies the projects by name, round, priority, and amount requested.
 - i.** For projects requesting initiation, provide the project category, project name, priority number, project number, total amount available for projects, and, if applicable, the amount of funding being requested in the current quarterly report.
 - ii.** Projects requesting initiation of project funding in the transmittal letter may not include requests for reimbursement/payment for work already completed because work on the project performed prior to written workplan approval and the execution and receipt of the appropriate financial instrument by the agency/entity is not reimbursable/payable by SNPLMA.
 - iii.** In addition, agencies/entities should confirm their understanding that funds requested by transfer, direct charge, or ASAP drawdown for projects requesting initiation will not be provided until the workplan is approved and the appropriate financial instrument has been executed and received by the recipient agency/entity.
- c.** Confirm that the projects identified in the quarterly report are being/will be carried out in compliance with all the policies, procedures, and guidelines in the current SNPLMA Implementation Agreement, Federal Acquisition Regulations (FAR), Section 106 consultation requirements under the National Historic Preservation Act (if applicable), the terms and conditions of the financial instrument (IAA, BLM task order, Assistance Agreement, transfer documentation) and, as appropriate, one or more of the following:
 - i.** Agency/entity contracting and construction policies
 - ii.** Agency Memorandum of Understanding concerning SNPLMA Lake Tahoe Restoration Projects (for Lake Tahoe projects only), and/or
 - iii.** The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (PL-910-646) and other agency real property acquisition policies.
- d.** Confirm that all funds requested and previously provided will be/are being utilized only for the projects for which they were approved by the Secretary of the Interior as described in the nominations.

- e. Confirm that all funds will be/are being allocated and accounted for by project.
 - f. Transferred funds will be obligated and/or expended within the quarter for which they are requested, and/or within three months of receipt.
 - g. The amount reported by project as obligated and/or expended in the Quarterly Report from funds previously provided is correct and accurate as of [date].
 - h. Confirm an understanding that Federal regulations require retention of records that document expenditures of funds (e.g., receipts, invoices, contracting documents, etc.), and that the agency/entity will retain/is retaining such supporting documentation and expenditure records in the project file or other appropriate file (see A. above) as expenses are incurred and will make them available for periodic project review by SNPLMA and for project closeout or termination, as well as for formal audit purposes.
 - i. Confirm that the financial reports retained in the project file will be/have been annotated to explain expenses for documents excepted from retention in the project file by SNPLMA policies (see A above and D.3.a below) and acknowledge that the agency/entity could be asked to produce the excepted documents for formal audit purposes.
 - j. Confirm that a list of staff charging payroll to the project and the function/role of each in carrying out the project is included/will be included in the project file (see A. above).
 - k. Provide a contact name, phone number, and email address in case there are questions about the request or content of the quarterly report.
4. **Limitation on Initial Funding Request:** Projects approved beginning with Round 10 and forward are not to include any contingency funds in the total amount requested for the project. Round 10 projects and forward must request use of contingency funds, if approved for the category, according to the process and limitations explained in Section X.E. of the IA. (See the IA-Part I for a complete explanation regarding the process for requesting use of contingency funds.)

To minimize time required to make contingency funds available to reimbursable projects, contingency amounts, where approved by the Secretary, will be obligated on initial IAAs and Assistance Agreements rather than requiring contract modifications to add the funds later. However, agencies/entities may not utilize those obligated contingency amounts until after use of the contingency funds has been approved in writing by the SNPLMA Division. BLM Task Orders and transfer authorization letters will not include contingency funds because these financial instruments can quickly be modified by the SNPLMA Division to reflect approval for the use of contingency funds.

5. **Initial Funding Documentation Requirements:** The following documents are to be attached to the letter requesting initiation of project funding or enter into Grants.gov, as appropriate, for all projects regardless of the whether the project is funded by reimbursement, direct transfer, ASAP drawdown, or BLM direct charge.

- a. For All Categories:** Attach the following to the letter requesting project initiation:
- i. Updated Estimated Necessary Expense Sheet (See B Appendices)
 - ii. Workplan if one was not submitted and approved as part of the current or a prior quarterly reporting cycle. (Work with the appropriate SNPLMA Program Manager for how to prepare a workplan outside of the normal quarterly reporting cycle.)
 - iii. Updated detailed budget/cost estimate if one was required in the nomination.
- b. For Non-Federal Projects funded by Assistance Agreement (PTNA; MSHCP; and certain Lake Tahoe, ENLRP, and Hazardous Fuels projects):** Enter the following into Grants.gov:
- i. Standard Form 424 Application for Federal Assistance
 - ii. For Non-Construction Projects (e.g., land acquisitions for PTNA projects, fuels treatments, etc.):
 - 1. Standard Form 424A Budget Information – Non Construction, and
 - 2. Standard Form 424B Assurance – Non-Construction
 - iii. For Construction Projects (e.g., picnic pavilion, shade structures, restrooms)
 - 1. Standard Form 424C – Budget Information – Construction, and
 - 2. Standard Form 424D Assurance -- Construction Program
 - iv. Certification Regarding Lobbying (See Appendix J-2)
- c. For PTNA Projects:** Attach a copy of a “Willing Seller Letter” to the letter requesting project initiation in those instances where an acquisition of a specific right-of-way, easement, or parcel of land is needed to complete the project but the acquisition was not identified in the nomination and thus no willing seller letter was included with the nomination.
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C. TO REQUEST QUARTERLY FUNDING

1. After initiation of the project, future funding needs are to be submitted through the SNPLMA quarterly reporting process and summarized in the quarterly report transmittal memo in accordance with Section X.B. “Quarterly Reports” of the SNPLMA Implementation Agreement. This includes requests for direct transfer, reimbursement requests for the previous quarter (IAA or BLM reimbursable task orders), estimated ASAP drawdowns, and BLM direct charges for the upcoming quarter. Requirements to request purchase funds for land acquisitions are addressed in section E. below.
2. The quarterly database submittal is to include a transmittal letter as described in B.3., above. Also include in the transmittal letter:

- a. Justification for the current amount requested by transfer or ASAP drawdown if the amount of previously transferred or drawn down funds that has been expended and/or obligated by the agency/entity is less than 95 percent of the total provided.
 - b. An explanation for disproportionate requests for funds when compared to progress reported and percent complete of deliverables. For example, 20 percent completion on only two of five deliverables coupled with a funding request that would result in providing 80 percent of the total amount available would require an explanation as to how previous funds provided have been used and why additional funds are needed at this time.
3. The SNPLMA Division will review the quarterly status reports and must approve the funding requests. Incomplete or inadequate quarterly reporting submittals and delays in receiving responses to requests for additional information can result in delays in receiving funds.
 4. If an urgent, unexpected need for project funds develops outside of the normal quarterly reporting cycle occurs (off-cycle), the agency/entity may submit an off-cycle funding request to the SNPLMA Program Manager. Such off-cycle requests must include the same confirmations outlined in C.2. above, and a thorough explanation of why funds are needed now and cannot wait until the next regular quarterly reporting cycle. Such requests will be processed outside of the normal quarterly report cycle if necessary to meet the Agency's funding needs.
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D. TO REQUEST REIMBURSEMENT (For Projects Under an IAA or BLM Reimbursable Task Order)

1. **Support Documents for Expenditures Not Required.** Projects funded by reimbursable agreements are not required to submit invoices, receipts, contracts, credit card statements, time sheets, travel vouchers, government vehicle logs and reports, contractor releases, agency completion reports, or other such supporting backup documentation for expenditures in order to receive reimbursement. *[Per EC Decision Memorandum approved 8/1/2011.]*

NOTE: Projects funded by BLM task order that charge necessary expenses directly to the category subactivity (5851, 5852, etc.) against the project number (work breakdown structure – WBS), projects funded by Assistance Agreement, and projects funded by 1151 direct transfer also do not have to submit expenditure support documents. (See A. above regarding expenditure documentation retention.)

2. **Reimbursement Request Letter:** If the request for reimbursement is submitted separately from the quarterly reporting submission, a reimbursement request letter on agency letterhead signed by an authorized manager and addressed to the SNPLMA Division is required. The letter should include at a minimum items B.3., b, c, d, e, h, i, j, and k above. These items can be modified in the letter as necessary to reflect reimbursement of funds expended versus requests for new funding.
3. **Required Documentation for Projects under IAA and BLM Reimbursable Task Orders**
 - a. Submit a current copy of the agency's financial report for the project showing obligations and expenditures.

- b. Annotate the report to show purpose of credit card purchases, travel, and official vehicle use (regular repeated use of official vehicle for the same purpose need be entered only once).
 - c. Financial reports may be in summary format by category of expense if appropriate given the nature of the project.
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E. TO REQUEST PURCHASE FUNDS FOR LAND ACQUISITIONS

These requirements are applicable to the Environmentally Sensitive Land Acquisition and PTNA categories as well as any other category that may be authorized now or in the future to acquire land for given purposes using SNPLMA funds.

Agencies/entities are not to request transfer or draw down of purchase funds (the bulk of the acquisition funds) until needed to close the transaction and convey title.

1. The quarterly report transmittal letter or off-cycle request for purchase funds letter should include the following:
 - a. Confirmation of agreement on price with the seller and that the agency/entity is ready to complete the transaction and utilize purchase funds within the quarter requested.
 - b. Confirmation that no health, safety or other liabilities were found to exist on the property which would negatively impact the intended use or prohibit the intended use of the property.
 - c. Confirmations regarding hazardous materials assessment (e.g., Phase I Environmental Site Assessment):
 - i. The assessment was completed.
 - ii. The assessment report was reviewed by a qualified environmental professional.
 - iii. No recognized environmental concerns (RECs) were identified. If RECs were identified, explain the nature of the REC and the level of cleanup required.
 - iv. Whether reporting to the Nevada Department of Environmental Protection (NDEP) was required and, if so, confirm that NDEP provided a “no further action required” letter following the cleanup.
 - d. Confirm whether compliance with the National Environmental Policy Act (NEPA) was required and, if so, the level of documentation completed and the date completed.
 - e. Confirm that the agency/entity completed a determination regarding the applicability of relocation assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 CFR Part 24, Final Rules Effective February 3, 2005). If relocation was required, briefly explain the nature of the relocation assistance provided and the cost.
2. Agencies/entities must include a copy of the appraisal review and value approval document as evidence that the amount of purchase funds being requested is consistent with the value approved

through a Federally approved appraisal or, for local entities, an appraisal obtained in accordance with the requirements in the SNPLMA IA.

3. Requests to transfer draw down, or direct charge purchase funds outside of the normal quarterly reporting cycle (“off-cycle request”) must include the same confirmations required in a transmittal letter as outlined in D.2., above as well as the confirmations in E.1 above, and the documents listed in E.2 above. Such requests will be processed outside of the normal quarterly report cycle (off-cycle) if necessary to meet the Agency’s deadline to complete the acquisition.
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F. TO REQUEST PROJECT CLOSE OUT (Completed and Terminated Projects)

Once an agency/entity has completed a project including finalizing all contract closeouts, conducting final inspections or reviews, and reconciling financial records for necessary expenses, it will submit a request to close out the package with required documentation to the BLM SNPLMA Division. Information to be included in the closeout request letter and documentation requirements for the closeout package were modified in August 2011 based on decisions made by the SNPLMA EC to make the closeout process more efficient.

1. **Closeout Request Letter.** The closeout package is to include a letter specifically requesting closeout of the project that includes the following:
 - a. Confirm the project was completed as described in the approved nomination or, beginning with Round 13, as described in the nomination Purpose Statement and, if applicable, as modified by any approved changes of scope.
 - b. Confirm that all deliverables identified in the Project Workplan have been completed and their completion status and project accomplishments have been reported in the most recent SNPLMA Quarterly Report database or will be reported in the next available reporting database.
 - c. For closeout of terminated projects, confirm that the Workplan has been updated to reflect the percent complete on all deliverables initiated prior to termination of the project.
 - d. If the project is being closed out due to termination, the letter must reference the date notice of termination (including the reason for termination) was sent to SNPLMA. If prior notice was not provided, the project closeout request letter needs to explain the reasons for termination.
 - e. Confirm agency/entity has received a contractor/implementer/sub-contractor Notice of Completion and Release of Claim form for all contracts entered into to carry out the project, when applicable.
 - f. Confirm that the agency/entity has completed any final project inspection/acceptance report required by its policies and procedures. (For completed projects only.)
 - g. Indicate the amount of any final transfer, reimbursement, direct charge, or ASAP draw down, if any, being requested as part of the project closeout package.

- h.** Indicate the total amount expended and the amount of any unused funds to be returned or deobligated.
- i.** Certify that the total amount expended plus any final amount requested for the project does not exceed the total amount available.
- j.** Confirm that the project was carried out in compliance with all the policies, procedures, and guidelines in the current SNPLMA Implementation Agreement, Federal Acquisition Regulations (FAR), Section 106 consultation requirements under the National Historic Preservation Act, the terms and conditions of the financial instrument (IAA, BLM task order, Assistance Agreement, transfer documentation), and the following, as applicable to the project:
 - i.** Agency/entity contracting and construction policies,
 - ii.** Agency Memorandum of Understanding concerning SNPLMA Lake Tahoe Restoration Projects (for Lake Tahoe projects only), and /or
 - iii.** The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (PL-910-646) and other agency real property acquisition policies.
- k.** Confirm that all final funds requested and previously provided were utilized only for the project being closed out.
- l.** Confirm that per Federal regulations all documents supporting project expenditures have been retained in the project file or other appropriate file (e.g., receipts, invoices, contracting documents, etc.—see A. above) and are available for review by SNPLMA as part of a final project review and will be maintained and available in the case of a formal audit.
- m.** Confirm that the financial reports retained in the project file have been annotated to explain expenses for documents excepted from retention in the project file by SNPLMA policies (see A. and D.3.b above) and acknowledge that the agency/entity could be asked to produce the excepted documents for formal audit purposes.
- n.** If contributed funds were claimed in the nomination, confirm that \$XXX dollars were received in cash contributions and/or \$XXXX dollars were received through in-kind contributions (e.g., agency labor not charged to the project, volunteer hours, etc.) consistent with the commitments made in the nomination. If the contributions were less than the amount committed to in the nomination, provide an explanation.
- o.** Confirm that a list of staff charging payroll to the project and the function/role of each in carrying out the project is included/will be included in the project file (see A. above).
- p.** For land acquisitions confirm that the agency/entity has obtained a title insurance policy with liability coverage equal to the purchase price or, for Federal agencies only, in compliance with Department of Justice standards.
- q.** Regarding Project Equipment (See Appendix B “Necessary Expenses” for more information on project equipment):

- i. Identify the equipment and its project function.
 - ii. Certify the percent utilized by the project and the time period required by the project.
 - iii. Note whether equipment was previously leased, newly leased or purchased, and explain circumstances where purchase resulted in a savings over the cost of leasing.
 - iv. In the case of purchased equipment, the closeout request should certify the “per unit fair market value” including the source or method for determining the value and, if necessary, the final funding request should make appropriate deductions from expenditures.
 - v. In the case of leased equipment, certify that the lease has been terminated and/or lease costs transferred to another funding source.
- r. Provide a contact name, phone number, and email address in case there are questions about the closeout request.

2. **Documentation Requirements for Project Closeout Packages.** If the information provided by the agency/entity per the requirements below is insufficient to clearly understand how the funds were used and what was accomplished, the SNPLMA Program Manager may request additional information.

- a. **Workplan Status Update Report in the SNPLMA Quarterly Report Database.** (This final update and the annual accomplishments as described in 2.b. below will meet the requirement referred to in some categories as a “Summary of Project Accomplishments.”)
 - i. Submit a copy of the final “Workplan Status Update Report,” reflecting completed deliverables and associated tasks and subtasks (e.g., 100%).
 - ii. Status comments where applicable, should include the quantity, size, etc., relative to the completed deliverables.
 - iii. For any deliverables not completed, the status comments for the deliverable should explain why it was not completed (e.g., removed, modified, or reduced via a change in scope).
 - iv. For terminated projects being closed out, the status report will indicate the percent completed on all deliverables which were initiated prior to a decision to terminate the project (i.e., 100%, 20%, etc.) and those which were only partially completed or not started. Level of completion of deliverables should be compatible with the explanation provided for termination of the project.
- b. **Annual Accomplishments:** The Annual Accomplishment section of the database is used to report overall project accomplishments upon completion and closeout of the project. During the July 2012 meeting, the EC authorized the use of a list of Performance Measures (PM) tied to the SNPLMA Strategic Plan for use in helping to quantitatively identify overall project accomplishments. (See Appendix J-3 for a more complete explanation and examples of PMs.)

- i. Upon completion of the project, the applicable PMs with applicable quantities, should be entered into the Annual Accomplishments section of the SNPLMA Quarterly Reporting Database (this section of the database will remain available all quarters to facilitate this closeout requirement).
- ii. Agencies/entities may enter additional information on accomplishments as appropriate to fully describe the accomplishments and how the project accomplished its purpose. (Note: Annual Accomplishments/Project Accomplishments are uploaded to the SNPLMA Project website and are available for viewing by the public, so take care to provide well thought out narrative descriptions of project accomplishments in addition to PMs.)
- iii. The reported PMs should reflect the project deliverables (i.e., outputs) identified in the nomination and/or Project Workplan regardless of the round (these outputs are identified as primary and anticipated deliverables beginning with Round 13 projects).

Links to the SNPLMA Strategic Plan and the list of Performance Measures are available on the SNPLMA website at <http://www.blm.gov/snplma>.

c. Financial Accounting for Use of Funds:

- i. All projects funded by inter-agency agreements (IAA/IGO), BLM task orders, and 1151 direct transfers submit a financial accounting of expenditures by providing:
 - a) A copy of the agency's final consolidated financial report for the project showing obligations and expenditures.
 - b) Annotate the report to show the purpose of contracts, credit card purchases, travel, and official vehicle use (regular repeated use of official vehicle for the same purpose need be entered only once).
 - c) Financial reports may be in summary format by category of expense if appropriate given the nature of the project.
 - ii. For all projects funded by Assistance Agreements, submit a financial accounting of expenditures by providing:
 - a) A final form SF- 425, Federal Financial Report
 - b) Final cost-tracking worksheet
- d. For PPP Projects, Conservation Initiatives, and MSHCP Where the Project Resulted in a Final Study or Report:** If an on-site review of the final study or report is not feasible, coordinate with the Program Manager to submit a full copy or summary and conclusions of the report in lieu of a final project review/inspection.
- e. For Environmentally Sensitive, PTNA, or other Land Acquisitions:** Submit a copy of the recorded deed.
- f. For Capital Improvements, ENLRP, Hazardous Fuels, and Conservation Initiatives:**

Submit photographs (no more than six), two per page, of the completed project when applicable based on the nature of the project. Also submit the photos electronically on CD.