Frequently Asked Questions (FAQs)

This document contains answers to common questions asked by recipients of Oregon Department of Forestry (ODF) Urban and Community Forestry (UCF) All Entities Subaward Program. While the list is not exhaustive, it is an informative resource reflecting the most current policies, procedures, and limitations that may emerge during the subaward's lifecycle. The UCF program will continue to update this document as new questions and policies arise.

Please reach out to your primary contact at ODF UCF with any questions that are not addressed here.

General Questions

1. **What is the status of ODF's subaward programs related to federal executive orders and associated grant funds?**

   The Department of Forestry is partnering with the U.S. Forest Service to ensure that the obligated funds are spent down and projects completed in the State of Oregon. Over the last 6 months and even during the prolonged federal shutdown, payments have been processed and promptly going out to subrecipients. The UCF program has now executed all subaward agreements and is helping partners proceed with grant activities. We are committed to promptly fielding your concerns, eliminating uncertainty, and minimizing risk for subrecipients wherever possible. As we become aware of any development that may impact your subaward, we will pass that information along promptly.

2. **How many proposals were awarded through the ODF All Entities subaward program?**

   In 2024, the All-Entities subaward program received 89 proposals totaling an estimated $45 million in funding requests. After undergoing eligibility reviews, 87 proposals made it into the final evaluation process, and 26 competitive proposals were selected to receive funding totaling $11.8 million. In addition, two foundational contracts were funded totaling $700,000, altogether totaling $12.5 million in awarded funds.

3. **Will there be another round of funding in the future?**

   The pool of applicants was highly competitive and the All-Entities subaward program allocated the entirety of the funding available in 2024. ***Consequently, there will not be another Call for Proposals as part of this federal funding allotment***.

   To learn about related funding opportunities, please visit the ODF UCF Subaward webpage and see Other Related Grant Opportunities on the righthand menu: [https://www.oregon.gov/odf/forestbenefits/Pages/ucf-subaward-programs.aspx.](https://www.oregon.gov/odf/forestbenefits/Pages/ucf-subaward-programs.aspx)

4. **When will All Entities Subaward Program funds be distributed?**

   Funds are eligible to be distributed after a recipient's subaward agreement has been executed, and only for work that occurs within the project's approved performance period. To date, all subrecipients have executed their subaward agreements with ODF UCF and are eligible to receive funds either through reimbursement or advance payment. Please see the Payment Options and Workflows section below for questions related to reimbursements and advance payments.

5. **When does ODF advise a recipient to publicly announce their All Entities Subaward Program award?**

   We recommend that organizations wait to publicly announce their success until their subaward agreement has been executed. All public releases of information should follow the terms of the prime award agreement.

   Recipients shall acknowledge ODF and US Forest Service support in any publications, audiovisuals, and electronic media developed as a result of this award. Follow directions in USDA Supplemental 2 CFR 415.2. Example language available online, https://www.fs.usda.gov/working-with-us/grants/partner-comm-products.

6. **Can an organization use ODF's logo for a presentation, publication, or flyer?**

   ODF Public Affairs permits the use of ODF's logo for subaward project material when referencing ODF as the funding sponsor. Two high-resolution logos are available: one in black and white, and the other in traditional ODF colors. Send an email to your UCF primary contact to receive the logo of choice. Please do not recolor or modify the original design of the logo. The acknowledgement conditions listed in question five are applicable to presentations, publications, flyers, or brochures.

Developing and Executing Subaward Agreements

1. **Can subrecipients request a project start date that is before their anticipated subaward agreement execution date?**

   Subrecipients can request their performance period start date to begin up to 90 days prior to the execution of the subaward agreement, and no earlier than the date of notice of award, January 15, 2025. Allowable, allocable, and reasonable expenditures for project activities that occur during this time window may be eligible for reimbursement once the subaward agreement has been executed.

   All costs incurred prior to the execution of the subaward agreement are at the subrecipient's risk, as there is no obligation by ODF to reimburse for activities that occurred without an executed subaward agreement. These risks are numerous, including expenditures not being in accordance with the subaward agreement, or failure to execute the subaward agreement.

2. **Subrecipients are required to complete a risk assessment before their subaward agreement can be executed. Will specific questions for the risk assessment be sent to recipients in advance to prepare staff and compile necessary documents?**

   Risk assessment questions can be sent in advance at the request of the subrecipient, allowing you to prepare by gathering the necessary documents and information to ensure accurate and complete responses. Please reach out to your UCF primary contact to receive this information.

3. Some risk assessment questions ask about any legal immunities held by the subrecipient. What are legal immunities?

Legal immunity is an exemption or protection from legal liability granted to individuals, organizations, or entities for specific situations. Insurance coverage applies when legal immunities do not fully protect the individual or entity from liability. For example, any organization that employs workers in Oregon is required to purchase workers' compensation insurance. This provides a level of protection (i.e., immunity) for both the organization and the employee if they happen to get injured on the job.

Allowable Activities and Expenses

1. Are pre-award costs eligible for reimbursement?

Pre-award costs are project expenditures that are made prior to the performance period start date. ***Pre-award costs are not eligible for reimbursement or advance payment expenditure in this subaward program.***

However, the performance period start date can begin up to 90 days prior to the execution of the subaward agreement, and no earlier than the date of notice of award, January 15, 2025. Please see the Developing and Executing Subaward Agreements section for more detail.

Subrecipients are also allowed to be reimbursed for replenishment of stock items that were used in approved project activities. For example, a subrecipient has tree stakes on hand that were purchased in bulk before the project performance period. The subrecipient uses some of these stakes for approved tree plantings as part of the subaward project. The subrecipient may now purchase and seek reimbursement for new tree stakes that replace the exact amount used for approved project activities.

2. Federal mapping tools that were made available during the application period are no longer available online. How can subrecipients ensure that project activities occur in approved geographies?

The federal mapping data is backed up on other public domain areas, and ODF currently hosts a mapping tool resource for reporting and compliance purposes: https://experience.arcgis.com/experience/a5df933edc2f48a3b80eb30e4d55fadc.

> ***Note:*** The UCF program reserves the right to update the ODF mapping tool at any time and will include any updates on the subaward program webpage.

3. How should subrecipients disburse stipends as part of the project work?

Stipends can be eligible for funding, but they require prior approval by ODF and the US Forest Service. According to 2 CFR 200.456, stipends are categorized as participant support costs. However, the regulations do not specify procedures for managing and disbursing these stipends. If a project intends to include stipends in its budget, it is essential to obtain pre-approval from the US Forest Service after the project has been approved.
Permitted stipends to project participants include one-time payments (e.g., checks, cash).

Subrecipients may also set up a trust account to disperse stipends according to the organization's policy. Gift cards, gas cards, and pre-paid credit cards are not an option for this subaward program.

4. **May subrecipients purchase equipment as part of this subaward?**

   Purchase of equipment is not allowed as part of this subaward. Please see Ineligible Costs on p. 8 of the Call for Proposals for a definition of equipment:

   > *Equipment purchases. Equipment is defined as an article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost of $5,000 or more per unit.*

   Equipment rentals are allowable and must be identified in subrecipients' budgets under the budget category 'Other Costs (equipment rentals and stipends).'

5. **May subrecipients use funding to replace supply stock items used for an approved activity, if the supply was purchased in bulk outside of the project's performance period?**

   Yes. See "Are pre-award costs eligible for reimbursement?" above for more detail.

6. **May subrecipients use federal funds to pay existing employees? What is the difference between "supplementing" and "supplanting" in the context of federal funds?**

   An organization cannot use federal subaward funds to replace funds that have already been budgeted for staff costs. This is called ***supplanting*** and is prohibited under federal grant rules. However, an organization can use subaward funds to ***supplement*** staff time or costs if the funding supports additional work related to the project/program that would not have been possible otherwise. For example, if an existing employee is using their time to work on subaward projects, they can bill those hours to the subaward as long as it's included in the proposed budget and approved by ODF.

   > ***Supplanting:*** Using federal funds to replace other funds that were already set aside for the same purpose – *not allowed*.
   >
   > ***Supplementing:*** Using federal funds to add to what's already available, such as covering extra costs for a project – *allowed*.

7. **Can an organization use subaward funds to pay a deposit or retainer for future work to be completed?**

   Deposits and retainers for professional service are allowed on a case-by-case basis as part of this subaward program. Timelines are subject to ODF approval and depend on the nature of the work conducted. Please reach out to your UCF primary contact to seek approval for deposits and retainer fees.

8. **Are political advocacy or community organizing allowable activities in this subaward program?**

   Subrecipients may not use subaward funds for lobbying activities. Lobbying activities are broad and include, but not limited to, grassroots advocacy, local political organizing, contacting legislators to recommend or influence local, State, or Federal legislation, or calling individuals to action to conduct these activities. 2 CFR 200.450(c) (i) to (iv) outlines restrictions for non-profits on lobbying and lists unallowable costs for certain lobbying activities.

Subrecipients may conduct non-partisan education, outreach, and technical information sharing. If a subrecipient wishes to engage in any lobbying activities outside the scope of this project, they must use other funding sources or volunteer in-kind hours.

Payment Options and Workflows

1. What are the payment options for subrecipients?

Two payment options are available to subrecipients: ***reimbursement*** or ***advance payment*** (2 CFR 700.7). See 2 CFR 200.305 for more information about federal payments. Regardless of payment option, funds cannot be dispensed to subrecipients unless they have an executed agreement.

Reimbursement claims must be submitted to ODF no more than once a month and no less than twice a year. However, ODF strongly encourages subrecipients to submit reimbursement on a quarterly basis, at the same interval that progress reports are due. See the Reporting and Monitoring section below for more information.

Advance payments must be expended within 90 days of their delivery. See "How do advance payments work?" below.

> ***Note*:** Claims from subrecipients for payments may have special conditions per 2 CFR 200.208 and expense requirements per Oregon Accounting Manual 10.40.00.

2. How can subrecipients submit a reimbursement claim and what information and documentation needs to be included?

Reimbursement claims are submitted via the UCF Subaward Portal in Webgrants.

Please see Claim Submission Tutorial (written or video) for instructions on to how submit a reimbursement claim through the UCF Subaward Portal.

Please see Claims 101: General Information and Supporting Documentation for a checklist of items that need to be included in each reimbursement claim.

3. How frequently should subrecipients submit reimbursement claims?

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4. How long will it take for subrecipients to receive payment?

ODF estimates that payments will be delivered to subrecipients 30-45 days after the subrecipient has submitted a reimbursement claim or advance payment request. During much of the year, subrecipients can expect to receive payments about 30 days after submission. However, ODF often experiences staffing shortages during the winter holidays (Thanksgiving – New Years Day) and wildfire season (variable, but as long as May – October). Payment delivery during these timeframes may take closer to 45 days.

Bear in mind that payment delivery is defined as the day that payment is released by ODF. If a subrecipient is enrolled in direct deposit, date of payment delivery and receipt should be identical, or nearly so. If a subrecipient has opted to receive payment via paper check, they will need to add several days to the timeframe to account for mail delivery. To learn more about setting up direct deposit, see "What can subrecipients do to ensure payments are successfully made between ODF and their organization?" below.

5. How do advance payments work?

ODF is actively developing a process for advance payment delivery and verification to provide eligible subrecipients with working capital. Below are the current terms (these are subject to change).

- The subrecipient must certify that advance payment is necessary to fund their project's operations.
- The subrecipient must submit an advance payment request through the UCF Subaward Portal in Webgrants to initiate the fund delivery process. ODF staff will review and either approve the request or follow up with the subrecipient to address any necessary changes. Once approved, funds will be delivered to the subrecipient.
- All funds received through advance payment must be fully expended within 90 days of the date of their delivery. Exceptions require prior approval by ODF and USFS.
- Once the subrecipient has spent all funds, they must submit an advance payment expenditure verification in the UCF Subaward Portal in WebGrants. Subrecipients will not be eligible to receive their next advance payment until they have completed this step.
- It is the subrecipient's responsibility to request advance funds in a timely manner to support the operational budget of this proposal.

Keep in mind it may take a subrecipient 30 or more days to prepare an advance payment request and may take 30 or more days for ODF to review, approve, and release payment.

Advance payment requests must be submitted in accordance with the advance payment request schedule negotiated between ODF and the subrecipient and formalized in the subaward agreement. All verifications of advance payments will be reviewed and processed by ODF before a new advance payment request is sent to USFS.

See Advance Payment Schedule Template for details.

6. **What happens if an advance payment is not fully spent within 90 days of their delivery to the subrecipient?**

   We recognize that unforeseen circumstances may prevent a subrecipient from expending an entire advance payment during the 90-day period. Please reach out to your UCF primary contact to seek approval for an advance payment extension. After reviewing your request, they will ask you to do the following:

   - To remain in compliance, the subrecipient must submit the advance payment expenditure verification no later than two weeks after the original 90-day expenditure deadline. The verification must include a description of the funds that have not been used and a projected timeline for spending the remaining funds.
   - The subrecipient will submit a formal modification request including an updated timeline to spend the remaining advance payment funds. ODF will review and approve this request.
   - Once the advance payment has been fully spent within the updated timeline, the subrecipient will resubmit an updated advance payment verification no later than two weeks after the new expenditure deadline.

   See Advance Payment Schedule Template and Amendments/Modifications Tutorial for more information.

7. **What can subrecipients do to ensure payments are successfully made between ODF and their organization?**

   Follow these instructions:

   - First, subrecipients should confirm that the fiscal contact from their organization is registered in WebGrants and OregonBuys.
     - If the organization is new to OregonBuys, email a copy of your organization's W9 to your UCF primary contact.
     - ODF will create a new account profile for the organization in OregonBuys and the State's Financial Management System.
   - Once an organization is registered in OregonBuys, the State will by default release payment by mail in the form of a paper check.
   - To receive payment via Direct Deposit, the subrecipient must fill out and submit an Automated Clearing House (ACH) form.
     - ***Note:*** Please mail the ACH form to Department of Administrative Services, following instructions on p. 1 of the form. ***This form will contain confidential financial information. Do not email it to anyone, including ODF staff.***

   See the State of Oregon's Vendor Direct Deposit webpage for more information

8. Do I need to sign up for direct deposit (ACH) if my organization is already receiving direct deposits from the State of Oregon for a different project?

No. If you are already receiving direct deposits from the State of Oregon through a separate contract or grant, you are not required to complete the ACH request form again. Direct deposit requests are account-specific, so the only time your organization will have to complete a new ACH request is if your organization switches financial institutions or would like to receive funds through a new financial account.

9. How are indirect costs reimbursed/distributed to subrecipients as part of this subaward program?

Where applicable, indirect costs should be calculated and claimed on each submitted reimbursement claim, advance payment request, or advance payment verification. If not, ODF cannot guarantee the subrecipient will receive the indirect costs that they have budgeted for.

Entities with Negotiated Cost Rate Agreements (NICRAs) should apply indirect costs per the NICRA listed in the subaward agreement. Entities without NICRAs should apply indirect costs per the de minimis indirect rate of 10%. Calculation of indirect costs should follow Title 2 CFR 200.400-200.476 (Subpart E – Cost Principles – May 2024).

The following direct costs are included in the indirect cost calculation:

Personnel, Fringe Benefits, Travel, Supplies, Contractual, Other Costs (excluding rentals, participant support costs, and stipends), and the first $25,000 of Subawards (i.e., sub-subawards).

The following direct costs are not included in the indirect cost calculation:

Other Costs including equipment rentals, participant support costs and stipends; and any portion of Subawards (i.e., sub-subawards) over $25,000.

Note: Indirect costs should be claimed on the first $25,000 of each sub-subaward. Only $25,000 of each sub-subaward is eligible for indirect costs, unless otherwise specified in the 2nd-tier subrecipient's NICRA.

Subrecipients need to calculate and claim indirect costs each time they submit a reimbursement claim, advance payment request, or advance payment verification to receive the full amount of indirect costs budgeted in the project budget.

Please see Claims 101: General Information and Supporting Documentation for a step-by-step guide to calculating and claiming indirect costs in WebGrants.

Reporting and Monitoring

1. What are the reporting requirements for the All Entities Subaward Program?

Subrecipients are required to submit progress reports to ODF on a quarterly basis. Progress reports are submitted through the UCF Subaward Portal in Webgrants and follow a standardized format. Progress reports are due 30 days after the end of the quarterly reporting period:

- Q1: Jan 1 – Mar 31 (progress report due Apr 30)
- Q2: Apr 1 – Jun 30 (progress report due Jul 30)
- Q3: Jul 1 – Sep 30 (progress report due Oct 30)
- Q4: Oct 1 – Dec 31 (progress report due Jan 1)

ODF strongly encourages subrecipients to submit reimbursement requests following the same schedule as progress reports.

See the Reporting Schedule and the Progress Report Submission Tutorial (PDF or video) for more information.

ODF is required to submit quarterly reports of program activities accomplishments to the US Forest Service, the federal agency funding the All Entities Subaward Program. ODF compiles the information provided in subrecipients' quarterly progress reports and submits it to USFS. To this end, subrecipients should only report information that they feel comfortable sharing with the federal government.

2. What is a desk review?

A desk review is part of ODF's subrecipient support and monitoring duty. This is a standardized process of reviewing documents and reports to understand subrecipients' performance and business compliance with organizational standards and State/Federal regulations. Desk reviews may be conducted virtually or in person, with questions sent to the subrecipient in advance of the desk review. Occasionally, a desk review will be organized to occur during a site visit. In these cases, the subrecipient will be contacted by ODF to schedule, allowing time to prepare beforehand.

Making Changes to a Subaward Agreement

1. Can changes be made the subaward agreement after it is executed?

Yes, changes to subaward agreements are allowed, contingent on ODF approval. Changes to a subaward agreement can include (but not limited to) the scope, budget, performance metrics, performance period, and contact details.

Please reach out to your UCF primary contact if you feel that a change to your subaward agreement is needed. Formal modification requests should be submitted via WebGrants following instructions in the Amendments/Modifications Tutorial. UCF staff will then review the request and walk the subrecipient through the following steps. Depending on the nature of the request, this could entail execution of a formal subaward amendment.

2. How long does it take for a modification to go into effect?

Depending on the nature of the request and responsiveness of the subrecipient, it can take several weeks for changes to be made in WebGrants, or for a first draft of a subaward amendment to be sent via email. Prompt response to any questions or requests posed by ODF will expedite this process.

All modification requests that are submitted to ODF are individually reviewed, approved, and executed by ODF staff. We appreciate your patience with this process. Modification requests that are deemed to be urgent will be expedited, while those that are less urgent will likely take more time to process. If a specific action cannot be performed until the modification is complete, please include this detail in your request.

> ***Example of urgent modification request:*** The subrecipient's reimbursement claim cannot be approved until a budget category is modified.
>
> ***Example of a less urgent modification request:*** The subrecipient's lead contact has retired and their replacement information needs to be added to the subaward agreement.

3. Is there a limit to how many amendments or modifications can be made to a subaward agreement?

No. As long as the content of any amendments and modifications are approved by ODF, there is no limit to how many may be requested over the lifetime of the subaward.

4. What should a subrecipient do if they need to submit a rebudgeting request?"

Subrecipient must seek pre-approval from ODF to ensure that funds are used in compliance with the award terms and applicable regulations, see § 200.308.

ODF has an internal control benchmark for rebudgeting requests. Subrecipients proposing budget changes of less than 10% of the total budget approved for the project/program is permissible. If the proposed budget changes exceed 10% of the total budget, the subrecipient must note if it will change the scope, timeline, outcomes or their ability to complete the approved project/program. All rebudget requests must provide justification for the proposed changes, including how it may improve project outcomes/deliverables. Submit an amendment/modification request in WebGrants following the Amendments/Modifications Tutorial.