Salmon Recovery Funding Board

Mission

The Salmon Recovery Funding Board provides funding for elements necessary to achieve overall salmon recovery, including habitat projects and other activities that result in sustainable and measurable benefits for salmon and other fish species.

Board Members

Citizen Members
David Troutt, Chair, Dupont
Nancy Biery, Quilcene
Robert Bugert, Wenatchee
Samantha “Sam” Mace, Spokane
Phil Rockefeller, Bainbridge Island

Agency Members
Conservation Commission
Department of Ecology
Department of Fish and Wildlife
Department of Natural Resources
Department of Transportation

Recreation and Conservation Office (RCO)

Director
Kaleen Cottingham

Natural Resources Building
1111 Washington Street
Olympia, WA 98501
E-mail: info@rco.wa.gov

Telephone: (360) 902-3000
FAX: (360) 902-3026
TTY: (360) 902-1996
Web site: www.rco.wa.gov

Mailing Address
PO Box 40917
Olympia, WA 98504-0917
# Table of Contents

Section 1: Introduction ........................................................................................................................ 1
  Background..................................................................................................................................... 1
  About this Manual........................................................................................................................ 2

Section 2: Regional Salmon Recovery Organizations ..................................................................... 4
  Introduction to Regional Salmon Recovery Organizations ........................................... 4

Section 3: Lead Entities ........................................................................................................................ 7
  Introduction to Lead Entities.................................................................................................... 7
  Lead Entity Process Overview .......................................................................................... 8

Section 4: Conflict of Interest Policy ............................................................................................... 14

Section 5: Reimbursement Policies.................................................................................................. 17
  Capacity Grant Agreements with RCO ............................................................................... 17
  Important Things to Know..................................................................................................... 18
  Compliance with All Laws....................................................................................................... 19
  Eligible Capacity Grant Costs ............................................................................................ 20
  Ineligible Capacity Grant Costs ........................................................................................ 25
  How to Bill RCO.......................................................................................................................... 26
  A-19 Invoice Voucher Instructions ...................................................................................... 28
  Federal Audit Requirements................................................................................................. 31
  RCO Sponsor Monitoring....................................................................................................... 31
  Record Retention....................................................................................................................... 31

Section 6: Reporting Requirements ................................................................................................. 33

Appendix A: Salmon Recovery Contacts ........................................................................................ 35

Appendix B: Sample Conflict of Interest Policy ............................................................................. 39
Section 1: Introduction

In this section, you’ll learn about:

✔ The history of salmon recovery in Washington
✔ About this manual

Background

The Washington Way

Salmon, steelhead, and trout have been, and continue to be, a critical part of Washington’s history, culture, economy, and recreational enjoyment. They are a basic and important natural resource and a symbol of the natural beauty of the state. Salmon also are valued for subsistence, for nutritional health, and for the spiritual well-being of tribal people.

The decline of native salmon, steelhead, and bull trout in Washington State has resulted in part from habitat loss and damage and inadequate passage and flows. Between 1997 and 1999, 12 species of salmonids in Washington were listed for protection under the federal Endangered Species Act. Coupled with other listings from the early 1990s, more than 75 percent of the state’s geographic area is affected.

In response to the decline of our salmonids and the Endangered Species Act listings, Washington State developed the Statewide Strategy To Recover Salmon – Extinction is Not an Option (1999). The statewide strategy provides a coordinated framework that can be used to combine the building blocks of salmon recovery to support healthy, sustainable populations levels with productive commercial and recreational fishing as well as meaningful exercise of tribal treaty rights. Two of the key building blocks for salmon recovery are the lead entity program and the regional salmon recovery organizations.
Regional Organizations

To coordinate the work of recovery planning and implementation, seven regional salmon recovery organizations have been created. Six of them have regional recovery plans approved by the federal government. See Section 2 for more information on regional salmon recovery organizations.

Lead Entities

In recognition that a strong, watershed-based, locally implemented plan is essential for salmon recovery, the Legislature made clear its intent to create a framework that allows for the coordinated delivery of federal, state, and local assistance to communities for habitat projects that will assist in the recovery and enhancement of salmon stocks. The framework created by the Legislature in 1998 has been used to create 25 lead entities across the state.

Cities, counties, and tribes within a geographic area must develop a mutual agreement to create a lead entity. Five of the state’s regional salmon recovery organizations also play a lead entity role for their salmon recovery region. See Section 3 for more information on lead entities.

About this Manual

The Salmon Recovery Funding Board annually allocates money to support infrastructure and capacity needs of lead entities and regional salmon recovery organizations. These capacity grants are administered by the Recreation and Conservation Office (RCO) and Governor’s Salmon Recovery Office as part of the Recreation and Conservation Office. The purpose of Manual 19 is to provide direction and guidance to the state’s regional salmon recovery organizations and lead entities in administering and managing their capacity grants.

Manual 19 is created under the authority granted to the Salmon Recovery Funding Board. It reflects the requirements of Revised Code of Washington, chapters 39.26, 77.85,
and 79A.25.240; Washington Administrative Code 420.04 and 420.12; and policies of the Salmon Recovery Funding Board and RCO.

RCO’s activities are intended to follow state and federal guidelines for nondiscrimination based on race, creed, color, national origin, age, marital status, sex, sexual orientation, residence, veteran status, and disability. If you believe the office or its programs discriminate, please inform RCO’s director.

If you need this manual in an alternative format, contact regional organization and lead entity staff support in the Governor’s Salmon Recovery Office:

Regional Organization Support Staff  Lead Entity Support Staff  
Brian.Abbott@gsro.wa.gov  Lloyd.Moody@gsro.wa.gov  
(360) 902-2638  (360) 902-2217

Also see Appendix A for a complete listing of contact information.
Section 2:
Regional Salmon Recovery Organizations

In this section, you’ll learn about:

✓ Salmon recovery regions
✓ Regional recovery organizations
✓ Council of Regions

Introduction to Regional Salmon Recovery Organizations

The federal Endangered Species Act requires the federal government to develop recovery plans for salmon species listed for protection under the Act. The federal government measures the health of fish populations based on Evolutionarily Significant Units or Distinct Population Segments, which are populations or groups of populations of salmon species that are substantially, reproductively isolated from other populations and that contribute substantially to the evolutionary legacy of the species.

Eight Salmon Recovery Regions

In 1998, the Legislature statutorily created the Governor’s Salmon Recovery Office and charged it with coordinating and assisting in the development of recovery plans for all listed salmon, steelhead, and trout in Washington6. The Governor’s Salmon Recovery Office, together with other state and federal agencies, defined eight salmon recovery regions. The 1999 statewide strategy to recover salmon concluded the best way to ensure recovery plans were implemented was to encourage local groups to develop them.

---

6 See Revised Code of Washington 77.85.030
Regional Salmon Recovery Organizations

To coordinate the work of recovery planning and implementation, seven regional organizations formed, roughly along the lines of the salmon recovery regions.

In September 2001, with support from the National Oceanic and Atmospheric Administration’s National Marine Fisheries Service, the Salmon Recovery Funding Board provided infrastructure and capacity funding for six regional groups to develop recovery plans. Each group developed a recovery plan that expanded on previous planning efforts and helped connect local social, cultural, and economic needs and desires with science and Endangered Species Act goals. The Salmon Recovery Funding Board capacity funding complemented other funding these groups had acquired for drafting components of the plans. Today, these six regional organizations have regional recovery plans approved by the federal government and are working vigorously to implement them.

In 2013 the newest regional organization, Washington Coast Sustainable Salmon Partnership, completed the Washington Coast Sustainable Salmon Plan, a regional salmon action plan to protect and promote the sustainability of a number of salmon populations in the Washington Coast Salmon Recovery Region that are not listed under the Endangered Species Act. A recovery plan for Endangered Species Act listed Lake Ozette sockeye was completed by the federal government, working with a local steering group, in May 2009.

Three of the regional recovery organizations have been legislatively created. The Lower Columbia Fish Recovery Board is charged with developing a program for salmon and steelhead recovery in Clark, Cowlitz, Lewis, Skamania, and Wahkiakum Counties. The Hood Canal Coordinating Council is designated as the regional salmon recovery organization and lead entity for Hood Canal summer chum, and the Puget Sound Partnership serves as the regional salmon recovery organization for other Puget Sound salmon. Four other organizations have self-started and been recognized by the

---

7 Regional organizations must be recognized in statute (See Revised Code of Washington 77.85.010(7)), or by the Governor’s Salmon Recovery Office.
8 Hood Canal, upper Columbia River, mid-Columbia River, lower Columbia and Puget Sound regional organizations have final recovery plans accepted by the federal government. The Snake River regional organization has submitted a recovery plan for the Washington portion of its region, which has been accepted by the federal government; however, approval of the full regional recovery plan is pending work to be done in Oregon and Idaho. The middle Columbia steelhead plan was approved in 2009. The federal government has been working on a bull trout recovery plan for Washington since 2002 but has not yet published a draft for review outside the agency.
9 See Revised Code of Washington 77.85.200.
10 See Revised Code of Washington 77.85.090(3) and Revised Code of Washington 90.88.030(1)(a).
11 See Revised Code of Washington 77.85.090(3).
Governor’s Salmon Recovery Office, as provided by state law. These regions are: Upper Columbia Salmon Recovery Board, Snake River Salmon Recovery Board, Yakima Basin Fish and Wildlife Recovery Board, and Washington Coast Sustainable Salmon Partnership.

Each regional salmon recovery plan calls for monitoring and reporting efforts to implement the plan and for periodically reviewing progress toward meeting recovery plan goals as part of an adaptive management process. Regional recovery plans have an implementation schedule, which provides details on responsibilities, tasks, sequence or schedule, and costs for actions that are included.

A primary purpose of a regional recovery organization is to prepare and oversee implementation of recovery plans that gain regional consensus on measurable fish population status and goals; integrates actions necessary in harvest, habitat, and hatcheries; and monitors the implementation, effectiveness, and results of these actions. Regional organizations also work with the Governor’s Salmon Recovery Office and RCO to report on their recovery progress.

Salmon Recovery Funding Board capacity grants to regional recovery organizations fund coordination to help implement the regions’ recovery plans.

**Council of Regions**

Formed in 2002, the Council of Regions is a forum for Washington’s regional recovery organization leaders to develop solutions to common issues and to coordinate implementation of shared priorities.

Meetings are facilitated by a chairperson chosen by council members. Assistance is provided by the Governor’s Salmon Recovery Office and RCO.

The council has no independent decision making authority. It serves as an advisory body, providing information and recommendations to member regions, the Salmon Recovery Funding Board, and state and federal agencies about regional salmon recovery policies, implementation strategies, and monitoring coordination.

---

12 See Revised Code of Washington 77.85.090(2).
Section 3: Lead Entities

In this section, you’ll learn about:

✓ The lead entity process
✓ Habitat Work Schedule

Introduction to Lead Entities

Other key players in salmon recovery are the 25 local lead entities, which have been created through the process established by the Legislature.

To create a lead entity, counties, cities, and tribal governments within a geographic area must jointly designate, by resolution or by letters of support, the area for which a habitat project list is to be developed and the lead entity that is to be responsible for submitting the habitat project list. The area must be based, at a minimum, on a Water Resource Inventory Area (WRIA), combination of WRIs, or any other area as agreed to by the counties, cities, and tribes involved. A county, city, conservation district, special district, tribal government, regional recovery organization, or other entity may be a lead entity.

Lead entities develop strategies, and garner community support for salmon recovery. Lead entities solicit, develop, prioritize, and submit habitat project lists for funding to the Salmon Recovery Funding Board. They use Habitat Work Schedule to track and report salmon recovery projects and related activities. They are comprised of four components:

• Lead entity grant sponsor

---

13 Projects include habitat restoration projects, habitat protection projects, habitat projects that improve water quality, habitat projects that protect water quality, habitat-related mitigation projects, and habitat protection maintenance and monitoring activities. See Revised Code of Washington 77.85.010 for the definition of the habitat project list.

14 See Revised Code of Washington 77.85.050(1)(a).

15 With the exception of the lower-Columbia region where SalmonPORT is used.
• Lead entity coordinator (usually a county, conservation district, or tribal staff)
• Technical Advisory Group
• Citizens Committee

The Technical Advisory Group assists in development of salmon recovery strategies and identification or review and prioritization of projects. It ensures the projects are scientifically valid. Using information from the Technical Advisory Groups as well as social, economic, and cultural values, the Citizen Committees, composed of representative interests of counties, cities, conservation districts, tribes, environmental groups, business interests, landowners, citizens, volunteer groups, regional fish enhancement groups, and other habitat interests, adopt ranked lists of projects and submit them to the Salmon Recovery Funding Board for funding consideration.

Lead entity funding is provided by the Legislature and the federal Pacific Coastal Salmon Recovery Fund through RCO. Additional funding is provided for Puget Sound lead entities from the Legislature through the Puget Sound Acquisition and Restoration Fund to support their capacity to recruit, develop, review, and prioritize eligible projects.

**Lead Entity Process Overview**

Each lead entity develops and maintains an updated recovery strategy to guide its selection and ranking of projects. The strategy prioritizes geographic areas and types of restoration, protection, and other activities (e.g., monitoring and outreach), identifies salmon species’ needs, and identifies local socio-economic and cultural factors as they relate to salmon recovery. These stakeholder-supported strategies increase effective decision-making by lead entities and define and clarify roles between lead entities and the broader salmon recovery planning community.

**Lead Entity Habitat Strategies and Use of Recovery Plans**

A lead entity strategy is a habitat protection and restoration action plan for the watersheds within the lead entity area. It provides a stepwise approach to how, where, and when to take action to restore and protect habitat and the watershed processes that are necessary to support salmon.

The lead entity strategy may be an independent document, or in areas with completed regional recovery plans, it may be the habitat restoration and non-regulatory habitat protection component of a regional salmon recovery plan or its appropriate recovery plan chapter.
Technical Advisory Group

The Technical Advisory Group is made up of local technical experts, and may include private, local, state, federal or tribal biologists or other natural resource experts. The Technical Advisory Group rates the projects submitted by the grant applicants on their technical merits. These local technical experts are often the most knowledgeable about the local watershed, habitat, and fish conditions. Their expertise is invaluable to ensure priorities and projects are based on ecological conditions and processes. They judge projects on their technical merits, benefits to salmon, and certainty that the benefits will occur.

Citizens Committee

The Technical Advisory Committee submits its technical evaluation of projects to the Citizens Committee. The Citizens Committee is critical to ensure that priorities and projects have the necessary community support for success. Citizens Committee members are often the best judges of the community’s social, cultural, and economic values, as they apply to salmon recovery, and of how to increase community support over time through the implementation of habitat projects. The Citizens Committee ranks the project list, and submits it through the lead entity or recovery region to the Salmon Recovery Funding Board for consideration for funding.

Citizens Committee Representation

State law16 identifies the interests that are to be represented on a lead entity Citizens Committee. The interests identified are:

- Business Interests
- Cities
- Citizens
- Conservation Districts
- Counties
- Environmental Groups
- Landowners
- Regional Fish Enhancement Groups
- Tribes
- Volunteer Groups
- Other Habitat Interests

Lead entities should strive to have each of the statutorily identified interests represented on its Citizens Committees. If such an interest is not participating on a lead entity Citizens Committee, lead entity coordinators should actively pursue potential candidates.

16 Revised Code of Washington 77.85.050 (1)(b)
representatives to ensure appropriate representation. The Governor’s Salmon Recovery Office recognizes that in some lead entity areas, the statutorily identified interests may not be actively engaged in salmon recovery efforts\textsuperscript{17}. If after active recruitment efforts, a specific interest is not represented on a lead entity Citizens Committee, the lead entity coordinator is to notify the Governor’s Salmon Recovery Office lead entity program manager. At a minimum, a lead entity Citizens Committee should include interests to represent diverse habitat-related community values and issues.

Annually, in the April 15 progress report, each lead entity coordinator shall provide the lead entity program manager with a list of participating citizens and technical committee members. The lead entity coordinator also will provide a definition of “participating.”

**Habitat Work Schedule System**

Habitat Work Schedule is an online, statewide database for lead entities and their project sponsors, regional salmon recovery organizations, and state agencies that communicates information about salmon recovery actions and progress towards goals at multiple scales (watershed, regional, and statewide). The Habitat Work Schedule increases support from citizens, interest groups, elected officials, and funders because it is transparent and allows easy retrieval of salmon recovery information. The Habitat Work Schedule maintains landowner privacy through security features in the system.

Lead entities and regional salmon recovery organizations use the Habitat Work Schedule as a planning and scheduling tool to sequence and prioritize projects and actions to implement the salmon recovery plans and lead entity habitat strategies. The Habitat Work Schedule improves planning because it is easily used to organize and share planned actions with technical reviewers and multiple salmon recovery partners at both watershed and regional scales. The Habitat Work Schedule allows them to see how recovery actions relate to each other, fit together, and where future opportunities might be.

The Habitat Work Schedule is used for a wide variety of salmon recovery activities. Good examples are habitat protection projects such as easements and land acquisitions; habitat restoration projects; program activities such as educational and outreach, road management to control sediment, or agricultural practices that are better for fish; effectiveness monitoring activities, changes in habitat over time due to restoration or protection; and changes in habitat capacity for fish. The Habitat Work Schedule supports a great level of project detail including project or activity name, type, description, objective, a mapped location, amounts funded, goals, outputs, outcomes (metrics), the limiting factor being addressed, the project addresses, photographs, and reference

\textsuperscript{17} See Revised Code of Washington 77.88.200(2) for specific management board membership requirements for the lower Columbia region. The management board acts as the Citizens Committee for the lower Columbia region.
documents; information about the organization implementing the project or activity; and the status of the project or activity (conceptual, proposed, active, or completed).

The Habitat Work Schedule supports lead entities and regional salmon recovery organizations in managing their recovery activities by allowing them to view data for a variety of projects in several ways (maps, spreadsheets, hierarchical diagrams, etc.). Regional salmon recovery organizations and lead entities use the Habitat Work Schedule to efficiently track their salmon recovery actions and projects, both geographically and over time, so they can communicate progress being made to address factors limiting salmon recovery.

The Habitat Work Schedule can track the performance and effectiveness of projects and changes in habitat over time which supports monitoring and adaptive management. This helps those planning future projects be more strategic about project placement and design. The Habitat Work Schedule stores and reports the National Oceanic and Atmospheric Administration’s Pacific Coastal Salmon Recovery Fund habitat metrics consistent with PRISM, in addition to more detailed metrics to report on local variability (such as floodplain habitat metrics).

The Habitat Work Schedule also tracks projects from multiple funding programs, including the state Salmon Recovery Funding Board, agricultural incentive programs, federal road management programs, and multiple conservation programs on a single map so people more easily can find ways to coordinate their projects, saving time and money. It also supports their efforts to leverage funds from other federal, state, local, tribal, and private entities for the priority projects.

The Habitat Work Schedule provides a data site and portal for the Department of Fish and Wildlife’s Estuary and Salmon Restoration Program. This program uses the Habitat Work Schedule to store and report detailed project information about restoration and protection of nearshore and estuarine habitat in Puget Sound.

Training and a help desk is available for the Habitat Work Schedule. Lead entities and project sponsors are encouraged to participate in the Habitat Work Schedule trainings that are periodically conducted by the RCO. Trainings provide information on how to most efficiently and effectively use the Habitat Work Schedule for project management and how to best update project information regularly.

RCO will continue to work with lead entities, regional organizations, and project sponsors to look for and create efficiencies in the project evaluation and funding processes, including maximizing the use of existing databases such as the Habitat Work Schedule.

The Habitat Work Schedule Web site can be found at: [www.hws.ekosystem.us/](http://www.hws.ekosystem.us/).
More Information
Governor’s Salmon Recovery Office
Jennifer Johnson Lloyd Moody
(360-902-2219) (360) 902-2217
Jennifer.Johnson@gsro.wa.gov Lloyd.Moody@gsro.wa.gov

Washington Salmon Coalition

Mission Statement
The mission of the Washington Salmon Coalition is to support and strengthen the 25 Lead Entities in Washington State in their endeavor to restore, enhance, and protect salmonids and their habitats in a scientifically-sound manner that engages local communities and supports our economy. Each lead entity is a member of the Washington Salmon Coalition.

History
The Washington Salmon Coalition was originally constituted as the Lead Entity Advisory Group to provide advice to the Washington State Department of Fish and Wildlife on current and emerging policy issues associated with salmon recovery. In December 2013, the lead entities changed the name of their statewide organization to the Washington Salmon Coalition. Over time, the coalition evolved to mainly support the Lead Entity Program by serving as a forum for discussing lead entity issues and improving communication with the Salmon Recovery Funding Board, RCO, Department of Fish and Wildlife, the Governor’s Salmon Recovery Office, other state agencies, the Council of Regions, and other interested groups. Education and coordination in general are a central focus and theme for the Washington Salmon Coalition. The roles of lead entities and of the Washington Salmon Coalition should evolve with the needs of salmon recovery and the changing landscape of Washington State’s economy.

Goals
The Washington Salmon Coalition seeks to effectively communicate a unified voice representing the interests of lead entities and their communities statewide, provide a communication forum for discussing emerging lead entity issues, and develop strategies for addressing these topics. The Washington Salmon Coalition seeks to foster relationships and share best practices amongst colleagues and provide educational opportunities for the 25 lead entities in Washington. The Washington Salmon Coalition communicates as a collective voice that salmon recovery the “Washington Way” is yielding statewide results. The Washington Salmon Coalition meets about seven times a year.
Lead entity grant management is handled through the Governor’s Salmon Recovery Office. Contact Lloyd Moody, Lloyd.Moody@gsro.wa.gov, (360) 902-2217.
Section 4: Conflict of Interest Policy

In this section, you’ll learn about:

✓ Policy guidance conflict of interest polices
✓ Key points for structuring your policy

Conflict of Interest Policy Guidance for Regional Salmon Recovery Organizations and Lead Entities

Conflict of interest is difficult to define, yet dealing properly with conflict of interest is crucial to maintaining an organization’s integrity and reputation. This is especially true for the state’s lead entities and regional salmon recovery organizations as they depend on public confidence and support to fund and implement salmon restoration and protection projects. Because public confidence is so important, lead entities and regions should take steps to avoid even the appearance of impropriety.

Conflict of interest arises whenever the personal or professional interests of a regional board member, lead entity committee (citizen or technical), or staff member of either type of organization are potentially at odds with the objectives of the lead entity or regional organization as described in their bylaws and/or other founding and guiding documents.

It is important to note that conflict of interest is a broad concept. It is about the presence of any factors that are likely to affect a decision-maker’s fairness of judgment or perceptions of that judgment. The legal definition of conflict of interest, usually set out in state or federal laws governing nonprofits, is very specific and covers relatively few situations. Most conflicts fall into a gray area where ethics and public perception are more relevant than statutes or precedents.
Adopting and actively employing a well-written policy that clearly addresses conflict of interest are essential steps to responsibly manage conflict of interest. Here are three considerations to keep in mind:

1. Content – your policy should include certain ingredients, including the following:

   A. Definition of conflict of interest. It should be clear and non-technical and should be broad enough to include the full range of factors that can be expected to affect fairness in decision-making. For example, it should not be limited to just financial interests.

   B. Examples of Conflict of Interest. Examples are a natural way to supplement a definition. Examples can be a great way to illustrate how conflict of interest occurs in your organization.

   C. Procedures. Your conflict of interest policy should outline the procedures that will be followed to avoid conflict of interest, where possible, and to deal effectively with it when it occurs. For example, who should be notified? Are there forms to be filled out (e.g., disclosure forms)? Should I remove myself from decision-making? Are there exceptions? Who has authority to grant exceptions?

2. Readability – There’s little point in having a policy if the members or employees of your organization won’t read it or can’t understand it. That means it cannot be written entirely in legalize.

3. Awareness and Training – there’s no point in having a conflict of interest policy if no one knows about it. Members and employees of your organization need to know the policy exists, and they need to have the opportunity to discuss it and have their questions answered.

Key Points to Remember in Structuring Your Conflict of Interest Policy

- Your policy should require those with a conflict (or who think they may have a conflict) to disclose the conflict or potential conflict.

- Your policy should prohibit board or committee members from voting on or scoring on any matter that gives rise to a conflict between their personal or professional interests and the objectives of the lead entity or regional organization.

- A great way to find out whether any board, committee, or staff member has a conflict or potential conflict of interest is to circulate an annual “conflict disclosure questionnaire” that asks board, committee, and staff members to
review and sign the questionnaire to disclose existing or potential conflicts and reminds them to disclose any that might evolve in the future.

- Your policy should explain how the board or committee will deal with violations (e.g., corrective action).

- Minutes of board or committee meetings should reflect when a board, committee, or staff member discloses a conflict or potential conflict and how the conflict was managed by the board or committee.

- To avoid confusion and potential conflict, lead entity project evaluation and scoring criteria as well as project review procedures and schedules should be made widely available (e.g., Web site postings, e-mail distribution, local newspapers, public meetings) early in the grant round process to potential project sponsors, interested parties, and the public in general.

- Your policy should note that it is intended to supplement but not replace any applicable state and federal laws governing conflict of interest that may be applicable to your organization.

See Appendix B for a sample conflict of interest policy
Section 5: Reimbursement Policies

In this section, you’ll learn about:

- Capacity grant agreements with RCO
- Important things to know
- Compliance with all laws
- Eligible capacity grant costs
- Ineligible capacity grant costs
- How to bill RCO
- A-19 Invoice Voucher instructions
- Federal audit requirements
- RCO sponsor monitoring
- Record retention

Capacity Grant Agreements with RCO

Unlike the vast majority of grants administered by RCO, lead entities and regional salmon recovery organizations are not projects. They are local and regional processes that require human infrastructure and capacity to develop community-based project proposals and to implement, update, and report on the progress of salmon recovery plans. These capacity grants are awarded by the Salmon Recovery Funding Board annually, but may be amended to add capacity allocations by the funding board for the second half of each biennium.

Depending on the region, RCO may combine the regional organization and lead entity into one grant agreement. However, each would have a distinct scope of work, deliverables, and budget. At the end of the grant period, any unspent funds will be reallocated to other projects by the Salmon Recovery Funding Board. For this reason, if you expect to have any unspent funds at the end the grant period, notify the appropriate grant manager by the end of April before the end date of the capacity grant.
Important Things to Know

PRISM for Fiscal Users

PRISM is the database RCO uses to track and manage its many grants. PRISM can provide lead entities or regional salmon recovery organizations with information about the status of a billing, the balance of your grant, and other useful fiscal information. RCO provides a number of videos for grant sponsors. Video 9 focuses on PRISM information for fiscal users. Here’s a link to the RCO Web site for training videos-www.rco.wa.gov/doc_pages/reimbursement.shtml. You can scroll down the page to select Video 9 – PRISM Overview for fiscal users.

You Have to Pay First

RCO pays grants through reimbursement. You may request reimbursement only after you have paid your employees and vendors. RCO does not provide money before vendors are paid, except as outlined in the Salmon Recovery Funding Board’s cash advance policy (see page 57 of Manual 18, Salmon Recovery Grants).

RCO Will Pay Only for Allowable Costs

RCO will pay only for allowable costs. A cost is allowable if it is reasonable, necessary to complete the approved scope of work, eligible in the lead entity and or regional salmon recovery organization grant programs, documented adequately, incurred during the period of performance set forth in the project agreement, and determined to be in accordance with generally accepted accounting principles. Costs outside the period of performance are allowable only if pre-approved. A cost is considered reasonable if the work or materials and the cost reflect what a prudent person would have spent under the circumstances. In determining reasonableness of a given cost, consideration shall be given to:

- Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the lead entity or regional salmon recovery organization and the performance of the grant agreement.

- The restraints or requirements imposed by such factors as sound business practices; arms-length bargaining; federal, state, and other laws and regulations; and terms and conditions of the grant agreement.

- Market prices for comparable goods or services.
Use a Verifiable Payment Method

RCO will not reimburse for payments made in cash. Paying in cash does not provide a verifiable audit trail.

RCO Pays Promptly

RCO generally pays reimbursement requests within 30 days of receiving a properly completed invoice. Properly completed invoices include all necessary documentation.

Your Information is Public

All information and documentation submitted to RCO is open to public review (Revised Code of Washington 42.56 and 77.85.130(8)). RCO recommends confidential or sensitive information, including home addresses and social security numbers, be removed from documents submitted to RCO.

Statewide Vendor Number

You are required to have a statewide vendor number to receive payments. You can be paid by check or electronic fund transfer (EFT). To register, visit the Department of Enterprise Services Web site at www.des.wa.gov/services/IT/SystemSupport/Accounting/Pages/swps.aspx.

Compliance with All Laws

You must comply fully with the grant agreement, grant program policies, RCO policies, and all applicable federal, state, and local laws, orders, regulations, and permits. Please contact your grant manager with any questions.

Requirements for Federally Funded Grants

- Non-profit organizations are subject to the requirements of Office of Management and Budget Circular A-122, Cost Principles for Non-Profit Organizations. This circular can be found at: www.whitehouse.gov/OMB/circulars/a122/a122.html
- Federally-recognized Indian tribes and state and local governments are subject to the requirements of Office of Management and Budget Circular A-87, Cost

---

18 See Revised Code of Washington 42.56.230 for a listing of the types of personal information that is exempt from public inspection and copying under that chapter.
Principles for State, Local and Indian Tribal Governments. This circular can be found at: www.whitehouse.gov/omb/circulars/a087/a87_2004.html

- Educational institutions are subject to the requirements of Office of Management and Budget Circular A-21, Cost Principles for Educational Institutions. This circular can be found at: www.whitehouse.gov/omb/fedreg/2005/083105_a21.pdf

### Eligible Capacity Grant Costs

#### Liability Insurance

The lead entity or regional salmon recovery organization shall provide insurance coverage, which shall be maintained in full force and effect during the term of this grant, as follows:

- Automobile Liability. If services delivered pursuant to this contract involve the use of vehicles, either owned or not owned by the lead entity or regional salmon recovery organization, automobile liability insurance shall be required.

- The insurance required shall be issued by an insurance company authorized to do business in Washington.

At RCO’s request, the lead entity or regional salmon recovery organization shall submit to RCO within 15 days of the request, a certificate of insurance which outlines the coverage and limits defined in the Insurance Section. The lead entity or regional salmon recovery organization shall submit renewal certificates as appropriate during the term of the contract.

The lead entity or regional salmon recovery organization should carry and maintain general public liability insurance in accordance with sound business practices.

#### Payroll

Employee time directly related to the approved scope of work may be reported as a grant cost. The reportable amount is the employee’s regular rate of pay, including taxes and benefits. Taxes and benefits are eligible only if you pay them when they are due.

#### Timesheets

All payroll-related costs charged to RCO capacity grants need to be documented on a timesheet. Do not submit copies of the timesheet with your invoice unless requested to do so. The timesheet must meet the following standards:

- Reflect an after-the-fact determination of the actual activity of each employee.
• Account for the total activity for which employees are compensated.

• Be signed or authorized electronically by the individual employee or by a responsible supervisor having firsthand knowledge of the activities performed by the employee.

• Be prepared at least monthly and coincide with one or more pay periods.

• Not be budget estimates or other distributions based on a percentage before the work was performed.

**Travel, Meals, and Transportation**

Travel costs are limited to the state per diem rates, which can be found by following this link: [www.ofm.wa.gov/resources/travel.asp](http://www.ofm.wa.gov/resources/travel.asp). You must maintain a detailed travel log, which includes a name with dates, times, locations, business purpose, and itemized travel costs.

Reimbursements for meals are limited to the state per diem meal rate in effect for the area of travel. Reimbursements for meals provided by the sponsor are limited to the lower of the actual cost or the state per diem meal rate. Reimbursements for lodging are limited to the lower of the actual cost or the state per diem lodging rate.

Transportation costs that are directly attributed to the capacity grant can be reimbursed using one of the following methods:

• Mileage: Allowable costs are limited to a maximum of the current state mileage rate. No other vehicle costs including insurance, fuel, oil changes, repairs, maintenance, or lease payments will be allowed.

• Short-term Vehicle Rental: Allowable costs are limited to actual rental and fuel costs. This generally applies to rentals lasting less than one month.


**Refreshments**

Regional organizations and lead entities may wish to provide coffee and light refreshments and or meals as an integral part of a meeting or volunteer activity and be reimbursed for expenses incurred through RCO capacity grants. Supporting documentation must be maintained with the regional organization or lead entity. This documentation must include pre-approval by the regional organization or lead entity, a list of attendees (sign-in sheet), meeting purpose, and agenda, and receipt showing
actual cost. Don’t forget that costs can’t exceed associated per diem rates for the meal and location.

**Contracting**

Lead entities and regional organizations shall establish and follow written procurement procedures or comply with current state procurement requirements. A new state law \(^{19}\) went into effect on January 1, 2013 that consolidates procurement laws under the Department of Enterprise Services. See information at [www.des.wa.gov/about/pi/ProcurementReform/Pages/default.aspx](http://www.des.wa.gov/about/pi/ProcurementReform/Pages/default.aspx).

In compliance with state law \(^{20}\), the Department of Enterprise Services has established policies for direct buy purchases and procurements (see the Department of Enterprise Services Policy: DES-125-03 at the agency’s Web site). Effective January 1, 2013, lead entities and regional organizations are authorized to purchase goods and services up to a cost of $10,000 (excluding sales tax) directly from a vendor and without competition. This authorization includes sole source contracts up to $10,000 (see the Department of Enterprise Services Policy: DES-140-00, exemptions).

All procurement transactions greater than $10,000 shall be conducted in a manner to provide, to the maximum extent practical, open and free competition. Be aware of organizational conflicts of interest. Contractors that develop or draft specifications, requirements, statements of work, invitations for bids, or requests for proposals shall be excluded from competition for such procurements.

For contracts more than $20,000 or a combined dollar amount of more than $20,000 going to one vendor (during the contract period), the regional or lead entity organization must send RCO a copy of the contract, including the scope of work, for review before completing the contract. RCO will review the contract proposal in a timely manner for consistency with work products promised in the implementation scope of work.

**Equipment and Supplies**

Lead entities and regional organizations use a variety of equipment and supplies to support their salmon recovery efforts. RCO recognizes that the service life for equipment varies and establishes a replacement schedule to guide its replacement (see below). For equipment purchased that costs less than $700, lead entity and regional staff are asked to maintain model number, serial number, and proof of purchase information to be made available to RCO upon request. For equipment with a purchase cost greater than $700 (including software), lead entities and regional staff shall submit model number,

serial number, and proof of purchase information when submitting requests for reimbursement and also will explain why the new equipment is being purchased (e.g., in accordance with equipment replacement schedule).

Equipment shall only be purchased when it makes economic sense to do so and the lead entity or regional staff can justify purchase. For example, many telephone service providers provide free phones with a two-year service contract. In other cases, it may be a better choice to lease equipment rather than purchase it. Work with your grant manager to coordinate purchase or lease of equipment.

Notify your RCO grant manager in writing immediately if equipment is lost or stolen and complete a Request for Removal of Equipment Form available from the RCO grant manager. For any RCO personal property stolen, you should provide a police report and insurance report for each incident and should report the theft immediately to the RCO grant manager.

### Equipment Replacement Schedule

<table>
<thead>
<tr>
<th>Type of Equipment</th>
<th>Replacement Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>Computer equipment, primarily desk top and laptop computers, tablets, scanning equipment, printers, and standalone hard drives along with the appropriate software</td>
<td>Not more often than once every three years</td>
</tr>
<tr>
<td>Mobile telephones</td>
<td>Not more often than once every two years</td>
</tr>
<tr>
<td>Cameras, video recorders, projectors</td>
<td>Not more often than once every four years</td>
</tr>
<tr>
<td>Global Positioning System (GPS)-related equipment</td>
<td>Not more often than once every three years</td>
</tr>
</tbody>
</table>

### Returning Equipment to RCO

If a lead entity or regional grant is terminated or not renewed, any equipment purchased with lead entity or regional grant funds with remaining useful service life (along with associated software and manuals) will be returned promptly to RCO.

### Equipment Disposal

Worn out or broken equipment shall be disposed of appropriately by lead entity or regional staff. Equipment replaced in accordance with the replacement schedule, worn out, or broken may be sold by the lead entity or regional salmon recovery organization for market value with the proceeds being credited on the next billing to RCO. Be sure to coordinate with your grant manager before disposing of equipment.
Cost Sharing

Where a lead entity coordinator serves more than one lead entity, the lead entities shall minimize duplication of equipment purchased and work out equipment cost sharing agreements whenever practicable.

Supplies

Supplies include general office supplies, appropriate publications, and field gear for staff (e.g., rain gear, rubber boots, hip waders).

Web site

Web site creation and maintenance that benefit the regional or lead entity organization are eligible costs.

Training, Seminars and Conferences

Training expenses, along with seminars and conference fees that benefit the regional organization or lead entity are eligible costs. Note: Related travel expenses are to comply with state travel regulations.

Indirect Costs

Indirect costs are those incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved. An indirect cost rate is a device for determining in a reasonable manner the proportion of indirect costs each program should bear. It is the ratio (expressed as a percentage) of the indirect costs to a direct cost base.

Subject to state or federal program restrictions, RCO allows the use of a federally approved indirect cost rate, or an indirect cost rate developed through 2 Code of Federal Regulations 225, 230, as appropriate, up to 25 percent of the applicable base of the allowable direct costs incurred during grant performance. The grant administrator must provide documentation of a current, approved indirect rate before indirect billings will be accepted.

Limitations

For those lead entities or regional organizations using an indirect cost rate, the indirect cost rate shall not be applicable to capital expenditures or the portion of sub-awards or subcontracts that exceed $25,000.
Overhead and Administrative Costs

In lieu of an indirect rate (as described above), allocable overhead and administrative costs may be allowed if specified in the grant agreement. The amount of overhead or administrative costs allowed in a grant is to be specified in the grant budget, but may not exceed 25 percent of salaries and benefits. This assumes an organizational structure using employees to accomplish its primary functions. For those organizations who contract out the work that would otherwise be done by employees, RCO will negotiate an appropriate overhead and administrative cost rate.

Allocating Overhead Costs

If you are not using an indirect cost rate, but want to bill for allowable overhead expenses, you must identify an appropriate portion of the overhead expense to charge to your lead entity grant. Allocating overhead costs is the process of dividing the costs into parts that are designated by expenditure for a specific purpose, like a lead entity grant. Building rent provides a good example. If a lead entity uses 20 percent of the space in a building whose monthly rent is $5,000, a defendable allocation for the lead entity share of the rent would be 20 percent or $1,000 a month. If costs are allocated, please ensure there is a defendable basis, and this basis is tracked and documented and kept current.

In no case are administrative costs allowed when indirect costs are allowed. In other words, no grant recipients are to charge both overhead and administrative costs and indirect costs because it creates potential duplication. For example, costs that are included in calculating an indirect cost rate may not be charged as a direct cost to the lead entity or regional grant.

Ineligible Capacity Grant Costs

Do not include ineligible costs in the billings. Some examples of ineligible costs include:

- Costs billed to another funding source, except when being used as a non-reimbursable amount.
- Bad debts, including any losses arising from uncollectible accounts or claims.
- Ceremonial expenses, such as podiums, tents, and refreshments.
- Fines and penalties.
- Lobbying.
- Interest and other financial costs.
Payments to an equipment replacement fund.

If you are not sure if an item is eligible for reimbursement, consult with your Governor’s Salmon Recovery Office grant manager.

How to Bill RCO

A reimbursement request, otherwise known as a bill for lead entities, consists of an A-19 Invoice Voucher and the grant work book filled out for the applicable billing period. For regional organizations, a reimbursement request consists of an A-19 Invoice Voucher and the cost report they are submitting for payment. The A-19 Invoice Voucher is generated from PRISM. The A-19 can be found in PRISM using the following file path: Reports > Sponsor Reports > Invoice Voucher.

To submit a reimbursement request, send RCO the materials described below.

- **A-19 Invoice Voucher:** Summarized billing information is reported on this form. The invoice submitted to RCO must have an original signature in blue ink by a representative of the sponsor. The first A-19 is provided with your agreement materials. Each time a payment is made, RCO sends you a new A-19 with updated information to use for your next reimbursement request. A-19s also are available for you to print from PRISM. For specific information about completing the A-19, see the end of this section.

- **Cost Report and Grant Work Book Worksheet:** Lead entities must submit the worksheet from their grant workbooks for the billing periods they are requesting payment for. Regions use their cost reports. The lead entity Excel worksheet (as part of your grant excel work books) or the regional organization cost reports must include the following information, and be reported in the appropriate task category:
  
  - A specific description of the items purchased or services performed. General descriptions such as the employee’s job title, “subcontractor,” “per diem,” “payroll,” or “supplies” are not acceptable. RCO encourages you to show the calculation used to determine items such as mileage, per diem, and payroll.
  
  - The date the payment was made. If the cost is not a payment, use the date the entry was made to your records.
  
  - The name of the vendor or employee to whom the payment was made. If the purchase is made with a credit card, reference the credit card company and where the purchase was made. If the cost is to reimburse an employee for a purchase, reference the employee name and where the
purchase was made. If the cost is the use of your organization’s own resources, reference the name of the log or journal.

○ The transaction number, which can be any of the following:

  ▪ A payment number – this includes check numbers, electronic fund transfer (EFT) numbers, or any other number that creates a verifiable audit trail. If using a credit card, use the actual check number that paid the credit card debt.

  ▪ Log or journal number – the number of an entry into your records that records the expense. Use an abbreviation of the entry type at the beginning of the number.

  ▪ Payroll – It is acceptable to use “Payroll” as the transaction number.

  ▪ Debit card – It is acceptable to use “debit card” as the transaction number if a transaction number is not available. The bank statement must show the debit transaction and be made available to RCO upon request.

Unacceptable transaction numbers include the field order number, purchase order number, or invoice number. Unacceptable terms are payment pending, accrued, cash, currency, or anything other than the examples listed above. It is not acceptable to leave the field blank.

○ The amount of the payment or transaction, reported as expenditure or non-reimbursable amount.

**Submitting Reimbursement Requests Via E-mail**

In lieu of submitting hard copies of the A-19 Invoice Vouchers and the grant work book worksheets, lead entities may submit reimbursement requests via e-mail. To submit a reimbursement request via e-mail, you need to prepare an original A-19 Invoice Voucher, with an original signature, then scan it and e-mail it to RCO at Billing@rco.wa.gov, along with your grant workbook (the actual excel file, not a pdf). Because regional organizations don’t use grant work books, they will need to include the Excel spreadsheet cost reports they are submitting for payment. In the subject line of the e-mail, include your grant number and the billing time period (e.g., 13-1668, July-Sept 2013 billing). If you bill via email, you must maintain the original billing materials, with signature, in your files (See records retention, page 31).
Lead Entity and Regional Organization Billing Deadlines and Limits

Lead entities and regional organizations must submit reimbursement requests not less than quarterly and not more often than monthly. Reimbursement requests must be submitted within 30 days from the end of the billing period.

When your lead entity or regional organizational grant ends, send a final reimbursement request by the date identified in your grant agreement milestones with all required documentation to RCO. A final report is required to be submitted in PRISM. You will not receive final payment until the final report is accepted and all required documentation has been submitted.

Administering Regional Organization Contract Timelines

Facilitating a regional collaborative framework around natural resource issues depends on the participation and support of multiple parties and the public. Even though a regional organization may attempt to complete a task under its contract schedule or fill transitioning staff positions seamlessly, circumstances can delay work and result in funds remaining at the end of the grant period.

To provide the time necessary to complete planned work, regional organizations will be given 26 months to manage their contract. The first year of a biennium will begin on July 1 and end on June 30 of the following year. The contract will be amended adding second year funding (if available). Any funds remaining after the 26-month period will be returned to RCO for distribution by the Salmon Recovery Funding Board for board priorities.

A-19 Invoice Voucher Instructions

Items sponsors must complete Items 1-4 (see sample A-19 Invoice Voucher at the end of these instructions).

1. **Sponsor’s Certification:** You must complete the sponsor’s certification section with an original signature in blue ink.

2. **Billing Period:** Enter the beginning and ending dates when costs were incurred. This is not the dates of payment.

3. **Final Billing:** Indicate if this will be your last bill by checking yes or no.

4. **Costs for this Billing:** Using the totals from your billing period worksheet, enter all costs for this billing by category (non-capital or equipment). These amounts should be the same as the totals from the billing period worksheet.
Verify all the pre-printed information (Items A-H)

A. **Sponsor**: The name and address of the organization that is responsible for the project.

B. **Grant Number and Name**: RCO assigned number and name for your lead entity grant.

C. **Invoice Number**: Incremental invoice number assigned.

D. **Grant Agreement**: Grant funds approved in the grant agreement.

E. **Previous Billings**: Allowable costs submitted in previous billings.

F. **Agreement Information**: Funding breakout between the state and federal RCO funds.

G. **Previous RCO Reimbursements**: Information about past billings submitted.

H. **Statewide Vendor Number**: Office of Financial Management assigned vendor number.
### Section 5: Reimbursement Policies

**Washington State Recreation and Conservation Office (RCO)**

**Agency Name**

**Washington State RCO**

P.O. Box 40917

Olympia, WA 98504-0917

**Sponsor**

<table>
<thead>
<tr>
<th>To Be Completed By Sponsor</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Number</strong></td>
</tr>
<tr>
<td><strong>Project Name</strong></td>
</tr>
<tr>
<td><strong>From:</strong></td>
</tr>
<tr>
<td><strong>2</strong></td>
</tr>
</tbody>
</table>

**To:**

**This is a Final Billing?**

- **Yes [ ]**
- **No [ ]**

**Costs For This Billing**

<table>
<thead>
<tr>
<th>Project Categories</th>
<th>Agreement Expenditure</th>
<th>Non-Reimbursable Amount</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acquisition</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Incidentals</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land/Inc Subtotal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Admin Costs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acquisition Total</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A&amp;E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development Total</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Capital</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Capital Costs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equipment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Capital Total</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Funding & Expenditure Formula**

For RCO Use ONLY

<table>
<thead>
<tr>
<th>Agreement Information</th>
<th>Previous RCO Reimbursements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sponsor:</strong></td>
<td><strong>Total Billed</strong></td>
</tr>
<tr>
<td>RCO Federal:</td>
<td><strong>RCO Share Billed</strong></td>
</tr>
<tr>
<td>RCO:</td>
<td><strong>RCO Share Approved</strong></td>
</tr>
<tr>
<td>RCO:</td>
<td><strong>Advance Balance</strong></td>
</tr>
<tr>
<td>RCO:</td>
<td><strong>Match Owed Balance</strong></td>
</tr>
<tr>
<td>Agreement Total:</td>
<td><strong>RCO Share Retained</strong></td>
</tr>
<tr>
<td></td>
<td><strong>RCO Share Paid</strong></td>
</tr>
</tbody>
</table>

**Certification For Payment**

<table>
<thead>
<tr>
<th>Project Manager/Date</th>
<th>Accounting/Date</th>
</tr>
</thead>
</table>

---

Manual 19, Regional Organization and Lead Entity Capacity Grant Guidance • February 1, 2014
Federal Audit Requirements

Sponsors who spend more than $500,000 in federal funds from any source within their fiscal year are required to complete an Office of Management and Budget Circular A-133 Audit. If you receive any federal funds, RCO will send you a letter each year describing audit requirements. You must respond to the letter with the requested information.

State and local governments will be audited by the Washington State Auditor’s Office. Other sponsors must hire a certified public accounting firm to conduct the A-133 Audit. A copy of the audit report must be provided to RCO.

Failure to complete the audit or receive an extension by the due date will result in suspension of all agreements and reimbursements. Extensions only can be granted by the federal agency responsible for implementing the requirements of the Single Audit Act for your organization.

If there is an audit finding, you may be asked to submit the corrective action plan to RCO. RCO will review the corrective action plan and notify you in writing within 6 months if it meets our standards to resolve the audit finding.

RCO Sponsor Monitoring

RCO reviews all grant costs for each invoice processed. RCO will conduct additional sponsor monitoring, which could include requests for backup documentation and visits to your office. This monitoring is a more detailed review of your source financial documents. Although you are required to maintain copies of all documentation, please do not submit to RCO unless requested to do so.

Record Retention

You must keep the following original documents on file for at least 6 years after RCO closes the project:

- Invoices and receipts
- Timesheets
- Copies of payments (checks, warrants, bank statements, etc.)
- Copies of internal transactions
- Travel and mileage logs
- Records pertaining to a use allowance for sponsor-owned equipment
• Competitive bidding documentation
• Donation logs and statements
• All books, records, documents, data, and other materials relevant to the grant agreement.

The records must support all project-related costs reported to RCO and be made available upon request. If any litigation, claim, or audit is started before the end of 6 years, you must keep the records until all litigation, claims, or audit findings involving the records have been resolved.
Section 6: Reporting Requirements

In this section, you’ll learn about:

✔ Lead entity reporting requirements

Lead entities and regional salmon recovery organizations each have their own reporting requirements.

**Lead Entities**

Lead entities report twice a year to the Governor’s Salmon Recovery Office and RCO on their progress in completing the tasks that make up their scopes of work. The two reporting dates are April 15 and October 31. The Governor’s Salmon Recovery Office and RCO will provide a reporting template to the lead entity for each reporting period.

**Recovery Plan Implementation Reports (Regions Only).** There are three methods RCO uses to help the regional organizations provide better communication on progress toward overall recovery plan implementation. These methods will help answer the question “How are we doing?” The goal is to streamline reporting to show more easily the progress they are making in implementing their recovery plans. The Governor’s Salmon Recovery Office will provide templates for all reporting necessary under this grant agreement, and will attempt to include requirements of the National Marine Fisheries Service for any other monitoring reports needed.

1. The Governor’s Salmon Recovery Office will work with regional organizations and the National Marine Fisheries Service, to the extent feasible, to fill data gaps and meet reporting requirements for:

   - National Marine Fisheries Service (recovery plan implementation monitoring)
Section 6: Reporting Requirements

- Pacific Coastal Salmon Recovery Fund project implementation and funding
- *State of Salmon in Watersheds* report
- 6-month Grant Agreement Progress Reports

2. At least once a year (twice per biennium), the Governor’s Salmon Recovery Office staff will interact with regional organization staff to anticipate and address issues that may affect achievement of recovery plan implementation milestones. These meetings also will be open to Salmon Recovery Funding Board members, state agency staff, and federal agency staff by invitation. The timing of the meetings will be announced by the Governor’s Salmon Recovery Office in the first quarter of each calendar year.

3. The Salmon Recovery Funding Board also should receive informational presentations from the regional recovery organizations. This gives the board a chance to hear regularly what kinds of things regional organizations and lead entities are doing and, especially, give board members firsthand experience with how implementation of all plans is proceeding. The Governor’s Salmon Recovery Office staff will work with regional organizations to schedule these informational presentations to the Salmon Recovery Funding Board.
Appendix A: Salmon Recovery Contacts

For contact information for Salmon Recovery Funding Board staff, regional organizations, lead entities, and watershed stewards, visit the RCO Web site at www.rco.wa.gov/salmon_recovery/lead_entities_contact.

### Hood Canal Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hood Canal Coordinating Council Lead Entity</td>
<td>14*, 15*, 16, 17*</td>
<td>Alicia Olivas (360) 271-4722 <a href="mailto:aolivas@hccc.wa.gov">aolivas@hccc.wa.gov</a></td>
<td>Mike Ramsey (360) 902-2969 <a href="mailto:michael.ramsey@rco.wa.gov">michael.ramsey@rco.wa.gov</a></td>
</tr>
<tr>
<td>North Olympic Peninsula Lead Entity for Salmon**</td>
<td>17*, 18, 19</td>
<td>Cheryl Baumann (360) 417-2326 <a href="mailto:cbaumann@co.clallam.wa.us">cbaumann@co.clallam.wa.us</a></td>
<td>Mike Ramsey (360) 902-2969 <a href="mailto:michael.ramsey@rco.wa.gov">michael.ramsey@rco.wa.gov</a></td>
</tr>
</tbody>
</table>

### Lower Columbia River Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Klickitat County Lead Entity**</td>
<td>29*</td>
<td>John Foltz (509) 773-2353 <a href="mailto:johnf@co.klickitat.wa.us">johnf@co.klickitat.wa.us</a></td>
<td>Dave Caudill (360) 902-2649 <a href="mailto:dave.caudill@rco.wa.gov">dave.caudill@rco.wa.gov</a></td>
</tr>
<tr>
<td>Lower Columbia Fish Recovery Board Lead Entity</td>
<td>24*, 25, 26, 27, 28, 29*</td>
<td>Jeff Breckel (360) 425-1553 <a href="mailto:jbreckel@lcfrb.gen.wa.us">jbreckel@lcfrb.gen.wa.us</a></td>
<td>Alice Rubin (360) 902-2635 <a href="mailto:Alice.rubin@rco.wa.gov">Alice.rubin@rco.wa.gov</a></td>
</tr>
</tbody>
</table>
### Middle Columbia River Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Klickitat County Lead Entity**</td>
<td>29*, 30, 31</td>
<td>John Foltz (509) 773-2353 <a href="mailto:johnf@co.klickitat.wa.us">johnf@co.klickitat.wa.us</a></td>
<td>Dave Caudill (360) 902-2649 <a href="mailto:dave.caudill@rco.wa.gov">dave.caudill@rco.wa.gov</a></td>
</tr>
<tr>
<td>Yakima Basin Fish and Wildlife Recovery Board Lead Entity</td>
<td>37*, 38, 39</td>
<td>Darcy Batura (509) 453-4104 <a href="mailto:dbatura@ybfwrb.org">dbatura@ybfwrb.org</a></td>
<td>Kay Caromile (360) 902-2639 <a href="mailto:kay.caromile@rco.wa.gov">kay.caromile@rco.wa.gov</a></td>
</tr>
</tbody>
</table>

### Puget Sound Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green, Duwamish and Central Puget Sound Watershed Lead Entity (WRIA 9)</td>
<td>9</td>
<td>Karen Bergeron (206) 477-4641 <a href="mailto:karen.bergeron@kingcounty.gov">karen.bergeron@kingcounty.gov</a></td>
<td>Elizabeth Butler (360) 725-3944 <a href="mailto:elizabeth.butler@rco.wa.gov">elizabeth.butler@rco.wa.gov</a></td>
</tr>
<tr>
<td>Hood Canal Coordinating Council Lead Entity</td>
<td>14*, 15*, 16, 17*</td>
<td>Alicia Olivas (360) 271-4722 <a href="mailto:aolivas@hccc.wa.gov">aolivas@hccc.wa.gov</a></td>
<td>Mike Ramsey (360) 902-2969 <a href="mailto:mramsey@rco.wa.gov">mramsey@rco.wa.gov</a></td>
</tr>
<tr>
<td>Island County Lead Entity</td>
<td>6</td>
<td>Dawn Pucci (360) 678-7916 <a href="mailto:D.Pucci@co.island.wa.us">D.Pucci@co.island.wa.us</a></td>
<td>Mike Ramsey (360) 902-2969 <a href="mailto:mramsey@rco.wa.gov">mramsey@rco.wa.gov</a></td>
</tr>
<tr>
<td>Lake Washington, Cedar, Sammamish Watershed Lead Entity (WRIA 8)</td>
<td>8*</td>
<td>Jason Mulvihill-Kuntz (206) 477-4780 <a href="mailto:jason.mulvihill-kuntz@kingcounty.gov">jason.mulvihill-kuntz@kingcounty.gov</a></td>
<td>Elizabeth Butler (360) 725-3944 <a href="mailto:elizabeth.butler@rco.wa.gov">elizabeth.butler@rco.wa.gov</a></td>
</tr>
<tr>
<td>Nisqually River Salmon Recovery Lead Entity</td>
<td>11</td>
<td>Chris Ellings (360) 438-8687, Ext. 1270 <a href="mailto:ellings.christopher@nisqually-nsn.gov">ellings.christopher@nisqually-nsn.gov</a></td>
<td>Elizabeth Butler (360) 725-3944 <a href="mailto:elizabeth.butler@rco.wa.gov">elizabeth.butler@rco.wa.gov</a></td>
</tr>
<tr>
<td>North Olympic Peninsula Lead Entity for Salmon</td>
<td>17*, 18, 19</td>
<td>Cheryl Baumann (360) 417-2326 <a href="mailto:cbaumann@co.clallam.wa.us">cbaumann@co.clallam.wa.us</a></td>
<td>Mike Ramsey (360) 902-2969 <a href="mailto:mramsey@rco.wa.gov">mramsey@rco.wa.gov</a></td>
</tr>
<tr>
<td>Pierce County Lead Entity</td>
<td>10*, 12</td>
<td>Lisa Spurrier (253) 798-6158 <a href="mailto:lspurri@co.pierce.wa.us">lspurri@co.pierce.wa.us</a></td>
<td>Kay Caromile (360) 902-2639 <a href="mailto:kcaromile@rco.wa.gov">kcaromile@rco.wa.gov</a></td>
</tr>
<tr>
<td>San Juan County Community Development Lead Entity</td>
<td>2</td>
<td>Barbara Rosenkotter (360) 370-7593 <a href="mailto:barbarar@sanzuanco.com">barbarar@sanzuanco.com</a></td>
<td>Mike Ramsey (360) 902-2969 <a href="mailto:mramsey@rco.wa.gov">mramsey@rco.wa.gov</a></td>
</tr>
</tbody>
</table>
## Puget Sound Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Skagit Watershed Council Lead Entity</td>
<td>3, 4</td>
<td>Richard Brocksmith (360) 419-9326 <a href="mailto:rbrocksmith@skagitwatershed.org">rbrocksmith@skagitwatershed.org</a></td>
<td>Marc Duboiski (360) 902-3137 <a href="mailto:marc.duboiski@rco.wa.gov">marc.duboiski@rco.wa.gov</a></td>
</tr>
<tr>
<td>Snohomish Basin Lead Entity</td>
<td>7</td>
<td>Beth Liddell (425) 388-3144 <a href="mailto:Beth.Liddell@co.snohomish.wa.us">Beth.Liddell@co.snohomish.wa.us</a></td>
<td>Elizabeth Butler (360) 725-3944 <a href="mailto:elizabeth.butler@rco.wa.gov">elizabeth.butler@rco.wa.gov</a></td>
</tr>
<tr>
<td>Stillaguamish River Salmon Recovery Co-Lead Entity</td>
<td>5</td>
<td>Pat Stevenson (360) 631-0946 <a href="mailto:pstevenson@stillaguamish.com">pstevenson@stillaguamish.com</a></td>
<td>Elizabeth Butler (360) 725-3944 <a href="mailto:elizabeth.butler@rco.wa.gov">elizabeth.butler@rco.wa.gov</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ann Bylin (425) 388-3464, Ext. 4659 <a href="mailto:ann.bylin@snoco.org">ann.bylin@snoco.org</a></td>
<td></td>
</tr>
<tr>
<td>West Sound Watersheds Council Lead Entity</td>
<td>15*</td>
<td>Kathleen Peters (360) 337-4679 <a href="mailto:kpeters@co.kitsap.wa.us">kpeters@co.kitsap.wa.us</a></td>
<td>Elizabeth Butler (360) 725-3944 <a href="mailto:elizabeth.butler@rco.wa.gov">elizabeth.butler@rco.wa.gov</a></td>
</tr>
<tr>
<td>WRIA 1 Salmon Recovery Board Lead Entity</td>
<td>1</td>
<td>Alan Chapman (360) 312-2298 <a href="mailto:alanc@lummi-nsn.gov">alanc@lummi-nsn.gov</a></td>
<td>Marc Duboiski (360) 902-3137 <a href="mailto:marc.duboiski@rco.wa.gov">marc.duboiski@rco.wa.gov</a></td>
</tr>
<tr>
<td>WRIA 13 Salmon Habitat Recovery Committee Lead Entity</td>
<td>13</td>
<td>Amy Hatch-Wineka (360) 427-9436, Ext. 110 <a href="mailto:amyhw@thurstoncd.com">amyhw@thurstoncd.com</a></td>
<td>Kay Caromile (360) 902-2639 <a href="mailto:kay.caromile@rco.wa.gov">kay.caromile@rco.wa.gov</a></td>
</tr>
<tr>
<td>WRIA 14 Salmon Habitat Recovery Committee Lead Entity</td>
<td>14*</td>
<td>Amy Hatch-Wineka (360) 427-9436, Ext. 110 <a href="mailto:amyhw@thurstoncd.com">amyhw@thurstoncd.com</a></td>
<td>Kay Caromile (360) 902-2639 <a href="mailto:kay.caromile@rco.wa.gov">kay.caromile@rco.wa.gov</a></td>
</tr>
</tbody>
</table>

## Upper Columbia River Salmon Recovery Region

Regional Organization: Upper Columbia Salmon Recovery Board
Executive Director: Derek Van Marter
(509) 670-1462
derek.vanmarter@ucsr.com
415 King Street
Wenatchee, WA 98801
Web site: www.ucsr.com

Upper Columbia Salmon Recovery Board Lead Entity
44,45, 46, 48, 50
Joy Juelson (509) 433-2999 Joy.Juelson@ucsr.com
Marc Duboiski (360) 902-3137 marc.duboiski@rco.wa.gov
## Appendix A: Salmon Recovery Contacts

### Snake River Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Snake River Salmon Recovery Board Lead Entity</td>
<td>32, 33, 35</td>
<td>Steve Martin (509) 382-4115 <a href="mailto:steve@snakeriverboard.org">steve@snakeriverboard.org</a></td>
<td>Kay Caromile (360) 902-2639 <a href="mailto:kcaromile@rco.wa.gov">kcaromile@rco.wa.gov</a></td>
</tr>
</tbody>
</table>

### Northeast Washington Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kalispel Tribe-Pend Oreille Lead Entity</td>
<td>62</td>
<td>Todd Andersen (509) 447-7245 <a href="mailto:tandersen@knrd.org">tandersen@knrd.org</a></td>
<td>Dave Caudill (360) 902-2649 <a href="mailto:dcaudill@rco.wa.gov">dcaudill@rco.wa.gov</a></td>
</tr>
</tbody>
</table>

### Washington Coast Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chehalis Basin Lead Entity</td>
<td>22, 23</td>
<td>Jane Atha (547) 297-8743 <a href="mailto:jatha@centralia.edu">jatha@centralia.edu</a></td>
<td>Alice Rubin (360) 902-2635 <a href="mailto:arubin@rco.wa.gov">arubin@rco.wa.gov</a></td>
</tr>
</tbody>
</table>

### Washington Coast Salmon Recovery Region

<table>
<thead>
<tr>
<th>Lead Entity</th>
<th>(WRIA)</th>
<th>Lead Entity Contact</th>
<th>RCO Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Pacific Coast Lead Entity</td>
<td>20</td>
<td>Rich Osborne (360) 374-4560 <a href="mailto:osborner@uw.edu">osborner@uw.edu</a></td>
<td>Alice Rubin (360) 902-2635 <a href="mailto:aubin@rco.wa.gov">aubin@rco.wa.gov</a></td>
</tr>
<tr>
<td>Pacific County Lead Entity</td>
<td>24*</td>
<td>Mike Nordin (360) 208-4451 <a href="mailto:plutroll@willapabay.org">plutroll@willapabay.org</a></td>
<td>Alice Rubin (360) 902-2635 <a href="mailto:aubin@rco.wa.gov">aubin@rco.wa.gov</a></td>
</tr>
<tr>
<td>Quinault Indian Nation Lead Entity</td>
<td>21</td>
<td>Rich Osborne (360) 374-4560 <a href="mailto:osborner@uw.edu">osborner@uw.edu</a></td>
<td>Alice Rubin (360) 902-2635 <a href="mailto:aubin@rco.wa.gov">aubin@rco.wa.gov</a></td>
</tr>
</tbody>
</table>

*Indicates a partial WRIA
**Indicates the lead entity is part of the salmon recovery region, but not part of the regional organization
Appendix B: Sample Conflict of Interest Policy

Article I: Purpose

The purpose of this conflict of interest policy is to protect the Sample Lead Entity interest and effectively manage conflict of interest issues as it acts to fulfill its lead entity requirements pursuant to Revised Code of Washington 77.85 and its scope of work obligations as part of its grant agreement with the Recreation and Conservation Office (RCO). This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to Sample Lead Entity.

Article II: Definitions

Conflict of Interest arises whenever the personal or professional interests of a lead entity committee (citizen or technical) or staff member of Sample Lead Entity are potentially at odds with the objectives of the lead entity as described in its bylaws and/or other founding and guiding documents.

A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

Article III: Procedures

1. Duty to Disclose. In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial or other interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.
2. Determining Whether a Conflict of Interest Exists. After disclosure of the financial or other interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest

   A. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.

   B. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

   C. After exercising due diligence, the governing board or committee shall determine whether the board can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

   D. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a vote of the disinterested directors whether the transaction or arrangement is in the board’s best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

4. Violations of the Conflicts of Interest Policy

   A. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

   B. If, after hearing the member’s response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.
Appendix B: Sample Conflict of Interest Policy

Article IV: Records of Proceedings

The minutes of the governing board and all committees with board delegated powers shall contain:

1. The names of the persons who disclosed or otherwise were found to have a financial or other interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing board’s or committee’s decision as to whether a conflict of interest in fact existed.

2. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Article V: Compensation

A voting member of the governing board who receives compensation, directly or indirectly, from the Board for

1. A voting member of the governing board who receives compensation, directly or indirectly, from the Board for services is precluded from voting on matters pertaining to that member’s compensation.

2. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Board for services is precluded from voting on matters pertaining to that member’s compensation.

3. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Board, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Article VI: Annual Statements

Each director, principal officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person:

1. Has received a copy of the conflicts of interest policy,

2. Has read and understands the policy,

3. Has agreed to comply with the policy, and
4. Understands the Board is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Article VII: Periodic Reviews

To ensure the Board operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

1. Whether compensation arrangements and benefits are reasonable, based on competent survey information and the result of arm’s length bargaining.

2. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Board’s written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

Article VIII: Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, the Board may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.