

## **ADF&G HUNTER ACCESS GRANT PROGRAM INVOICING POLICIES AND PROCEDURES**

The ADF&G Division of Wildlife Conservation Hunter Access Program (HAP) is a cost-reimbursable program; HAP reimburses only for actual expenses incurred including approved indirect costs. HAP strives to provide timely reimbursements of invoices while maintaining compliance with state and federal requirements.

### Allowability

In general, costs must meet the following federal criteria to be allowable under the HAP:

- Be necessary and reasonable for performance of the HAP project
- Be allocable to the HAP project
- Take place within the project performance period
- Be authorized or not prohibited under state or local laws or regulations
- Conform to all limitations or exclusions set forth in 2 CFR 200, the terms and conditions of the ADF&G and Pittman-Robertson Wildlife Restoration grant award, or other governing regulations as to types or amounts of cost items
- Be consistent with the subawardee's\* policies and procedures that apply uniformly to both federally financed and other activities
- Be accorded consistent treatment (e.g., a cost may not be assigned to an HAP project as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated as an indirect cost)
- Be determined in accordance with generally accepted accounting principles (except for state and local governments and Indian tribes, as provided for in 2 CFR 200)
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federal award in either the current or a prior period, except as specifically provided by federal law or regulation
- Be the net of all applicable credits (e.g., your net cost must include reduction-of-expenditure-type transactions, such as purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges, per 2 CFR 200.402, 2 CFR 200.406)
- Be adequately documented

*\*For the purposes of this document, "subawardee" refers to any direct recipient of HAP Funds including federal, state, local governments, and non-profit organizations.*

### Nonfederal invoice requirements

Subawardees need to be set up as a vendor with the State of Alaska before spending HAP grant funds. The link to the Vendor Self Service website can be found through this link <http://doa.alaska.gov/dof/iris/>.

Every nonfederal invoice must contain the following information:

- Name, address, and phone number of the billing organization
- HAGP Grant number (e.g., AKW-D-2-2015)
- Unique invoice number (assigned by the billing organization)
- Date the invoice was issued
- Period of expenditures (e.g., July 1, 2016 – September 30, 2016)
- Total expenses billed by line item (expenses must be listed by lines 1000–6000 as shown in the statement of work budget table)
- The following certification signed by an authorized representative of the billing organization (electronic signatures are acceptable): *I certify that I am authorized to sign this report on behalf of my organization. To the best of my knowledge and belief, this report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise (31 CFR 3729-3730 and 3801-3812).*
- Itemized list of expenses claimed (attached to the invoice)
- Documentation of each expense (e.g., invoice, receipt, timesheet/activity report--see below for details)
- Proof of payment of each expense (e.g., cancelled check, receipt, zero balance invoice--see below for details)
- Documentation and proof of payment of match expenses
- Any other documentation required by the subaward agreement/project terms and conditions

### Federal invoice requirements

Federal investigators are required to fill out, sign, and return an HAP federal invoice confirmation memo for every invoice. When HAGP receives a federal invoice, staff will email the invoice confirmation memo for completion to the federal investigator for the project if a memo was not included with the invoice. Federal invoices will not be processed without a completed memo.

### Invoice routing

All invoices should be emailed to [DFG.DWC.HunterAccess@alaska.gov](mailto:DFG.DWC.HunterAccess@alaska.gov). Please clearly state in the subject line that the email contains invoices for reimbursement. Emailed invoices do not need to be mailed in hard copy.

### Documentation of expense and proof of payment

Documentation of expenses must be sufficient such that HAP staff can easily identify each item. Common problems with documentation include credit card receipts that are copied on top of invoice expense descriptions, copies of backup documentation that are too faint to read, and cryptic product descriptions on invoices and receipts. These and other issues can cause delays in invoice processing. The subawardee should provide an explanation for any expense that is not clear and understandable by a layman; all expenses should be easily identified in the budget narrative in the proposal form scope of work. HAP also requires proof of payment of all expenses to document that the organization has incurred the cost. Proof of payment can take the form of canceled checks, receipts, zero balance invoices, pay stubs, etc. Please see the “Line item details” section below for more information on documentation by line item.

### Unallowable costs

HAP staff will review invoices for allowability of costs. Any costs that are not reasonable, not identified in the proposal form budget narrative (see below) or otherwise not allocable to the project, or are unallowable per federal regulations or HAP policies, may be questioned and unallowed. If HAP staff learns that reimbursed or match costs previously accepted are unallowable per federal requirements, these costs may be retroactively disallowed, as follows:

Active projects: Retroactively disallowed costs that have been reimbursed must be credited on the subawardee’s next invoice. Disallowed match costs must be replaced with the next invoice if needed to meet match requirements; further reimbursements will be withheld until/unless match requirements are met. If necessary, the subawardee may be required to reimburse the HAP if sufficient allowable match is not accrued for reimbursed expenses. The subawardee may provide additional match documentation or accrue additional match expenditures during the project period to meet match requirements.

Closed projects: Retroactively disallowed costs from closed projects must be reimbursed to the HAP. Retroactively disallowed match may result in the disallowance of reimbursed costs; subject to approval by the HAP and/or auditors, the subawardee may provide documentation of additional allowable match incurred during the project period or reimburse the HAP for the portion of reimbursed costs originally met with the disallowed match. Match expenses may not occur outside the original project performance period.

### Expenses not described in the budget narrative

Within reason, investigators should include all anticipated expenses in the budget narrative when submitting their proposal form and finalizing their project statement with HAP staff. Any expense that is not described in the budget narrative either directly or as part of a described category (e.g., field supplies) may be questioned by HAP staff. Investigators should contact HAP staff before making expenses not included in the proposal budget narrative.

### Late project costs

All expenditures must be necessary to accomplish project objectives during the project performance period. Therefore, supplies and equipment must be purchased early enough in the project to allow significant use during the life of the project. Supplies and equipment purchased late in the project period (e.g., within six months of the end date for supplies and within one year of the end date for equipment) will receive additional scrutiny and may be unallowed by HAP

staff even if they are in the project budget. Questions about acceptable timing of supplies and equipment purchases should be directed to HAP staff.

#### Program Income

Program income is defined as gross income earned by the subawardee that is directly generated by a supported activity or earned as a result of the federal grant during the project performance period (2 CFR 200.307(a)). HAP does not allow program income during the project performance period (e.g., collecting fees at a trailhead that was improved with HAP grant funds while the grant is open). After the period of performance has ended (the grant has been closed) fees may be collected but may be subject to HAP terms and conditions. Questions about program income should be directed to HAP staff.

#### Credits

Invoices should include a brief explanation of any credits issued on them.

#### Reimbursement timing and review

ADF&G HAP will issue a reimbursement within approximately 30 days of receipt of an invoice if the invoice is complete and acceptable; incomplete invoices (i.e., invoices that lack the required information listed above) will be held pending submission of missing information. Invoices may also be held until any questions arising during review of the invoice are resolved. The subawardee's invoice contact identified in the subaward agreement will be contacted by HAP staff with any questions or concerns and, if appropriate, guidance on how to resolve the issue(s). The subawardee may choose to remove questioned costs from the invoice to expedite payment. Funds withheld due to unsatisfactory compliance with any of the HAP policies and/or federal requirements may be paid at a later date at HAP's discretion upon satisfactory correction or completion of the condition that caused the withholding.

#### Invoice submission deadline

All invoices must be complete and received by HAP no later than 30 days following the project period of performance end date in order to qualify for reimbursement. The HAP requires recipients to bill at least quarterly for efficient processing of invoices.

#### Confidentiality and privacy

All invoices submitted become the property of the State of Alaska. Alaska Statute 40.25.110 requires public records to be open to reasonable inspection. The subawardee is responsible for ensuring that invoices and supporting documentation do not contain private or sensitive information such as social security numbers, home addresses, or telephone numbers of employees.

#### Line item details

##### Personnel (line 1000)

Compensation for personal services described in the finalized project statement shall be reimbursed for reasonable, allowable, and allocable services rendered during the project period, including but not necessarily limited to, wages, salaries, and fringe benefits, as described in 2 CFR 200.430. Compensation for employees engaged in work on HAP projects will be considered reasonable to the extent that it is consistent with that paid for similar work in other activities of the subawardee.

### Salaries and wages

2 CFR 200.430 describes federal requirements for the internal documentation of the subawardee's personnel costs. With its invoices, the subawardee must provide documentation supporting those personnel costs requested for reimbursement compliant with 2 CFR 200.430. Documentation must include the employee's activity allocable to the project as part of the employee's total activity. In addition, pay stubs, accounting sheets showing direct deposit transactions, or other documentation that the employee was paid are required.

### Fringe benefits

Fringe benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe benefits include, but are not limited to, the costs of leave, employee insurance, pensions, and unemployment benefit plans. The costs of fringe benefits are allowable to the extent that the benefits are reasonable and are required by law, the subawardee's entity-employee agreement, or the subawardee's established policy. Fringe benefits should be distributed to particular projects and other activities in a manner consistent with the pattern of benefits accruing to employees whose salaries and wages are chargeable to such projects and other activities.

Only actual fringe benefits provided to employees are allowable. Documentation of all fringe benefits is not required; however, the subawardee must be able to satisfy to HAP staff that claimed costs are based on actual expenditures. If a percentage rate is used to calculate the fringe benefits charged to HAP projects, the subawardee must provide HAP staff with calculations justifying the rate used by employee or provide the federally negotiated indirect cost rate agreement (NICRA) if the fringe benefits rate is federally negotiated.

### Travel (line 2000)

Meals, incidentals, and lodging costs will be reimbursed according to the subawardee's travel policies and procedures and must be documented. If a per diem rate is used, a calculation including the per diem rate and the number of days claimed must be provided. HAP staff may require a copy of the subawardee's travel policies and procedures prior to reimbursing travel costs.

### Contractual, supply, and equipment expenses (lines 3000, 4000, and 5000)

Contractual, supply, and equipment expenses must be documented with an invoice, receipt, or other documentation describing the expense as well as a canceled check, receipt, zero balance invoice, or other documentation indicating the expense was paid.

### Indirect (line 6000)

The HAP allows for the recovery of indirect costs for nonfederal entities with a federally negotiated indirect cost rate agreement (NICRA) or eligible entities claiming the 10% de minimis indirect rate described in 2 CFR 200 if the rate is included in the finalized project statement budget. The federally approved rate letter must be provided for all approved provisional and final HAP grant awards and are applicable to the project period throughout the life of the project. Federal entities must provide a memo on agency letterhead (or comparable documentation) that provides their indirect rates throughout the life of the project.

Per federal regulations the HAP does not allow administrative or overhead expenses to be charged as direct (grant) expenses. Examples of typical administrative expenses include the following:

- Rent
- Utilities
- Building maintenance or cleaning
- Insurance
- Telephone service
- Postage
- Office supplies (e.g., folders, ink cartridges)
- Office furniture and equipment (e.g., chairs, desks, printers)
- Administrative staff
- Audit expenses (unless they appear in the finalized statement of work)
- Legal expenses
- Equipment depreciation
- Other services or items shared between multiple projects or not directly related to the execution of the project

If the subawardee has applied for, but not yet received, a NICRA at the time the subaward agreement is finalized, indirect will not be paid until the NICRA is received and HAP staff has been provided a copy of the federal rate letter. If a NICRA rate is not approved by the end of the project performance period, indirect costs will not be reimbursed. Budgeted indirect costs may not be moved to other line items.

### Match

Match requirements must be met by the time that each invoice is paid (i.e., reimbursement of project expenditures will not occur until the required non-federal match percentage (25%) has been met). Excess match expenditures (specific to the project) will carry forward and be available to match future expenses on the same project. Please see the *HAP Match Guidance* document for details on match requirements.