

COMMONWEALTH OF PENNSYLVANIA
Department of Conservation and Natural Resources

***Bureau of Recreation and Conservation (BRC)
Administrative Policy/Grant Guidelines***

SUBJECT: Development- Eligible and Ineligible Grant Project Activities/Costs/Match

EFFECTIVE DATE: 1/1/13

REVISED DATE: 11/22/13

BACKGROUND: The DCNR Community Conservation Partnerships Program (C2P2) grant program is administered by the Bureau of Recreation and Conservation (BRC). This policy has been established to help define the various types of activities, costs and match, to include both cash and non-cash match values, which are eligible under the C2P2 program.

Please note that it is difficult to identify all possible project activities, costs and match scenarios. The Bureau reserves the right, at its sole discretion, to review and determine the eligibility of all proposed project activities, costs and match both during the grant application process and the grant administration and management process, should your project be selected for funding.

POLICY: To be considered eligible, all project activities, costs and match must be:

1. Approved by the Bureau.
2. Directly related to performing the official scope of work included in Appendix A of the grant agreement.
3. Incurred within the grant agreement period.

I. Eligible Activities, Costs and Match:

1. If an application is funded, costs incurred prior to the approval of the grant necessary to submit the grant application and to meet the Bureau's requirements, **may be eligible** at the Bureau's discretion. Examples of eligible pre-agreement costs include the preparation of the site development drawings, specifications and surveys related to the development of the project.
2. **Professional Services Fees** contracted to perform all or part of the Bureau approved project scope of work. These fees/costs can include: design costs provided by an architect, engineer or landscape architect to develop drawings and specifications, bid advertisements including postage, construction observation, property surveys, solicitor/attorney fees, permitting costs, etc.
 - a. Professional Services Fees are limited to 15% of the total eligible construction costs.
 - b. Design work must be under the seal of a licensed professional who is authorized by Pennsylvania law to apply the seal. Depending on the project, the professional could be an architect, engineer or landscape architect. **No value for drawings and specifications will be accepted for work done by individuals not meeting these qualifications and licensure requirements.**

3. Costs related to an independent project audit, if required by the Bureau. These costs may be considered eligible even if the audit is performed after the grant agreement period, as specified in the grant terms and conditions.
4. Construction contracts entered into between the applicant/grantee and a contractor to perform the approved scope of work.
5. Construction material contracts that meet the design specification approved by the project consultant and Bureau, entered into between the applicant/grantee and a supplier to provide the materials to complete the approved scope of work.
6. For **Small Community- Development Projects, ONLY:**

The maximum grant under the small community program is \$40,000. To receive the \$40,000, the total project costs, including eligible match, must meet but NOT exceed \$60,000. \$20,000 in grant funding is restricted to the purchase of eligible materials and approved professional services (maximum \$3,000). Additional grant funds of up to \$20,000 may be provided, and this additional grant money must be matched by the municipality on a dollar for dollar basis with cash or non-cash match. The additional grant money and the municipal match must be used to cover all other eligible costs, such as labor and/or equipment and other approved professional services fees.
7. For **PA Recreational Trail & Snowmobile/ATV- Development Projects, ONLY:**

The purchase of tractors, trail groomers, maintenance equipment, etc. that are being used to maintain various trails.
8. Cash contributions being provided by other organizations to be used as a portion of the local matching funds should be transferred to the applicant/grantee to expend. In such cases, where an outside organization/agency wishes to expend funds on behalf of the applicant/grantee, a formalized Agreement must be entered into by all parties, to define the participating parties roles and responsibilities (e.g. Community Development Block Grant (County CDBG) Funds, County Gaming Funds, County Redevelopment Authority Funds, etc.) *Draft Agreements should be provided to DCNR for review and approval prior to execution.*

II. Ineligible Activities, Costs and Match:

1. Items related to the preparation of the grant application.
2. Projects located outside of the Commonwealth of Pennsylvania.
3. Grant project administration, including costs associated with creating and maintaining complete and accurate grant project records (e.g. generating Bureau progress reports, submitting payment requests, correspondence or resolutions; in-house costs related to supervision of staff; costs for accounting and bookkeeping, etc.).
4. Costs of conducting fundraising activities.
5. Costs for lobbying activities.
6. Costs of food, drink, gifts and or other hospitality items related to the general promotion of the applicant/grantees organization or project.
7. Costs determined by the Bureau to be in violation of the Grant Terms and Conditions.
8. Purchase of maintenance equipment, such as tractors, mowers, maintenance supplies, recreational supplies, hand tools, etc.; except for PRT and S/ATV funded grants/projects.
9. Appraisal and other costs related to a land donation.

10. **Generally, items not permanently affixed to real property.** Because it is not possible to list all items, the Bureau, at its sole discretion, will determine the eligibility of all questionable items. Examples of such items include portable equipment such as tables, chairs, sporting equipment, portable toilets, concession stand equipment, kitchen equipment (such as refrigerators, stoves, fryers, and microwaves), computers, televisions, microphones, tools, etc.
11. **Temporary facilities,** to include but not limited to, portable ice skating rinks, removable field fencing, temporary bridges, tents, etc.
12. Demolition costs not preapproved by the Bureau. Typically, this includes demolition costs that are nominal in relation to the total project cost.

III. MATCH: General Information

1. DCNR Development grants require a match. Depending on the project type and categories, matching funds may include CASH and/or NON-CASH Values: In-House Services, Equipment Use, Donated Goods & Services and/or Volunteer Labor.

All match must be directly related to the Bureau approved scope of work. See the table below and for additional information and refer to the Grant Program Guidelines for each project type and category.

Project Types	Required Match	Cash	Non-Cash	Land Donation
Development	50%	x	x	x
Land & Water Conservation Fund	50%	x		
PA Recreational Trails – (Development/Maintenance)	20%	x	x	
Rivers	50%	x	x	x
Rails-to-Trails	50%	x	x	x
Small Community (Development)	Varies	x	x	x
Snowmobile/ATV (Development)	20%	x	x	x

2. Typically, items eligible for reimbursement with Grant Funds are also eligible as Match.
3. Grant funds will not be used to reimburse for NON-Cash Match activities or costs.
4. Match in excess of that counted for a project may not be carried over for use on another grant.
5. Match, whether in the form of cash, non-cash or a land donation, may be used only once as match. If it has been counted as match for another project/grant or portion of this project, it may not be again counted as match, no matter who funded the project(s).
6. Cash contributions being provided by other organizations to be used as a portion of the local matching funds should be transferred to the applicant/grantee to expend. In cases where an outside organization/agency wishes to expend funds on behalf of the applicant/grantee, a formalized Agreement must be entered into by all parties to define the participating parties roles and responsibilities (e.g. Community Development Block Grant (County CDBG) Funds, County Gaming Funds, County Redevelopment Authority Funds, etc.) *Draft Agreements should be provided to DCNR for review and approval prior to execution.*

7. Donated work is valued at the value of the work performed, *not the value of the individual performing the work*. **For example**, a licensed Landscape Architect preparing a site plan may value that work at the rate for which they normally bill for such work. However, the value of the work provided by a Landscape Architect doing non-skilled labor will be valued up to the current PA Independent Sector Volunteer Rate, http://www.independentsector.org/volunteer_time at the time the work was performed, not at the billable rate of the Landscape Architect. Likewise, Professional Tradesmen bring significant value to a project and may charge their billable rate. *Individuals with no training and/or experience in Masonry, for example, cannot perform Masonry work and claim the value of that work to be at the level of a professional Mason.*
8. **Individuals and firms providing and/or donating services must possess** the actual skills, qualifications, certifications, training and experience, for the services they will provide and must provide written documentation of the service rendered. The Bureau may request a resume and/or listing of qualifications. The acceptable rate will be established as the professionals/contractors actual hourly rate, as documented on their employer's/firms official letterhead or invoice.

IV. MATCH: Specific Information

A. ELIGIBLE MATCH-

1. **In-House Services-** the value of In-House staff services and labor will be equal to the employees actual, established hourly wage rate, as set by the organization/agency's governing body or the employee's hourly rate plus fringe benefits and operational overhead costs. Fringe benefits and overhead costs include but are not limited to employee insurance, retirement benefits and paid time off. (A Billable Rate Schedule must be provided.) Please note that daily recordkeeping is required during the grant period.
2. **Equipment Use-** the value of municipal owned equipment used to directly develop the site. Equipment must be owned by the applicant/grantee or use donated by an equipment owner. (A Billable Equipment Rate Schedule must be provided.) Please note that daily recordkeeping is required during the grant period.
3. **Donated Goods & Services: Are only eligible** as non-cash match, if they meet the specific project design specifications, are approved by your design consultant and the Bureau, and are related to performing the approved scope of work.
 - a. The value for **Donated Goods** shall be established by the actual cost of those materials, if items were to be sold at actual cost and should be documented on an invoice by the Supplier/Person donating them.
 - b. **Donated Services-** can include both Labor and Equipment costs, owned and provided by a local contractor and used exclusively to develop the site. Such a donation requires a Letter of Commitment during the application period and upon conclusion of the grant project, a formal written letter must be supplied by the Contractor, on company letterhead, providing the specifics of the work performed, range of dates of work performed, as well as the value of the work and/or equipment donated.

4. **Volunteer Labor-** those services which are not paid for by the applicant/grantee to perform all or part of the project scope of work. Volunteer services (non-skilled labor), will be valued up to the current Pennsylvania Independent Sector Volunteer Rate, http://www.independentsector.org/volunteer_time at the time the work was performed. **Work performed by prisoners or individuals under the age of 18 will be valued at the Commonwealth's minimum wage rate.**

5. **Land Donations** may be an eligible non-cash match for a development project. The market value must be determined by a state certified General Real Estate Appraiser, and the applicant must provide a copy of the appraisal with the application. This value will be considered as match for developing the donated land and/or adjoining parklands. **If the development project is selected for funding, a second land appraisal may be required. (Please refer to the Land Acquisition policy/guidelines for additional information related to the appraisal.)** *A Letter of Commitment regarding the proposed land donation must be provided during the application period, while possession of the property can occur only during the approved grant period.*

B. INELIGIBLE MATCH-

1. The value of lands acquired by Mandatory Dedication or by other Federal, State or Local requirements **may not be used as match** (e.g. wetland or brownfield mitigation, landfills, etc.).
2. Appraisal costs and other costs related to a land donation are not eligible as a match on development projects.
3. Volunteer time affiliated with attendance at meetings or other related grant administrative tasks.
4. Some state sources of funding; for example, Redevelopment Capital Assistance Program (RCAP) funds. Contact the Bureau if there are questions about the eligibility of match.

This policy remains in effect until revised or rescinded.