

All Entities Subaward Program: Frequently Asked Questions

The Oregon Department of Forestry, Urban & Community Forestry (UCF) program has received many questions from subrecipients of the All-Entities subaward program. While this list is not exhaustive, it is an informative resource reflecting the most current policies, procedures, and limitations that may emerge during the grant's lifecycle. The UCF team will continue to update this document as new questions and policies arise.

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

Answer: The actions of the new administration have created uncertainty and given rise to questions about federal assistance, including grants that are already executed. The State of Oregon and other states have filed lawsuits to ensure that grant agreements to the state which are under contract are honored and can continue without pause or delay. To date, federal judges trying the cases have issued responses and orders that ensure that the flow of federal funds through agreements that are executed continues. The UCF program is proceeding with the completion of subawards and grant activities. We are committed to promptly fielding your concerns, eliminating uncertainty, and minimizing risk for subrecipients wherever possible. As we become aware of any development that may impact your subaward, we will pass that information along promptly.

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

Answer: The All-Entities subaward program received 89 proposals, totaling an estimated \$45 million in funding requests. All 2024 submissions received eligibility reviews, and 87 proposals made it into the final evaluation process. Twenty-six competitive proposals have been selected to receive funding that totals \$11.8 million. In addition, two foundational contracts were also funded, totaling \$700,000. Altogether, \$12.5 million in funding has been awarded. The pool of applicants was highly competitive and the All-Entities subaward program allocated the entirety of the funding available in 2024. Consequently, there will **not** be another Call for Proposals in 2025. The UCF program is committed to assisting in locating other grant funding opportunities and sharing them directly on the subaward webpage, <https://www.oregon.gov/odf/forestbenefits/Pages/ucf-subaward-programs.aspx>.

- 3. Question:** Do you all have an estimated timeline on when the UCF grant funds will be distributed?

Answer: Funds can only be distributed after the subaward agreement is executed, and only for work that occurs within the approved project performance period. Awardees seeking reimbursement can submit a claim request, no more frequently than monthly. Awardees that negotiate a working capital advance will justify an advance payment based upon cashflow needs during the pre-award and negotiation of the grant agreement. Advance payment requests will be processed as soon as possible after subawards are executed.

- 4. Question:** What is a pre-award cost and can a subrecipient request this from ODF?

Answer: Pre-award costs are for approved award expenditures that occur prior to the

beginning of the project period. Pre-award costs are not allowed in this program. However, the project performance period of the grant agreement can begin upon the date the agreement is executed or requested back to the date of notice of award (January 15, 2025) if the activities are allowable, allocable, and reasonable. All costs incurred prior to the execution of the agreement are incurred at the subrecipient's risk as there is no obligation by the pass-through (ODF) to reimburse for activities occurring when no executed agreement is in place.

When undertaking project work prior to execution of a grant agreement the Subrecipient acknowledges there are risks associated and must agree to take on any risks related to initiating their project/program work before a grant agreement is executed by the pass-through entity (ODF).

Note: Some organizations include the initial planning or prep for the program/project work within their operational budget, by offsetting the pre-work with in-kind match, or by utilizing other grant funds before they consider submitting a pre-award cost request with the pass-through entity.

5. **Question:** Can subrecipients request a project start date that is before the date they anticipate having a signed/executed agreement?

Answer: A subrecipient can request a specific project performance period start and end date but understand there are inherent risks associated with initiating a program/project before the subaward agreement is executed.

Note: If a subrecipient begins working/expending funds prior to having a signed/executed agreement, the subrecipient is assuming the risk that these funds will not be reimbursed for various reasons. These reasons are numerous, including if expenditures are not in accordance with the specifics of the agreement or if the agreement never gets signed/executed.

6. **Question:** Will there be specific questions for the "risk assessment" that can be sent in advance so subrecipients can prepare documents and staff as part of the pre-award / agreement process?

Answer: A standardized risk assessment will be administered. Relevant questions can be provided in advance, allowing you to prepare by gathering the necessary documents and information to ensure accurate and complete responses.

7. **Question:** What is a desk review?

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

8. Question: What are the payment options for subrecipients?

Answer: Per [2 CFR 200.305](#), two options are available, advance payments ([2 CFR 700.7](#)) or reimbursement. Note claims from subrecipients for payments may have special conditions per [2 CFR 200.208](#) and expense requirements per Oregon Accounting Manual [10.40.00](#). Each option will be discussed during the pre-award meeting, and permitted conditions included with the grant agreement. Regardless of payment option, funds cannot be dispensed to subrecipients unless they have an executed agreement.

9. Question: Can you provide an example of what ODF will want to see included with a reimbursement request?

Answer: At a minimum, the subrecipient must provide documentation that shows proof of expenditure toward completion of tasks, activities, or deliverables included in the grant agreement. This includes, but is not limited to, contracts, receipts, payroll records, and mileage logs. Make sure to be clear on direct versus indirect costs, that all claims align and draw from the line items from the approved budget, with descriptions provided as needed. All claims must include a current copy of the organization's active SAM.gov registration. See the table in the following question for timeline suggestions and process reminders.

10. Question: How do advance payments work?

Answer: ODF is working to develop the process for advance payment and advance payment to provide working capital. Below are the current terms (these are subject to change).

- The subrecipient must certify that advance payment is needed to fund this project's operations.
- The subrecipient must submit an advance payment request in WebGrants to initiate the fund delivery process. Once funds are delivered and spent, the subrecipient must submit an advance payment expenditure verification in WebGrants to confirm that all funds have been spent down before they are eligible to receive their next advance payment.
- All funds received through advance payment must be fully spent down within 90 days of receipt of funds. Exceptions require prior approval by ODF and USFS.
- It is the subrecipient's responsibility to request advance funds in a timely manner to support the operational budget of this proposal.
- Keep in mind it may take a subrecipient 30 or more days to prepare an advance payment request and may take 30 or more days for ODF to review/approve/release payment.
- Advance payment requests must be submitted in accordance with the advance payment request schedule negotiated between ODF and the subrecipient, formalized in the grant agreement. All verifications of advance payments will be reviewed and processed by ODF before a new advance payment request is sent to USFS.
- See [Advance Payment Schedule Template](#) for details.

11. Question: What happens if an advance payment is not fully spent within 90 days of the receipt of funds?

Answer: We recognize that advance payment requests may be based on projected costs and that there may be many reasons that the full amount may not be spent during the 90-day period. To remain in compliance, you must submit the advance payment expenditure verification within two weeks of the expenditure deadline (see [Advance Payment Schedule Template](#)) with a description of the funds that have not been used and projected timeline for spending the remaining funds. In addition, you will need to submit an amendment/modification request (see [Amendments/Modifications Tutorial](#)) outlining the requested change in advance payment expenditure time frame. Once the advance payment has been fully spent, resubmit the advance payment verification detailing how all funds have been spent.

12. Question: Can we modify the grant scope, budget, performance metrics or contact details?

Answer: Yes. You can submit your modification request in WebGrants (see [Amendments/Modifications Tutorial](#)). Your UCF primary contact will review to inform about the next administrative steps which may include an adjustment of information in the WebGrants system up to developing an amendment for your grant agreement.

13. Question: What mapping resource do subrecipients use for the duration of the grant if the federally mapping tools are not available online?

Answer: The federal mapping data is backed up on other public domain areas, and ODF currently has a mapping tool resource available for reporting and compliance purposes.

<https://experience.arcgis.com/experience/a5df933edc2f48a3b80eb30e4d55fadc>.

Note: The UCF program reserves the right to update the ODF mapping tool at any time and will include any updates on the [subaward program webpage](#).

14. Question: How can stipends be dispersed as part of the program/project work?

Answer: Participant support costs may be allowed with prior approval. [2 CFR 200.456](#) lists stipends as participant support costs in 2 CFR 200.1 but does not define how stipends can be administered. As of March 19, 2025, all subrecipients who included stipends in their budget proposals have received pre-approval by the US Forest Service.

Permitted stipends to program/project participants include one-time payments (e.g., checks, cash). Subrecipients may also set up a trust account to disperse stipends according to the organization's policy. Gift cards, gas cards, and pre-paid credit cards are not an option for the ODF subaward program

15. Question: When would ODF advise a subrecipient to publicly announce their acceptance of the grant award?

Answer: It is recommended that organizations do not announce or publicly share their success of winning an award from the state agency until an executed grant agreement is in place. All public releases of information should follow the terms of the prime award agreement.

The recipient shall acknowledge US Forest Service support in any publications, audiovisuals, and electronic media developed as a result of this award. Follow directions in USDA Supplemental 2 CFR 415.2.

16. Question: Is the purchase of equipment allowable?

Answer: Equipment purchase is not allowed. Section K of Federal Financial Assistance Grant award 24-DG-11062765-084, received by ODF from USDA US Forest service reads:

FUNDING EQUIPMENT (on page 6) states that “*Federal funding under this award is not available for reimbursement of ODF’s purchase of equipment. Equipment is defined as having a fair market value of \$5,000 or more per unit and a useful life of over one year. Supplies are those items that are not equipment.*”

As equipment purchase is disallowed to the pass-through entity, ODF, the purchase of or fabrication of equipment by any subrecipient is not allowable. Equipment rentals are allowable and must be identified in your budget narrative under ‘other costs.’

17. Question: What are legal immunities?

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

https://orprima.org/images/meeting/100516/public_entity_immunities.pdf

18. Question: Can I make changes to my budget? How does that process work?

Answer: Yes. You will need to submit a modification request to make changes to your budget (see [Amendments/Modifications Tutorial](#)). Your UCF primary point of contact will review the request and work with you to make any necessary changes.

19. Question: The fiscal contact from my organization is registered in WebGrants and OregonBuys. What else must we do to ensure payment is made between ODF and our organization?

Answer: Follow these steps:

1. Email your organization vendor number and Login ID username to your UCF primary contact. If your organization is **new to OregonBuys**, also send them your organization’s W9.
2. The UCF primary contact will work send your W9 to ODF OregonBuys team to create a new account profile in the State’s Financial Management System.
3. After registering in OregonBuys and being confirmed as an active user, the State will by default release payment through check form and by mail.
4. If your organization would like to receive payment via Direct Deposit an Automated Clearing House (ACH) form must be completed and attached to your account profile.
 - a. Webpage for ACH information

b. ACH form with instructions

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

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

21. Question: Can an organization use federal funds to pay for existing employees? What is the difference between "supplement" and "supplant" in the context of federal funds?

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

In simpler terms:

- **Supplanting** means using federal funds to replace other funds that were already set aside for the same purpose (this is not allowed).
- **Supplementing** means using federal funds to add to what's already available, like covering extra costs for a project (this is allowed)

22. Question: Can an organization use grant funds to pay a deposit or retainer for future work to be completed?

Answer: USFS has confirmed that deposits and retainers for professional service costs are allocable and eligible costs under this subaward program. Timelines are subject to ODF approval and depend on the nature of the work conducted. Please reach out to your primary contact to seek approval for deposits and retainer fees.

23. Question: Can an organization use ODF's logo for presentation, publication, or flyer?

Answer: ODF Public Affairs permits the use of ODF's logo for grant project material when referencing ODF as the funding sponsor. The two logos available are high-resolution in black and white, and the other in traditional ODF colors. Send an email to your UCF primary contact to receive the logo of choice. Please do not recolor or modify the original design of the logo.