

**From:** [Ramsey, Tami \(ECY\)](#)  
**To:** [Busby, Laura \(ECY\)](#); [Robertson, Alaina \(ECY\)](#)  
**Cc:** [Krumlauf, Jill \(ECY\)](#); [Dunne, Kelsey \(ECY\)](#)  
**Subject:** RE: West Plains Water Coalition SWMPPG-2023-HIPSpC-00078  
**Date:** Monday, March 25, 2024 3:57:18 PM  
**Attachments:** [image002.png](#)

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Thank you for the added information, Laura, it is much appreciated.

I appreciate you laying it out as background, and what you're looking for as guidance. Especially for long, full emails.

I added my thoughts from a training perspective below in orange.

If we need to discuss more, it might be better to talk rather than continue a written dialogue. Then document the result in an email for future reference.

Best,

*Tami*

Tami M. Ramsey, SWM Grants Coordinator  
360-628-4261 work cell

**It's not about perfection, it's about progress. Practice makes progress.**

**From:** Busby, Laura (ECY) <lbus461@ECY.WA.GOV>  
**Sent:** Friday, March 22, 2024 1:09 PM  
**To:** Ramsey, Tami (ECY) <TMOR461@ECY.WA.GOV>; Robertson, Alaina (ECY) <alay461@ECY.WA.GOV>  
**Cc:** Krumlauf, Jill (ECY) <jkru461@ECY.WA.GOV>; Dunne, Kelsey (ECY) <kdun461@ECY.WA.GOV>  
**Subject:** RE: West Plains Water Coalition SWMPPG-2023-HIPSpC-00078

Hello All,

My apologies for the unclear nature of my initial email. My goals are to create awareness of this situation and get help in determining if there are any next steps we should/could be taking. I hope this revision is clearer and I look forward to your thoughts on the list of possible next steps. I'm happy to provide any added context or information.

**The situation:**

West Plains Water Coalition (WPWC) is struggling (they are a very new organization). Board members are quitting due to concern about unilateral decision-making, financial issues (with Ecology but also maybe broader), and overall poor communication from the President, John Hancock. The Fiscal Sponsor, Community-minded Enterprises, is also concerned about these same issues and about their ability to be reimbursed for expenses incurred. While these are their issues, they are aggravated to some degree by the lack of continuity in grant management from Ecology.

Their agreement was written by Faith ("active" on 10/24/2023), briefly managed by Alaina, and then by me. Some of their current financial struggles with eligibility would not have occurred had they had the same grant manager and/or consistent messaging from us. This is not anyone's fault, just acknowledging that our staffing and grant management changes have undoubtedly impacted their ability to know what's required, meet those expectations, and, to some degree, function well financially. This does not, however, excuse John's poor communication, poor financial management, and lack of follow through on eligibility guidelines he has been given through PPG Guidelines, Yellow Book and from Alaina and I as grant managers.

**The financials:**

I have denied \$31,213.85 in submitted expenses in the first 2 PRPRs. A small portion of the expenses are flat-out ineligible.

The \$20,000 Camp Creative contract estimate (not final but signed), dated August 1, 2023, was uploaded in their Q1 PRPR. Faith sent the PRPR back for modifications and, once returned, I finalized the few outstanding pieces, including denying a \$10,000 ineligible downpayment for Camp Creative. Their relevant Project Budget line item: *PR design, marketing strategy, website, & related systems*, is for \$46,000.

The bulk of the denials are with this contract. Some of the items/work may be eligible but I don't have appropriate backup documentation:

- Faith may have given preapprovals for materials but I don't have much in the way of clear records on this – some inconclusive emails supplied by John.
- The Camp Creative invoices do not have the level of detail required to know what work was accomplished for the hours reported or what the materials they developed were.

I have had follow up communications with John, some members of the WPSC board, and the fiscal sponsor folk about the denied expenses – including why some line items were denied and what's needed for approval, where possible. Note that this situation also has impact on their renewal.

**The PPG Guidelines say:**

**Contracts** – Ecology must review and approve service providers contracted to work on the project. Contracts above \$10,000 must use open procurement practices including those listed in the application or labeled "partners". Ecology will review and approve contracts, invoices, sole source, and procurement documents.

Under required backup documentation:

Contracted Services: To receive reimbursement for costs incurred for contracted services, please include:

- Copy of the contract including the cost base of the contract and the deliverables due.

- Procurement records showing fair open and transparent process.
- Invoices noting the accomplishments for the period.
- For time and material contracts, a log of hours worked by day.

**Possible next steps:**

Yes, we have lots of reasons to say this is on them and we don't need to do anything, however, I believe we all want the recipient to be successful. I think it is to everyone's advantage to do what we can to support them and their grant work. Maybe we can do some things to help them out even though they have not been exemplary recipients.

My questions are:

1. Can I give late approval (and then pay) for eligible goods and services that I don't have prior backup documentation for, given they fell in the timeframe of grant manager transitions, and may or may not have been preapproved? This is clearly an exception we would grant as a result of our staff transitions. *If something required prior approval and they didn't get it, you could review everything after the fact to determine if you would have given prior approval. If you find that prior approval would have been given, you could document it and include a reminder in the documentation of the prior approval procedure/requirement and warn them that this is a one-time deal???* This workaround should be the exception not the rule; we have processes for a reason and the more we deviate from them the harder it is for recipients to learn the right way and also increases the program's chances of an audit finding for deviating from our own policy/processes. All required backup for the costs are still required.
2. What other steps do you recommend to provide support for the denied, but potentially eligible, funds? *Maybe one-on-one training for this recipient? They need to understand the requirements for reimbursement and follow them. After they've been sufficiently training, or so you think they have, and they still aren't getting it. There's not much else we can do to support them. After a while, the extra time you take with them will become a time suck that you can't sustain. (I'm thinking of my Clark County experience with the accounting department). At some point, after you've done your due-diligence with them, you have to deny costs, document in the comments why and what they can do to fix it, and then move on.*
  - a. Would it make sense for me to meet with the fiscal sponsors, John, and Camp Creative to sort out what they need to provide for required backup documentation? *If I remember correctly, the fiscal sponsor is responsible for the PR/PRs; it's the implementing agency that is responsible for getting the work done. So yes, it makes sense to me that a meeting with the fiscal sponsor is appropriate. If they agree to include the contractor, that would be appropriate too.* Or is this something I should suggest to the fiscal sponsors to do (my concern is they don't have a great handle on what's needed so may not get it, creating more work for everyone).

- b. Other ideas?
3. What documentation do we need for the Camp Creative contract per the PPG Guidelines (noted above) or other guidance? *The fiscal sponsor should provide a copy of the executed contract, procurement documents; Camp Creative should provide invoices and time accounting (assuming the contract is for time/materials). If the contract is for deliverables, then there should be an amount assigned to each one and the only backup document you would need to reimburse the assigned amount is the actual deliverable (copy of material, sign in sheet for meeting... whatever the deliverable is – which should all be very clear in the contract).*
- a. I had verbal confirmation it was “competitively bid” but that they only got one response. I do not have any documentation on this. Do I assume that Faith reviewed the required elements? Or do I try to get all the backup documents from John? *Get the backup. You can ask John if he already submitted it to Faith. If he did, we need access to her Outlook & efiles.* Or let it go and move forward as if this was competitively bid based on John’s verbal acknowledgement? Or is there another recommended path forward?
- b. John approved Camp Creative going over the contracted amount of \$20,000. *They will have to amend the contract in order for us to approve costs over the \$20K. That’s a standard contracting expectation.* He informed me after the fact so I did not have any preapproval of this added work/expense. *If the PPG approved budget doesn’t align with a more expensive contract, it may be a moot issue, it’s my understanding that for the purposes of Year 1 Budget and renewal, and to keep the original project in line with the original scoring/competitive process, deviating from either needs to be vetted.* And, he has exceeded the Ecology (legal?) limit of \$30,000 for contracts that can be informally competitively bid (which I think is the bid process he used, but would need to confirm. Limit is per my recent Direct Buy research sent in an email to AR 03/13/2024, to TR 03/18/2024). *I have not even begun to digest that information, let alone ground-truth it, so it doesn’t factor in to this right now from my brain anyway.* Do I draw the line at the original \$20,000 contract amount? Or do I allow them to charge more on this contract, with appropriate backup documentation for the work? Wouldn’t this require a written contract amendment with Camp Creative (which does not currently exist)?
4. Other next steps?

I am grateful for any assistance you can provide. This is proving to be a great learning experience for me! I still feel new to these grants. I appreciate the forum to work through these kinds of complex issues and to get your sage advice. Thank you for your understanding on my way of processing.

Laura

**From:** Ramsey, Tami (ECY) <[TMOR461@ECY.WA.GOV](mailto:TMOR461@ECY.WA.GOV)>

**Sent:** Wednesday, March 20, 2024 11:51 AM

**To:** Busby, Laura (ECY) <[lbus461@ECY.WA.GOV](mailto:lbus461@ECY.WA.GOV)>; Robertson, Alaina (ECY) <[alay461@ECY.WA.GOV](mailto:alay461@ECY.WA.GOV)>

**Cc:** Krumlauf, Jill (ECY) <[jkru461@ECY.WA.GOV](mailto:jkru461@ECY.WA.GOV)>; Dunne, Kelsey (ECY) <[kdun461@ECY.WA.GOV](mailto:kdun461@ECY.WA.GOV)>

**Subject:** RE: West Plains Water Coalition SWMPPG-2023-HIPSpC-00078

I provide this info in hopes that it helps folx stay focused on the job and not get sucked too much into the emotional realm of the situation. I think it can be hard sometimes. I heard first hand, some of the struggles Faith experienced with several recipients and their issues. At the end of the day, you are a grant manager administering a grant for the department of Ecology. Be sure to take care of you!

- We have guidelines that give us and them the boundaries from which we are constrained.
- As long as we continue to work within those boundaries to interpret and make decisions, that's all we can do. That and "educate" them on those boundaries and expectations.
- All else is on them.

In this situation and future similar ones, our PMT liaison, Kelsey, may want to alert Peter Lyon just so he's not blind-sided by this should it come at him from another direction. So thank you, Laura, for bringing to our attention.

Generally speaking,

- If the recipient wants to discuss costs that were denied, that discussion typically falls on the grant manager
- If the grant manager is feeling like communication with the recipient is threatening, assistance would come from the grant manager's supervisor
- If the grant manager needs assistance communicating grant processes/protocols, the statewide grant coordinator can help
- If the grant manager needs assistance with technical topics such as EAGL, the grants technical assistance lead can help

Be well,

*Tami*

Tami M. Ramsey, SWM Grants Coordinator  
360-628-4261 work cell

It's not about perfection, it's about progress. Practice makes progress.

**From:** Busby, Laura (ECY) <[lbus461@ECY.WA.GOV](mailto:lbus461@ECY.WA.GOV)>

**Sent:** Wednesday, March 20, 2024 9:32 AM

**To:** Robertson, Alaina (ECY) <[alay461@ECY.WA.GOV](mailto:alay461@ECY.WA.GOV)>  
**Cc:** Krumlauf, Jill (ECY) <[jkru461@ECY.WA.GOV](mailto:jkru461@ECY.WA.GOV)>; Ramsey, Tami (ECY) <[TMOR461@ECY.WA.GOV](mailto:TMOR461@ECY.WA.GOV)>;  
Dunne, Kelsey (ECY) <[kdun461@ECY.WA.GOV](mailto:kdun461@ECY.WA.GOV)>  
**Subject:** RE: West Plains Water Coalition SWMPPG-2023-HIPSpC-00078

Thank you Alaina,

I look forward to input and help from the group!

Laura

**From:** Robertson, Alaina (ECY) <[alay461@ECY.WA.GOV](mailto:alay461@ECY.WA.GOV)>  
**Sent:** Tuesday, March 19, 2024 6:37 PM  
**To:** Busby, Laura (ECY) <[lbus461@ECY.WA.GOV](mailto:lbus461@ECY.WA.GOV)>  
**Cc:** Krumlauf, Jill (ECY) <[jkru461@ECY.WA.GOV](mailto:jkru461@ECY.WA.GOV)>; Ramsey, Tami (ECY) <[TMOR461@ECY.WA.GOV](mailto:TMOR461@ECY.WA.GOV)>;  
Dunne, Kelsey (ECY) <[kdun461@ECY.WA.GOV](mailto:kdun461@ECY.WA.GOV)>  
**Subject:** Re: West Plains Water Coalition SWMPPG-2023-HIPSpC-00078

Hi Laura,

Thanks for this update. This is beyond my role so I am copying both Tami and Kelsey here. Upon their review, we will likely want to schedule a meeting to debrief this fully and determine next steps.

Best,

Alaina

Alaina Robertson (she/her)  
Grants Technical Assistance Lead  
Solid Waste Management  
Washington State Department of Ecology  
[alay461@ecy.wa.gov](mailto:alay461@ecy.wa.gov)  
[360-706-4048](tel:360-706-4048)

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**From:** Busby, Laura (ECY) <[lbus461@ECY.WA.GOV](mailto:lbus461@ECY.WA.GOV)>  
**Sent:** Tuesday, March 19, 2024 5:02:48 PM  
**To:** Robertson, Alaina (ECY) <[alay461@ECY.WA.GOV](mailto:alay461@ECY.WA.GOV)>  
**Cc:** Krumlauf, Jill (ECY) <[jkru461@ECY.WA.GOV](mailto:jkru461@ECY.WA.GOV)>  
**Subject:** West Plains Water Coalition SWMPPG-2023-HIPSpC-00078

Hello Alaina,

I don't think there is any action we can take at the moment but wanted to send this as an

update, and, in case you do have action(s) to suggest. It may be worthwhile to elevate as well so others are aware there are issues evolving with this recipient.

Last week I met with Nancy Rust and Dan Sigler, Community-Minded Enterprises (FS), regarding the large number of items/dollar amount I denied in the West Plains Water Coalition (WPWC) Q2 PRPR and their concern about a contract with Camp Creative that has a large amount of outstanding (and currently denied) expenses. They let me know that John has exceeded the contract amount (which was \$20,000 per the estimate that was uploaded to their Jul-Sep 2023 PRPR). According to them, the Camp Creative invoices now total over \$30,000 but I don't know how much of that is eligible OR how much we should consider for eligibility beyond the original \$20,000. \$3,622 has been approved through Dec., 2023 PRPRs. It's likely that a bunch more is eligible but it's unclear from the invoices. I told them I need clearer invoices that show the connection to task work. He apparently did a competitive bid but only got one applicant. I do not have any supporting documentation for that. I'm not sure if they do either.

Note that I have previously met with John, with Nancy, and with Chris, the WPWC treasurer, regarding eligibility and what needed to happen for items to be eligible (preapprovals, backup documentation requirements, clarity about connection to task work, etc.) and why some items were not eligible (example: one or two individual meals for one on one meetings at casinos or restaurants and materials that I can't identify let alone know if they were preapproved).

Note that my conversation with John about Camp Creative included him saying he had approved Camp Creative going over the contract amount and I indicated that might be eligible if it was still supporting task work. We also discussed that he might need to cover it with other funds. Their Project Budget for that line is 46K or close to that. This conversation was before all the contract back and forth we've had recently. I also had no clue how much he had gone over, nor did I realize the original contract was for 20K – I was assuming it was not over 10K since we have that amount explicitly in the PPG Guidelines. I have been trying to clarify the contract stuff for this and other grant recipients so I'm not giving out any bad information.

Today, I got a phone call from a Mo Noter (sp?), the Vice President of WPWC, regarding challenges they are facing. John is the president and has been doing the majority of the legwork for this new nonprofit. Mo was clear that he has never been on a nonprofit board or "done anything like this before".

He conveyed:

- John has been making unilateral decisions without board input.
- John's lack of clarity about his activity and financial decisions have caused them concern.

- As a result all board members, except Mo (and John, of course), have quit.
- He wanted legal advice on what his liability is given they are having financial issues. I told him I couldn't provide legal advice but that the organization and the fiscal sponsor are the responsible parties for ethical money management for the grant.

I conveyed:

- Apologies about our late start and lack of continuity with staffing on the Ecology side. This agreement was active on 10/24/2023 so not as late as some. And, that John has had the resources available about what is eligible, etc. from the beginning (Guidelines/Yellow Book).
- Challenges with getting clear communications from John regarding preapproval for materials and other work.
- Concern regarding their Camp Creative contract, initially estimated at \$20,000, but John approved a bunch of work bringing the total to over \$30,000 and I don't know how much is eligible without appropriate backup documentation. I told him I doubt the grant would cover anything over \$30,000 in eligible expenses but that I'd have to get assistance before I could definitively tell him anything for sure on the contract.
- I explained that some materials were approved due to our transition and late agreements that would probably not have been approved otherwise.
- I told him I hope they are able to resolve the issues, that I want to be able to approve as much as possible – given it's eligible and that I hope the organization can continue to do this important work.

I'm sure there is more. I'm sending this because it feels like a potential train wreck. As you know, we have struggled with getting clear communication from John throughout. Mo confirmed that this is not just an issue with Ecology.

I don't think there is anything to be done at the moment but I'd happy to hear if there are suggestions for managing this or proactive steps to take that might keep this train on course.

Thanks,

**Laura Busby** (she, her)

PPG and WRRED Grant Manager

(360) 280-5088

Solid Waste Management Program

Washington Department of Ecology



**BYOB**  
Bring Your  
Own Bag.



## Project Details

Close

### **Project Title**

West Plains Water Coalition, implementing entity view on map

### **Agreement Number**

SWMPPG-2023-HIPSpC-00078

### **Recipient Organization**

Hip of Spokane County

### **Ecology Program**

Solid Waste Management

### **Funding Opportunity**

Solid Waste Management Public Participation Grants

### **Project Category**

Release of hazardous substances

### **Theme**

Solid Waste

### **Subtheme**

Education & Outreach

### **Link(s)**

None

### **Project Description**

HIP of Spokane, as a fiscal sponsor to the West Plains Water Coalition will spend \$120,000 to educate and involve people in solutions to groundwater contamination from per- and polyfluoroalkyl substances. The project facilitates public engagement in the formal cleanup process for registered contaminated sites in the West Plains. Anticipated results of this work include educating 500 people at events, mobilizing 25 volunteers, and facilitating 40 public comment submissions for cleanup actions.

### **Overall Goal**

The purpose of this agreement is to facilitate public participation in the investigation and remediation of contaminated sites and implement the State of Washington's Solid and Hazardous Waste Management Priorities through activities outlined in the Scope of Work. This agreement contributes to achieving chapter 173-321 of the Washington Administrative Code (WAC) and chapter 70A.305 RCW of the Hazardous Waste Cleanup-Model Toxics Control Act (MTCA).

### **Current Status**

Agreement Active

### **Funding Source(s)**

Model Toxics Control Operating Account (MTCOA) Grant

### **Total Cost**

\$120,000.00

### **Total Eligible Cost**

\$120,000.00

### **Ecology Share**

\$120,000.00

**Total Disbursed**

\$52,524.16

**Effective Date**

7/01/2023

**Expiration Date**

6/30/2025

**Ecology Financial Manager**

Wimberley, Faith

**Ecology Project Manager**

Wimberley, Faith

**Project Center Lat/Long**

47.62257, -117.40401