

Ohio Soil and Water Conservation Commission
SWCD Match Task Force
DRAFT Match Policy Survey Results

Total Survey Attempts: 81

Total Completed Surveys: 80

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Matchability Response Charts and Comments – Questions 7, 8, 9

Accountability Response Charts and Comments – Questions 10, 11, 12

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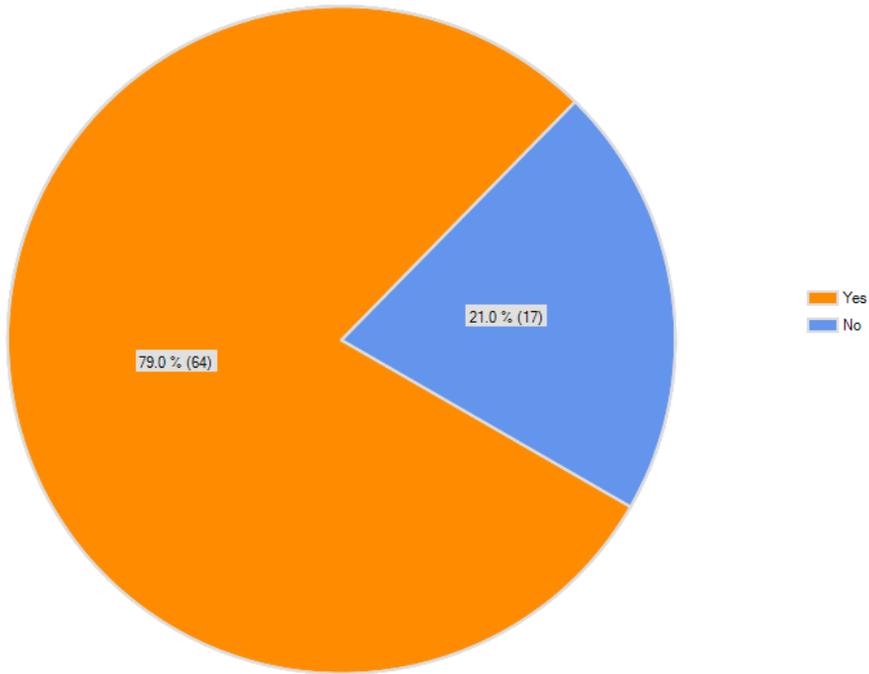
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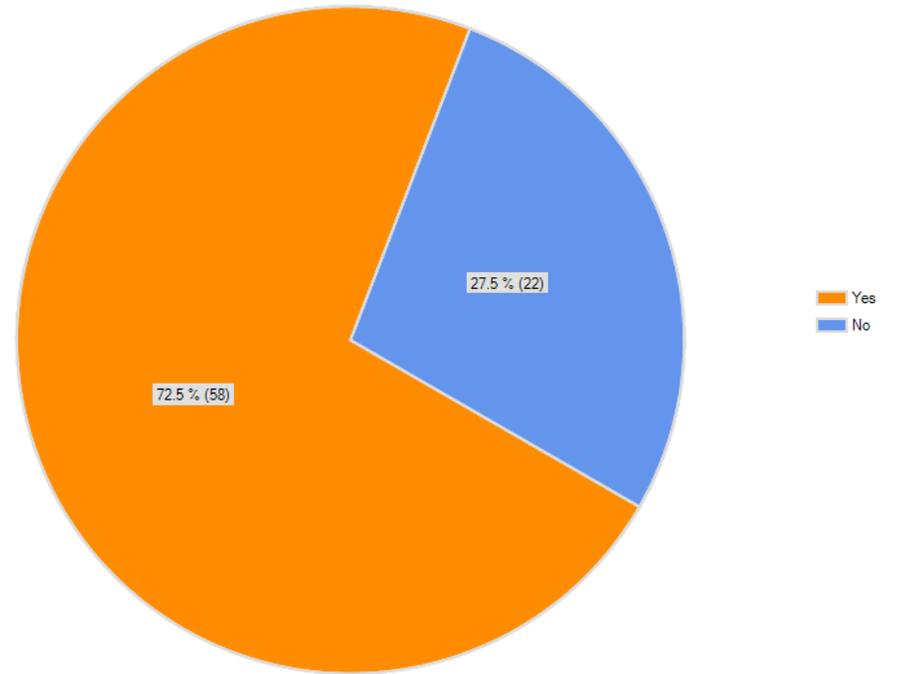
37 pages

June 25, 2014

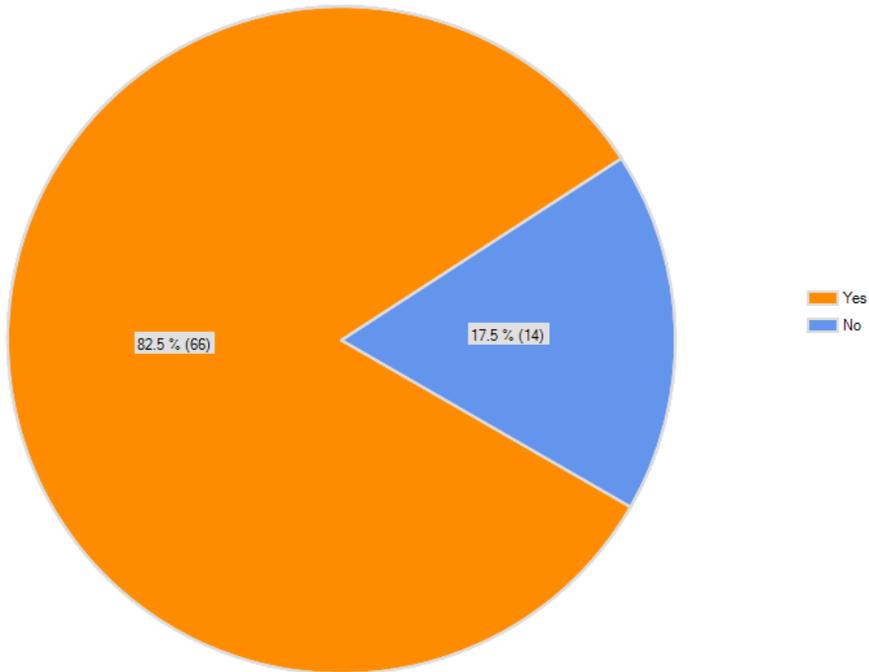
Are the Matchability section elements of the policy acceptable?



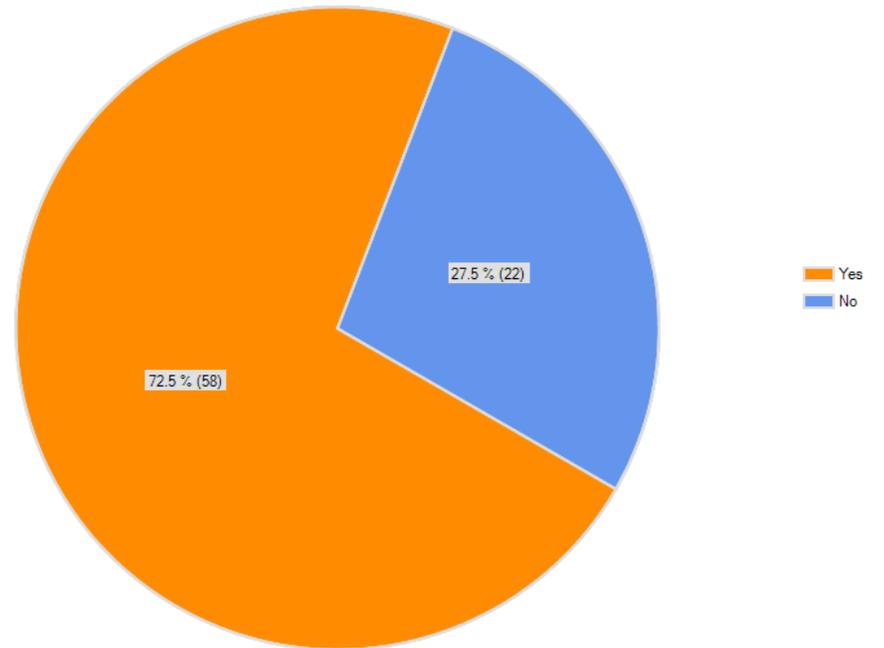
Are the Accountability requirements of this section of the policy acceptable?



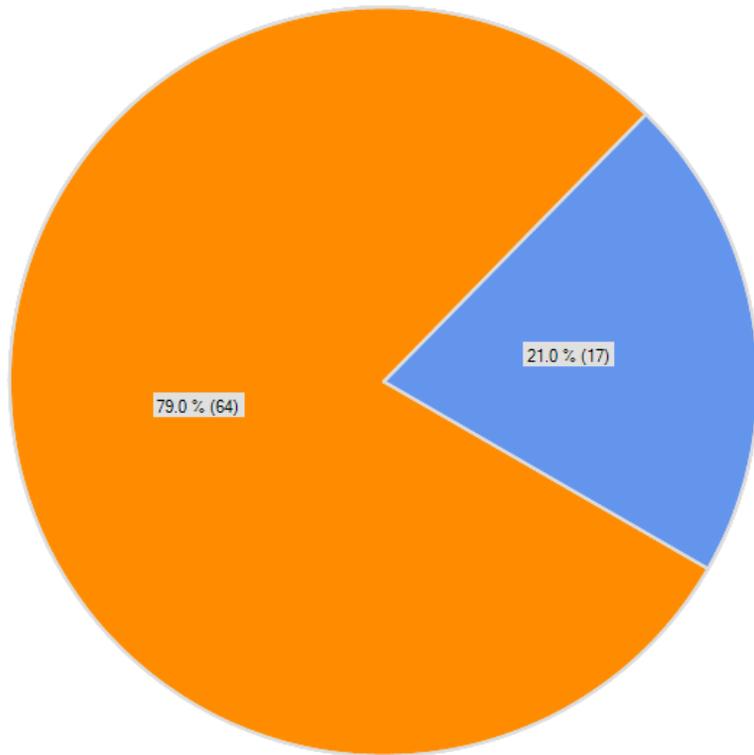
Is the match formula as described in the policy acceptable?



Are the fund balance limits set by policy for a SWCD to receive full state match acceptable?



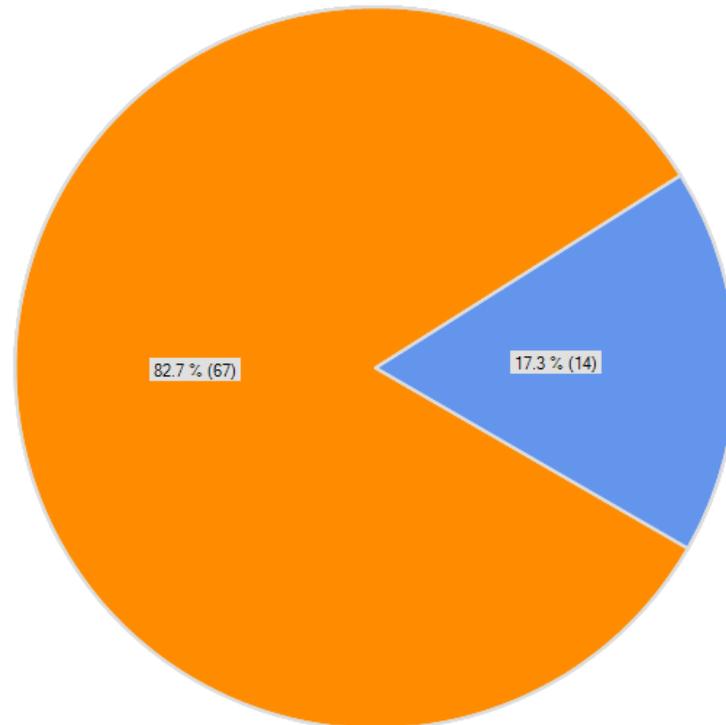
Are the Matchability section elements of the policy acceptable?



Yes
No

Matchability

Does the Matchability section support the OSWCC match funds guiding principles as described above?



Yes
No

OSWCC Match Task Force Survey Results – Matchability Comments

Greene	Need further clarification of the items OSWCC will not match revenue received or expended on transfers to other agencies or organizations. Does this or could someone interpret this to include monies paid to OFSWCD or OASWCDE or NACD?
Trumbull	Other points listed gave a clarification of item number 4 under Clarification and guidance
Hamilton	<p>The "Clarification and Guidance" seems to sneak in extra restrictions even beyond the Matchability, to which we already object.</p> <p>At the risk of sounding paranoid, it does sound a bit like the Commission looked at the way big, urban districts handle their funds and went after that, especially with the exclusion of Stormwater and funding for core programs that may happen to pass through another agency. Hamilton County Soil and Water Conservation District very strenuously objects to excluding from match funds that are used in stormwater programs or come through Engineering or Stormwater departments/utilities, when those funds clearly support the core of the Soil and Water mission.</p> <p>While Soil and Water Conservation Districts began largely in response to the "Dustbowl" conditions of the 1930s West, in this part of the country we are much more likely to lose soil from runoff. Obviously the biggest original manifestation was runoff in agricultural settings, but as many of our counties have become largely urbanized, the exact same concern now manifests in runoff that our urban Districts often place in a stormwater utility. "Soil and Water" does NOT refer only to agricultural soil and water that falls on cultivated fields.</p> <p>Having said that, we can agree with some of the funding restrictions that exclude those funds generated by District activities that have already been funded and matched once, such as rents, property sales, use fees, and insurance settlements.</p> <p>We would like clarification on "insurance payments," since this could be interpreted as District payments of premiums, which we do not feel should be excluded.</p> <p>Finally, there should be clarification of "transfers to other agencies or organizations," as this could read to exclude dues, including OFSWCD dues. Such dues should not be excluded from match, although we think it is reasonable to exclude funds where the District is essentially a "pass-through" to another entity.</p>
Adams	If our County funds remain the same and this Match policy takes place, we will not be able to keep our program as it is right now. We will be forced to make drastic cuts. We will not have a "viable program to meet local needs".
Meigs	"Fees" definition needs to be clarified to not allow some districts to receive unwarranted match dollars through loopholes in the policy. Under certain circumstances districts could get matchable funds through MOU's or cooperative agreements with agencies or organizations outside the local appropriations.
Pickaway	<ol style="list-style-type: none"> 1. The term used acceptable is too vague a term, a better term would be right or fair. 2. To be acceptable define the percent received or matched dollar amounts because we have no idea what impact the definition of fee will bring. We believe that based on this area alone our match will drop 10% and that doesn't show on your spreadsheets. 3. If all were acceptable, then our area and other soil and water districts would be harmed in the future. Grants from commissioners can't compete with invoices from agencies for matching money and we lose our ability to address what we think needs done in the county because funding, invoices and memorandums would dictate priorities.

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Muskingum	Why does it matter which county fund the money comes from? As long as the local funds are being used properly for conservation, they should be matched, regardless of what county fund they come from.
Marion	Our only concerns would be how we can implement local conservation efforts in partnership with other local county entities without funding being hampered.
Darke	Understand why some funds aren't being matched, trying to make sure funds are available for match.
Union	We would like more clarification on assessments for fees for urban storm water maintenance programs and stormwater utilities.
Brown	The Board like that it spells things out and is easier to understand what is or is not able to be matched by state monies. they were concerned that if additional funds are found to be eligible for match, the requests for matching dollars will increase and subsequently, the amount of monies for each district will decrease.
Erie	We feel the matchability of funds is well thought out as districts receive funds in many ways and through many sources. Our district is utilizing Federal Funds through ODNR DOW for our Watershed Coordinator Program; Local Government appropriations from County, Townships, and Municipalities; private foundation funds; grant funds; etc.
Logan	Will fracking income to Districts be matchable?
Scioto	Fees are going to be an unknown, the more urban counties may have a better time of coming up with fees than some of the poorer counties of the state
Wood	The first four bullets of the list under "Clarification and Guidance" need further clarification - they are still a bit vague.
Clark	The matchability of funds for MOU's with CAUV must be consistant State Wide. We currently do not recieve Match for our CAUV work, but have been told some Districts do.
Gallia	Concerns of fees for services: potential cost of matching dollar versus the rest of the state (SWCD's).
Preble	Don't add other programs to match. If we do, it will only cause everyone to jump on the bandwagon and ask for more funds to be matched. In the end, we will all be right back where we started.
Carroll	Not sure how we can deposit money by April 30 when we receive it monthly here in Carroll County. Also not sure what you consider Capital Improvement.
Wyandot	will not change what our county has been submitting for state match
Medina	We are concerned due to the fact that townships can not make an appropriation without an invoice.
Summit	7. We could not accurately answer this question as we feel the matchability section is somewhat vague and would like clarification on two points: <ul style="list-style-type: none"> • Assessment for fees for urban stormwater maintenance programs (not matchable)

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	<p>Stormwater maintenance as required in Summit County’s Comprehensive Storm Water Management Ordinance is the work of keeping best management practices in proper working condition. A Long Term Maintenance Agreement between a landowner/developer and the local unit of government is required to ensure that the landowner properly maintains a structure or practice. Examples of storm water maintenance include cleaning out catch basins and ditches, removing woody vegetation from a detention basin, removing accumulated sediment from a forebay or micropool in an extended detention basin and replacing clogged (amended) soil material in a bioretention cell.</p> <p>Can we assume that the stormwater maintenance bullet under matchability refers to these types of physical tasks? Or is this better explained in another document?</p> <ul style="list-style-type: none"> • The OSWCC may choose to limit the match percentage of funds dedicated to those programs where the legal authorities of implementing those programs fall under another local unit of government. <p>Please provide examples for this section. Many SWCD’s including Summit, assist communities with their NPDES Phase I or II Storm Water Permits. Are you suggesting this assistance may not be matchable? Summit SWCD assists Phase I and II communities with public education and technical support in the delivery of storm water management, water quality and nonpoint source pollution education as well as ODNR’s Rainwater Manual guidelines and specifications for urban conservation practices. This assistance and support is much like the delivery of conservation or resource management plans and (NRCS Engineering Handbook) practice information and construction assistance for bmps (grass waterways, animal waste facilities) in the agricultural sector. District staff is not responsible for enforcement of the storm water permit. Rather, the district offers guidance and support for better landuse decisions and resource management.</p>
Highland	<p>The matchability section is not acceptable because it isn't equally fair across the board for all SWCD's. All funds received from the County should be matchable even if they come from a sub-account. The Highland SWCD receives funds for CAUV inspections and according to the guidelines those funds are not matchable. Other Counties are receiving match for the exact same CAUV inspections. This is totally unacceptable. Also, the Highland SWCD does not support the changes to bullet #4 regarding clarification of matching fees. We feel this will open a loop hole for SWCD's to get matched that were not in the past. The Board would like to see that section remain the same with no changes.</p>
Mercer	<p>Looks good, very fair</p>
Fairfield	<p>We feel this current model limits growth and discourages partnership opportunities within our community. It also encourages less transparency as to where and how funds are coming into the district. If there are particular functions that the OSWCC do not want to match, simply list them instead of limiting how the money for such activities is routed.</p>
Geauga	<p>It is very important to note that this language is acceptable as long as it stays as is. Any slight tweaks could make it unacceptable. It is very important to us that it is acceptable to match township appropriations even if an invoice or other documentation is required to procure that money. The board was suprised that anyone associated with a government organization would even question the invoice portion of this. When can a SWCD cut a check without proper documentation to support the expenditure. It is no different for a municipality and or township. Refer back to audit requirements that even SWCDs go through. Its a matter of accounting procedures and protocols per ORC.</p>
Van Wert	<p>In favor of the policies in writing.</p>
Hocking	<p>On question #5 we stated "no" because we received a first draft as of 6/3/14 and the language stated under the clarification and guidance of matchability</p>

OSWCC Match Task Force Survey Results – Matchability Comments

	<p>item #4 "Fees collected, receipted and deposited by SWCDs would not be matched" is much more restrictive than the wording in the present draft we received with this survey, which leaves room under this section for counties to be able to add fees for matching by creative billing which still leaves the balance uneven for all counties. Therefore question #6 is "no" because it does not follow the first draft principles of limiting matchability on funding.</p>
Athens	<p>It has been our understanding that matchable funds are appropriated funds from the county general fund, municipality or township.</p>
Portage	<p>This section seems to have had no major changes.</p>
Mahoning	<p>What is matchable according to the OSWCC is fair due to the fact the funds being matched are for all services provided by the SWCD.</p>
Cuyahoga	<p>This is a "conditional" yes, pending clarification of some language and assuming our interpretation of the current language is correct. While we can live with the 30 day deadline for transferring \$ to the special fund, it adds a significant burden to staff time, especially since funds are received from multiple sources and not all at the same time. A quarterly transfer would be more efficient. Needed clarification on the limitation of match on funds where the legal authority for implementing a program rest with another local unit of government. We conduct plan reviews for a number of entities, but have no legal authority to implement sanctions when a contractor is not in compliance with code. We make recommendations to correct the offence, but if no action is taken, it is up to the regulating agency to take action. We are assuming that there is a distinction between "implementing"--as in conducting reviews--and "enforcing"--as in issuing stop work orders, and that our match funds for these programs would not be limited. Clarification needed: We assume that "fees for urban storm water maintenance programs" refers to actual infrastructure issues, e.g., construction, repair and maintenance of storm water practices, not plan and field reviews and giving advice. We expect that "OSWCC will not match revenue...Transfer to other agencies or organizations" refers to true flow-through funds, not funds for which we contract with another agency (e.g. Metroparks) to help us complete a project.</p>
Fayette	<p>Match should not be used as an artificial tool to gain additional funding for programs normally administered by other agencies.</p>
Lake	<p>Lake SWCD believes requiring that all eligible funds be depositing into the District's Special fund is not in the spirit of ORC 1515.14. Which directs the state to make it's matching payments to the County Auditor-District Special Fund. We feel this requirement limits the ability of districts to manage their own finances and locally lead conservation programs in an efficient and effective manner. (A district's ability to manage year to year carry-over, which could effect local appropriation levels is one example. Extended employee vacancy could cause a similar financial situation) Appropriations that are deposited into District accounts (non-special) are held to the same auditing and and reporting standard as all other government funds. This requirement seems an unnecessary requirement.</p>
Defiance	<p>Seems like some Districts are receiving large amounts of match on municipal funded projects while other opportunities to work with County agencies are not matched unless it comes from the County's general fund. Some balancing of match may be necessary here.</p>
Delaware	<p>This section states that "Fees for services in which actual hours, costs of materials and/or other expenses are billed directly to the entity after specific services are rendered..." are not eligible for State Matching. Our question then is, why are dollars received for NPDES Phase II services currently being matched? The EPA requires detailed documentation from NPDES Phase II communities as to their storm water quality programs. This means those Phase II communities require some sort of detailed contractual agreement with the SWCD to provide specific services. They will almost certainly require the SWCD to provide a detailed quarterly and/or annual report showing "actual hours, costs of materials and/or other expenses." The bill from the SWCD to the Phase II community may not be detailed, but the required report to EPA of services rendered will be. Also, matching programs associated with fees is taking money from other districts to do another agency's work. Districts billing a municipality could manipulate their own income by the fees they set. The municipality would benefit by running its program at a reduced rate due to the reliance on the State Match portion for which the municipality does not have to pay. Districts getting their funding primarily through generalized grants from County Commissioners and other sources don't have this luxury. We would argue that</p>

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	<p>if you are going to continue to allow dollars generated from NPDES programs to be matched, then you should allow dollars generated from services rendered by SWCDs to Drainage Improvement and Maintenance programs to be matched as well. Both programs are so similar, it is hard to understand why the maintenance program has been singled out as being exempt. To clarify, we are not talking about yearly “assessments” being matched. We feel that the dollars we receive for our day to day efforts towards the overall operation of County program should be matched. Assessments when collected go into the County general fund. At an annual budget hearing, the County Commissioners take SWCD recommended budget figures and set up an annual County Special Revenue Fund for the maintenance program. During the same hearing, they review and subsequently approve our SWCD funding request after looking over our proposed budget. The SWCD responsibilities for the drainage improvement and maintenance program are outlined in a three-way working agreement with the County Commissioners and Engineer, similar to those contracts the urban SWCDs have with their Phase II communities. Drainage improvements and the maintenance program are part of the annual plan of work. We include it in our SWIMS annual report. One funding source comes from assessments; the other funding source comes from either a direct consumer fee or tax. Drainage is a top conservation priority in our county. Our landowners demand good drainage. We are on the front line to make sure we not only deliver good drainage, while using BMPs like one-sided construction, alternative channel design, buffers, water quality storm water basins, and selective dip-outs to ensure that there are minimal environmental impacts associated with it. Once the drainage system is improved these BMPs are included as part of the project and placed on the maintenance program in perpetuity. There is no better investment of State match dollars anywhere! The added funds with help us build on our program with added staff, resources and future water quality improvements. Public information and involvement is important (NPDES), but conservation on the land has always and will always be the best bang for the buck.</p>
Stark	It is important that the clarification for fee doesn't include appropriations that need to be garnered by submitting invoices.
Fulton	leave match money alone
Lucas	5. All county funds should be matchable and not limited by line items of the county department budgets. 6. Current policy does not support viable and diversified staff needed for best possible service
Jefferson	The negative responses are based on the necessity of confirmation for the following: 1. Please clarify approved funding sources of capitol improvement appropriations 2. Regarding the limitation of match percentage for of funds programs fall under another local unit of government ...Q. Will the reviews of these program considerations be conducted well in advance of the district's budget preparations? 3. In reference to appropriations/grants/transfers..the board perceives a misperception of the statement..or any other county-wide department board or commission. The interpretation is that it reads to include the board of county commissioners.
Coshocton	It would be helpful to see how the policy reads now and then the changes that are being implemented; that way they can be compared.
Warren	Our District currently functions within these guidelines.
Morgan	We feel the above revenue should be able to be state matched.
Tuscarawas	Local Budgets sometimes not out timely enough to meet an April 30 deadline.
Franklin	This draft policy document seems to go beyond providing guidance into rule making. 1) All state matchable funds must be deposited into special fund. The General Assembly's authorization of District Funds for the management of non-county dollars by the Boards of Supervisors has numerous, positive, practical implications for the District that allow it to operate at the speed of business. Requiring all local government dollars to be placed in the Special Fund will increase staff time, reduce district control of how they can spend funds to meet their unique needs, and slow down business. Revised Code 1515.08(E) grants the supervisors of each soil and water conservation district the power “to accept donations, gifts, grants, and contributions in money, service,

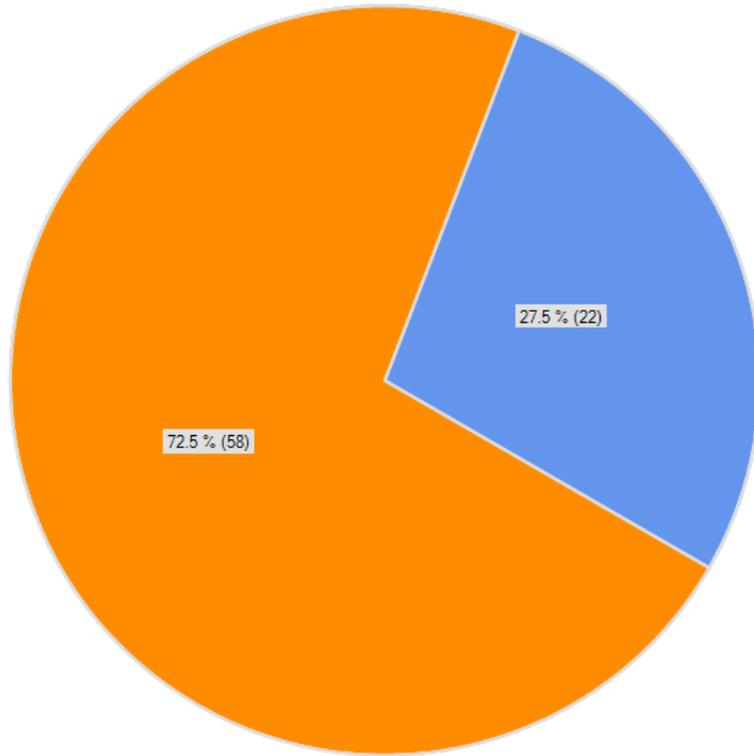
OSWCC Match Task Force Survey Results – Matchability Comments

<p>Franklin (continued)</p>	<p>materials, or otherwise, and to use or expend them according to their terms.” This statute authorizes the creation of the District Fund. See, R.C. 1515.09 (“...the district fund that is created with moneys accepted by the supervisors in accordance with division (E) of section 1515.08 ...”) This provision authorizes the District to place municipal dollars it receives in the District Fund. Revised Code (“R.C.”) 1515.10 provides that each County Board of Commissioners may appropriate money from the proceeds of a levy or from the county general fund to be held in a Special Fund for the District to be expended for certain purposes. This statute authorizes the creation of the Special Fund. See, R.C. 1515.09 (“... the special fund created pursuant to section 1515.10 of the Revised Code.”) Nowhere does the General Assembly mandate that the District place municipal dollars in the Special Fund. Nowhere does it mandate that the District place municipal dollars in the Special Fund as a condition of receiving matching funds. Allowing municipal funds to be placed in District Fund has been the mode of operation for 15 plus years for many Districts. Placing such a requirement on the District through the use of this policy is inappropriate and contrary to the intention of the General Assembly. By binding the eligibility for valuable matching dollars to the placement of municipal dollars in the Special Fund, the policy would effectively limit the types of money that would be placed in the District Fund. This would effectively coerce the Districts into using the Special Fund as their primary funding management mechanism. This requirement may exceed the guidance authority of the OSWCC. There is no evidence that requiring Districts to operate primarily out of Special Fund only provides any additional protection against abuse of funds. The few examples that we are aware of where funds were managed inappropriately by an employee, took place in Special Fund. The fact that we currently turn around payments in a timely manner allows us to partner effectively with local governments because we are able to deliver services, which often involve purchase of items or services, in a timely manner. Timeliness and flexibility is a big part of our success. A better policy, should the OSWCC have the authority to do so, would be to require each district to have a financial policy in place has been reviewed and approved by a financial professional or auditor. They should also be able to show that a financial professional is reviewing their records on an annual basis; if not more frequently. If they cannot provide this, then the contingency can be to pay everything out of special fund. This would provide more flexibility to better meet the accountability needs of all 88 SWCD’s. In Franklin County: • This decision will increase staff time considerably for each payment we process and deposit we make. Every payment made out of special fund or deposited into special fund needs to be entered into the county accounting system by Franklin Soil and Water Staff. Because we are not co-located with the county our offsite connection to the system is not reliable. After the payment or deposit is entered into the system, Franklin Soil and Water staff needs to drive to the courthouse sometimes several times per week to process payments. This involves paying for parking and walking some distance to deliver the payment request papers to the auditor’s office. • It will also decrease our flexibility and increase staff time as we navigate outdated county fiscal policies that may still work for county business but are outdated for our operations and how we work with the public and our partners. • Despite these efforts the responsibility is still largely on Franklin SWCD staff and board to ensure proper use of public funds. The auditor does not know the unique details of our operation, and the very small size of our operation compared to other county agencies (the next smallest being about 200 staff) may reduce our ability to convince the auditor to change their review to include our needs. See suggested changes below: Limitations and exceptions to the above: • All funds (cash) considered for match shall be directly deposited into a District account within 30 days of being received by the District and prior to April 30. 2) OSWCC may choose to limit percentage of funds dedicated to those programs where legal authorities of implementing those programs fall under another local unit of government. This statement is confusing. This could include all District programs in urban areas especially when broad reaching stormwater permits encompass all the traditional district programs including education and landowner assistance. If the commission wants to limit what is matchable beyond what is stated in ORC to keep district programs straying too far beyond original purpose another statement such as, the District should be able to demonstrate that the eligible funds benefit natural resource conservation and meet the local mission and goals of the SWCD. However any such policy may exceed the guidance authority of the OSWCC. See recommended changes below: • The OSWCC may choose to limit the match percentage of funds dedicated to programs over 8,000 that do not have a benefit to natural resource conservation or do not meet the local mission and goals or the local SWCD. 3) Clarification and Guidance... This section can be simplified significantly and placed under the limitations and exceptions section. a) This first paragraph creates confusion. If the funds are appropriated correctly as indicated in ORC then they should be matchable. Reclarifying this with specific statements of what cannot be matched in this section only creates confusion and bureaucracy. What funds are matchable requires the most oversight by program specialist whose resources and time are limited. Also the expanded definitions of what is not matchable allow for misinterpretation and misunderstandings. The best way to remedy this is to keep things simple. The entire debate on fees creates confusion. If the funds are appropriated as indicated in ORC they should be matchable. If local governments require more accountability from districts on how their funds are spent, it ensures that District dollars meet a local need and are spent responsibly; it should be allowed. The commission needs to ask what they are trying to accomplish with this. Also to further reduce confusion describe capital outlay and cost share under one bullet. This would include costs spent on drainage maintenance, purchase of land, buildings or conservation easements; installation of conservation practices, or anything else that could be considered capital outlay would only be matchable up to \$8,000. There is no need to spell out drainage assessments or stormwater utilities as not matchable. If the funds do not come from the county general fund or a municipal appropriation, they are not matchable per ORC. Determining the origin of the funds before they come to a municipal or general fund appropriation is only going to create more oversight responsibilities which will likely be applied inconsistently from District to District. If the commission wants to limit what is matchable beyond what is stated in ORC, then require the eligible funds benefit natural resource conservation and meet the local mission and</p>
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	<p>goals of the SWCD. Districts should be ready to demonstrate that state matching funds meet this need. While it leaves some room for creativity, it provides a parameter and expectation as to the purpose of the funds without creating more confusion and bureaucracy. b) Second paragraph and bullets are clear. It would read more clearly to move these bullets to Limitations and exceptions..... See recommended changes below: Limitations and exceptions to the above:</p> <ul style="list-style-type: none">• All funds (cash) considered for match shall be directly deposited into a District account within 30 days of being received by the District and prior to April 30. County funds must be deposited into the county held Special Fund of the District.• Each state fiscal year, only 8,000 dollars of appropriations dedicated for implementation of capital improvements will be matched this includes cost share payments, land purchase, conservation easements or any funds to construct conservation, stormwater or drainage improvements• The OSWCC may choose to limit the match percentage of funds dedicated to programs over 8,000 that do not have a benefit to natural resource conservation or do not meet the local mission and goals or the local SWCD.• Funds that are transferred directly to other agencies or organizations to benefit of their programs or projects under their lead or oversight. <p>Clarification and Guidance: Delete this section and transfer some items to Limitations and Exceptions above.</p>
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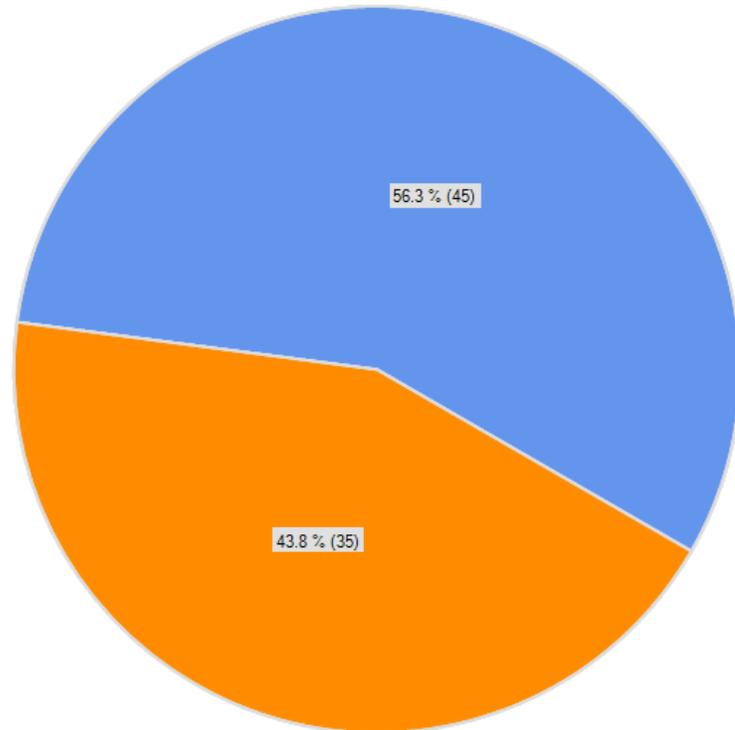
Are the Accountability requirements of this section of the policy acceptable?



Yes
No

Accountability

Does the SWCD foresee meeting the requirements of this section to be an unusually difficult hardship for the board and staff ?



Yes
No

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Greene	<p>Very concerned about the templates to be developed and how they would work. Let's be realistic, SWIMS was supposed to be easy to use but in reality had a big learning curve. Our fear is these templates will not be well thought out but rather thrown together to meet a timeline and become very frustrating to use. The concept of the accountability makes sense, but the ability to follow through is very concerning.</p>
Madison	<p>Developing a APW</p> <p>Our District SWCD has an Annual Plan of Operations (APO) against which we continually align our support and workload. The APO document itself is reviewed and updated yearly.</p> <p>Our goals are centered around what our District's landowners needs, and our success with the conservation programs stem from being allowed the flexibility to develop local plans and programs to provide and be accountable to our district's clients. The implementation of a standard template for 88 Districts will either have to be very general with each District only using the template as a guideline or extremely detailed to encompass every service each district provides to their clients, which some districts would not. Neither option is of much help if the goal of the Commissioner is accountability. The board can understand why a District should receive no match if they have NO Plan of Operation or Plan of Work in place but to penalize 25% for not following a template seems not only excessive but disrespectful.</p> <p>Reporting Practices for Accountability</p> <p>According to our Program Administrator, adding cooperators, cooperator projects and using the GIS function in SWIMS is extremely time consuming. NRCS does not use SWIMS, but their own reporting system, so for the District to capture all services would require double entry for us to report into SWIMS. This burden would be added to our SWCD Program Administrator's work load.</p> <p>Another concern of the mapping system is NRCS and Section 1619. Should we be putting this data on a map when we have to go into executive session before we even say the name of the landowner that we are working with? How much detail is really necessary? Implementation dollars are generally from NRCS, not the state. The District should be able to provide accountability by summarizing the information, which is how our partners at NRCS report their information.</p> <p>If the goal of the Commissioner is to be able to produce a uniform report of accomplishments, there are other ways to do this without mandating a template or penalizing the Districts. The example that our District Program Administrator used was the national contest known as the "Goodyear Cooperator of the Year." Districts would compete for a grand prize to send their supervisors on a national trip to accept their award. They would report their accomplishments in a uniform way following the guidelines of the Goodyear Report. If SWIMS could be set up to help Districts efficiently compete in a contest for either some great prize or bragging rights, then Districts would have an incentive to use SWIMS and voluntarily comply. The reporting has to be quick and easy, like entering data in the timesheet, for it not to be a burden.</p> <p>It would be unfortunate to go through this process and in the end require a new layer of accountability and more time consuming reporting mechanism. As proposed, the District sees the workload but not necessarily accountability increasing as the partners change from working together on one District Report to requiring three different reporting systems.</p>
Pike	<p>We are providing the annual plan of work and using SWIMS to report.</p>
Hamilton	<p>While we completely understand the need for consistent reporting of District activity, and even requiring planning and reporting to receive matching funds, our Board is concerned that the SWIMS system may not adapt well to including work PLANS as well. We are also hesitant</p>

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	<p>to submit to a required template for our Annual Plan of Work.</p> <p>We would like to see much more technical work done to settle on systems for planning and reporting that work reasonably well for all Districts, and the present Matchability discussion is probably not the appropriate place.</p>
Williams	<p>We Would like more clarification as to the ramifications incurred if the Annual Plan Of Work standards set by the Board are not achieved.</p>
Meigs	<p>SWCD would like to see a draft of the "Annual Plan of Work Template" before responding to this question. District staff are having problems now doing mapping and other required reporting due to SWIMS not being updated to make it compatible with current computer operating systems.</p> <p>Who on the OSWCC is going to read through 88 reports four times a year to determine districts are meeting their goals? If this information is not going to be regularly reviewed and used, why require it? Program Specialists will probably get this responsibility dumped on them. They will be put in bad situations with their districts if they have to report one not meeting its goals.</p> <p>Match Policy does not mention what percentage of goals must be met to get full state match funding. Is it 100%, 75%, 10%? Who will make that determination? Will state match funds be reduced by equal percentage of goals not met? None of these questions are addressed in the policy.</p>
Adams	<p>If the Commission is actually going to look at this, then once a year for the progress reporting is adequate. We are not against reporting or accountability, but the current system (SWIMS) needs updated to make reporting easier. It's outlived its useful life. Before you have this requirement, the system needs upgraded to current technology standards.</p>
Pickaway	<ol style="list-style-type: none"> 1. An upgrade is needed for the SWIMS program - new computers are unable to use the program due to conflicts with internet levels and some windows operating systems. 2. Will there be a fee on the maintenance of the SWIMS program for the district? We've shifted too much match money to the SWIMS program already trying to patch and antiquated system. 3. What is the accountability requirement of the quarterly progress review and the Annual Plan of Work with the reduction of match dollars? Will we need to report to the State quarterly and who there has time to review all these?
Muskingum	<p>A "one size fits all" template for an annual plan of work might be difficult considering how diverse the 88 SWCDs are and how the funding varies so much. Who gets to ultimately decide the goals in this template? If it is the state (or someone other than the SWCD), what happens if the "goals" aren't met? We are all for accountability, and have no problem showing what we accomplish, but we don't think that local goals should be determined by the state.</p>
Crawford	<p>The staff has concerns about how easily our current plan of work fits into the proposed annual plan of work template; especially the time involved to write the plan of work since no draft was available. The staff is also concerned that there may be additional time involved in entering data into SWIMS. Staff members are currently maxed out and SWIMS entries for projects and initiatives can take a lot of time, especially when the system is slow; which is much of the time here at the Crawford office. The staff is currently able to capture almost all of what we do, but do get frustrated when entering data & mapping in SWIMS because of the multiple screens and the system is slow. Sometimes we want to enter 1/2 of an event into two different programs, but currently have to double report, for example entering one</p>

OSWCC Match Task Force Survey Results – Accountability Comments

	event under the Sandusky River Storm Water reduction grant and one event under the Bucryus storm water education program.
Marion	We need to be accountable to ODNR for the funds, this is more than reasonable approach.
Darke	Already reporting in SWIMS and fulfilling the above requirements. OK with an APO template being developed and used. If you don't meet the accountability requirements, match SHOULD be reduced, not MAY.
Brown	Concerned with the requirement to review the APW quarterly. This will be time consuming for the board to review, measure, quantify, etc.. As it stands, SWIMS has inefficiencies that could make the reporting cumbersome. Updates to SWIMS may help but should be made at NO cost to the district.
Erie	Although we do not see unusual hardship in accomplishing this criteria, we do encourage the SWCC and ODNR to make SWIMS updates a priority to bring the program up to current technology standards. For instance, staff has to share computers because SWIMS needs Internet Explorer 8 to be fully functional with all modules for reporting. Consideration of web based gis applications to allow employees to use tablets or smart phones to function efficiently is becoming a significant need. Smaller staffs mean more need to be able to work remotely to accomplish goals and reporting. We will also need to have ability to modify and allow annual plan to be more dynamic with regard to grant projects and changing local priorities during the year.
Licking	Possible concerns with the APW templates being top down or customize work plans that the commission wants done and not allowing for the local conservation needs. Templates are okay, but control needs to stay local
Logan	We are curious as to what the Annual Plan of Work template look like and who will be developing it. Will one template be designed for all 88 Districts? Each District is unique and different. Who will be responsible to review all reporting required for state match and will this be done on a regular basis?
Scioto	SWIMS needs to be upgraded, with computers getting older and out of date it will not work with Windows 8 or anything higher than internet explorer 8. We have nothing against report and doing an Annual Plan of Work but we need the tools to work with first.
Wood	Accountability requirements are acceptable as long as they do not become so cumbersome that the focus of the district is lost and an over abundance of time is spent reporting rather than serving our customers. The template really needs to be in the hands of the districts no later than October, in order that the annual plan can be worked in to it, and the SWIMS can be set up in time for use by January 1 of the reporting year. It is not a quick process to set up SWIMS.
Clark	The wording of "may reduce" match dollars needs to have more teeth. Districts do need to provide accountability. The templates used MUST be consistent across the State. Questions and concerns were mentioned in regard to the State of Ohio taking more control of SWCD's, where local resource issues may not be addressed in concert as State priorities.
Gallia	Difficult to evaluate when the template/s will not be available until November: we must see the templates before finding it acceptable on the final decision. The SWIMS Program is outdated & troublesome at times.
Preble	Please don't come up with a difficult APO with top-down directives that do not allow us to address local concerns.

OSWCC Match Task Force Survey Results – Accountability Comments

Guernsey	Assuming that the district is not penalized for not accomplishing goals in the annual plan that become non-attainable during the year due to circumstances beyond out control.
Lawrence	Because the SWIMS program is not compatible with the newer version of internet explorer and computers will not let you roll back to explorer 8.
Carroll	Will we get to comment on the templates? Not sure how we can use the SWIMS program to be accountable when as of 6-17-14 it does not work and has not for 6 months. If the commission does not receive our information they can reduce our funding to 0? The proposed SWIMS system must work in order for to hold SWCD's accountable. We suggest that a back-up system be in place for this to work out. At our office we have been unable to enter any initiatives for over 6 months.
Knox	Our Board is fine with this portion of the proposed policy as long as things do not get too carried away with the Plan of Work Template and as much of that process as possible is "automated" through the SWIMS program so that we are not duplicating work.
Ashtabula	With 88 different and unique districts a template, one size fits all, may not reflect accurately what is needed and/or required in each individual district. Priority of a district may change within the course of a year thereby not conforming or following the initial Annual Plan of Work.
Allen	we are already doing this.
Holmes	We think accountability is a good idea.
Wyandot	more information is needed to determine if annual plan of work template will be acceptable and if we can meet the requirements
Ross	Swims in its current form, does not provide an efficient or detailed way to capture the work the districts do. All districts should be able to see the annual plan of work template before before they could approve of the policy as presented.
Butler	<ol style="list-style-type: none"> 1. It would be good to have a template to work to so the proper amount of detail is achieved. 2. Accountability - We have a great deal of concern about accountability morphing into a requirement to satisfy statewide priorities, rather than a requirement to meet self identified priorities set by local districts. Districts were set up to be LOCALLY led, not state led.
Mercer	Our concern is the last sentence that states "...MAY reduce total match dollars...". Districts who refuse to adhere to the accountability section of this policy should be ineligible to receive ANY state match dollars. There is policy for a reason. You don't have to accept the state match dollars but if you do, you will follow all aspects of the policy!
Summit	10. Is there a strategy or an objective tool to measure whether a district is meeting this requirement?
Monroe	<p>Our main concern is that SWIMS is so outdated. It needs to be upgraded and have the new template added. Will this be available in time for the changes? If not, what is the back up plan?</p> <p>Second, what are the minimum standards going to be from the OSWCC? Are there going to be state wide priorities (ex. algae bloom) that</p>

OSWCC Match Task Force Survey Results – Accountability Comments

	if a county does not have that problem will we be penalized? Will locally led conservation go by the wayside?
Highland	The Highland Board of Supervisor feels that meeting the accountability requirements will cause a hardship for their employees as long as the current version of SWIMS is being used to complete the template for the Annual Plan of Work. SWIMS is slow and very unproductive at this point and will not run on windows 8, which forces the IT Specialists to down grade all computer to windows 6 everytime an upgrade is loaded. A new or upgraded reporting system must be provided before the requirements are enforced.
Perry	The "annual plan of work template" is the only not currently in place. The reliability and lack of user friendly features in SWIMS continues to be a concern for the staff.
Fairfield	We are already doing some of these functions. A SWIMs upgrade would be beneficial.
Geauga	We agree that accountability is important yet we want to ensure since the "Annual Plan of Work Template" as referred to a set of standards that must be met rather than everyone having to conform to one template. Our District APO is tied directly to SWIMS and all of our time is therefore charged directly to items on our APO. We would think that should be acceptable.
Hardin	It would be nice to see the templates before answering. Questioning if templates will be difficult to complete.
Morgan	Due to staff members being part time employees, it is hard enough to keep up with the current work load.
Hocking	Before we have these requirements, we need to have a reporting system that works properly! SWIMS needs to be upgraded so it is compatible with current operating systems, user friendly and not so time consuming. When the system is not working properly, it is extremely slow and staff many times spends valuable time putting information in SWIMS only to have it not save and then have to start all over. We also have to keep having our operating system rolled back to an old version, because SWIMS is not compatible with the newer systems.
Athens	The Annual Plan of Work (APOW) and reporting requirements can cause an unnecessary burden on our district. SWIMS is out of date and we have concerns as to whether or not this program can function efficiently enough for our staff to be able to meet these program requirements. If and when SWIMS is updated – who will pay the cost of the upgrade? Will it be able to handle the reporting required from all 88 counties with the different programs and services being offered? Will the OSWCC will be reviewing the quarterly updates of the APOW – if not will anyone other than the Boards of Supervisors?
Auglaize	Depends on how much money we get and what is required. The money amount should at minimum pay for the requested services.
Portage	The Board and staff and the Portage SWCD currently spend much more of our income complying with current accountability standards and state requirements than we receive in match dollars from the state.
Mahoning	We certainly agree with accountability, but is there a process for including unforeseen hardships such as a sudden illness, etc.
Jackson	Software can't keep up with reporting required. System upgrade needed for a project like this.
Cuyahoga	This MIGHT produce a hardship, if the Annual Plan of Work template is just another document to be completed for the sake of completion. We already submit a comprehensive Annual Plan of Work that we actually use to direct our activities. If, however, the template would improve on our current format and if it could be coordinated with SWIMS, it might actually be helpful.

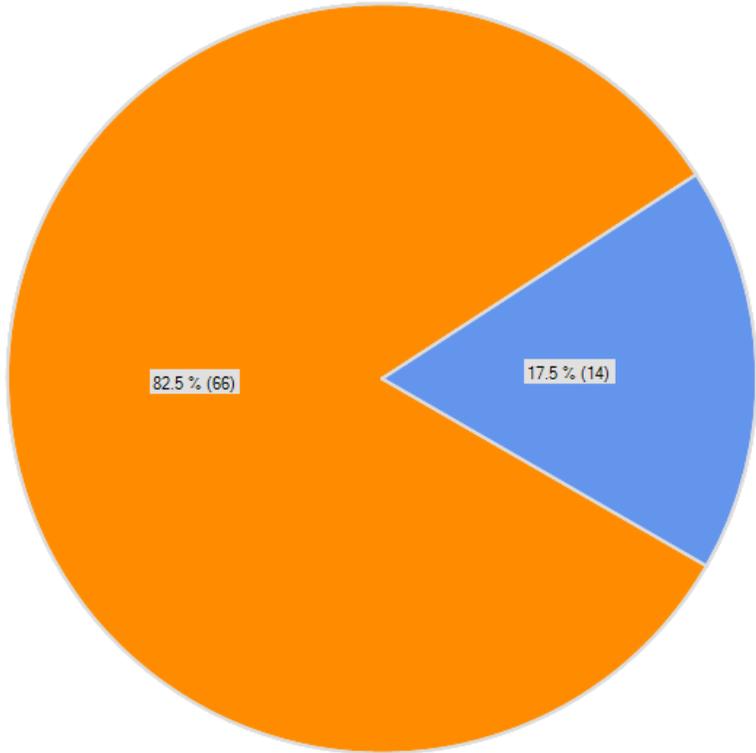
OSWCC Match Task Force Survey Results – Accountability Comments

Fayette	Accountability for the APOW rests with the locally elected Board of Supervisors, not the OSWCC. APOWs are flexible plans that can change according to local circumstances. Flexibility is one of the greatest assets of SWCDs. The proposed policy would decrease and/or eliminate this flexibility. Time and other resources expended on SWIMS and/or APOW reporting are directly deducted from those used to put practices on the ground.
Lake	Standardized Annual Plans of Work for all 88 districts may be problematic. Would need to be very flexible.
Defiance	Establishing measurable objectives and reporting on the achievement of the District's planned objectives seems to be a fair request of the Districts. This will be helpful for our planning process and progress reporting to our Commissioners. It will also be good to gage districts productivity and allow funding to be more in line with a district's productivity.
Delaware	Creating an annual plan of work is important. A general planning template for minimal reporting to the OSWCC might be useful, but without a draft proposal, we are unable to make that determination. We are certainly always open to new ideas. What makes the Ohio Soil and Water Conservation program stand out as a national leader is local Boards setting local priorities, individualism yet cohesiveness. We are opposed to throwing any more (State Match) money into SWIMS until a task force or committee explores its usefulness. Let's postpone that bullet in the "Accountability" Section. The immediate bigger problem is an outdated, slow and difficult to use SWIMS program.
Fulton	Make SWIMS program work with current computer software. Shouldn't have to downgrade Internet Explorer to utilize SWIMS. Leave match money alone.
Lucas	8 & 9. Accountability regarding best use of funds is essential for transparency to State and Public
Washington	9. Depending on the depth of the template and the additional requirements of SWIMS
Franklin	This draft policy document seems to go beyond providing guidance into rule making. 1) Accountability ... Planning is already difficult without forcing districts to use a specific format. Providing the ability to use SWIMS for planning is fine. If the district can meet the need, including quarterly reports, through another avenue, allow them to do so. It is more important that the local district is comfortable with the planning documents they are using to accomplish their goals. The state is not going to review these documents in the level of detail that the districts are. Further controlling the planning process will reduce creative thinking and ownership and it will evolve into a "creating widgets" process. Requiring planning in order to receive state match may be exceeding the guidance authority of the OSWCC. Additionally, SWIMS is outdated, slow and difficult to use. See changes marked in red below: Accountability Beginning, July 2015, SWCD revenue eligible for state match dollars will be matched fully at the current fiscal year match rate when the following criteria are met: The OSWCC is presented with a SWCD Annual Plan of Work for the current calendar year, reflecting district resource inventory and needs, developed by the SWCD board, meeting OSWCC minimum standards. The annual plan of work must be approved by the board of supervisors. Quarterly progress will also be provided by the board of supervisors and the program specials. Templates and a mechanism for recording and tracking plans through SWIMS or another system will be provided. The SWCD is using the OSWCC approved reporting system in accordance with OSWCC policy. The approved system is currently the Soil and Water Information Management System (See Attachment B) SWCD's depositing matchable municipal funds into District Fund must demonstrate that they have and are using a financial policy that meets minimum ORC requirements and that a financial professional is reviewing their financial accounting activities annually. The OSWCC may reduce total match dollars by 25% or more for those SWCDs that do not meet the above requirements.
Jefferson	The board recognizes the accountability requirements but because the criteria ties mostly to the SWIMS program they realize that technical issues with the program have limitations and that some small district's may not have the staff to fully utilize the capabilities of the program.
Coshocton	Will the APO continue to ONLY be approved by SWCD Board? Will OSWCC have the authority to change our priorities? We want to see programs continue to be locally driven. We have no problem being accountable to the APO we develop.

OSWCC Match Task Force Survey Results – Accountability Comments

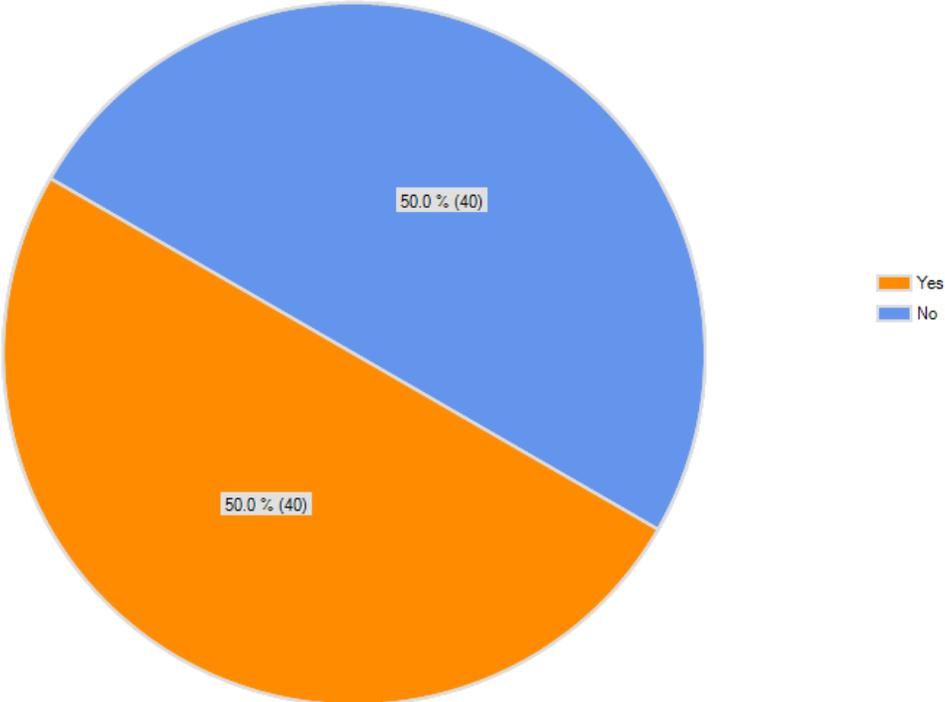
Warren	We are agreeable to the requirements and have worked to make our APW more reflective of our actual program, though we haven't fully integrated it into the SWIMS timekeeping.
Madison	<p>Developing a APW Our District SWCD has an Annual Plan of Operations (APO) against which we continually align our support and workload. The APO document itself is reviewed and updated yearly. Our goals are centered around what our District's landowners needs, and our success with the conservation programs stem from being allowed the flexibility to develop local plans and programs to provide and be accountable to our district's clients. The implementation of a standard template for 88 Districts will either have to be very general with each District only using the template as a guideline or extremely detailed to encompass every service each district provides to their clients, which some districts would not. Neither option is of much help if the goal of the Commissioner is accountability. The board can understand why a District should receive no match if they have NO Plan of Operation or Plan of Work in place but to penalize 25% for not following a template seems not only excessive but disrespectful. Reporting Practices for Accountability According to our Program Administrator, adding cooperators, cooperator projects and using the GIS function in SWIMS is extremely time consuming. NRCS does not use SWIMS, but their own reporting system, so for the District to capture all services would require double entry for us to report into SWIMS. This burden would be added to our SWCD Program Administrator's work load. Another concern of the mapping system is NRCS and Section 1619. Should we be putting this data on a map when we have to go into executive session before we even say the name of the landowner that we are working with? How much detail is really necessary? Implementation dollars are generally from NRCS, not the state. The District should be able to provide accountability by summarizing the information, which is how our partners at NRCS report their information. If the goal of the Commissioner is to be able to produce a uniform report of accomplishments, there are other ways to do this without mandating a template or penalizing the Districts. The example that our District Program Administrator used was the national contest known as the "Goodyear Cooperator of the Year." Districts would compete for a grand prize to send their supervisors on a national trip to accept their award. They would report their accomplishments in a uniform way following the guidelines of the Goodyear Report. If SWIMS could be set up to help Districts efficiently compete in a contest for either some great prize or bragging rights, then Districts would have an incentive to use SWIMS and voluntarily comply. The reporting has to be quick and easy, like entering data in the timesheet, for it not to be a burden. It would be unfortunate to go through this process and in the end require a new layer of accountability and more time consuming reporting mechanism. As proposed, the District sees the workload but not necessarily accountability increasing as the partners change from working together on one District Report to requiring three different reporting systems.</p>
Putnam	availability of staff time

Is the match formula as described in the policy acceptable?



Distribution Equity

Does SWCD perceive this change in the policy will encourage local funders to continue to fund the SWCD at current levels and or begin to fund the SWCD greater levels?



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Putnam	Depends on County Commissioners
Hocking	Item 11 is yes as long as any matchable revenue above \$500,000 is matched after all other revenue levels are matched first. The funds above \$500,000 should be matched at a rate at least 10 percent below the current fiscal year formula percentage for all those funds between \$20,000 and \$500,000. This would allow those counties under \$500,000 to receive the support they need to better meet local needs.
Portage	This policy does little to nothing for the poorly funded districts. There should be no maximum number of years that a district can be eligible to receive assistance grants.
Athens	Funding changes are only benefiting a few at the expense of other counties that have and are currently supporting soil and water conservation districts. This approach encourages more of a welfare system in the distribution of state funds and provides little incentive for bottom growth at the expense of better funded SWCDs.
Mahoning	We don't know if this will encourage local funders to give us more, because we are still perceived as a "non-mandated" entity. However, we do now have the ability to argue that the more we are funded, potentially more matchable funds are available to our County.
Auglaize	We feel a cap is a good idea.
Jackson	In our situation, this would be a big shot in the arm to help us re-establish the SWCD program in the county.
Fayette	<p>This policy essentially proposes the state will fund a district in each county regardless of local decision-making. This is contrary to the historical commitment to local leadership.</p> <p>This policy discourages additional local funding. Districts with little to no local contribution will be supported at high rates while those with increased local funding will suffer reducing rates. Local funders will get the most "bang for the buck" at low levels of support.</p>
Cuyahoga	Our local funders do not really care how other districts are funded. They care about our services and their own budgets. We could also mention here that urban areas actually contribute more to our match base through Construction and Demolition funds, but we understand the need to support ALL districts at least at a minimum level.
Lake	It could encourage local funders to fund districts that receive no or minimal funding.
Delaware	<p>Equitable is defined as dealing fairly and equally with all concerned. That is not the case in the scenarios presented. The redirection of funds as outlined from the top funded Districts to those with no or minimal amounts of local funding will not be sufficient to stabilize those struggling Districts. Such funds will not allow them to hire the staff they need to make a substantial change in their program. On the other hand and in Delaware's case, losing nearly \$30,000 over a four year period is substantial. Large Districts lose the most with this proposal. The Districts "in the middle" of the chart don't change much, if at all. To be equitable, all Districts should be prorated the same for matchable monies above the \$20,000. This spreads the burden more evenly and reduces the excessive load currently proposed for higher income Districts.</p> <p>Keep in mind that Ohio has been a leader in soil and water conservation and is one of the strongest programs in the NACD family. Our State Legislators have recognized this time and time again with their State Match support. These votes come from urban as well as ag</p>

OSWCC Match Task Force Survey Results – Distribution Equity Comments

	<p>legislative districts. If you weaken the strongest SWCDs, you will water down the statewide program as a whole. We do not want to jeopardize the relationships we have built with our respective legislators by cutting back on our programs due to this proposed distribution's approach.</p>
<p>Washington</p>	<p>12. Local funders are also limited on the amounts available for a non-mandated program such as SWCD.</p>
<p>Fulton</p>	<p>Keep match the same. Don't show dollar limits. Leave match money alone.</p>
<p>Warren</p>	<p>The policy is acceptable & we're glad to see support for 88 Districts. Question 12 is hard to follow. In our County, I don't believe that a change in match policy will result in an increase in funding levels. Was a cap on the amount of matchable dollars considered to ensure an equitable distribution of match?</p>
<p>Franklin</p>	<p>1) Distribution Equity.... This formula does not adequately address the need to have some base of funding to help prevent office closures and it is punitive to larger urban districts who have greater population to fund.</p> <p>Also, can the commission provide more than a 1:1 state match for local funds?</p> <p>1515.14 "there shall be paid in each calendar year to each local soil and water conservation district an amount not to exceed one dollar for each dollar received in accordance with...."</p> <p>Assuming local dollars stay consistent, in the first year of enactment of the new State Match formula (2015-2016) the three largest counties incur the deepest financial impact while only providing between a 2,981- \$5,544 funds to the bottom 9 funded districts (2015-2016). From 2015-2019, under the new state match formula, The top 3 funded districts state match funds are significantly reduced by \$29,511- 25,627 with the largest redistribution of funds resulting in one county with a \$19,044 increase, the next highest is 6 counties with around an \$11,000 increase. Outside of the top funded districts and least funded districts the change in dollars is relatively minor. The fund redistribution is enough to impact operations of the top funded districts but not enough to bring on new staff to the bottom funded districts.</p> <p>Looking at dollars at the per capita level gives a completely different perspective to distribution equity. Regardless of acres per county, the more the land is subdivided between people and regulated and serviced by more local governments the greater the conservation workload. When using 2010 census numbers, the highest state match received per capita is Fayette County at \$5.39. The lowest state match received per capita is Portage County at \$0.09 per capita. The average per capita is 1.80. For the top funded Districts: Franklin, Hamilton, Cuyahoga, Fairfield and Delaware the amount of state match received per capita is \$0.46, \$0.42, \$0.25, \$1.25, and \$1.53, respectively. It is estimated by 2050 an additional 604,000 individuals will live in Central Ohio (http://www.morpc.org/pdf/uli_columbus2050.pdf) which will create an even greater funding gap.</p> <p>To better meet the goal of providing a better base funding to the underfunded districts, it may be more useful to up the base funding for all districts to a higher number, maybe \$25,000 if possible. Then maybe match the next \$25,000 by 100% to stay within the 1:1 ratio outlined in ORC. All districts should get the same flat rate and match. If the top districts are going to take a cut, then ensure enough of a base for the bottom funded districts.</p> <p>To better meet the goal of distribution equity focus it would be better to focus on managing the annual state match increase per district. If the rate of increase is managed, then there is an opportunity to get ahead of increase demands by engaging state legislators. Capping</p>

OSWCC Match Task Force Survey Results – Distribution Equity Comments

<p>Franklin (continued)</p>	<p>state match increases each year by no more than 20% over the previous year’s match funding would go a longer way to providing consistency in availability of state match funds to all Districts. Because 20% may be counterproductive to bringing on new working agreements for lesser funded districts, districts can alternatively use 20% of the average District state match ($\\$10,208,446 / 88 \text{ counties} = \\$116,005 * .20 = \\$23,201$) over the previous year’s match funding.</p> <p>Capping levies at 5% and not all eligible funds seems inequitable. If the cap of 5% was applied to all eligible districts it would be not equitable to the larger urban districts, especially when they pull in some of the lowest rates of state match per capita and their funds would be cut immediately using this percentage. Because the districts are all across the board on what state match funds they receive in versus population, it would be hard to develop an equitable formula that does not negatively impact existing districts. The best we could recommend is to set the state match cap at 75% of per capita rate for state match by state population ($10,208,446 / 11,536,504 = .88$) times the county population ($0.88 * \text{county population}$). This seems to provide a reasonable cap for some of the larger funded districts. Because this would create a problem for districts that currently receive more than .88 per capita also set a secondary cap of \$250,000 per district. So the total cap for districts would be 75% of the state per capita rate for current state match ($10,208,446 / 11,536,504 = .88$) times the county population ($.88 * \text{county population}$) or \$250,000, whichever is greater.</p> <p>Through the decades, although threatened, state match funds have largely been preserved because legislators from both urban and rural communities view the formula as equitable.</p> <p>Successful districts also set the standard and provide ideas and resources that keep the SWCD’s moving forward toward the common goal that we are all trying reach.</p> <p>See changes below:</p> <p>Distribution Equity</p> <p>Among the OSWCC match guiding principles is the goal of state match distribution which supports a strong program in each of the 88 SWCDs. To accomplish this is the following statewide distribution policy</p> <p>To provide a base of funding in all 88 SWCDs the following will be implemented:</p> <ul style="list-style-type: none"> • Regardless of total local matchable revenue, each SWCD will be provided a base state match of 15,000 in FY 2015, 20,000 in FY 2016 and 25,000 in 2017. • Beginning July 1, 2015, the first 1520,000 dollars of local matchable revenue will be matched at a 100% The match on the first 20,000 dollars of local matchable revenue shall increase each year by \$5,000 from 2018 until 2019 for a total of \$25,000 provided that total match funds available are equal to greater than the total funds available during the previous state fiscal year. (Maybe do away with this bullet all together, as there is the bullet below to provide some relief). • SWCDs that have experienced a catastrophic loss of local matchable revenue resulting in a greater than 40% reduction over the past three years and districts receiving less than \$25,000 from combined local matchable revenue may be eligible for Conservation Assistance Grants from the OSWCC. To better manage consistency in state match available to districts the following will be implemented: <p>The state match on revenue received for SWCD operations will not exceed more than 20% over the previous year, or over 20% of the</p>
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OSWCC Match Task Force Survey Results – Distribution Equity Comments

<p>Franklin (continued)</p>	<p>average Districts states match; whichever is greater.</p> <p>State match will not be provided at on local funds that exceed the 75% of per capita rate for state match by state population (10,208,446/ 11,536,504 = .88) times the county population (0.88* county population). To help phase in this per capita approach and not cut funds from any districts a secondary cap of \$250,000 per district is provided. State match funds on local revenues will be capped at 75% of the state per capita rate for current state match (10,208,446/ 11,536,504 = .88) times the county population (.88*county population) or \$250,000, whichever is greater.</p>
<p>Jefferson</p>	<p>The board discussed the sustainability of the policy beyond 2018. In the event of economic/political changes will future funds be available. A initiative to seek dedicated funding is highly encouraged.</p>
<p>Coshocton</p>	<p>What happened to working towards the 1:1 match that has been discussed for years? Your figures show 60% match in 2018; down from 78% in 2014. This will NOT help us at the local level. County Commissioners appreciate the State matching funds we bring to our community to protect our soil and water resources.</p>
<p>Greene</p>	<p>Who has the ability to change the dollar or per centage amounts in this proposal in the future? I like the fact the OSWCC put the task force together for these current proposed changes. I woulf hope someting similar would be done for future changes in the specifics of the match process.</p>
<p>Pike</p>	<p>Commissioners' funding depends on the State funding to our local Commissioners.</p>
<p>Hamilton</p>	<p>While the Hamilton County SWCD Board supports both statewide soil and water conservation and local Board control, we believe there has to be a better way to accomplish both of these than to give underfunded Districts funding at levels that do not realistically support useful programs, but that require denying funds to better-funded Districts that can actually make useful progress towards the goals all Districts share.</p> <p>We realize there are a number of Ohio counties that have such small populations that it would be a burden on them to fund even a single District employee. However, we think it may be more useful for them to cooperate with other Counties or possibly ODNR to put together truly useful programs.</p>
<p>Adams</p>	<p>Although we state that this formula is acceptable, we feel it is not necessarily fair or right. This is not enough of an incentive to encourage our County Commissioners to increase our funding, and we have no other means at the present time of increasing our funding.</p>
<p>Williams</p>	<p>We need more dialogue on the last sentence. Does this create a match issue with districts that have taken the task of securing local funding?</p>
<p>Meigs</p>	<p>Question 12 is an and/or question, not a yes/no question. How can you answer that?</p> <p>Meigs did not perceive a \$20,000 cut in local funding until our Administrator received a phone call from the Commissioners with the news. The spreadsheet sent assumes consistent funding over the next five years from both local and state officials. How can we possibly perceive what the commissioners will do in the next five years, and how can the OSWCC possibly perceive what state match will be five years out? That's two more biennium budgets and possibly new state leadership/administration, so the proposed match</p>

OSWCC Match Task Force Survey Results – Distribution Equity Comments

	<p>funding levels are only good if everything falls exactly into place the next five years. What are the chances of that really happening? The proposed numbers also assume there will be no big changes in local matchable funds. If some districts find a loophole through their fees and agreements, they will be able to draw much more money out of the state match pot of fixed dollars, and that means some other district(s) will have to get less.</p>
Pickaway	<p>1. According to your "Introduction and Guidance Task Force" section of the survey states to keep the long held state match fund guiding principal. This survey for "new funding levels" does not meet an equitable match for Ag areas, does not maintain changing needs for Ag areas and does not represent equal distribution for all 88 counties.</p> <p>2. Eliminate matching revenue money at a cap of \$350,000, \$300,000 for levy money and prorate the percent matched for all income so everyone feels the cut.</p> <p>3. The purpose of Soil & Waters was to help with farmland erosion, the shift of funding is being channeled into more Urban Programs. Urban funding should be from the agency responsible by law to carry out. We don't doubt that some soil and water districts can do it better but let those urban agencies pay for it and not put it at the expense of other district programs. It is the agency's responsibility not ours.</p> <p>4. This distribution of funding does not support a strong program for all 88 counties. Increasing the match on the first \$20,000 from the commissioners would help districts have a stronger program but the matching of fees would be harmful to all 88 because it would dictate their workload and supervisors lose their authority to change priorities.</p>
Muskingum	<p>Our county has flat-lined our funding for several years. We don't see that changing for the better, even if state match goes up. As your spreadsheets show, we are one of the districts in the middle that won't be affected too much by the proposed changes. One supervisor did note that he has a problem taking from the "haves" to give to the "have nots" - it's not fair that just because they can raise more local funds that they receive less state match.</p>
Darke	<p>Policy detrimental to current relationships with local funding in Western Ohio by shifting funds to Eastern Ohio. Take funds from industries creating problems in Eastern Ohio rather than from Western counties. Local support (funding) needs to exist in order for match.</p>
Brown	<p>Who knows what future funders will think? Would be important to help commissioners, etc to understand the matching fund system and the percentages in the policy. Don't think it will discourage funders, but if they do not have money it really does not matter. It will vary county-to-county and is an major UNKNOWN.</p>
Union	<p>Concerning #12, we do not feel that the change in policy will encourage local funders to begin to fund the SWCD at greater levels, but anticipate that funding levels may stay the same.</p>
Vinton	<p>Continue to fund at current levels</p>
Erie	<p>We do not see how any changes in match policy can change the local funding that is driven by local economy and reduces budgets for local governments due to reductions in state funds.</p>
Licking	<p># 12 - probably makes no difference. Some local funders make reduce levels.</p>

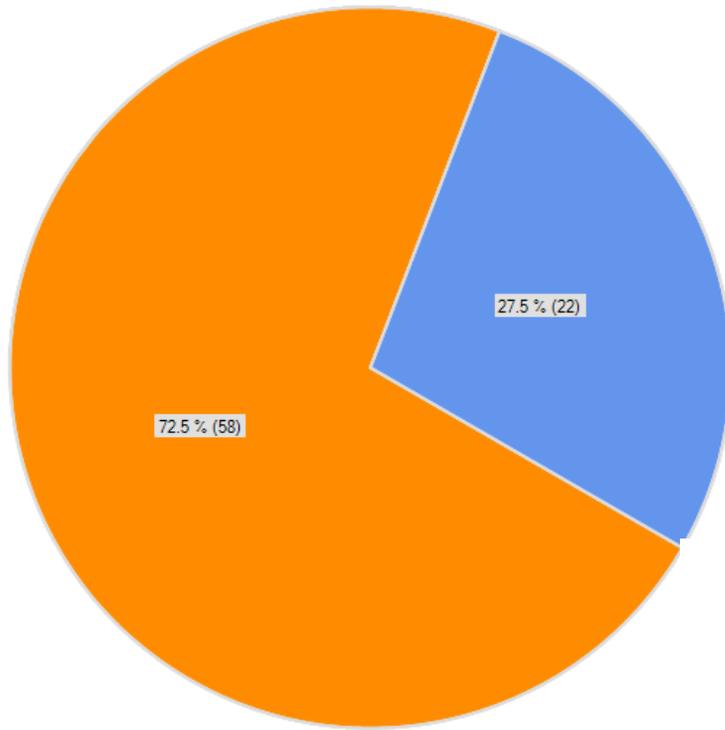
OSWCC Match Task Force Survey Results – Distribution Equity Comments

Logan	<p>Until Districts are mandated and as long as local funding continues to decrease and work that our District provides to other agencies isn't matchable we do not foresee much of an increase in our local appropriations.</p> <p>The \$500,000 cap seems a bit high - needs to be re-visited</p>
Scioto	The match rate may go up but with additional fees being added the actual rate will go down. We think that some counties may look at it has they don't need our money, and that the state could or would supply more.
Clarks	Caps need to be set for those urbanized Districts that have a stronger tax base. Additionally, public monies shouldn't be kept in a nest egg. If you have it use it wisely!!! However, it is a concern that some some Districts may have lost their funding locally due to straying away from providing technical service and becoming an intergral part of County operations. Counties do not need another Extension office or park district.
Gallia	Greater match percentage of first \$20,000 could help encourage local fudning to be maintained. It could also encourage an increase of local funding to their SWCD's.
Preble	Not much will change for us.
Guernsey	We do not anticipate additional matchable funds from the county commissioners.
Lawrence	What happens to the local funding being cut then state matching continues to cut is our concerns.
Carroll	The \$15,000 is a minimum not a match? What happens if the total funds are not equal to or greater? We do not understand the last bullet, about special property tax levy?
Knox	We need more clarification on the 5% match on property tax receipts. It seems to us that this could still pose a state wide issue if multiple SWCD's pass levies at the same time. Otherwise, we are fine with the distribution equity proposal.
Ashtabula	Depending on the County funding could remain at current levels, for other greater levels may be forthcoming. However some County Commissioners may see the increase in base state match and the increase in percent of initial matchable dollars as a reason to provide less local allocation. We believe the question can not be accurately responded to in its present form.
Allen	helps keep all districts funded
Holmes	The state match has always been our strong argument for local funding, especially when we could talk about "almost one to one match." I'm not confident that the local funders will be able to pick up the of decreasing match.
Wyandot	Suggest matchable revenue above \$500,000 be matched at 50%. Really don't know if policy will result in current level or greater level of local funding, but it might result in lower level.
Butler	1. We are concerned over the source(s) of future state funds. It is getting harder to claim dollars from the GRF, and more are competing for the tipping fees. The total amount of dollars available to districts may fall in the future.

OSWCC Match Task Force Survey Results – Distribution Equity Comments

	<p>2. If the total amount of state money available for matching stays at the current levels, all should be well. If the amount to be distributed falls to the point that districts get less than a 60% match, then it is anticipated that county commissioners would stop local funding to SWCDs. If this were to happen, we feel a new formula should be developed to protect viable districts. Non viable districts (those zeroed out or with minimal funding) should combine into regional centers. This would reduce the number of entities being matched, and drive each entity's match back up above the magic 60% level.</p>
Mercer	<p>The District is concerned about matching amounts over \$500,000. Even at 60%, this is a great deal of money that could be used to fund more districts at a higher rate. We are also concerned about specific dollar figures because the amounts might be appropriate today but there is no mechanism in the policy to adjust for inflation in the future. If the policy is to be reviewed every 2-5 years then this may not be an issue.</p>
Summit	<p>13. This question does not lend itself to a yes or no answer. Summit SWCD has worked hard to improve local funding opportunities as state dollars have become stretched. We strive to provide support and value where our county has a need. We can't control the economy and the affect on our local budget, hence the desire to keep a small cushion in reserve funds.</p>
Highland	<p>The Highland SWCD feels this match formula is acceptable as long as funding remains available with the proposed matching changes. The changes to the formula will not encourage growth in local funds in Highland County because the current local funds are lacking for the entire County and we are a non-mandated entity.</p>
Clermont	<p>Clermont SWCD believes that matching 200% of the first \$20,000 in local revenue will be an excellent incentive to County Commissioners who have in the past zeroed out their districts.</p>
Perry	<p>The State match formula plays no role in the Perry County Commissioners decision making process when providing funds to the SWCD. Their appropriation is reflective of their confidence in the SWCD and their available funds.</p>
Fairfield	<p>The system encourages the existance of 88 SWCDs which is good. In a larger district like ours, we don't see where changes will encourage any action by local funders.</p>
Ottawa	<p>We will probably stay at the same local funding level. We do not see this as something that will increase local funding.</p>
Geauga	<p>Because of the reduction in match for gaining larger local support this would never cause funder to want to maintain or increase funding. The fact that there is a match and the higher it was became an incentive for funders to provide appropriations. Many of our communities saw this as one of the very few ways to bring back money to the County when so much goes out and very little is ever returned since all government funding is getting more and more redistributed so that you don't get your tax money back to your county. (Example school funding)</p>
Morgan	<p>Would like to see an increase of the base state match of \$15,000 to \$20,000.</p>

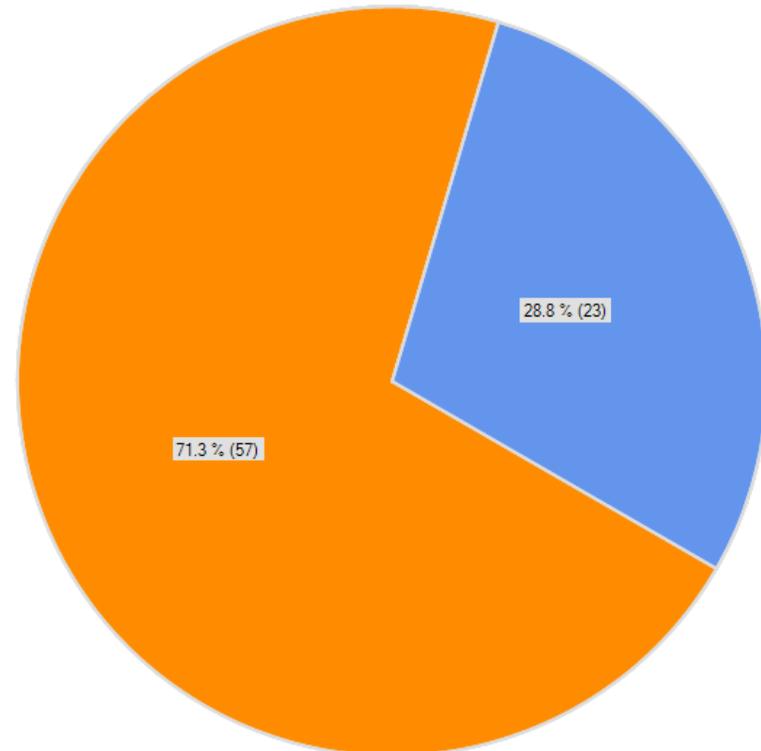
Are the fund balance limits set by policy for a SWCD to receive full state match acceptable?



SWCD Fiscal Status

Yes
No

Is the timeline to draw down fund balances by the SWCD reasonable?



Yes
No

OSWCC Match Task Force Survey Results – Fiscal Status Comments

Putnam	Need more time - Boards should not be penalized for being fiscally responsible
Portage	First, the district funds should have nothing to do with any match policy. The commission does not regulate district funds. The Portage SWCD does not submit a budget to the Board of County Commissioners we submit a contract and an invoice. This section should be removed.
Mahoning	At this time, the limits work for our SWCD.
Auglaize	OSWCC has no idea what each district plans are for their reserves. A district that manages their money well should not be required to take less match.
Defiance	This seems to be a fair and effective way to reduce match contributions to districts that are stockpiling large amounts of funds. Based on our financials, we are currently meeting the financial status requirements while carrying over a reasonable amount for operating expenses.
Fayette	This policy punishes districts who have been frugal and built reserves to carry then through lean economic times or to take advantage of unforeseen opportunities. Local funders are aware of district finances. They will reduce funding if they decide balances are too large.
Tuscarawas	This is way too confusing for board understanding. It feels like a penalty for receiving more local funding? Need to be clarified.
Cuyahoga	We see no need to limit cash carry-over or discourage saving reserves to deal with unforeseen circumstances. We understand that funds deposited in our stewardship fund (conservation easements) or set aside for special projects will not be counted in these calculations.
Lake	The \$150,000 total budget criteria seems very low. It appears that all but 15 counties fall into that category. We have no issue with the 200% of combined D/S balance of 2017 budget as long as employee hold back balances of unused leave, FMLA, and unemployment expenses are not included or counted as restricted.
Delaware	<p>Is this an overall problem? Is the proposed 200% figure enough? The more staff, especially experienced staff, the more financial obligation the Board has in case of a catastrophic event. It has been pointed out to us time and time again by the ODNR Auditors and Program Specialist to make sure to keep enough money in reserve to meet our obligations. Salary and benefits are a huge portion of any District's budget. It is also prudent to keep a certain percentage in reserve for your program's rainy day fund. All local governmental agencies strive for an adequate cash reserve to get them by during an event like we had recently starting in 2006. The District fund is a good place for a District's rainy day fund. We are aware of at least one neighboring District that has relied heavily on District fund money to keep their doors open in recent years. Since you are not matching any dollars put in the District fund, we are not sure this rule is needed.</p> <p>To exempt Districts' under the \$150,000 budget level is counterintuitive. If a District with a limited budget sits on more money than their financial obligations and a reasonable rainy day fund, they should be required to spend down their excess prior to receiving additional state match support should the proposed formula be adopted. If you are going to implement this rule, it should apply to all Districts.</p> <p>In the end, all a District has to do is state what use they have for the balance. If the purpose of this rule is to force some Districts to look more closely at their balance, it is useful.</p>
Fulton	Don't need to report District Fund on Form 11, it's already reported on the Cash Basis Statement. Minimum of 25% - no. 200% - need to have a balance for future use. Leave match money alone.

OSWCC Match Task Force Survey Results – Final Comments

Hocking	<p>This policy as received in the final draft seems to leave room for Districts to get matched on the fees listed in the Clarification and Guidance section depending on the wording they use in their billing and how creative they are with the bills. This is not fair to all districts and defeats the purposes of the revision of this policy to make matching money fair and more evenly distributed. A lot of counties do not have the opportunity to collect fees due to the size and make up of their county. One example would be NPDS work and fees. A very limited number of counties would be eligible for these fees or match on them, thus benefitting a few districts but hurting the majority of the districts. There are only so many dollars to go around and if you start matching fees, regardless of how worded, the match on actual local appropriations will suffer and decrease hurting the districts who do not have the opportunity to collect fees.</p>
Portage	<p>Additional comments will be emailed to committee members.</p>
Athens	<p>While we understand that there is a huge disparity of funding issues across the state, we are hopeful that your efforts to develop a funding structure is fair and equitable to ALL 88 Soil and Water Conservation Districts!</p>
Mahoning	<p>We do have a concern that our new computers that are run off of the upgraded County IT server are not compatible with the SWIMS mapping program and that we may be penalized.</p>
Jackson	<p>We appreciate all the help we can get at this time. Some of the proposed changes will be difficult to complete, but we will work hard to see that it is done.</p>
Fayette	<p>A number of questions arise.</p> <p>Are SWCDs to be locally lead or state lead? Do they report to a locally elected Board of Supervisors or to a state appointed OSWCC? Should they focus on local natural resource concerns or state imperatives? Is state match intended to help carry out local programs with no strings attached, similar to local contributions, or is it a grant for those applying to work on state initiatives? Attempting to serve two masters is inefficient and untenable in the long term. These policy discussions seek how to divide the same shrinking pie. What efforts are being made to grow the size of the pie?</p>
Defiance	<p>Policy changes seem quite reasonable from our standpoint and it appears that little or no change to match amounts will be realized for us. We question how significant a change will occur to the overall percentages as some districts' local contributions increase due to levy funding that is not currently shown on the spreadsheet projections.</p>
Tuscarawas	<p>Main Concern SWCD Financial Status clarify</p>
Cuyahoga	<p>We appreciate the work that the Task Force has done in trying to sort through a complex situation and come up with a system of match that is fair to all.</p>
Noble	<p>We do not want to see the locally led SWCD's being run at the state level</p>
Lake	<p>Thank you Task Force for working so hard to ensure a fair and balanced approach to state match. We appreciate your efforts.</p>

OSWCC Match Task Force Survey Results – Final Comments

Delaware	It is good we are having this discussion about State Match policy. It is long overdue. We appreciate the opportunity to provide District input. Fairness and equity is all we ask for an outcome.
Fulton	Would like to come to the commission meeting also.
Lucas	We fully support the wish to have 88 strong SWCD's and are willing to assist with this effort
Franklin	<p>Word documents with our comments and suggested changes to the policy are available just email jfish@franklinswcd.org or call 614-486-9613 and we will get these documents to you promptly by email or fax. Overall comments are below:</p> <p>1) Policy document needs to be cleaner and may exceed guidance authority. This draft policy document seems to go beyond providing guidance into rule making. A guidance document should explain ORC and related procedures to be consistent with ORC; not set new restrictions. Guidance should not be binding or dictate rights and obligations. If this document continues to dictate rights and obligations and continues to set forth legal consequences for those who do not act consistent with the policy, then the OSWCC should go through a proper rule making process to allow for notice and public comment. Further, it is questionable whether this draft policy document is in fact consistent with the mandates of the ORC or the intent of the General Assembly.</p> <p>Beyond the question of authority, the issue for the existing policy is consistent application. The additional language used to clarify what is matchable to assist in understanding ORC creates confusion. Each district administrator, program specialist and ODNR staff interpret the language differently in part because each has a different experience and districts operations vary significantly from county to county.</p> <p>Additionally, the more restrictions or interpretations placed on what is matchable or not matchable increases the oversight needed by the program specialists whose resources are already stretched thin. They do not have the resources to give the level oversight needed to make a more complex policy consistent. A much clearer and concise policy will better assist with consistency in application and therefore assists with equity.</p> <p>2) The introduction would benefit from some additions. The introduction provides a history of district state match. It ends with the addition of the ability of districts being able to match municipal and township funds creating a strain on the availability of state match funds.</p> <p>This explanation does not explain that over the past 6 years the bigger strain on the availability of state match funds is the reduction of available funding by the state legislature. The needs have increased across the state, with more focus and the need to manage agricultural and urban non-point source pollution, the availability of state match funds has been challenged by switching funding from GRF to reliance on fees.</p> <p>Additionally, one guiding principle that is missing is to support effective programs that meet local and state needs SWCDs will not remain viable in the long term if we only focus on equitability.</p> <p>See suggested changes marked in red below: Background:</p> <p>Beginning in 1959, the Ohio Soil and Water Conservation Committee (now the Ohio Soil and Water Conservation Commission) was given authority by the Ohio legislature to match local funds with state funds through ODNR to carry out local conservation programs. From 1959 to 1980, as then specified in Chapter 1515, they matched funds appropriated and received through the county's "inside millage" or from the</p>

OSWCC Match Task Force Survey Results – Final Comments

Franklin
(continued)

county's general fund. As Ohio's landscape changed and district programs and services grew, SWCDs led an effort to change Section 1515.14* to allow funds appropriated to SWCDs from municipalities and townships to also be matched. The ability to match municipal and township appropriations has created tremendous funding opportunities for SWCDs, especially those serving their county's urban conservation needs. In the late 2000s, Section 1515.14 was amended to clarify matching funds from millage "outside" or in excess of the 10 mil limitation due to the increase in SWCDs (with permission of county commissioners) looking for funding through dedicated property tax levies. Both these changes have provided expanded revenue opportunities for SWCDs, but have also created concern about match distribution equity among all 88 SWCDs.

Further fueling equity concerns, in 2009 the ability to increase state match funding provided by the state legislator was restricted while the need for water quality improvements have increased. These needs can be tied to increased concern regarding agricultural non-point pollution and increased regulation of urban storm water management. Urban storm water management is essentially the urban equivalent of managing agriculture non-point source pollution.

In 2013, the OSWCC created and charged the SWCD Match Task force to revisit the 2004 OSWCC policy and make recommendations at the July 2014 OSWCC meeting. The following policy statement and guidelines are the result of that effort.

Purpose:

Clarify and communicate the Commission's policy on the matchability of local funds provided to a Soil and Water Conservation District to carry out the mission and goals of the SWCD as directed by the board of supervisors.

Guiding Principles:

- Develop, communicate and implement a policy that is within the authorities of the Ohio Revised Code;
- Set policies reflective of and responsive to districts' changing needs; and
- Maintain an equitable distribution of state matching funds that support a strong statewide program
- Support SWCDs every SWCD to have enough staff to have a viable program to meet local needs.
- Support effective programs that meet local and state needs

3) Impacts on Franklin SWCD... This policy will cost Franklin Soil and Water more money and possibly partnerships due to staff time and increased complexity in working with us. The assumptions that we can more easily find new pots of money to cover our costs is not fair.

On top of increased costs we will receive less state match. We will need to use more staff resources and funds to comply with new constraints including: putting all of our money in special fund, which is difficult to use and unneeded.

We have already established a financial policy and hired a finance and payroll specialist to ensure fiscal responsibility; and using new forms for planning and reporting when we have just completed our 5th strategic plan and have established systems that meet our needs.

In addition to these new constraints that increase our costs we are also taking by far the largest cut in funding.

Urban districts bring in more funds because we work with more landowners, residents and local governments to protect natural resources. We have worked very hard to build a professional, responsive, and fiscally responsible organization that local partners want to work with; which is in large part why we have the funds that we do. Staying visible in a large urban county is a monumental important task. Part of maintaining visibility is having enough resources to meet the local needs. If we cannot adequately meet local needs, than our relevance and ability to conserve natural resources diminishes. There are no other entities that can provide similar services with equal access to all local governments and residents at a cost effective rate that encourages shared services across political boundaries. The public deserves equal access to conservation assistance whether they are in urban or rural areas.

OSWCC Match Task Force Survey Results – Final Comments

Coshocton	Providing more time to digest the language and discuss among board members would be very helpful! This is very important information for SWCD's and we need to make sure we understand the information. Thank you!
Greene	We commend OSWCC for putting together the Task Force and seeking Districts comments. We hope whatever is decided on it is well thought out and easy to follow rather than quickly thrown together with the intent of having someone else later on develop the specific details.
Hamilton	<p>Again, the Board of Supervisors of the Hamilton County SWCD objects to</p> <ul style="list-style-type: none"> - The exclusion from matching for stormwater funds that clearly support the SWCD mission - The exclusion from matching for funds that support the SWCD mission that for good reasons go through other agencies - Using the present matchability discussion to force Districts to adopt templates and SWIMS for annual planning, when there needs to be further discussion of the appropriateness of this change. - The potential exclusion from matching of appropriate dues and insurance premium payments - Taking funds from large Districts, in favor of Districts that may still be funded at such a low level that they can not make productive use of the funds they do receive. <p>We believe further discussion of the matching scheme is necessary and that the scheme presented should not go into force.</p>
Pike	We think the current formula is equitable to all Districts.
Williams	Are Districts going to be invited for comment at the Commission meeting. Where is the Commission meeting going to be held?
Meigs	One of the biggest issues on the proposed changes to the state match policy is the potential to create a funding loss to many districts due to loopholes in the matchability section. Matchable contributions from county commissioners cannot compete with fees or invoices to agencies that become matchable through roundabout agreements or MOU's. SWIMS needs to be fixed ASAP. Hands off the DF.
Adams	In a nutshell, this survey and the State Match formula is complicated and confusing. It is hard for staff, supervisors and commissioners to understand how this all works. With that being said, we feel that it is vital that all Districts receive funding adequate to run their program. The biggest flaw that we see with this proposal is the potential for Districts to receive State Match on fees. If this were to happen, in general, urban Districts could gobble up State Match dollars from the rural Districts that don't have extra fees to generate more Match money. This also will cause Districts to gravitate toward a fee based program rather than addressing true conservation needs. Therefore, this whole process seems to be counterintuitive. The taskforce was originally designed to help the bottom one third of Districts. It seems that very top counties are the ones that have the potential to get more of the dollars. We like that the percentages are going up, but we feel it is still inadequate for the lower one third of the counties.
Morrow	Thank you for your time in reviewing the policies and making updates.
Crawford	Mike Hall and Liz Miller are willing to assist with the development of the plan of work template and the Program Type reporting features.
Marion	Each SWCD should be held accountable for the funds received either on a state or local level. Our only concern with the policy update would be the match ability for local governing agencies to consolidate efforts and funds. We feel the conservation effort is the priority and if we can collaborate with other agencies to get this accomplished for the lowest price in Marion County that is what we will strive to do.

OSWCC Match Task Force Survey Results – Final Comments

Darke	Appreciate the time the task force has put into this policy. Again trying to slice the pie a different way, need a bigger pie. Knowing the formula is a positive. Believe local support needs to exist for match. Lowering match for counties with strong local support makes it tougher getting that local support.
Brown	Nice job considering what was available to work with. The policy is good in theory. Once again a lot of this will be based on local dollars that have not been matched in the past and the overall impact that will have on all SWCD's. This may have a major unintended negative impact on the amount of state matching dollars available to the SWCD's.
Union	We feel that the majority of the survey questions are guiding us to the answers that you want to receive.
Erie	Overall, we don't foresee any significant impact to Erie SWCD as our funding is not at the upper or lower end of the match limits.
Licking	The Board has concerns that with the additional appointees by the governor, the commission will become more political in nature. Commission members, policies / funding may change per governor's desires and not address conservation needs at local levels.
Logan	We would have liked to see a "maybe" place to mark on the survey. It concerns us that the same revenue venues that is currently provided for State Match is just being divided up differently. New revenue for future State Match has not been addressed. Thank you for allowing us to participate in this survey.
Clark	The larger problem at hand is finding a CONSTANT & CONSISTENT funding source. With the amount of work SWCD's do for mandated and well funded State agencies (EPA, ODA) , perhaps some of these funds should be allocated toward our work that we do for them free.
Preble	We need to look at alternative revenue sources, not different ways to divvy out the current pot of money.
Knox	Our Board would like to express their sincere appreciation to the Commission for the opportunity to provide comment on this matter.
Holmes	We like the idea of guidelines and across the board "rules" for matchability so that it's not so arbitrary. We'd like to thank the task force for their hard work.
Wyandot	Concern was expressed during survey discussion that not all counties follow same rules for state match and we hope this policy will close loopholes.
Ross	A strong state match policy is good for the SWCD districts. However, it is imperative that District's have a strong relationship with their county commissioners. Keeping them involved and informed of the local work that SWCD's do helps county officials justify the support they provide. In addition, every effort needs to be made to improve the efficiency and capabilities of SWIMS.
Mercer	We applaud the Task Force on their efforts. This policy is comprehensive and fair. We truly appreciate the work you have done, thank you!
Summit	Summit SWCD agrees with the commission that there is a need to provide a method for equitable delivery of state match dollars to all 88 districts. As budgets shift across the state, we hope that the OSWCC and this task force have given thought to the accountability section and how problems with a lack of accountability might be addressed.

OSWCC Match Task Force Survey Results – Final Comments

	Each SWCD plays a unique role in the resource management and decision making process in their county. While programs may vary widely across the state, it is important to remember that we are all working towards the same goals of maintaining and improving water quality and properly managing the natural resources that are unique to our program areas. We would encourage fair representation of both our rural and urban service areas in any future decision making processes and feel that we can learn a great deal from one another.
Highland	The Highland SWCD was encouraged by the development of the State Match Taskforce hoping the outcome would be more equal across the board but the changes proposed do not seem to reflect that. No matter what changes are accepted there is only one pot of money to be used for state match and there are a few District's barely hanging on. The Highland Board of Supervisor's hopes all comments are reviewed and taken into consideration before any changes are implemented.
Clermont	We greatly appreciate the work and long hours put in by the Match Funds Task Force.
Perry	Some of the board felt, their comments will fall on deaf ears. Other wanted their opinions heard. Some felt that the big, highly funded SWCD's have a greater voice in the political process, for the age old reasons. Are priorities being given to the resource base, or the population base??
Fairfield	We understand where the OSWCC is going but we feel there will be negative consequences to some of the larger and more progressive districts. We are doing more with less funds and fear losing good professional staff which gives our office credibility within the community if funds decrease. We are also serving a much larger population and require a staff capable of meeting local needs.
Ottawa	Districts that are well funded have worked very hard over the years to get to that position. Supervisors have had the foresight to push for more local funding and expanding of programs to get a strong SWCD program. If a district is not doing those things, then maybe they should not be offered increased funding to keep the doors open just for the sake of having an SWCD presence.
Geauga	<p>We thought the presentation of the policy in the survey format broken down by section was well planned and thought out. It was very easy for a board to go item by item. Very well structured.</p> <p>As far as the purpose of redistributing State Match and the concern that "Urban" counties will get so much more than other counties. Conservation of our natural resources and prevention of erosion and pollution is important for all land uses not just agricultural. Impacts can occur by all land uses and the importance to ensure proper practices are implemented is important to be monitored on the local level. Better compliance and relationships occur when local entities can work with landowners of all land uses. "Urban" counties may appear to be getting a large dollar amounts compared to some more rural counties but the number of landowners and projects occurring at any one time is exponentially larger and thus requiring much more staffing. The need to have to restructure the match policy because of concern that one district gets more money is not valid in our opinion. It is all relative to scale on how much you are doing regardless of what type of land use is being affected.</p>
Wayne	Decreasing match over time is not desirable. To offset the decrease all other spending from potential match funds should be on the table too. \$916,534 is spent on other things including ear marks (Heidelberg) that could provide \$10,415 per SWCD if cut. (Excluding \$25,000 for Morgan) Cheaper, better alternative to SWIMS?

OSWCC Match Task Force Survey Results – Fiscal Status Comments

Warren	We have been going thru a fund drawdown for a few years now at the request of the County Commissioners.
Franklin	<p>This draft policy document seems to go beyond providing guidance into rule making.</p> <p>SWCD Fiscal Status... This seems to create more bureaucracy and is incredibly difficult to read; especially the last bullet. Also why is it that there is no limit to what districts can save at the \$150,000 budget level. The way this reads a district that has \$150,000 a year in distributions from their special and district funds could have a 1 million in unassigned funds. The formula should apply to all districts; it should not be arbitrary. However any such policy may exceed the guidance authority of the OSWCC.</p> <p>See changes below: SWCD Financial Status</p> <ul style="list-style-type: none"> • Annually on the Form 11, the SWCD shall report District Fund and Special Fund balances including the amounts as reported on the Cash Basis Annual Financial Report for Non-spendable, Restricted, Committed, Assigned, and Unassigned. • SWCDs should maintain an unassigned balance of all SWCD funds (special and district) at a minimum of 25% of the current year annual budget or an amount designated by the county. • Beginning July 1, 2018, state match dollars will be reduced, for those SWCDs with operating budgets with a combined a total unassigned balance in excess of 200% the combined total of the Special Fund and District Fund distributions (as reported on the previous year’s Cash Basis Annual Financial Report) in excess of 200% of the 2017 budget, by an amount equal to the difference between the combined 2017 previous years Special and District Fund balances and 200% of the 2017 previous year’s budget amount.
Coshocton	We do not like this portion of the polciyt that restricts SWCD funds. As long as our SWCD can cover our liabilities why do we need to justify our balances? This could lead to SWCD's hiding funds which will cause probelms for everyone. We expect to be audited and only use our monies for SWCD business.
Greene	OSWCC will need to define the terms of non-spendable, restricted, committed, assigned, and inassigned rather than in the future program specialists defining them.
Pike	Special and District funds should not be combined.
Williams	<p>We question the need to report District Fund Balances on Form 11. They are already reported on the Cash Basis Report, and have never been reported previously. We feel that there needs to be additional dialogue on this topic.</p> <p>Bullet point 2: We feel that it will cause additional hardships on districts that are currently operating on limited funding.</p> <p>Final Bullet Point: We question why Districts with budgets above 150,000. will be penalized. More dialogue on this issue is needed.</p>
Meigs	Districts have never been required to show dollar amounts in the District Fund on the Form 11. The OSWCC has no legal authority or acceptable reason to control or try to control what amount of funds are in the DF or what they are used for. The dollars in the DF have been earned by the districts from sales of items, services provided and/or accrued over many years by the district operating in a frugal business-like manner. Dollars in the DF are for the daily operation of the district, so districts should not penalized for having too much or spending it

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	<p>however the Board of Supervisors directs it to be spent in accordance with division E of section 1515.08 of the ORC.</p> <p>By law DF funds are not matchable if transferred to the Special Fund, so the OSWCC should not have the ability to penalize a district for having too much money in the DF. County commissioners typically don't know how much money a district has in its DF, so why does the OSWCC need that information put on the Form 11?</p> <p>It is acceptable to make those requirements for the Special Fund, but not the DF.</p>
Adams	<p>It appears that Districts that have budgeted their money wisely are being penalized. If you are one of the counties that are sitting on a large amount of money, then 3 years is reasonable to draw down those balances. But if you are one of the less fortunate counties, then waiting 3 years for a little more help may seem like a long time.</p>
Pickaway	<ol style="list-style-type: none"> 1. Matching money should go toward voluntary programs. To spend matching money on fee based programs that are other agencies responsibilities is at the expense of voluntary conservation efforts. The fee based programs are required by law and will get done regardless of matching money, by those responsible. 2. This policy is showing a greater shift to Urban programs and taking away from Agricultural programs even for those rural districts like Lawrence and Fairfield that do Phase 2 work other districts that have no opportunity for fee based income have a clear disadvantage because they have to rely on contributions and can't invoice to receive whatever funds they want. 3. There was not a sufficient amount of time for all districts to receive information before completing this survey. 4. The policy does not support a strong program for all 88 counties.
Morrow	<p>SWCD's have been told for years to be wise money managers. Please do not penalize those swcd's that have been able to save money for those rainy days which seem to happen within the smaller swcd's. As it reads, those swcd's that have less than a \$150,000 operating budget would not be affected by having a larger than 200% balance in all funds. We as a district support that!</p>
Marion	<p>The reduction of funds for those who have excess money carried over does not apply to our small office. We run on less than a 150,000 dollar operating budget for the entire FY. In the past we have been cut locally for having a high carry over, our commissioners stated that was our rainy day fund and it was raining. It's the goal of the Marion SWCD to carry over at least one year's operating budget encase of a complete disaster and the 150,000.00 would accommodate our office.</p>
Darke	<p>Don't penalize for being prudent with money. Certainly don't want huge stockpiles of funds sitting, but necessary to have a rainy day fund to keep stability for the county and staff.</p>
Erie	<p>By forcing a reduction in fund balances, we feel this may have more effect on increasing local commitment to district activities and funding than other changes in policy. Creates an environment of full disclosure and discussion on management of all funds with county in particular.</p>
Logan	<p>Districts should not be penalized for being fiscally responsible. Our District funds are a combination of Tree Sales, grants and materials sold that brings in minimal funds, since 1943. We have relied on our District funds for everything except salaries and benefits for the last 5 years.</p>
Scioto	<p>On the buy down, it might make counties get more creative on ways to place the money in restricted funds so that they don't have to worry about the spend down of this funds</p>
Clark	<p>Caps should be set on the limit of Districts to acquire State match. Again...public funds do not need to be sitting in an account.</p>

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Wood	There needs to be CLEAR definitions with specific examples of "Non-spendable", "Restricted", "Committed", "Assigned", and "Unassigned".
Preble	Some districts already have way too much carryover, and this will curb that problem.
Guernsey	What is the reason for the required 25% unassigned balance? Also, we are concerned that the balance we will be holding in restricted funds will be questioned by the commission as to its validity.
Lawrence	You are forcing districts to spend money will that cause auditors to look at misuse of funds? trying to spend it
Carroll	Is the minimum of 25% a recommendation or a requirement? If this is a requirement you must maintain 25% of your budget in each fund meaning 25% for District and 25% in Special? How can SWCD office guarantee this? Can you have 40% in one and 10% in the other?
Knox	We are somewhat concerned that the 200% maximum could be a little on the high side (maybe 150%). Our concern is that politically, that level of carry-over/cash balance may not be defensible.
Holmes	We feel we are being punished for fiscal responsibility. Our district fund will be used to fill the void of local and state funding. Perhaps by 2018 our balance will be below the threshold where we lose match. It took us 75 years to build this fund--we will never be able to replenish it when it's gone.
Butler	There is some concern here that frugal districts with financially responsible restraint could be punished under this policy.
Medina	Future funding and finances are unknown, concerned with the eroding of local control.
Mercer	2 years worth of operating expenses in reserves is a great goal to strive for and any more than that is not needed.
Highland	The Highland SWCD does not support the fund balance limits. The \$150,000 total operating special fund budget is entirely too low and shouldn't be enforced. At the present time the Highland SWCD does not fall above that limit but we only have two employees and with insurance increases we may be to that limit in a few years. With the past budget cuts the Board strongly feels they need to have enough funds to support the District on their own during bad times. Until a District has been through a difficult budget crunch themselves it's hard to explain how important it is to be able to depend and operate on District housed funds only.
Perry	The Perry SWCD ended 2013 special fund with a \$0.00 balance. The board feels that any district that can cache County funds from year to year, then kudos to them. However any carryover in the form of State Funds as a percentage of that carryover total should be returned to the State and added to the available matching funds for the following year. It makes no sense to pay some SWCD's more than what is needed annually when other SWCD's do not have enough. Regarding the timeline: One Board member paraphrased the sentiments with. "Why take 5 years to strangle the cat?" . i.e. If the changes are needed, then implement them now, Why take 5 years?
Geauga	While this is manageable and an acceptable timetable we question where the figures came about. They seem very random.
Wayne	Our decision was made with the information we had at the time