

State Highway Traffic Safety

Contract Reimbursement Training

Summary of Topics

- Super Circular 2 CFR 200
- Composition of Costs
 Direct & Indirect
 Allowable Costs
- Back Up Documentation
 Personal Services
 Fringe Benefits
 Operating Costs
- Useful Information:

MOM - Montana Operations Manual Montana Highway Traffic Safety Website NHTSA Website

Super Circular 2 CFR 200

This final guidance <u>supersedes</u> and <u>streamlines</u> requirements from:

- OMB Circulars: A–21, A–87, A–110, and A–122 {2 CFR Part 225} Cost Principles for State, Local, and Indian Tribal Governments
- OMB Circulars A–89, A–102, and **A–133**; and
- the guidance in Circular A–50 on Single Audit Act follow-up.

Super Circular 2 CFR 200

OFFICE OF MANAGEMENT AND BUDGET

2 CFR Chapter I, and Chapter II, Parts 200, 215, 220, 225, and 230 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

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http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf

Super Circular 2 CFR 200

Project costs must be compatible with the applicable federal requirements from:

Highway safety grant funding policy for NHTSA field administered grants (online at www.nhtsa.dot.gov/nhtsa/whatsup/tea21/index.html) and whichever CFR from below applies to your entity:

- 2 CFR Part 215 Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations (formerly OMB Circular A-110)
- > 2 CFR Part 220 Cost principles for educational institutions (formerly OMB Circular A-21)
- 2 CFR Part 225 Cost Principles for state, local, and Indian tribal governments (formerly OMB Circular A-87)
- > 2 CFR Part 230 Cost principles for non-profit organizations (formerly OMB Circular A-122)

The Different Entities

The Federal Awarding Agency

200.74 Pass-Through Entity

Pass-through entity means a non-Federal entity that <u>provides a sub-award to a sub-recipient to carry out part of a Federal program</u>.

200.93 Sub-recipient.

Sub-recipient means a non-Federal entity that <u>receives a sub-award from a pass-through entity to carry out part of a Federal program</u>; but does not include an individual that is a beneficiary of such program. A sub-recipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

200.23 Contractor.

Contractor means an entity that <u>receives a contract</u> as defined in § 200.22 Contract.

200.22 Contract

Contract means <u>a legal instrument</u> by which a non-Federal entity <u>purchases property or services</u> needed to carry out the project or program under a Federal award.

Subpart E – Cost Principles 200.400 – Policy Guide

Fundamental premises:

- The non-Federal entity is responsible for effective/efficient administration of the federal award
- The non-Federal entity must comply with agreements,
 objectives, terms, and conditions of the federal award
- The non-Federal entity has primary managerial responsibility

§ 200.69 Non-Federal entity

Non-Federal entity means a **state**, **local government**, **Indian tribe**, institution of higher education (IHE), or **nonprofit organization** that carries out a Federal award as a recipient or sub-recipient.

Recurring Themes



- Necessary
- Reasonable
- Consistency
- Support
- Documentation



Subpart E – Cost Principles 200.402

Composition of costs:

- The **Total Cost** is the sum of:
 - the allowable <u>direct</u> and <u>allocable indirect</u> costs
 - less any applicable credits



"Buy America!"

Subpart E – 200.403 Factors affecting allowability of costs

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- (a) Be <u>necessary</u> and <u>reasonable</u> for the performance of the Federal award and be allocable hereto under these principles.
- (b) <u>Conform to any limitations or exclusions</u> set forth in these principles or in the Federal award as to types or amount of cost items.
- (c) Be <u>consistent</u> with <u>policies and procedures that apply uniformly</u> to both federally-financed and other activities of the non-Federal entity.
- (d) Be accorded <u>consistent treatment</u>. A cost may not be assigned to a Federal award as a <u>direct cost</u> if any other cost incurred for the <u>same purpose in like</u> <u>circumstances</u> has been allocated to the Federal award as an <u>indirect cost</u>.
- (e) Be determined in accordance with generally accepted accounting principles
- (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period
 - (g) Be <u>adequately documented</u>

Subpart E – Cost Principles 200.412 Classification of Costs

Direct vs. Indirect Costs

- A cost may be **direct** with respect to some specific service or function, but **indirect** with respect to the Federal award or other final cost objective.
- Therefore, it is essential that <u>each item of cost incurred for the same purpose be treated consistently in like circumstances</u> either as a <u>direct</u> or an <u>indirect</u> cost in order to avoid possible double-charging of Federal awards.

Subpart E – Cost Principles 200.413 Direct Costs

Direct costs:

Can be identified specifically with a particular final cost objective



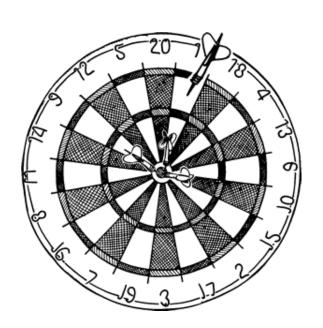


• Can be <u>directly assigned to such activities</u> relatively easily with a high degree of accuracy.

"Buy America!"

Subpart E – Cost Principles 200.413 Direct Costs

• <u>Identification with the Federal award</u>, rather than the nature of the goods and services involved, <u>is the determining factor in distinguishing direct from indirect costs of Federal awards</u>





Subpart E – Cost Principles 200.413 Direct Costs

• Direct costs can be <u>directly assigned</u> to such activities <u>relatively easily</u> with a <u>high degree of accuracy</u>

Typical costs charged directly to a Federal award are:

- the **compensation** of employees who work on that award
- their related **fringe benefit** costs
- The costs of **materials** and **other items of expense** incurred for the Federal award.

If directly related to a specific award

certain costs that otherwise would be treated as indirect costs may also include:

- extraordinary utility consumption,
- the cost of materials supplied from stock or services rendered by specialized facilities
- or other institutional service operations

Any direct cost of minor amount may be treated as an indirect cost

Subpart E – Cost Principles 200.414 Indirect Costs

▶ Indirect (F&A) costs:

Classified as "facilities" (space costs) or "administration" (overhead costs)

Cannot be identified specifically with a particular final cost objective





Subpart E — Cost Principles 200.414 Indirect Costs

Facilities

- Depreciation on buildings,
- Equipment and capital improvement,
- Interest on debt associated with certain buildings,
- Equipment and capital improvements, and
- Operations and maintenance expenses.



Administration

- General administration and general expenses
- Director's office
- Accounting, Personnel,
 Clerical and
- All other types of expenditures not listed specifically under one of the subcategories of Facilities



Direct vs. Indirect Costs?

- Costs incurred for the
- <u>same purpose in like circumstances</u>
- must be treated consistently
- as either **direct** or **indirect** costs

Indirect Allocation	<u>2.</u>	50%	2.5	<u>0%</u>	2.:	<u>50%</u>	2.	<u>50%</u>	2.	<u>50%</u>
	<u>A</u>	<u>dmin</u>	Proj	ect 1	Pro	ject 2	Gr	ant 1	Gı	rant 2
Direct Costs							\$ 1	00.00	\$ 1	00.00
Indirect	\$	5.00	\$	5.00	\$	5.00	\$	5.00	\$	5.00

Subpart E – Cost Principles 200.414 Indirect Costs

After direct costs have been determined and assigned directly to awards or other work as appropriate, indirect costs are those remaining to be allocated to benefitting cost objectives.

A cost may not be allocated to a Federal award as an indirect cost if any other cost incurred for the <u>same purpose</u>, in <u>like circumstances</u>, has been assigned to a Federal award as a <u>direct cost</u>.

Direct cost of minor amounts may be treated as indirect costs (200.413)

Appendix VII to Part 200 Indirect Cost Proposals

States, Local Government and Indian Tribe Indirect Cost Proposals

A. General

- 1. Indirect costs are those that have been incurred
 - 1. <u>for common or joint purposes</u>.
 - 2. These costs benefit more than one cost objective and
 - 3. <u>cannot be readily identified with a particular final cost objective</u> without effort disproportionate to the results achieved
 - 4. Typical examples of indirect costs may include:
 - Certain state/local-wide central service costs,
 - General administration
 - Accounting and Personnel services
 - Depreciation on buildings and equipment,
 - Costs of operating and maintaining facilities

Appendix VII to Part 200 Indirect Cost Proposals

States, Local Government and Indian Tribe Indirect Cost Proposals

200.57 Indirect cost rate proposal

Indirect cost rate proposal means:

- the documentation prepared by a non-Federal entity to substantiate its request for the establishment of an indirect cost rate
- as described in Appendix VII to Part 200—States and Local Government and Indian Tribe Indirect Cost Proposals of this Part.

Subpart E – Cost Principles Appendix IV - Indirect Costs for Nonprofits

Rate Determination for Nonprofit Organizations

An indirect cost rate may be accomplished through allocation procedures

Simplified Allocation Method

Where an organization's major functions benefit from its indirect costs to approximately the same degree

Multiple Allocation Base Method

Where an organization's indirect costs benefit its major functions in varying degrees

Direct Allocation Method

Joint costs are prorated individually as direct costs across activities

Special Indirect Cost Rates

to take into account factors which substantially affect indirect costs applicable to activities

Subpart E – Cost Principles 200.414 Indirect Costs

De Minimis Rate

(f) ...any non-Federal entity that has <u>never received a negotiated indirect cost</u> rate.... may elect to charge a <u>de minimis rate of 10%</u> of <u>Modified Total</u> <u>Direct Costs (MTDC)</u> which may be used indefinitely....

However

...this methodology, once elected, <u>must be used consistently for all Federal</u> <u>awards</u> until such time as a non-Federal entity chooses to <u>negotiate an</u> <u>indirect rate</u>, which the non-Federal entity may apply to do at any time.

If de minimis indirect rate is used:

Administrative Costs - will no longer be allowable

Direct Costs - allocable charges can no longer be reported as direct

MTDC is defined in:

§ 200.68 Modified Total Direct Cost (MTDC)

Subpart E — Cost Principles 200.414 Indirect Costs

§ 200.68 Modified Total Direct Cost (MTDC)

MTDC means:

- all direct salaries and wages,
- applicable fringe benefits,
- materials and supplies,
- services,
- travel, and
- sub-awards and
- subcontracts up to the first \$25,000 of each sub-award or subcontract

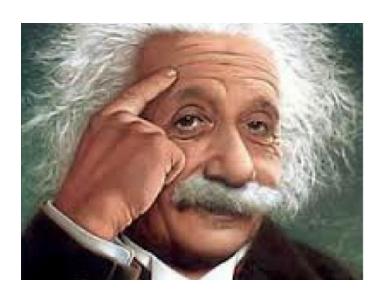
MTDC excludes:

- equipment,
- capital expenditures,
- rental costs,
- tuition remission,
- scholarships and fellowships,
- participant support costs
- the portion of each sub-award and sub-contract in excess of \$25,000.

Subpart E – Cost Principles

Reasonable costs:

• A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a <u>prudent person</u> under the circumstances prevailing at the time the decision was made to incur the cost



Subpart E – Cost Principles

Reasonable costs:

Ordinary and necessary for operations

Represent <u>market prices</u> for comparable goods/services for the geographic area

Reflect <u>prudent</u> purchasing behavior

No <u>significant deviation</u> from established practices/policies to increase costs

Accorded <u>consistent treatment</u> as either direct or indirect



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Montana SHTSS Focus

▶ Reimbursements – Back up Documentation:

Provide <u>adequate documentation</u>

Support the accumulation of costs

Indirect costs should be <u>allocated consistently</u>

(MOM) CH 399 Internal Control Guidebook Page 17 & 62

Internal control systems:

all transactions and other significant events

should be

clearly documented, and the

documentation should be readily available

for examination at each agency.

Documentation of transactions should be:

- Timely
- Complete & Accurate
- Should <u>allow tracing of the transaction</u> from the source documents to the financial reports

Tips for Preparing Back Up Documentation

- ✓ Documentation makes sense & supports the entry
- ✓ Documents have reasonable explanations or clearly state the purpose of the transaction
- ✓ Documentation includes only <u>RELEVENT</u> data
- ✓ Important amounts are circled or highlighted (note: unless scanned and/or faxed)
- ✓ Source of the data is documented or is clearly evident
- ✓ Amounts can be <u>recalculated</u> or <u>verified easily</u>
- ✓ Documentation is legible
- ✓ Copies are readable highlighted/shaded information is not too dark when copied
- ✓ All relevant amounts in the supporting documentation tie to the reimbursement form
- ✓ Proper signatures should be clearly documented indicating authorization.

Consider who will be looking at the document in the future:

- Legislative Auditors (LAD)
- Federal Auditors
- Employees doing research
- Management
- Legislators
- Taxpayers
- Other states

Exhibit B - Reimbursement Request

Salaries & Benefits

Timesheets ##
Payroll Reports \$\$

Operations

Receipts Invoices Contractual Agreements

2 CFR Part 225 Cost Principals for State, Local, and Indian tribal governments.

h. Support of salaries and wages.
Standards regarding time distribution

Charges to Federal awards for salaries and wages, whether treated as direct or indirect costs, will be <u>based on payrolls</u> <u>documented</u> in accordance with generally accepted practice of the governmental unit <u>and approved</u> by a responsible official(s) of the governmental unit.



2 CFR Part 225 Cost Principals for State, Local, and Indian tribal governments.

Employees who work on a single cost activity.





Employees who work on multiple cost activities





2 CFR Part 225 Cost Principals for State, Local, and Indian tribal governments.

- (3) Where employees are expected to work solely on a single Federal award or cost objective:
- Charges for their salaries and wages will be supported by periodic <u>certifications</u> that the employees worked solely on that program for the period covered by the certification.
- These certifications will be prepared at least <u>semi-annually</u> and will be signed by the employee or supervisory official having first hand knowledge of the work performed by the employee.
- (4) Where employees work on multiple activities or cost objectives:
- a <u>distribution of their salaries or wages</u> will be supported by <u>personnel activity reports</u> or equivalent documentation

200.430 Compensation – Personal Services

(a) General.

Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. (i.e. Fringe Benefits)

123 - John R. Doe	Pay Period 06/02/	Required Deductions									
Earnings		Federal Income Tax	00.00	00.00							
Hours Rate 50 9.00	This Period 450.00	YTD 900.00	WI State Income Tax	00.00	12.16						
Gross Pay	450.00	900.00	FICA - Social Security Other Deductions	25.92	51.84						
			Health Insurance 401k Parking	00.00 00.00 00.00	00.00 00.00 00.00						
			NET PAY	\$418.00	\$836.00						
Your Employer 1234 Some Street Milwaukee, WI ZIPCODE PAY ***Four hundred eighteen dollars and 00 cents************************************											

200.430 Compensation – Personal Services

(b) Reasonableness

Compensation for employees engaged in work on Federal awards will be considered reasonable to the extent that:

it is consistent with that paid for similar work in other activities of the non-Federal entity.

In cases where the kinds of employees required for Federal awards are not found in the other activities of the non-Federal entity

it is comparable to that paid for similar work in the labor market

200.430 Compensation – Personal Services

Reasonable for the services rendered and Conforms to the established written policy of the non-Federal entity
Consistently applied to both Federal and non-Federal activities;

 Is determined and supported as provided in paragraph (i) of this section, Standards for Documentation of Personnel Expenses





200.430 Compensation – Personal Services

(i) Standards for Documentation of Personnel Expenses

- (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed.
 - (i) Be <u>supported by a system of internal control</u> which provides reasonable assurance that the charges are accurate, allowable, and properly allocated
 - (ii) Be incorporated into the official records of the non-Federal entity
 - (iii) Reasonably <u>reflect the total activity for which the employee is</u> <u>compensated</u> by the non-Federal entity
 - (iv) Encompass both federally assisted and all other activities compensated by the non-Federal entity on an integrated basis
 - (v) <u>Comply with the established accounting policies and practices</u> of the non-Federal entity

WEEK THREE							Hourly	
							Rate	Benefits
	Monday	<u>Tuesday</u>	Wednesday	Thursday	<u>Friday</u>	TOTAL	\$ 25.00	25%
Administrative		2		2		4	\$ 100.00	\$ 25.00
Project 1					2	2	\$ 50.00	\$ 12.50
Project 2					2	2	\$ 50.00	\$ 12.50
Grant 1	4	3	4	3	2	16	\$ 400.00	\$ 100.00
Grant 2	4	3	4	3	2	16	\$ 400.00	\$ 100.00
	8	8	8	8	8	40	\$1,000.00	\$ 250.00
WEEK FOUR							Hourly	
WEELTGEL							Rate	Benefits
	Monday	Tuesday	Wednesday	Thursday	Friday	TOTAL	\$ 25.00	25%
	- Indiana	<u>ruesuay</u>	Wednesday	Indisday	riday	101112	22.00	2070
Administrative		1		2		3	\$ 75.00	\$ 18.75
Project 1	4				2	6	\$ 150.00	\$ 37.50
Project 2	4	3			2	9	\$ 225.00	\$ 56.25
Grant 1		4	4	3	2	13	\$ 325.00	\$ 81.25
Grant 2			4	3	2	9	\$ 225.00	\$ 56.25
	8	8	8	8	8	40	\$1,000.00	\$ 250.00
MONTHLY TOTAL							Hourly	
							<u>Rate</u>	Benefits
	Monday	<u>Tuesday</u>	Wednesday	<u>Thursday</u>	<u>Friday</u>	TOTAL	\$ 25.00	25%
Administrative	1	5	2	6	0	14	\$ 350.00	\$ 87.50
Project 1	4	0	0	4	8	16	\$ 400.00	\$ 100.00
Project 2	7	3	0	0	8	18	\$ 450.00	\$ 112.50
Grant 1	12	14	15	13	8	62	\$1,550.00	\$ 387.50
Grant 2	8	10	15	9	8	50	\$1,250.00	\$ 312.50
	32	32	32	32	32	160	\$4,000.00	\$1,000.00

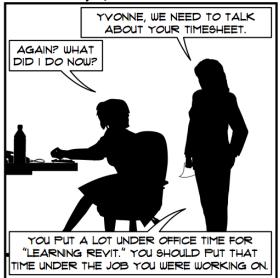
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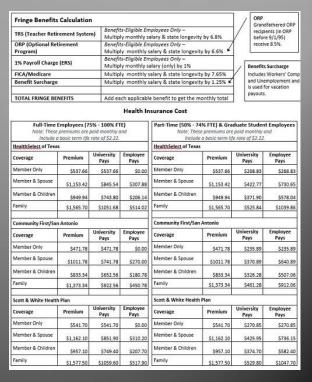
DESCRIPTION FOR IT, OKAY?



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(a) Fringe benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages.

- Costs of fringe benefits are allowable provided that:
 - benefits are reasonable and
 - are <u>required</u> by law
 - non-Federal entity-employee <u>agreement</u>, or
 - an established (employer) policy



(b) Leave. The cost of fringe benefits in the form of regular compensation paid to employees during periods of authorized absences from the job, such as for:

- annual leave
- family-related leave
- sick leave
- holidays
- court leave
- military leave
- administrative leave
- and other similar benefits

Allowable if all of the following criteria are met:

- (1) They are provided under established written leave policies
- (2) The costs are <u>equitably allocated</u> to all related activities, <u>including Federal awards</u>
- (3) The accounting basis (cash or accrual) selected for costing each type of leave is consistently followed by the non-Federal entity or specified grouping of employees.

- (c) The cost of fringe benefits in the form of employer contributions or expenses for:
 - (1) social security
 - (2) employee life
 - (3) health
 - (4) unemployment
 - (5) worker's compensation insurance
 - (6) pension plan costs and
 - (7) other similar benefits

Are <u>allowable</u> provided such benefits are granted under <u>established written policies</u>

(c) The cost of fringe benefits:

Fringe Benefits, must be allocated to Federal awards and all other activities:

- in a manner <u>consistent with the pattern of benefits</u> attributable to the ...employees whose salaries and wages are chargeable to Federal awards
- charged as direct or indirect costs in accordance with the non-Federal entity's accounting practices.

(d) Fringe benefits may be assigned to cost objectives by:

- identifying specific benefits to specific individual employees or
- by allocating on the basis of entity-wide salaries and wages of the employees receiving the benefits.

(e) Insurance

Unemployment Insurance & Workers' Compensation

(f) Automobiles

• That portion of automobile costs furnished by the entity that relates to **personal use by employees** (including transportation to and from work) is **unallowable** as fringe benefit or indirect costs

(g) Pension Plan Costs:

- Pension plan costs which are incurred in accordance with the established policies of the non-Federal entity are allowable
- 2 CFR 200.431(g) provides extensive guidance regarding Pension Plans

(h) Post-Retirement Health Plans (PRHP)

- (the) costs of health insurance or health services not included in a pension plan
- costs may be computed using:
 - a <u>pay-as-you-go method</u> or
 - an acceptable <u>actuarial cost method</u>

in accordance with established written policies of the non-Federal entity.

Subpart E – Cost Principles 200.420 – 200.475

Selected items of cost:

- 55 specific items are included
- Apply to both direct and indirect costs
- Failure to mention a particular item of cost does not imply that it is either allowable or unallowable (apply general principles of allowability)

- (To) <u>establish the allowability of certain items</u> involved in determining cost
- Allowability in each case should be <u>based on the treatment</u> <u>provided for similar or related items of cost</u>
- Criteria outlined in § 200.403 Factors affecting allowability of costs must be applied in determining allowability.
 - Necessary and reasonable
 - Conform to....these principles
 - Consistent with policies and procedures Adequately documented

- ▶ 200.422 Advisory councils.
- ▶ 200.423 Alcoholic beverages.
- ▶ 200.424 Alumni/ae activities.
- ▶ 200.425 Audit services.
- 200.426 Bad debts.
- ▶ 200.427 Bonding costs.
- ▶ 200.428 Collections of improper payments.
- 200.429 Commencement and convocation costs.
- ▶ 200.430 Compensation—personal services.
- ▶ 200.431 Compensation—fringe benefits.
- ▶ 200.432 Conferences.
- ▶ 200.433 Contingency provisions.
- ▶ 200.434 Contributions and donations
- 200.435 Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements

- ▶ 200.436 Depreciation.
- ≥ 200.437 Employee health and welfare costs.
- 200.438 Entertainment costs.
- 200.439 Equipment and other capital expenditures.
- ▶ 200.440 Exchange rates.
- 200.441 Fines, penalties, damages and other settlements.
- 200.442 Fund raising and investment management costs.
- 200.443 Gains and losses on disposition of depreciable assets.
- ▶ 200.444 General costs of government.
- 200.445 Goods or services for personal use.
- ▶ 200.446 Idle facilities and idle capacity.
- ▶ 200.447 Insurance and indemnification.
- ▶ 200.448 Intellectual property.
- 200.449 Interest.

- ▶ 200.450 Lobbying.
- ▶ 200.451 Losses on other awards or contracts.
- ▶ 200.452 Maintenance and repair costs.
- 200.453 Materials and supplies costs, including costs of computing devices.
- 200.454 Memberships, subscriptions, and professional activity costs.
- ▶ 200.455 Organization costs.
- ▶ 200.456 Participant support costs.
- ▶ 200.457 Plant and security costs.
- ▶ 200.458 Pre-award costs.
- ▶ 200.459 Professional service costs.
- ▶ 200.460 Proposal costs.
- ▶ 200.461 Publication and printing costs.
- ▶ 200.462 Rearrangement and reconversion costs.
- ▶ 200.463 Recruiting costs.

- 200.464 Relocation costs of employees.
- 200.465 Rental costs of real property and equipment.
- 200.466 Scholarships and student aid costs.
- 200.467 Selling and marketing costs.
- 200.468 Specialized service facilities.
- 200.469 Student activity costs.
- 200.470 Taxes (including Value Added Tax).
- 200.471 Termination costs.
- 200.472 Training and education costs.
- 200.473 Transportation costs.
- ▶ 200.474 Travel costs.
- **200.475** Trustees

Allowable Costs

200.430 Compensation—personal services 200.431 Compensation—fringe benefits

200.437 Employee health and welfare costs

- (a) Costs incurred in accordance with the non-Federal entity's <u>documented policies</u> for the improvement of working conditions, employer-employee relations, employee health, and employee performance are allowable.
- (b) Such costs will be <u>equitably apportioned</u> to all activities of the non-Federal entity.

Allowable Costs

200.432 Conferences

Allowable conference costs paid by the non-Federal entity as a sponsor or host of the conference may include rental of facilities, speakers' fees, costs of meals and refreshments, local transportation, and other items incidental to such conferences.

200.439 Equipment and other capital expenditures

- (1) <u>Capital expenditures</u> for general purpose equipment, buildings, and land are **unallowable** as direct charges
- (2) <u>Capital expenditures</u> for **special purpose equipment are allowable as direct costs**, provided that items with a unit cost of **\$5,000 or more** have the **prior written approval** of the Federal awarding agency or <u>pass-through entity</u>.

200.444 General costs of government

(a) For states, local governments, and Indian Tribes, the general costs of government are unallowable.

200.452 Maintenance and repair costs

Costs incurred for utilities, insurance, security, necessary maintenance, janitorial services, repair, or upkeep of buildings and equipment (including Federal property unless otherwise provided for) which

neither <u>add to the permanent value</u> of the property nor <u>appreciably prolong its intended life</u>

but keep it in an efficient operating condition, are allowable

200.453 Materials and supplies costs, including costs of computing devices

- (a) Costs incurred for materials, supplies, and fabricated parts necessary to carry out a Federal award are allowable.
- (b) **Purchased** materials and supplies must be charged at their <u>actual prices</u>, net of applicable credits.

Withdrawals from general stores or stockrooms should be charged at their <u>actual net cost under any recognized method of pricing inventory withdrawals</u>, <u>consistently applied</u>

Incoming transportation charges are a proper part of materials and supplies costs.

200.453 Materials and supplies costs, including costs of computing devices

(c) Materials and supplies used for the performance of a Federal award may be charged as **direct costs**.

In the specific case of computing devices

charging as direct costs is allowable
for devices that are essential and allocable, but
not solely dedicated, to the performance of a Federal
award.

(d) Where federally-donated or furnished materials are used in performing the Federal award, such materials will be used without charge

200.456 Participant support costs

Participant support costs as defined in § 200.75 Participant support costs are allowable with the prior approval of the Federal awarding agency.

§ 200.75 Participant support costs.

Participant support costs means direct costs for items such as <u>stipends or subsistence allowances</u>, <u>travel</u> <u>allowances</u>, <u>and registration fees paid</u> to or on behalf of **participants or trainees** (but not employees) in connection with conferences, or training projects.

200.459 Professional service costs Costs of professional and consultant services

- rendered by persons who are members of a particular profession or possess a special skill, and
- who are not officers or employees of the non-Federal entity,

are **allowable**, when <u>reasonable</u> in relation to the services rendered and

....<u>legal and related services are limited</u> under § 200.435 Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements.

200.461 Publication and printing costs

Publication costs for electronic and print media, including distribution, promotion, and general handling are allowable.

If these costs are not identifiable with a particular cost objective, they should be <u>allocated as indirect costs</u> to all benefiting activities of the non-Federal entity.

200.472 Training and education costs

The cost of training and education provided for employee development is **allowable**.

200.473 Transportation costs

Costs incurred for freight, express, cartage, postage, and other transportation services relating either to goods purchased, in process, or delivered, are **allowable**.

200.474 Travel costs

Travel costs are the expenses for:

transportation lodging subsistence, and related items

incurred by employees who are in travel status on official business of the non-Federal entity.

200.474 Travel costs

Such costs may be charged:

- -on an actual cost basis
- -on a <u>per diem</u> or <u>mileage basis</u>
 in lieu of actual costs incurred
- -on a combination of the two
- provided the method used is applied to an entire trip and not to selected days of the trip, and
 - results in charges consistent with those normally allowed in like circumstances in the entity's non-federally funded activities and
 - in accordance with non-Federal entity's written travel reimbursement policies.

Recurring Themes



- Necessary
- Reasonable
- Consistency
- Support
- Documentation



Links To Useful Information

Montana Operations Manual (MOM)

http://mom.mt.gov

Montana Operations Manual (MOM)

About DOA | Services | Resources | Department Websites | Public Notices/Meetings | Home

MOM

Montana Operations Manual (MOM)

Welcome to the Montana Operations Manual.

The Montana Operations Manual, or MOM, contains policies, procedures, and standards applicable to the internal operations of Montana state government.

Click Here to Access the Montana Operations Manual

<u>Instructions for direct linking to the MOM and specific MOM documents</u>

MOM Document Owners - Login Here

Contact us at MOM@mt.gov, (406) 444-2446

Links to useful Information

Montana Department of Transportation Website

http://www.mdt.mt.gov/

State Highway Traffic Safety Section

http://www.mdt.mt.gov/safety/safetyprg.sh tml

MDT Grants and Funding

http://www.mdt.mt.gov/safety/grants.shtml

http://www.mdt.mt.gov/safety/safetyprg.shtml



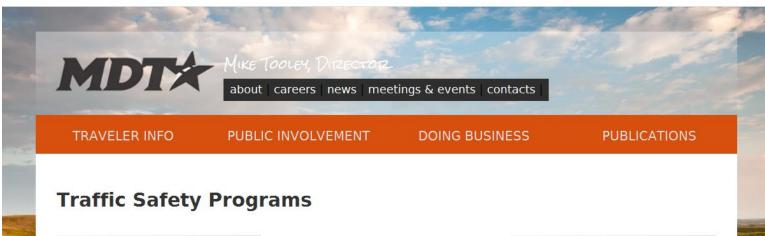
SERVICES

AGENCIES

LOGIN

SEARCH





Overview

Traffic crashes happen daily in Montana, causing human injuries, deaths, and property losses.

Did You Know?

 Montana has one of the highest alcohol-related fatality rates in the nation per vehicle mile traveled.



The State Highway Traffic
Safety Section is working to
reduce these losses through a
series of programs designed to
assist in the development of
counter-measures for known
problem areas.

The information on these pages is organized by program. If you have questions about a specific program, please call or email the contact listed at the bottom of each program details page.

Maximizing Resources Through Collaboration

Comprehensive Hwy Safety Plan

The CHSP is a statewide plan to reduce fatalities/injuries from highway crashes. Involves multiple stakeholders. Data, specific strategies, and contact information provided.

Highway Safety Plan

MDT's State Highway Traffic Safety Section implements many of the CHSP goals and

- Montana's seat belt usage has grown steadily over the past few years. However, seatbelt use on our reservations is still very low.
- Inattentiveness, carelessness, and driving speed accounted for over 50% of the crashes in the past 10 years.
- Incapacitating injuries have decreased over 33% during the past 10 years.
- The percentage of crashes involving young drivers has not changed significantly during the past 19 years.
- Elderly drivers have experienced increases during this same period.
- Motorcycle traffic crashes are up and affecting older riders more than any other group.

Source for data:

Traffic Safety Problem

Highway Safety Programs

Impaired Driving

Occupant Protection

Traffic Enforcement

Speeding

Distracted Driving

Traffic Records

Emergency Medical Services

Young Drivers

Motorcycle Safety

Home

Resources

Crash Data

Grants & Funding

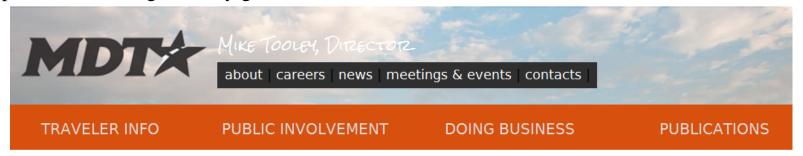
Resource Sharing

Traffic Safety Publications

Websites of Interest

Features / Services

http://www.mdt.mt.gov/safety/grants.shtml



Grants and Funding

Funding for Traffic Safety Projects

The Montana <u>State Highway Traffic Safety Section</u> administers federal grant monies for safety programs aimed at reducing deaths, injuries, and property losses resulting from traffic crashes.

Some of these grants cover administration costs such as increased overtime patrols for law enforcement agencies and the cost to purchase new law enforcement equipment. Others cover the production and delivery of educational programs.

Funding is limited and awarded through a competitive application process. <u>Additional funding options</u> are listed to assist those seeking funding for a project or program.



Highway Safety Programs

Impaired Driving

Occupant Protection

Traffic Enforcement

Speeding

Distracted Driving

Traffic Records

Emergency Medical Services

Links to useful Information

NHTSA Highway Safety Grants Management Resources

http://www.nhtsa.gov/About+NHTSA/Programs+&+Grants/Resources+Guide

NHTSA Highway Safety Grants Management Manual Contents

http://www.nhtsa.gov/nhtsa/whatsup/TEA21/GrantMan/HTML/00_Manl_Contents1_01.html

Enter Email Address

DRIVING SAFETY

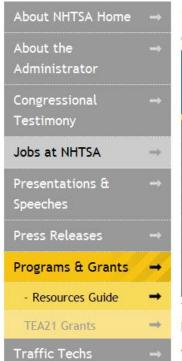
VEHICLE SAFETY

RESEARCH

DATA

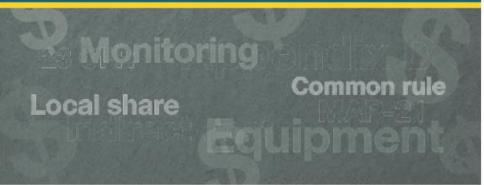
LAWS & REGULATIONS

ABOUT NHTSA



Resources Guide

WELCOME TO HIGHWAY SAFETY GRANTS MANAGEMENT RESOURCES



This site provides information to assist State and Federal professionals to manage highway safety grant programs administered by the National Highway Traffic Safety Administration. Included are:

- United State Codes, Code of Federal Regulations, and Office of Management and Budget Circulars
- NHTSA Grant Funding Guidance
- Section 402-grant guidance
- Glossary
- Questions and answers on selected traffic safety topics













- MOE Guidance
- Uniform Guidelines for State Highway Safety Programs
- Titles 23 and 49 U.S.C.
- Advertising Space Guidance
- Buy America Act Guidance
- Buy America Act U.S. Code
- Buy America Act Q&A
- Glossary of Key Terms and Definitions

Federal Regulations For All Grant Programs

- Federal Regulations
- >> 23 CFR Part 1200

Highway Safety Grant Funding Guidance

Revised February 2014



INTRODUCTION

PART I. GENERAL PROGRAM FEATURES

A. MAP-21 Programs

Section 402 - State and Community Highway Safety Grants (23 U.S.C. 402)

Section 405(b) - Occupant Protection Grants

Section 405(c) - State Traffic Safety Information System Improvement Grants

Section 405(d) - Impaired Driving Countermeasure Grants - High, Mid, and Low Range

Section 405(d) - Impaired Driving Countermeasure Alcohol Ignition Interlock Laws

Section 405(e) - Distracted Driving Grants

Section 405(f) - Motorcyclist Safety Grants

Section 405(g) - State Graduated Driver Licensing Grants

Section 405 - Grant Programs Transfers

Section 154 - Open Container Requirements

Section 164 - Minimum Penalties for Repeat Offenders for Driving While Intoxicated or Driving Under the Influence

Section 402 - State and Community Highway Safety Grants (23 U.S.C. 402)

Section 402 funds are used to support countermeasure strategies and projects identified in the States' Highway Safety Plan (HSP). This includes resources to initiate new projects and catalyze or accelerate existing projects to address major safety issues with well-planned strategies, and leverage additional State and local investment in highway safety. States must have an approved HSP to receive 402 grant funds. To review eligibility determination, qualification criteria, and use of grant funds reference: 23 CFR Part 1200.

Section 405(b) - Occupant Protection Grants

Section 405(b) encourages States to adopt and implement effective occupant protection programs to reduce highway deaths and injuries resulting from individuals riding unrestrained or improperly restrained in motor vehicles. To review eligibility determination, qualification criteria, and use of grant funds reference: 23 CFR Part 1200.21.

Section 405(c) - State Traffic Safety Information System Improvement Grants

Section 405(c) continues, with some changes, the State traffic safety information system improvements grant program authorized under SAFETEA-LU. The purpose of the new grant program is to support State efforts to improve the data systems needed to help identify priorities for Federal, State, and local highway safety programs, to link intrastate data systems, and to improve the compatibility and interoperability of these data systems with national data systems, and the data systems of other States for highway safety purposes such as enhancing the ability to analyze national trends in crash occurrences, rates, outcomes, and circumstances. To review eligibility determination, qualification criteria, and use of grant funds, reference: 23 CFR Part 1200.22.

Section 405(d) - Impaired Driving Countermeasure Grants - High, Mid, and Low Range

Section 405(d) encourages States to adopt and implement effective programs to reduce traffic safety problems that result from individuals driving motor vehicles while under the influence of alcohol, drugs, or the combination of alcohol and drugs or that enacts alcohol ignition interlock laws. To review eligibility determination, qualification criteria, and use of grant funds, reference: 23 CFR Part 1200.23.

Section 405(d) - Impaired Driving Countermeasure Alcohol Ignition Interlock Laws

Section 405(d) encourages States to adopt and enforce mandatory laws to require installation of alcohol ignition interlocks on vehicles operated by all individuals convicted of driving under the influence of alcohol or of driving while intoxicated. To review eligibility determination, qualification criteria, and use of grant funds, reference: 23 CFR Part 1200.23(5).

Section 405(e) - Distracted Driving Grants

Section 405(e) authorizes incentive grants to States that enact and enforce laws to prohibit distracted driving. This includes texting while driving and youth cell phone use while driving. To review eligibility determination, qualification criteria, and use of grant funds, reference: 23 CFR Part 1200.24.

Budget Circulars

- NHTSA Grant Funding Guidance
- Section 402-grant guidance
- Glossary
- Questions and answers on selected traffic safety topics

For user convenience, referenced Federal regulations are linked to source documents.

Topical Searches Certification and Assurances Equipment Highway Safety Plan Annual Report Highway Safety Plan Closeout Highway Safety Plan Content Indirect Costs List of Projects Lobbying Maintenance of Effort Monitoring National Priority Safety Program Grants Planning and Administration Costs Political Subdivision Participation Program Income Sanctions State Highway Safety Agency State Payback of Federal Funds

Federal Regulations For All Grant Programs

- Federal Regulations
- >> 23 CFR Part 1200
- 2 CFR 225 Federal Register Notice
- 2 CFR 200 (Uniform administrative requirements, cost principles and audit requirements)
- 2 CFR 200 Ouestions & Answers
- >> 49 CFR Part 18 (Common Rule)
- OMB Circular A-133 (Audits) See Subpart D.400 (d)
- >> Developing Cost Allocation Plans

MAP-21

Section 405 Fact Sheets

Covering Section 402 Program

SAFETEA-LU Incentive Grants

Section 154 and Section 164

163 Sanctions Regulation

Cost Principles for Universities

Cost Principles for Non-Profits

Cost Principles for Hospitals

Budget Circulars

- NHTSA Grant Funding Guidance
- Section 402-grant guidance
- Glossary
- Questions and answers on selected traffic safety topics

For user convenience, referenced Federal regulations are linked to source documents.

Certification and Assurances	
Equipment	
Highway Safety Plan Annual Report	
Highway Safety Plan Closeout	
Highway Safety Plan Content	
Indirect Costs	
List of Projects	
Lobbying	
Maintenance of Effort	
Monitoring	
National Priority Safety Program Grants	
Planning and Administration Costs	
Political Subdivision Participation	
Program Income	
Sanctions	
State Highway Safety Agency	

Federal Regulations For All Grant Programs

Federal Regulations

- ▼ MAP-21
- Federal Register Notice
- Federal Register Notice Distracted Driving (Aug. 2012)
- Federal Register Notice Distracted Driving (Oct. 2012)
- Appendix A to Part 1200
- >> Maintenance of Effort
- >> Appendix D to Part 1200 Fillable form
- >> Legislation S402 & S405
- >> Title 23 USC, Chapter 4 May 2013
- >> General Q&As

Section 405 Fact Sheets

Covering Section 402 Program

SAFETEA-LU Incentive Grants

Section 154 and Section 164

163 Sanctions Regulation

Cost Principles for Universities

Cost Principles for Non-Profits

Cost Principles for Hospitals

Contact Information

Bill Tuck, Grants Accountant, wtuck@mt.gov
444-6114