

Highway Traffic Safety Program Manual



April 2015
**Florida Department of
Transportation**

Chapter 1

Introduction

CONTENTS:

Section 1 — Overview

Purpose of Manual	1-2
Electronic Documents and Forms	1-2
Availability of Manual	1-2
Users of Manual	1-2
Mission Statement	1-3
Program Goal and Objective	1-3
Background	1-3
Organization	1-3
Responsibilities	1-4
Titles and Office Designations	1-6
Definition of Sub-subgrantee	1-6
Other Definitions and Acronyms	1-6

Section 2 — Federal Laws and Regulations

Background	1-7
The Highway Safety Act of 1966	1-7
Applicable Federal Regulations	1-7
The Common Rule	1-9
Other Applicable Office of Management and Budget Circulars	1-10
Documents Available	1-10

Section 3 — State Laws and Regulations

General	1-11
The Florida Traffic Safety Act of 1967	1-11
Uniform Grant Management Standards	1-11
Governor's Highway Safety Representative	1-11
Governor's Executive Orders	1-12
Intellectual Property	1-12

Section 4 — Signature Authority

Introduction	1-13
Signature Authority	1-13
Further Delegation of Signature Authority	1.14
Specific Authority to Contract	1-14

Section 1 - Overview

Purpose of Manual

The purpose of this manual is to establish program and project management procedures for sub-grants and contracts in support of the Florida Highway Traffic Safety Program (HTSP). This manual does not, however, address all HTSP regulations in regard to program content or other technical criteria. Occasional references to other Florida Department of Transportation (FDOT) functional manuals are also necessary.

The HTSP staff will review this manual on a frequent basis to ensure that procedures remain current and accurate. Revisions will be made as soon as feasible to accommodate any changes in state or federal laws or regulations.

For additional information on the HTSP see:

<http://www.dot.state.fl.us/safety/HighwaySafetyGrantProgram/>

Electronic Documents and Forms

In keeping with FDOT's overall move toward electronic documents and forms, the Florida HTSP has developed this manual and its related forms so that the appropriate information can be accessed electronically

Wherever this manual requires grant-related submissions of documents "in writing" or in "written" form, such submissions may also be made via e-mail or other electronic transmission at the discretion of FDOT.

Availability of Manual

Online. This manual is available online through the Internet at:

<http://www.dot.state.fl.us/safety/HighwaySafetyGrantProgram/HTSP/HTSPforms.shtm>

Users of Manual

This manual is intended for use by FDOT personnel, state and local government officials, subgrantees, contractors, researchers, and any others parties interested in procedures in support of the Highway Safety Grant Program.

Mission Statement

The mission of the HTSP is to develop, implement, and manage a data-driven comprehensive traffic safety program aimed at saving lives, preventing injuries, and reducing related costs associated with traffic crashes on Florida's roadways.

Program Goal and Objective

The goal of the HTSP is to use information, data, technology, resources, and skills to identify priority traffic safety issues, plan initiatives, generate coordinated action, and evaluate and communicate results.

The program objective is to operate the program in a manner that reduces crashes, injuries and deaths, and their related losses.

Background

The Florida HTSP uses federal, state and local funds. Federal traffic safety funds are primarily administered and distributed to the states by the National Highway Traffic Safety Administration (NHTSA).

Organization

FDOT is a decentralized organization operating through the Central Office, 7 district offices, and Florida's Turnpike Enterprise. The HTSP is administered by the State Safety Office in Tallahassee.

Responsibilities

The Highway Safety Grant Program (HTSP) The purpose of the Highway Traffic Safety Program is to develop, implement, and manage a data-driven comprehensive traffic safety program aimed at saving lives, preventing injuries, and reducing related costs associated with traffic crashes on Florida's roadways. The Highway Traffic Safety Program provides for the acceptance of State and Community Highway Safety Funds provided through the United States Department of Transportation under Section 402, Title 23, United States Code, and for the State's implementation of the provisions of the National Highway Safety Act of 1966, as amended. The law establishes broad objectives for the purpose of funds allocation. It is the intent of the Department that these rules permit maximum flexibility within the limits of the statutes, yet define procedures consistent with sound public fund management principles and consistent with the need to apprise potential applicants, fund recipients, and the public of the Department's policy governing administration of the program. Funding for the Highway Traffic Safety Program is based on the Federal Fiscal Year, from October 1 of each year through September 30 of the following year.

The HTSP is responsible for coordinating and administering the Highway Safety and Performance Plan (HSPP). To carry out these responsibilities, the HTSP staff will:

- ◆ develop and administer the annual State Highway Safety Plan,

- ◆ manage traffic safety projects in federally designated priority program areas and in other areas as may be assigned or as determined by problem identification processes,
- ◆ provide state agency and federal liaison,
- ◆ ensure compliance with state and federal regulations,
- ◆ administer traffic safety evaluation and research,
- ◆ provide legislative information on traffic safety issues,
- ◆ review, approve, and execute grants, contracts, and subcontracts,
- ◆ approve subcontracts or process them for federal approval,
- ◆ provide operational oversight to assure conformity with program and project management policies and procedures,
- ◆ monitor the activities, results, and expenditures of grant agreements and interagency contracts,
- ◆ implement and maintain an internal project monitoring system,
- ◆ close out traffic safety project and program areas, as appropriate,
- ◆ report to the governor's highway safety representative and federal oversight agencies on the status of traffic safety projects, and
- ◆ prepare and submit the Annual Report to the National Highway Traffic Safety Administration (NHTSA).

Titles and Office Designations

This manual uses the following titles and abbreviations to designate individuals and offices involved in the HTSP:

Program Manager

A Staff member of the Office, authorized by the Governor's Highway Safety Representative to act as liaison between the Office, the subgrantee, and implementing agency in all matters pertaining to the subgrant.

Project Director

The person responsible to the implementing agency for the management and operation of the subgrant.

Department

The Florida Department of Transportation (FDOT)

Office

FDOT State Safety Office

Highway Traffic Safety Program (HTSP)

The Highway Traffic Safety Program of the Florida Department of Transportation, State Safety Office.

Subgrantee

The applicant to whom the Department awards a subgrant

Other Definitions and Acronyms

This manual uses the following terms and acronyms to designate individuals, offices, and processes involved in the HTSP:

Audit

A review of programmatic and financial records conducted by a certified public accountant, which is the basis of an organization's legally required audit report per OMB Circular A-133.

Activity

Elements of work that accumulate to accomplish subgrant objectives, such as hiring of personnel, purchasing of equipment, conducting surveys, performing specific duties, and any other duties or acts designated in the subgrant agreement.

Applicant

A government entity as defined in Section 11.45 F.S.; state agency as defined in section 216.011, F.S.; sheriff; special district; corporation not for profit; or a Florida university that meets the minimum standards established in Rule 6E-1.0045, F.A.C., and is accredited by the Southern Association of Colleges and Schools or some other nationally recognized accreditation board, that requests approval of a Subgrant Application for Highway Safety Funds.

Chief Financial Officer

The employee of the subgrantee agency or the implementing agency who has overall fiscal responsibility for the subgrant

Claims

Refers to subgrantee request for reimbursement using applicable FDOT forms

Corporation Not for Profit

As defined in Section 617.01401, F.S., and shall include foreign corporations defined in that section. For purposes of this rule, the corporation must list in Article III of its Articles of Incorporation at least one purpose related to traffic safety or injury prevention.

Concept Paper

An initial request for highway safety funding, which includes a statement of the highway safety problem that the applicant has identified, a statement of proposed activities that the applicant will take to address the problem, an estimated budget for conducting the activities, and the name of a contact. Concept papers must be accompanied by a letter of support from the head of the agency that will implement the project, if funded

Cost Incurred

Costs are considered incurred on the date that goods or services are received and accepted

Evaluation

A process that involves measuring the success or failure of a project in achieving predetermined objectives

FFY

Federal Fiscal Year, the period beginning October 1 and ending September 30 the following year.

FHWA

Federal Highway Administration

Governor's Highway Safety Representative (GHSR or GR)

The state official appointed by the Governor of Florida, who is responsible to and represents the Governor in conduct of the Statewide Highway Traffic Safety Program

Implementing Agency

The subgrantee's designee for performing the activity defined in the subgrant

Management

Refers to the FDOT State Safety Office Chief Safety Officer and Traffic Safety Administrator

Milestone

The development of a specific activity within a specific timeframe

Monitoring

A process whereby HTSP assesses program progress and compliance by reviewing project related reports and files, financial records, and interviews subgrantees.

NHTSA

The National Highway Traffic Safety Administration

OMB

Federal Office of Management and Budget

Program Area

An area within the highway safety program eligible for traffic safety funding. Examples include: AL (Impaired Driving), OP (Occupant Protection), TR (Traffic Records), PT (Police Traffic Services), PA (Planning & Administration), etc.

Project

A plan of action begin undertaken to improve an identified traffic safety problem

Project Number

The Identification number assigned by the Office to each subgrant

Subgrant Agreement

The approved Subgrant Application for Highway Safety Funds, which constitutes a contract between the Department and the applicant, in which the applicant agrees to perform certain specified activities toward reaching certain specified objectives in return for certain specified compensation from the Department.

Subgrant Period

The effective time between the beginning and ending dates of the subgrant

Scope of Work

Is identified as the objectives and activities noted on the HTSP Project Agreement. The subgrantee agrees to perform in compliance with instruction provided by the HTSP. The subgrantee shall perform and request reimbursement for those services approved in the project agreement .

HSPP

The Highway Safety and Performance Plan within the Florida State Safety Office approved annually by NHTSA.

U.S. DOT

United States Department of Transportation

Section 2 - Federal Laws and Regulations

Background

The United States Congress authorizes traffic safety funds to be appropriated to the US DOT via NHTSA. NHTSA apportions and distributes these funds to the states.

The states obligate these funds through the annual State Highway Safety and Performance Plan, which is subject to NHTSA review and approval.

The Florida HTSP is primarily governed by federal regulations issued by NHTSA and applicable state laws.

The Highway Safety Act of 1966

The HTSP operates under the provision of the Highway Safety Act of 1966, 23 USC 402, *et seq.*, specifically 402(b)(1).

Under Section 402, federal agencies are given considerable leeway to modify the HTSP as necessary. This authorization requires these programs to have certain features under the Highway Safety Plan before they are approved. These features are contained in the following federal regulations.

Applicable Federal Regulations

The following regulatory items govern the daily administration of traffic safety grants at the district and state level. Administrators of traffic safety grants should be familiar with and follow each cited title and rule to effectively design and manage programs. Thorough knowledge of these regulations will reduce a majority of grant questions before they become problems.

The following federal laws and regulations cover traffic safety grants:

“Highway Safety Grant Funding Policy for NHTSA/FHWA Field-Administered Grants” July 2007

49 CFR Part 18 — DOT Implementation of Common Grant Rule: “Uniform Administrative Requirements For Grants and Cooperative Agreements to State and Local Governments” (see the following discussion of “The Common Rule.”)
07/24/2007

49 CFR Part 19 — “Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations”
07/24/2007

23 U.S.C. — Section 154 Open Container Legislation
7/22/1998

23 CFR Part 1270 — Open Container Regulation
8/24/2000

23 U.S.C. — Section 157 Seat Belt Use Incentive Grant Legislation
6/9/1998

23 CFR Part 1240 — Seat Belt Use Incentive Grant Regulation ()
10/29/1998

23 U.S.C. — Section 163 0.08 BAC Grant Program Legislation
10/23/2000

23 CFR Part 1225 — 0.08 BAC Grant Program Regulation
11/28/2003

23 U.S.C. — Section 164 Minimum Penalties for Repeat Offenders for DUI 06/08/2008

23 CFR Part 1275 — Repeat Offender Regulation
10/4/2000

23 U.S.C. — Section 402 Highway Safety Program Legislation
6/08/2008

23 U.S.C. — Section 405 Occupant Protection (OP) Incentive Grant
8/10/2005

23 U.S.C. — Section 405 OP Incentive Grant Criteria (23 CFR Part 1345)
12/30/2005

23 U.S.C. — Section 410 Alcohol-Impaired Driving Countermeasures Legislation (pre-TEA21)
11/28/1995

23 U.S.C. — Section 410 Alcohol-Impaired Driving Countermeasures Legislation (SAFETEA-LU)
8/10/2005

23 CFR Part 1313 — Section 410 Alcohol-Impaired Driving Countermeasures Regulation (SAFETEA-LU Incentive Grant Criteria)
4/21/2006

23 U.S.C. — Section 411 “State Highway Safety Data Improvement Grants” Legislation
6/09/2008

23 CFR Part 1335 — “State Highway Safety Data Improvement Grants” Regulation ()
9/11/2000

23 CFR Part 1200 — “Uniform Procedures for State Highway Safety Programs”
7/24/2007

23 CFR Part 1205 — “Highway Safety Programs Determination of Effectiveness”
7/24/2007

23 CFR Part 1206 — “Rules of Procedure for Invoking Sanctions Under the Highway Safety Act of 1966”
7/24/2007

23 CFR Part 1250 — “Political Subdivision Participating in State Highway Safety Programs” (that is 40% [of Section 402 funding] to local jurisdictions)
7/24/2007

23 CFR Part 1251 — “State Highway Safety Agency”
7/24/2007

23 CFR Part 1340 — “Uniform Criteria for State Observational Surveys of Seat Belt Use” (23 U.S.C. Section 157 related)
10/23/2000

Section 2003(b) TEA-21 (Child Passenger Safety) Legislation
6/9/2000

Transportation Appropriations Act of FY01 — Public Law 106-346 Section 351 providing Sanctions if State’s fail to pass 0.08 BAC law
10/23/2000

State Certifications and Assurances Statements
August 2005

NHTSA Order 462-6C — “Matching Rates for State and Community Highway Safety Programs
11/30/1993

Sec. 154/164 Guidance — Concerning TEA-21 Transfer Funding programs
3/31/2000

Sec. 154/164 — Frequently asked questions and answers regarding Sec. 154/164
July 2000

Sec. 157 Incentive Fund Program Accounting Guidance
1/22/1999

Sec. 157 Innovative Announcement of Discretionary Grants to Support Innovative Seat Belt Projects
6/1/2001

Sec. 163 (.08) Funds Accounting Guidance — Amended
11/20/1998

NHTSA/FHWA RR Grade Crossing Guidance
11/4/1994

Sec. 402 Advertising Space Guidance from NHTSA
12/1/2006

Sec. 2003(b) Announcement on Child Passenger Protection Education Grants
12/31/2001

Program Guidelines — “Uniform Guidelines for State Highway Safety Programs”
1/18/2007

Lobbying Guidance — Lobbying Restrictions
4/30/2004

The Common Rule

The US DOT Common Rule is contained in Title 49, Code of Federal Regulations (CFR) Part 18, and is titled “Uniform Administrative Requirements for Grants and Cooperative Agreements with State and Local Governments.”

The Common Rule was developed to establish “consistency and uniformity among federal agencies in the implementation and management of grants and cooperative agreements with state, local, and federally recognized Indian tribal governments” (Office of Management and Budget [OMB] Circular A-102 [revised], 8/29/1997).

The Common Rule supersedes OMB Circular A-102 of 1981. The Common Rule applies to federal grant recipients (such as the State of Florida) and the sub-recipients of federally assisted grants (such as municipalities receiving traffic safety grants from the State of Florida).

Other Applicable Office of Management and Budget Circulars

Office of Management and Budget (OMB) circulars are frequently used reference materials in administering grants. The following table lists OMB circulars applicable to the Florida HTSP:

2 CFR Part 220 — “Cost Principles for Institutions of Higher Education”
7/24/2007

2 CFR Part 225 — “Cost Principles for State, Local, and Indian Tribal Governments”
7/24/2007

41 CFR Part 60 — “Office of Federal Compliance Programs, Equal Employment Opportunity, Department of Labor, 12/13/2000

49 CFR Part 18 — “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, 7/24/2007

49 CFR Part 19 — “Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals & Other Nonprofit Organizations”
7/24/2007

2 CFR Part 230 — “Cost Principles for Nonprofit Organizations”
7/24/2007

OMB Circular A-133 — “Audits of States, Local Governments, and Non-profit Organizations.”
6/27/2003

OMB Circular A-110 — “Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations.”
9/30/1999

The following Florida Statutes are listed for reference purposes:

Section 112.061, Florida Statutes

Section 119, Florida Statutes

Chapter 119, Florida Statutes

Section 216.347, Florida Statutes

Chapter 287, Florida Statutes

Section 768.28, Florida Statutes

Documents Available

The fore mentioned federal regulations, rules, and other cited procedural documents can located via the Internet:

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

Section 3 - State Laws and Regulations

General

The laws and regulations of the State of Florida and FDOT policy also govern the HTSP. On the state level, Section 334.044, Florida Statutes authorizes FDOT “to do all things necessary to obtain the full benefits of the national Highway Safety Act of 1966...”

Uniform Grant Management Standards

The Florida Administrative Code consists of various statutes and is defined at Section 334.01, Florida Statutes.

Chapter 14, Part 98 of the Florida Administrative Code authorizes the function of the Florida Highway Traffic Safety Program within the Florida Department of Transportation.

Since states are allowed to use their own management systems if they are at least as restrictive as the requirement in the Common Rule, this management structure incorporates existing federal standards for grant management (2 CFR Part 225).

Although the states are given the right to use their own systems to manage programs, the US DOT via NHTSA provides the grant funds and therefore determines what type of programs are eligible for funding.

Governor’s Highway Safety Representative

The Federal Highway Safety Act of 1966 makes the Governor of Florida responsible for preparing and administering a statewide HTSP designed to reduce traffic crashes and the resulting property damage, injuries, and fatalities. The Governor has named the Assistant Secretary for Engineering and Operations of the FDOT to act as his or her representative in the HTSP. This person is designated at the Governor’s Representative for Highway Safety (GHSR or GR).

Intellectual Property

Section 334.049, Florida Statutes, addressing the FDOT’s authority regarding copyrights and trademarks

Section 4 - Signature Authority

Introduction

Signature authority for traffic safety grants and contracts, assurances, certifications, and other documents is delegated to various levels within FDOT.

Signature Authority

The following table lists signature authority related to the HTSP:

Document	Signature Authority
Highway Safety Plan	Approved by Florida’s GHSA Representative
Certifications and Assurances of the Highway Safety Plan	Approved by Florida’s GHSA Representative
Highway Safety Program Cost Summary (HS Form 217)	Approved by Financial Section, HTSP
National Highway Traffic Safety Administration Agreements	Approved by Florida’s GHSA Representative or Chief Safety Officer
Federal Grant Applications	Approved by Traffic Safety Administrator or Chief Safety Officer
Contracts	Approved by Traffic Safety Administrator or Chief Safety Officer,
Traffic Safety Project Agreements and Amendments (any amount)	Approved by Traffic Safety Administrator or Chief Safety Officer, HTSP
State Vouchers for Federal Reimbursement	Approved by Financial Section,
Request to NHTSA to Purchase Equipment (greater than \$5,000) with Federal Funds	Approved by Traffic Safety Administrator,

Further Delegation of Signature Authority

Unless prohibited in the delegation, the person with authority to sign a specific document may further delegate to appropriate employees as follows:

1. Give written notification to the employee, describing the specific grant or document and the extent of the signature authority and responsibility.
2. Send a copy of the delegating memo to the appropriate office as identified in the following list:

- FDOT Comptroller
- FDOT General Council
- Florida's GHSR
- NHTSA Regional Headquarters

In the absence of the Chief Safety Officer, signature authority is delegated to the Traffic Safety Administrator:

Specific Authority to Contract

Specific authority to contract derives from Section 334.004(7), Florida Statutes and Chapter 14, Part 98 of the Florida Administrative Code

Section 5 - Staff Responsibilities and Training

Staff Responsibilities

All HTSP Staff are responsible for coordinating and administering HSPP. To carry out these responsibilities, HTSP staff will:

- develop and administer the Highway Safety and Performance Plan
- manage traffic safety projects in federally designated priority program areas and in other areas as may be assigned or as determined by problem identification processes
- provide oversight to subgrantees and assist them in the development and implementation of traffic safety projects at the local level
- communicate and coordinate activities with the districts
- coordinate with federal, state and local government agencies and not for profit corporations
- ensure compliance with state and federal regulations

- administer traffic safety evaluation and research
- provide legislative information on traffic safety issues
- review and approve grants, contracts, and subcontracts
- provide operational oversight to assure conformity with program and project management policies and procedures
- monitor the activities, results, and expenditures of approved state agency subgrant agreements
- implement and maintain an internal project monitoring system
- closeout traffic safety project and program areas, as appropriate
- report to the governor's highway safety representative and federal oversight agencies on the status of traffic safety projects
- prepare and submit the Annual Report to NHTSA.

Management is responsible for the supervision and oversight of all HTSPs administered by the HTSP. This also includes supervision and performance evaluations of HTSP staff. Management is accountable for the outcomes from each HTSP area and the production of the Highway Safety Plan and the Annual Report.

Program Managers are responsible for planning and implementing traffic safety projects to ensure local participation in the statewide program. To carry out these responsibilities, the Program Coordinators will:

- assist in the development and submission of the HSPP
- develop traffic safety plans with agencies to address high crash locations
- monitor the activities, results, and expenditures of subgrantees based on criteria and performance measures in their agreements
- maintain an accurate listing of accountable equipment and property purchased with federal funds
- negotiate and assist project agreements
- process, administer, and monitor the subgrant agreements
- Receive, review, approve claims for processing the financial section

- review and approve monthly, quarterly, and final reports submitted by subgrantees
- provide information regarding activities as may be required or requested by the state or federal agencies
- represent FDOT HTSP at various federal, state and local meetings.

Finance Section is responsible for performing all finance related duties and processes. Financial processes, as they are addressed in the **HTSP Manual**, are as follows:

- Processes for Encumbering Project Agreements and Amendments
- Contracts in FMIS
- Procedures for Processing Payments
- Process Reimbursement Claims
- Process for Reconciling Finance Files
- Process for Closeout
- Process to Provide Financial Training to Subgrantees
- Process for Subgrantee Inventory
- Process for Grant Tracking Transactions
- Process for Federal Draw in Grant Tracking System (GTS)
- Process for Subgrantee Annual Audits
- Process for Reconciling Cash Balances for Designated Funds
- Process for Reconciliation of Federal Funds
- Process for Setting Up Finance Files and Correspondence Files
- Process for Journal Voucher corrections

Support Staff is responsible for administratively supporting management and program managers and financial section. This includes general office duties such as providing customer service, filing, faxing, logging, maintaining document logs, etc.

The HTSP is a team, with each function equally as important as the others. Success can only be achieved if everyone, regardless of title or job description, continuously works together in a cooperative and professional manner.

The HTSP maintains an organizational chart of current staff members and specific program areas and project responsibilities. This is available upon request.

Training is an important part for all HTSP staff and subgrantees. Funding is based on the adherence to several state and federal regulations and guidelines. Therefore, it is important for all staff and subgrantees to become familiar with all aspects of program and financial management processes

All HTSP staff is required to complete the following training courses:

- NHTSA sponsored Program Management Course.
- NHTSA sponsored Managing Federal Finances Course.
- NHTSA sponsored Data Analysis and Evaluation.

In addition, HTSP Staff is required to adhere to the Department's training plan which includes specific mandatory courses. NHTSA or FHWA sponsored courses that are related to HTSP areas will be required as they are developed.

In addition to the above, HTSP management and program coordinators are required to attend the following training courses:

- NHTSA sponsored Facilitator Training
- NHTSA sponsored Project Management

HTSP subgrantees are required to attend the following training courses:

- HTSP Computer Based Training
- HTSP sponsored Project Management Training
- HTSP sponsored Financial Training

HTSP staff and subgrantees may be required to take additional training courses upon recommendation of NHTSA or FHWA to improve overall program effectiveness.

Chapter 2 Planning

Contents:

Section 1 – Overview	2-2
Background	2-2
Planning Overview	2-2
Section 2 - State Highway Safety & Performance Plan	2-3
Priority Areas	
Program Funding	
Development Process	
Requirements of the Highway Safety and Performance Plan	
Section 3 - Traffic Safety Project Concept papers	2-13
Introduction	
Description and Content	
Submitting the Project Concept paper	
Section 4 - Project Continuation Plan	2-12
Introduction	
Plan Approval	
Application and Approval Process	
Section 6 - Project Selection	2-15
Introduction	
Project Concept paper Process	
Assessment of Required Concept paper Criteria	
Project Concept paper Approval	

Section 1 - Overview

Background

Federal grant involvement in traffic safety dates from the passage of the National Highway Safety Act of 1966.

While the districts are responsible for managing local projects, responsibility for the Statewide HSPP resides with the FDOT Safety Office, HTSP.

Planning Overview

This chapter describes the HTSP's planning process for traffic safety related projects at the local and statewide levels.

HTSP staff review concept papers based on an analysis of the traffic crash history of the state each year, using the most currently available crash data from the Department of Highway Safety and Motor Vehicles, to identify if the requested concepts are within those cities and counties with the most severe traffic crash problems. HST Program Managers will recommend qualifying concept papers to the Traffic Safety Administrator for funding. If additional funding is available, the HSTP staff may solicit concepts from those cities in counties within the top 25% of the Traffic Safety Matrix after all other concepts have been evaluated. Approved projects are included in the annual Highway Safety and Performance Plan, which is submitted to NHTSA for review and approval.

Section 2 - State Highway Safety and Performance Plan

Requirements of the Highway Safety and Performance Plan (HSPP)

Prior to September 1 of each year, the state prepares a planning document describing how federal highway safety funds will be apportioned, consistent with the guidelines, national priority areas, and other Section 402 requirements. The HSPP, as the state's formal planning document, is approved by the GHSR. This document must be submitted to NHTSA for review to ensure that the state's Highway Safety Program is in compliance with the requirements of the Section 402 program. The HSPP must include the following:

Certification Statement

The state prepares and submits a certification statement, signed by the Governor's Highway Safety Representative, which provides formal assurances regarding the state's compliance with applicable laws and regulations, and with financial and program requirements pertaining to the federal grant.

The Performance Plan

The Performance Plan describes the process used to identify the state's traffic safety problems and to propose the projects and activities the state plans to implement to reach its performance goals. It includes performance measures for each goal to track progress from a baseline, toward meeting the goal by the specified target date. The HSPP and Performance Plan are the state's planning, management, and grant delivery vehicles. The Performance Plan has three components – a process description, performance goals, and an NHTSA HS Form 217.

\$5,000 Equipment List

In addition to the performance plan and certification statement, a list items to be purchased under subgrant agreements costing over \$5,000 must be submitted to NHTSA for approval prior to subgrantee purchase.

Modifications and Additions

While the state is not required to submit modifications to the HSPP to NHTSA for approval, HSTP staff provides NHTSA the opportunity to review any HSPP changes prior to award or modification of subgrant agreements to prevent later reimbursement complications.

All additions or modifications to the \$5,000 list must be approved by NHTSA prior to subgrantee purchase.

Priority Area

The HSPP is divided into the following “National Program Areas” identified by NHTSA and FHWA, as follows:

Highway Safety Program Areas

Program Code	Program Area
NHTSA 402	
PA	Planning and Administration
AL	Alcohol
MC	Motorcycle Safety
OP	Occupant Protection
PS	Pedestrian/Bicycle Safety
PT	Police Traffic Services
TR	Traffic Records
CP	Community Traffic Safety Project
RS	Roadway Safety
PM	Paid Advertising
SC	Speed Control
405 OP SAFETEA-LU	
K2	405 Occupant Protection
K2PM	405 Paid Media
NHTSA 406	
K4	406 Safety Belts Incentive
K4OP	406 Occupant Protection
K4PT	406 Police Traffic Services
408 Data Program SAFETEA-LU	
K9	408 Data Program Incentive
410 Alcohol SAFETEA-LU	
K8	410 Alcohol SAFETEA-LU
K8PM	410 Alcohol SAFETEA-LU Paid Media
2010 Motorcycle Safety	
K6	2010 Motorcycle Safety Incentive

Program Funding

Funding of the projects within the program areas are primarily funded by the NTHSA; however, the HSPP may have other funding sources included. Funding sources are identified in the HSPP.

In addition to federal and state funds, some participating local governments provide “matching” funds or funds from other sources.

Development Process

The Highway Safety Planning process consists of the following stages:

1. Identify and prioritize program areas based on the State Strategic Highway Safety plan.
2. Assign program areas and responsibilities to Program Managers. Begin gathering data to be used in statewide problem identification. Project available funding. Review comments from NHTSA and FHWA regarding previous year HSPP execution.
3. Problem identification and current status of each program area is presented to the TSA by the HST program managers. Program area performance goals and measures are set for the upcoming fiscal year.
4. Concept Papers are accepted for review between January 1st and March 31st of each year.
5. June 1st – June 30th Concept paper are evaluated based on their contribution to the HSPP and SHSP program areas and performance goals, ranking on the Highway safety project matrix, past performance and project success rate. Award preference may be given to those projects that include cost sharing.
6. Qualifying projects are included for funding in the draft HSPP by June 30th of each year. Concept papers that did not qualify in the program area requested will be evaluated for qualification in other program areas and may be solicited for program concepts in qualifying program areas.
7. After the first draft HSPP is compiled and evaluated for funding levels, if there is additional available funding, HSTP staff may solicit project concepts from traffic safety partners who rank high in high priority areas who did not submit concepts during the open call for concept papers. (This may also occur if additional funds become available later in the fiscal year.)
9. A final HSPP is submitted to the GHSR for approval and certification by July 31st of each year.
10. The final HSPP is submitted to NHTSA and FHWA, if necessary, for review and comment, and approval on August 1st.
11. Acceptance or denial letters are mailed out for all concept papers notifying applicants if they were or were not included in the HSPP for funding. No projects will be officially awarded without NHTSA, and FHWA, if necessary, approval and no grants will be awarded prior to October 1st.

Section 3 - Traffic Safety Project Concept papers

Introduction

State and local government agencies and not-for-profit organizations interested in traffic safety issues may submit project proposals to HTSP during January 1st and March 31st of each year. The HTSP will use these traffic safety project Concept papers in the development of the State Highway Safety and Performance Plan for the next fiscal year.

Description and Content

Traffic safety project Concept papers are concept papers written in a specified format. The document contains three major parts: project administrative information, the project description, and budget information.

The concept administration information includes:

- proposing agency or organization identification
- project title
- amount of federal funds requested
- priority area
- type of request
- type of project
- proposing agency head information
- proposing agency project contact

The concept plan must include:

- a problem identification statement, including documentation of data
- proposed solution
- objectives and milestones to achieve solution
- evaluation method
- budget of funds needed to achieve objectives

The Problem Statement

Problem identification is a deliberate process to describe and better understand how people are being injured or killed on the road and serves two important functions:

- Provide the information necessary for selecting appropriate countermeasures and target audience for desired results. Understanding the magnitude of the problem, the underlying causes, and the target groups affected enables the selection of the most effective countermeasures.
- Provide some of the baseline data to determine if the proposed solution will accomplish its objectives. Documenting the procedures followed in data gathering will provide information for complete and correct comparison of post implementation results.

Clear problem identification, to include the times and situations with greatest risk for death or injury help for developing measurable objectives for evaluation. When determining the severity of problems, consideration should be made for any changes or projected changes in population, traffic patterns, and other demographic dynamics that may affect traffic safety.

The problem statement must:

- identify the traffic safety related problem or deficiency to be improved
- provide crash data for the most recent three years for baseline comparison
- include a brief analysis of the crash data
- include any pertinent citation, survey or trend data

Proposed Solution

The solution identifies the strategies for addressing the identified traffic safety problem and what is to be accomplished. These accomplishments are also known as objectives. All objectives should be SMART (Specific, Measurable, Action-oriented, Reasonable and Time-specific)

Objective – the specification of the events that would mark the successful achievement of the desired results of the proposed solution.

Specific – A specific objective is clear and unambiguous and tells exactly what is expected.

A specific objective will answer the five “W” questions:

What: What do I want to accomplish?

Why: Specific reasons, purpose or benefits of accomplishing

Who: Who is involved?

Where: Identify a location

Which: Identify requirements and constraints

Specific objectives avoid generalities like “improving traffic safety” or “increasing awareness”. A specific amount of change anticipated either in absolute (increase seat belt use to 75% countywide) or relative (increase citations by 15% over the baseline) terms should be expressed.

Measurable – For an objective to be measurable there must be something that is quantifiable and that can be re-evaluated to detect a change in over time. Measurable objectives are necessary for measuring progress toward the attainment of the desired result.

A measurable objective will usually answer questions such as:

How much?

How many?

How will I know when it is accomplished?

A specific and measurable objective will include a quantifiable level of change with a based line comparison (i.e., increase belt use by pickup truck drivers on 2-lane rural roads in Florida by 5% as compared to the previous year’s pickup truck driver seatbelt survey results of 85%)

Action-oriented – When action is required as part of a solution, action-oriented objectives are used set the minimum level of action expected to effectively implement strategies and countermeasures. Action can be seen and counted.

An action-oriented goal will ensure action is implemented to achieve the desired result of the overall goal. Using the previous objective example, an action-oriented objective for that solution could be “conduct high-visibility seatbelt enforcement on 2-lane rural roads twice a month for 6 months”.

Reasonable - Objectives that are out of reach or below standard performance are considered meaningless.

A reasonable objective will usually answer the question:

How: How can the objective be accomplished?

Time-specific – Projects don't last forever and objectives should have deadlines. Deadlines make it clear when results can be expected. They also keep a focus on what needs to be accomplished by when, which makes it obvious if they are met or not.

A time-specific goal will usually answer the question:

When?

What can I do in 6 months from now?

What can I do 6 weeks from now?

What can I do today?

Not So Smart	S.M.A.R.T
To encourage increased seat belt enforcement	To increase seat belt citations by 15 percent in 6 months
To reduce underage drinking	To reduce the number of liquor establishments that serve minors by 40 percent in 12 months
To get tough on speeders	To decrease average vehicle speed on Smith Road from 55 mph to 45 mph in 6 months

Evaluation

Before implementation of a solution, there must be a plan as to how you will conduct the evaluation of success.

An evaluation plan will address the questions:

What will you measure?

How will you measure it?

How will you analyze your results?

While all of these questions are important, “What will you measure?”, is critical to success of your evaluation.

What will be measured must be tied directly to the established objectives. If the objective is to reduce speeding on a given roadway, the most logical thing to measure would be average speeds on that given road. Since the objective is tied to speeding, measuring a reduction in crashes would not be beneficial for evaluating success in reducing speed. Ideally countermeasures whose objective is to reduce speeding would be implemented and success could be measured by monitoring speeds on the selected road segments before, during and after the countermeasures are in effect.

Once it is decided what will be measured to determine if objectives were achieved, information that will be gathered to make the measurement must be identified. To collect valid data, first determine where and when to collect the data, then how much data will be needed, and what procedures will be followed to collect and record the data.

There are five basic ways that you can measure program effects:

1. Observational Surveys
2. Knowledge/Attitudinal Surveys
3. Activity Records
4. Data Records
5. Media Coverage

Important vs. Convenient Possible Evaluation Measures	
Changes in crashes (the number or severity)	
Reductions in fatalities and the severity of injuries	
Secondary Outcomes (also called Proxy Measures)	Examples
Changes in observed	<ul style="list-style-type: none"> • Observing the use of seat belts and child safety seats • Observing the use of bicycle and motorcycle helmet • Measuring the speed of vehicles • Observing red-light running • Counting the number of pedestrians who jaywalk
Changes in reported behavior (what people say they do when asked)	<ul style="list-style-type: none"> • How often do you wear your seat belt? • Have you ever driven after having too much to drink?
Changes in attitude (what people believe)	<ul style="list-style-type: none"> • Support for legislative initiatives • Knowledge of a seat belt law • Teen attitudes about drinking and driving
Changes in awareness (what messages people have heard)	<ul style="list-style-type: none"> • Awareness of high visibility enforcement campaigns • Perceived risk of getting a traffic ticket
Changes in activities conducted (new program implemented)	<ul style="list-style-type: none"> • Citations issued by the police • Special police patrols and check-points • Presentations • Training programs • Media coverage • Legislation changes

Budget Information

Budget tables provide a breakdown of estimated costs, including personnel services, contractual services, commodities, indirect costs, and other costs. Items identified as need in the budget must correlate to the problem statement and solution.

Submitting the Project Concept Paper

Completed project concept papers should be mailed or hand delivered to the FDOT Traffic Safety Program at:

US Postal Service Mailing Address:

Highway Safety Grant Program
Florida Department of Transportation
605 Suwannee Street, MS 17
Tallahassee, FL 32399

Hand Delivery /Express Mailing (FedEx UPS, etc):

Highway Safety Grant Program
Florida Department of Transportation
1211 Governor's Square Boulevard
Tallahassee, FL 32399

Section 4 - Project Selection

Introduction

Completed project concept papers are forwarded to the Traffic Safety Administrator (TSA) who assigns each concept paper for review to a program coordinator.

After reviewing the project concept paper, the program coordinator assesses its applicability and response to Florida's traffic safety problems before sending it back to the TSA with a recommendation for approval or disapproval. In some cases, the submitting person/agency may be contacted by a HTSP Program Coordinator with questions and/or requests for additional information.

Project Concept Paper Process

As part of its review process the program coordinator evaluates each concept paper using the following criteria as a guide:

1. ensure that the concept paper includes the required concept paper criteria,
2. check for budget availability and available resources,
3. compare proposed project with current activities,
4. ensure that the proposed activities are in line with the strategies set forth in the Highway Safety Plan and all other current Safety Office approved Strategic Plans

5. determine whether or not the project will impact traffic safety and will work towards established goals as follows:
 - ensure the problem is adequately described, and objectives, measures, and resources requested will address the problem,
 - ensure that the applicant is the appropriate entity to perform the activities,
 - request additional information and meet with project applicant or others as necessary,
6. determine if the applicant agency's city or county ranks within the top 25% for fatalities and injuries in the program area they are requesting funding for:
 - if the applicant does not rank high in the requested program area; however, are higher in another program area, they may be solicited for their interest in submitting a concept for program areas that they rank higher in.
 - applicants may also be considered based the extent of need and resources available regardless of their matrix ranking

Section 3 - Project Continuation Plan

Introduction

NHTSA traffic safety funds are “seed money,” intended to provide start-up capital for a long-term dedicated HTSP. Therefore, HTSP project agreements supported with “non-dedicated” federal funds are limited to the length of the grant period and usually do not receive extended funding for more than three consecutive years in a given priority area. Evaluation and selection is done on an annual basis, so there is no guarantees that a local project that received first year funding will receive subsequent years funding.

If both FDOT and the subgrantee agree that the project has demonstrated great merit and has potential long-range benefits, or if the project scope is modified or expanded to a statewide benefit, the subgrantee may apply for funding assistance beyond the three-year limit. Program coordinators should explain this requirement with the potential subgrantee during project development.

“Statewide” projects being considered for extension beyond three years must:

- be based on exceptional project performance and grant management;
- include significant revisions or expansions to the scope of the project (assuming that the subgrantee will continue the portion of the project previously supported with federal funds);
- document a continued need for the project; and
- receive specific approval from the HTSP.

Each program concept should include project continuation plan to continue the efforts of the safety improvement once the grant funds are no longer available. Award preference will be given to those projects for which the subgrantee has assumed some cost sharing.

Chapter 3

Grant Award Contract Preparation and Execution

Contents:

Section 1 – Overview

Section 2 - Development Process

Section 3 – Budget

Section 4 - Project Agreement Preparation Details

Section 5 - Subgrantee Approval

Section 6 - FDOT Approval

Section 7 - Project Agreement and Contract Amendment

Section 1 - Overview

Introduction

The grant preparation process begins once the applicant is notified that their concept paper has been approved for inclusion in the HSPP. This chapter covers the development, preparation, approval, and execution of subgrant agreements. Amendments to subgrant agreements are also covered.

Subgrant Agreement

The HTSP's Project Agreement is a legally binding document when fully executed by both parties. Any attachments, other documents such as terms and conditions, detailed project descriptions, the approved budget, and certain required certifications and assurances are incorporated into the contract document.

The project agreement is typically used when the beneficiary of a project is a state agency, a local governmental jurisdiction (such as law enforcement agencies), institution of higher learning, or non-for-profit organization. A project agreement must have the signature of the appropriate Authorized Official representing the subgrantee and the Authorized Official from FDOT.

Process Overview

The following table lists the steps a typical project agreement follows from negotiation to execution. Also shown are the parties responsible for each step.

Subgrant Project Agreement

Step	Action	Responsible Parties
1	Subgrant Project Development	Subgrantee , HTS Program Manager, and HTS Finance Manager
2	Subgrantee Agency Approval	Subgrantee
3	Submittal of completed Subgrant Application to the HTSP	Subgrantee
4	Encumbrance of Funds	HTS Finance Manager
5	FDOT Approval	FDOT Legal and Chief Safety Officer or Traffic Safety Administrator
6	Execution	All parties
7	Amendment (if necessary)	All parties

Section 2 - Development Process

Introduction

Project development involves coordination and preparation of the subgrant agreement. HTS program managers coordinate with approved applicants construct the subgrant agreements.

This section describes the subgrant agreement and explains some of the associated factors and requirements. The preparation of the project plan and budget, which takes place during the development process, is described in following sections.

Grant Period

The grant period or term of contract is the time during which the subgrantee or performing agency may incur reimbursable costs to carry out the project. All grants periods will be within the Federal Fiscal year of October 1st and September 30th. The beginning of the subgrant agreement will be determined by the actual execution date. As there may be times when congress may not release all federal funds for grant execution at the beginning of the federal fiscal year, this date may vary among all grant awards.

Projects cannot extend beyond September 30th of the applicable federal grant year; therefore, project budgets approved in the HSPP may be reduced if objectives are removed or reduced or time period is shortened due to delayed funding availability. This decrease should match the appropriate amount of effort on the project during the awarded project period.

Subgrant Agreement Preparation

After coordination, the subgrantee will create the subgrant agreement document using the appropriate forms.

All subgrant agreements will be created using:

The Florida Department of Transportation Subgrant Application for Highway Safety Funds (FDOT form 500-065-01)

Coordination

Coordination allows the HTS program manager and subgrantee to arrive at an understanding on the specific details of the project (budget detail amounts, objectives and performance measures, and evaluation criteria, etc.) so that agreement preparation can proceed. Coordination involves discussion, clarification, or modifications to the proposed project. Items to be discussed during the coordination phase include, but are not limited to, the following:

Development of the Project Plan

Statement of the Problem – using problem statement from the concept paper, the HTS program manager and the subgrantee will ensure that the problem is clearly identified in the subgrant agreement.

Proposed Solution – using the proposed solution from the concept paper, the HTS program manager and the subgrantee will ensure that all overall goal and strategies and countermeasures to be implemented are clearly stated and correlate to the improvement of the identified problem.

Objectives – both the HTS program manager and subgrantee will ensure all objectives are SMART and are directly related to the identified problem and countermeasures in the subgrant agreement. Objectives will have performance measures to be reported quarterly.

Performance Measures – a quantitative or qualitative indicator expressed in terms of a planned level of activity and directly aligned to objectives.

Evaluation - using the plan identified in the concept paper, HTS program managers and subgrantees will work together to ensure the evaluation plan is clearly and completely stated in the subgrant agreement, to include the baseline measures, milestones, and performance expectations. The evaluation plan will be used by both the subgrantee and HTS program managers to monitor the progress and overall success of the project.

Section 4 - Budget

Introduction

The program coordinator subgrantee negotiate the content of the project budget during subgrant agreement development. This section explains some of the considerations and requirements involved in preparing the budget.

Method of Payment

The method of payment will be within the constraints of federal or state guidelines. No reimbursement is allowed before work has been performed or costs have been incurred.

Subgrantees will be reimbursed on the basis of actual cost, cost per unit, specific rates, or a combination of these. Explanations of these methods of payment follow.

Actual Cost. Actual cost agreements reimburse the subgrantee for all costs incurred under the project, subject to cost principles included in 2 CFR Part 225, “Cost Principles for State and Local Governments.” Subgrant agreements limit amounts and items authorized in the project budget. Adjustments between cost categories within the budget are allowed with prior written approval from the HTSP. No budget modifications will be accepted after June 30th of each year.

Cost Per Unit of Work. The subgrant agreement may authorize payment of contractual service agreements that are on the basis of units of work performed. This method of payment uses a negotiated per-unit cost, with each component documented and approved in a detailed cost contractual services agreement, that must be approved in writing by the HTSP. This method of payment eliminates the need to document each element included in the Project Reimbursement Claim, requiring instead that the *performance* of work be documented. However, the negotiated rate must be based on documented actual costs and experience in performing the proscribed task.

EXAMPLES: \$100 per person trained *or* \$40 per car seat distributed.

Specific Rates. Grants may authorize payment on the basis of specific rates. This method uses a composite of all or selected costs.

EXAMPLES:

- Salary: \$30 per hour
- Travel and per diem: \$85 per day, \$0.32 per mile

Other Travel and Per Diem: Reimbursement for airfare, car rental, per diem, and other travel costs will be based on the State of Florida, Department of Transportation’s Travel Policy-

Maximum Amount Eligible for Reimbursement

FDOT policy requires all agreements to include a “maximum amount eligible for reimbursement.” This maximum amount is the grant reimbursable amount as defined in the grant agreement and is FDOT’s share of the estimated project cost. The line items within the subgrant agreement budget is not to be exceeded. (A line item in the budget is the authorization for funds to be expended on the item.)

Increased Costs

If costs exceed maximum amount of the grant agreement, reimbursement will not be authorized. The HTSP will send a letter notifying the subgrantee.

Program Income

Subgrantees are encouraged to earn income to defray program costs. Program income includes income from fees for services performed, from the use or rental of real or personal property acquired with grant funds, from the sale of commodities or items fabricated under a grant agreement, and from payments of principal and interest on loans made with grant funds. Except as otherwise provided in regulations of the Federal agency, program income does not include interest on grant funds, rebates, credits, discounts, refunds, etc. and interest earned on any of them.

Definition of program income. Program income means gross income received by the grantee or subgrantee directly generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period. ``During the grant period" is the time between the effective date of the award and the ending date of the award reflected in the final financial report.

Cost of generating program income. If authorized by Federal regulations or the grant agreement, costs incident to the generation of program income may be deducted from gross income to determine program income.

Governmental revenues. Taxes, special assessments, levies, fines, and other such revenues raised by a grantee or subgrantee are not program income unless the revenues are specifically identified in the grant agreement or Federal agency regulations as program income.

Royalties. Income from royalties and license fees for copyrighted material, patents, and inventions developed by a grantee or subgrantee is program income only if the revenues are specifically identified in the grant agreement or Federal agency regulations as program income.

Property. Proceeds from the sale of real property or equipment will be handled in accordance with the requirements of Sec. Sec. 18.31 and 18.32.

Use of program income. Program income shall be deducted from outlays which may be both Federal and non-Federal as described below, unless the Federal agency regulations or the grant agreement specify another alternative (or a combination of the alternatives). In specifying alternatives, the Federal agency may distinguish between income earned by the grantee and income earned by subgrantees and between the sources, kinds, or amounts of income. When Federal agencies authorize the alternatives in paragraphs (g) (2) and (3) of this section, program income in excess of any limits stipulated shall also be deducted from outlays.

Deduction. Ordinarily program income shall be deducted from total allowable costs to determine the net allowable costs. Program income shall be used for current costs unless the Federal agency authorizes otherwise. Program income which the grantee did not

anticipate at the time of the award shall be used to reduce the Federal agency and grantee contributions rather than to increase the funds committed to the project.

Addition. When authorized, program income may be added to the funds committed to the grant agreement by the Federal agency and the grantee. The program income shall be used for the purposes and under the conditions of the grant agreement.

Cost sharing or matching. When authorized, program income may be used to meet the cost sharing or matching requirement of the grant agreement. The amount of the Federal grant award remains the same.

Income after the award period. There are no Federal requirements governing the disposition of program income earned after the end of the award period (i.e., until the ending date of the final financial report, unless the terms of the agreement or the Federal agency regulations provide otherwise.

Profit Prohibited

Sugrant agreements do not allow payment of any profit to the subgrantee. If the subgrantee subcontracts with a commercial (for profit) firm, the fee becomes an actual cost incurred by the subgrantee and is eligible for reimbursement if all other payment criteria meet the terms of the agreement.

Indirect costs (IDC) or facilities and administrative (F&A) costs are not considered profit and are eligible for reimbursement up to the HTSP approved percentage limit under certain circumstances. (See “Indirect Costs (Facilities and Administrative Costs)” later in this section.)

Budget Categories

The approved project budget should be as detailed as appropriate for fiscal control of the project, but great detail is not normally needed. Generally, the approved project budget will include only the following line items:

Budget Category Line Item Examples		
Category	Line Item	
Personnel	Salary and Fringe Benefits	\$50,000.00
Contractual Services	Special Event Coordinator	\$2,000.00
Expenses	Travel and Per Diem,	\$1,000.00
	Postage	\$2,000.00
	Printing	\$500.00
	Office supplies	\$500.00
OCO	(1) Message Board	\$2,000.00
	(1) Server	\$1,500.00
Indirect Costs	5% of direct cost	\$2,075.00

Overtime Rate

The majority of projects involving increased enforcement of traffic laws rely on the payment of overtime hours for patrol officers. The overtime pay rate for officers is based on actual cost per employee in accordance with the subgrantee's policy for payroll and salary rate.

When a project includes overtime salary or wages, traffic safety funds can pay for the additional cost of fringe benefits directly associated with the overtime hours not covered by the employee's basic benefit package (an example of an eligible fringe benefit cost associated with overtime would be an employer's contribution to a retirement plan). The costs of fringe benefits are allowable to the extent that the benefits are reasonable and are required by law, employee agreement, or an established policy.

Overtime can only be reimbursed for personnel of the subgrantee. Personnel must be verifiable through employment records. Subgrantees are required to provide a list of personnel working under the grant to the HTS Office.

Project Support

Any project support can be in the form of cash or in-kind contributions, which generally consist of the value of services, supplies, and nonexpendable personal property.

Criteria for determining the acceptability of cash and in-kind contributions are established in 49 CFR Part 18, "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments." These criteria require the in-kind match to be:

- verifiable from the subgrantee’s records
- not included as contributions for any other federally-assisted program
- necessary and reasonable for proper and efficient accomplishment of program objectives.

Other Criteria

Other criteria for the in-kind match require the local match to be:

- charges that would be allowable under 2 CFR Part 225
- not paid by the federal government under another assistance agreement, unless authorized under the other agreement and the laws and regulations it is subject to
- provided for in the approved budget when required by the federal agency.

Indirect Costs (Facilities and Administrative Costs)

2 CFR Part 225, “Cost Principles for State and Local Governments,” describes indirect costs as those costs incurred for a common or joint purpose benefiting more than one cost objective and not readily assignable to the cost objectives. 2 CFR Part 220, “Cost Principles for Educational Institutions” , uses the term “facilities and administrative” or F&A as an indirect cost equivalent. While these costs are permitted by the HTSP they require specific prior approval and are capped at **ten percent** of approved allowable costs.

Unallowable Costs for Selected Items

Facilities and Construction

- Costs for **highway construction, maintenance, or design** (other than design of safety features of highways incorporated into roadway safety guidelines).
- Costs for **construction or reconstruction** of permanent facilities, such as paving, driving ranges, towers, and non-portable skid pads.
- Costs for **highway safety appurtenances** including longitudinal barriers (such as guardrails), sign supports (except as allowed under Allowable Costs under Specified Conditions or Limitations for Selected Items, Part II. A.2.), luminaire supports, and utility poles. (FHWA safety construction federal-aid funds are available.)

- Costs for construction, rehabilitation, or remodeling for any buildings or structures or for purchase of **office furnishings and fixtures**. The following are some examples of those items:

Desk	Credenza	Storage Cabinet
Chair	Bookcase	Portable Partition
Table	Filing Cabinet	Picture, Wall Clock
Shelving	Floor Covering	Draperies & Hardware
Coat Rack	Office Planter	Fixed Lighting/Lamp

- The cost of land.

Equipment

- **Costs for the purchase of both fixed and portable truck scales. (Federal Motor Carrier Safety Program (MCSAP) funds are available for truck scales.)**
- Costs for **traffic signal preemption** systems. (FHWA federal-aid highway program funds are available.)
- Maintenance and extended warranty costs on all equipment purchased under the HTSP contract.

Training

- Costs to pay for an **individual's salary** while pursuing training or to pay the salary of the individual's replacement, which is considered supplanting, except to the extent that the individual's salary is already supported with highway safety funds under an approved project.
- Costs of training employees of federal and military agencies.
Note: Training for the U. S. Department of the Interior personnel who are assigned Section 402 responsibilities are covered under the 5% administrative take down.

Program Administration

- **Supplanting**, includes: (a) replacing routine and/or existing state or local expenditures with the use of federal grant funds and/or (b) using federal grant funds for costs of activities that constitute general expenses required to carry out the overall responsibilities of state, local, or federally recognized Indian tribal governments.
- NHTSA highway safety grant funds designated for any research purposes for which funds are authorized in 23 USC 403.

- NHTSA highway safety grant funds used to defray expenses incurred or sought to be incurred for activities of **federal civilian or military agencies or employees**. **Note:** For the U. S. Department of the Interior, personnel expenditures for the Section 402 program are covered under the 5% administrative takedown.
- **Alcoholic beverages** for any consumption purposes, including controlled settings for the training of law enforcement officers in techniques for determining driver impairment.
- Costs of **entertainment**, including amusement and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities).
- NHTSA highway safety grant funds for **commercial drivers'** compliance with specific Federal Motor Carrier Safety Regulations.
- University tuition is not payable unless they are a full time grant employee and it is part of a standard benefits package for the full time employee; i.e., graduate assistants are not full time employees of a grant unless so specified and agreed to in advance. The benefits must show an itemization or breakdown of the components by dollar and percent. Should this change, it must be reflected in a grant modification request.

Lobbying

- Federal – the cost of influencing the U.S. Congress and federal agency officials for activities associated with obtaining grants, contracts, cooperative agreements or loans.
- State – No federal funds may be used for any activity specifically designed to urge or influence a state or local legislator to favor or oppose the adoption of any specific legislative Concept paper pending before any state or local legislative body. Such activities include both direct and indirect (e.g. “grassroots”) lobbying activities, with one exception. This does not preclude a state official whose salary is supported with NHTSA funds from engaging in direct communication(s) with state or local legislative officials, in accordance with customary state practice, even if such communications urge legislative officials to favor or oppose the adoption of a specific pending legislative Concept paper.

Section 5 - Subgrantee Approval

Introduction

After final coordination of the draft project agreement with the HTS Office, the project agreement must be approved by the subgrantee in accordance with its respective contract review and approval procedures. This may involve placement on the agenda for a city council meeting, the county commissioners' court, or a state agency's director, board, or commission. Scheduling time frames vary from agency to agency.

Some local governments require agenda items to be heard at three consecutive meetings, which will add significantly to the time required for grant approval.

Scheduling requirements must be considered in the approval process to stay on a project schedule so that it can be activated on time.

Project agreements must be submitted with signatures of persons with legal authority to execute contractual agreements (i.e.; City Mayor, University President, Corporation President or, Agency Secretary).

NO ALTERNATE SIGNATURES WILL BE ACCEPTED AS SUGRANTEE APPROVAL FOR ANY GRANT RELATED DOCUMENTATION WITHOUT A DELEGATION LETTER FROM THE PERSON WITH CONTRACT EXECUTION AUTHORITY.

Educational Institutions

2 CFR Part 220, "Cost Principles for Institutions of Higher Education" (10/27/98), requires that educational institutions provide a "Certificate of Facilities and Administrative Costs" (F&A) for federally funded projects. In addition, 2 CFR Part 220 requires the following:

To assure that expenditures for sponsored agreements are proper and in accordance with the agreement documents and approved project budgets, the annual and final fiscal reports or vouchers requesting payment under the agreements will include a *certification*, signed by an authorized official of the university, which reads essentially as follows:

"I certify that all expenditures reported (or payment requested) are for appropriate purposes and in accordance with the provisions of the application and award documents."

General detail on these two requirements is contained in 2 CFR Part 220.

Not for Profit Agencies

Chapter 14-98, Florida Administrative Code, requires non-profit organizations to provide their "**Certificate of Status**" from the **Florida Department of State, Division of**

Corporations, verifying their not-for-profit status when submitting their concept paper. The “**Consumer’s Certificate of Exemption**” from the **Florida Department of Revenue** or a letter from the Department of the Treasury confirming Section 501(c)(3) status is not sufficient to meet this requirement.

If the non-profit organization’s project is selected for funding, it must provide a financial statement proving the establishment of a special account designated for project activities, which contains funds equal to or greater than the amount of the subgrant contract award, prior to FDOT contract approval.

Section 7 - FDOT Approval

Introduction

Miscellaneous Contract Number

HTSP enters the project agreement/contract number after the project agreement/contract has completed the internal review process. The preparer will leave this space blank.

Note: The subgrant agreement project number, once assigned, must be included on all correspondence and other documents relating to the project.

Assigning Project Agreement Control Numbers

During the internal review process and prior to any signatures, the HTSP, will assign a project agreement number that coincides with the appropriate funding source for all state and federally managed projects. This information is provided from the most current HSPP under the Project Description - Projected Costs and Funding Sources section.

The following is a typical project agreement number for a law enforcement grant specific to checkpoints and saturation patrols: AL-09-05-10

- AL –corresponds to program area code (Impaired Driving) \
- 09 – corresponds to the projects fiscal year of funding
- 05 – corresponds to program area funding number (Section 402 Alcohol)
- 10 –corresponds to the number assigned to the project in the annual HSPP.

Note: The subgrantee should include the project agreement numbers on all Project Reimbursement Claims. (See Section 8 of this chapter for more information.)

Legal Authority

For local grants, the agreement is made with the local government (county or city), not an operating division or function.

Standard Assurances

All project agreements contain standard boilerplate language requiring the subgrantee to adhere to all State and Federal guidelines

When the FDOT signatory executes a project agreement by signing it, he or she is certifying that the agreement:

- is legal and payable
- includes all required and applicable provisions
- complies with all applicable federal, state, and FDOT regulations and laws
- has received federal approval when such approval is required
- has been budgeted with available funds

So before approval, program coordinators will review all project agreements for form and content, applicable provisions, eligibility of costs, consistency, and accuracy.

When Problems are Identified

If, at any time, a HTSP staff member detects a problem(s) with a project agreement, the agreement should be returned to the program coordinator or appropriate person with a brief explanation of the problem and the Traffic Safety Administrator (TSA) should be alerted.

Changes Initiated During Review and Approval

A change made during the approval process could jeopardize the mutual agreement unless all parties acknowledge and accept the change. Therefore, any proposed change must be discussed with all parties *before* the change is made and an amendment is processed.

FDOT Signature Authority

For information on FDOT signature authority, see Chapter 1, Section 4 of this manual. Project agreements submitted for FDOT approval without original signatures from approved persons will not be processed.

Additional Copies

One original approved project agreement is kept in the HTSP file of record. All other original approved project agreements are returned to the applicant.

Section 8 - Project Agreement Amendment

Introduction

During the active period of a project, changing conditions may require that the original project agreement be adjusted.

If both parties consent to altering the project in some way, then a budget modification or amendment document must be executed to effect the change.

***Budget Modification:** The movement of budget between line items or expansion of line item definitions as long as the overall budget does not change.*

Some reasons for modifying the project agreement might include:

- changes in budget line item amounts or quantity limits or narrative descriptions
- changes to personnel in positions that are being reimbursed by the grant
- changes to quantities or percentages

Modification Process

To modify any terms of the grant agreement the agency must provide a formal request letter signed by the Authorized Representative of the Subgrantee Agency or Administrator of the Implementing Agency. This letter should provide justification for modification of the grant terms and clearly indicate the amounts and line items being modified. Modified budget detail and narrative pages should also be included. The TSO staff will review the request to insure that the requested modifications will not hinder the agency's ability to reach the objectives of the grant agreement.

Modification request to add new line items or expand line item definitions will need to explain what conditions have changed that require this modification compared to the time of the original grant award.

Modifications must be postmarked no later than June 30th to be considered.

***Project Amendment:** The increase or decrease of the overall grant budget.*

Project amendments are used when agencies are awarded a partial amount of funding allocated in the plan or when it is necessary to decrease the total grant award. Other reasons for amending the contract might include:

- removal of project activities, milestones, or performance indicators set forth in the approved application due to implementation issues.

Amendment Process

Amendments are approved in the same manner as the original agreement.

The agency will be advised as funding becomes available to award its' HSPF approved grant funding. The agency will be requested to provide a letter signed by either the Authorized Representative of the Subgrantee Agency or the Administrator of the Implementing Agency requesting the use of the available funding. The letter must be accompanied by modified application cover page in addition to the modified budget detail and narrative pages advising how the requested funds will be used. The amendment request will be reviewed by the HTSP staff to insure the funds are being distributed in accordance with the objectives of the grant purpose and that no funds are being identified for ineligible items. Should any changes be required the HTSP staff will contact the agency to discuss prior to adjusting the terms of the amendment as submitted. If both parties consent to the altering of the project, the funds will be obligated and processed through FDOT legal review for award execution.

Amendments to decrease project total with either be initiated by the awarded agency indicating the circumstances that no longer require the use of the total amount awarded or can be initiated by the Traffic Safety Office when there is a proven case of funding misuse. A letter must be accompanied by modified application cover page in addition to the modified budget detail and narrative pages advising which project line items are being reduced.

Amendments must be postmarked no later than June 30th to be considered.

Amendment Document

The HTSP will only use amendment documents approved by the FDOT legal division.

Amendment Filing

When the amendment is fully executed and filed with HTSP. HTSP will distribute it to all recipients of the original agreement. A copy of the amendment will be filed with a copy of the original agreement in the official financial file located at HTSP.

Chapter 4

Program and Project Administration

Contents:

Section 1 – Overview	5-2
Section 2 - Grant Management and Administration	5-3
Section 3 - Submitting Project Reimbursement Claims	5-5
Section 4 - PRC Review and Processing	5-6

Section 1 - Overview

Introduction

This chapter contains sections on a wide range of procedures, most of which are administrative in nature, for specific methods involved in the management of the HSGP.

Some of the sections contained in this chapter pertain to subgrantees, some only to project directors, and some to all involved in the HSGP. Sections 6 through 8 do not directly apply to subgrantees, although this information may be useful to subgrantees in considering the time necessary to complete the processes.

Thus, Project Reimbursement Claim (PRC) procedures are divided into two sections. Section 3 provides the procedures for subgrantee submittal, while Section 4 contains the PRC processing information.

Section 2 - Grant Management and Administration

Introduction

The HSGP employee responsible for the day-to-day oversight of a grant is the program coordinator. The program coordinator is responsible for tasks associated with project agreement preparation, execution, and/or administration. Failure to perform these tasks correctly can result in significant grant management and payment reimbursement problems.

Cost Eligibility

If a subgrantee begins work before the project agreement is fully executed, the subgrantee does so at its own cost. Costs incurred before the project agreement is signed by the FDOT are not eligible for reimbursement.

Costs incurred after the project agreement expires are not eligible for reimbursement.

Amendments and Modifications

If the cost, complexity, or scope of work authorized in the grant must be revised after the project agreement is signed, a written amendment must be executed to authorize the change. The program coordinator or the subgrantee must prepare the amendment. If additional tasks or costs are authorized in the amendment, the subgrantee must not begin work on the additional tasks or incur the additional costs until the amendment is fully executed.

With sufficient advance planning and ongoing monitoring by the project manager, subgrantees should have any amendments to a grant executed 60 days prior to the end of the grant. Only those amendments and modification requests post marked by June 30th will be accepted for review by the HSGP.

When an amendment is needed, sufficient time (a minimum of two weeks) should be allowed for proper review and execution.

Amendments and modifications must be signed by the parties who signed the original project agreement in accordance with HSGP procedures.

Other Grant Administration Tasks

Program coordinators will monitor the subgrantee's performance. Monitoring can be accomplished by on-site visits, telephone contact, or written reports. Monitoring reports must be kept in the file of record by the program coordinators. Keeping all files current will expedite PRC processing without unnecessary delays to within a minimum of two business days.

The program coordinator will *not*:

- impose any task upon the subgrantee or permit any substitute activity not specifically provided for in the project agreement
- give direction to the subgrantee or to employees of the subgrantee, except as provided in this document
- offer advice to the subgrantee that may adversely affect project performance, compromise the HSGP's rights, or provide the basis of a claim against HSGP that may affect any pending or future determination of fault or negligence
- authorize or agree to any change in the project agreement, standard provisions, certifications, project period, delivery schedule, maximum amount eligible for reimbursement, or other terms and conditions of the project agreement, unless such change is specifically authorized in the project agreement.
- promise or infer that a future agreement or extension of an agreement for another year is approved prior to HSGP approval.

Monitoring Schedule:

The continued coordination between subgrantees and the HTSP is imperative to program success and required by NHTSA. The following schedule outlines the minimum level of oversight a subgrantee should expect from the HTSP.

Within the first 30 days of Award:

Subgrantees will receive an award letter, a Traffic Safety Project Checklist and a link to a mandatory Computer Based Training (CBT).

- Subgrantees will be contacted by a HTS Program Manager, either in person or via telephone, to ensure receipt of grant agreement, Traffic Safety Checklist and CBT requirement, discuss expectations, report requirements, deadlines and questions or concerns thus far.
- Subgrantee files will be monitored to ensure receipt of:
 - a signed Traffic Safety Checklist
 - a passing CBT Certificate for Program Manager

if personnel is included in the subgrant agreement:

- a list of personnel approved to work under the subgrant agreement

if equipment with a unit cost of over \$1,000 is included in the subgrant agreement:

- a letter from the Administrative Agency head certifying that the equipment purchased will not be replacing any existing equipment.

Within the First and Second Quarter of the Federal Fiscal year:

- All subgrantee will receive, at least one (1) official on-site visit by the HTS Program Manager to allow a face to face discussion of program progress, to include but not limited to, an informal discussion on status of objectives and evaluation methods, problems, questions, etc. Review of quarterly report and claims.
- A financial audit will be scheduled for a date when expenditures have incurred and are available for detailed review; however, prior to the bulk of purchases to help prevent the unintentional incurrence of unallowable expenditures for reimbursement.

- Subgrantees files will be reviewed to ensure receipt of quarterly progress reports by January 30th. Only those subgrant agreements awarded prior to December 31st will require a quarterly report submission by January 30th
- Subgrantee files will be reviewed to ensure receipt of quarterly reimbursement claims, if expenditures were incurred.

if personnel is included in the subgrant agreement:

- the subgrantee files will be reviewed to ensure submission of monthly reimbursement claims for personnel cost incurred

Within the Third Quarter of the Federal Fiscal Year:

- At least one (1) Informal Telephonic or On-site Review to discuss goals, objectives and evaluation methods, review deadlines, discuss the need for budget modifications, answer questions, discuss goals for continuation of grant program, if applicable, etc. HTS program managers are responsible to identify the qualifying factors used to determine whether an informal vs. formal monitoring is required.

Informal Telephonic Review: Grants with small dollar thresholds, single contract grants, grants with no personnel costs, or continuation grants with no ongoing issues.

Formal On-site: Grants with large dollar amounts, personnel costs, overtime, problematic claim/report issues, or as required follow up from deficient on-site financial monitoring.

- Subgrantees files will be reviewed to ensure receipt of quarterly progress reports by January 30th and July 31st. Only those subgrant agreements awarded prior to December 31st will require a quarterly report submission by January 30th. Only those awarded prior to May 31st will require a quarterly report submission by April 30th.
- Subgrantee files will be reviewed to ensure receipt of quarterly reimbursement claims, if expenditures were incurred.

if personnel is included in the subgrant agreement:

- the subgrantee files will be reviewed to ensure submission of monthly reimbursement claims for personnel cost incurred

Within the Fourth Quarter of the Federal Fiscal Year:

- At the discretion of the HTS program manager, additional informal telephonic or formal on-site review may occur within the last quarter
- Subgrantees files will be reviewed to ensure receipt of quarterly progress reports by January 30th, April 30th and July 31st. Only those subgrant agreements awarded prior to December 31st will require a quarterly report submission by January 30th. Only those awarded prior to May 31st will require a quarterly report submission by April 30th.
- Subgrantee files will be reviewed to ensure receipt of quarterly reimbursement claims, if expenditures were incurred.

if personnel is included in the subgrant agreement:

- the subgrantee files will be reviewed to ensure submission of monthly reimbursement claims for personnel cost incurred

After the end of Grant Cycle:

- Subgrantees files will be reviewed to ensure receipt of quarterly progress reports by January 30th, April 30th, July 31st and October 31st.
- Subgrantee files will be reviewed to ensure receipt of the Final Narrative by October 31st.
- Subgrantee files will be reviewed to ensure receipt of the final quarterly reimbursement claim by October 31st.
- Subgrantee files will be reviewed to ensure receipt of a Certified Financial Audit, if the subgrantee expended over \$500,000 in federal funding within the fiscal year.

Section 3 - Submitting Project Reimbursement Claims (PRCs)

Introduction

Subgrantees and performing agencies use PRC to request reimbursement of project costs to the HSGP for costs incurred under the terms of project agreements . This section explains the requirements and procedures associated with the submission of a PRC.

Reimbursement Conditions

Reimbursement of costs under a traffic safety grant is contingent upon the following conditions:

-

- proof of actual costs having been incurred (that is, services provided, hours worked, etc.) in accordance with the approved project budget
- services and purchases having been received within the grant period.
- compliance with the cost principles established in the OMB circulars referenced in the project agreement.

Documentation

The HSGP requires the subgrantee to maintain complete documentation of claims in the form of source documents in support of amounts claimed, for a period of five years from the final audit of the project. Source documents include time sheets, invoices, and other original records of costs incurred.

The original source documentation need not accompany the request for payment, unless there is a demonstrated need for the requirement; however, source documentation should be photocopied and submitted with the PRC and original source documents will be checked not less than once per year during on-site monitoring reviews. The PRC must be completed appropriately and completely. PRC's submitted without source documentation will not be approved for payment.

Advances Prohibited

Advance payment will not be made before costs are incurred by the subgrantee.

Submission

Subgrantees submit reimbursement claims using all required and approved PRC forms.

Obtaining Claim Forms

The Project Reimbursement Claim forms and instructions are available on the HSGP web site. <http://www.dot.state.fl.us/safety/HighwaySafetyGrantProgram/hsgp/hsgpforms.shtm>

NOTE: Each subgrantee receives a copy of the Highway Safety Grant Program Project Management and Accounting Procedures Manual.

Section 4 – Project Reimbursement Claim Review and Processing

Introduction

The HSGP program coordinator reviews and verifies PRC's. After review and verification, the Finance Section (FS) of HSGP conducts a financial review of the PRC and, upon finding the PRC accurate and appropriate, submits the PRC for payment. This section explains PRC review and processing.

NOTE: It is imperative that the Highway Safety Grant Program (HSGP) assign a high priority to Project Reimbursement Claims in order for HSGP to make payments in a timely, professional manner.

Process Overview

1. PRC is received, reviewed, and approved by the program coordinator
2. Approved PRC is received, reviewed and approved by the Financial Section

(Review by the HSGP is not to exceed 30 calendar days beyond the receipt of a complete PRC. PRC's received without appropriate documentation or requiring further clarification are not considered complete until all issues have been resolved)

3. HSGP approved PRC's are forwarded to the FDOT Comptroller for payment processing

(FDOT Comptroller has 10 days to review and process payment of approved PRC's. If the FDOT comptroller has questions or needs additional documentation, the payment will be delayed until all issues are resolved.)

4. FDOT Comptroller forwards the complete and approved PRC to the Florida Department of Financial Services (DFS) for warrant execution or electronic funds transfer.

(DFS has 10 days to review PRC and release warrants or fund transfers)

Review

In reviewing the PRC, the program coordinator (program coordinator) will verify that:

- a HSGP Reimbursement Checklist form is completed
- all entries and attachments are correct
- each item is clearly identified.
- each item purchased is in accordance with the approved agreement.

The program coordinator must not approve a PRC unless copies of any required documentation have been submitted.

Once the program coordinator has approved the PRC, the Financial Section conducts a more thorough review of the cost, calculations, and verification of adequate documentation.

If the review reveals minor errors in addition or subtraction, the program coordinator or the financial section may make corrections to the PRC. Such corrections should only be made, however, *after* consulting with and obtaining concurrence from the person signing the PRC on behalf of the subgrantee or the designated financial representative. The person making the change should initial each correction and a copy with the changes returned to the subgrantee.

Any substantial errors detected by the program coordinator (or other reviewer) should either:

- be returned to the subgrantee for correction *or*
- the subgrantee should be notified that an appropriate adjustment should be made to the next PRC or the amended final PRC.

If an error is detected after the PRC has been processed, with the exception of the final PRC, the financial section will prepare a memo or letter (as appropriate) requesting the subgrantee to make an adjustment on the PRC.

If the final PRC has been processed and the final federal drawdown (closeout) has been completed, the subgrantee will be asked in writing and required to issue a refund check to HSGP if they were overpaid.

If underpaid, the subgrantee would be allowed to appeal in writing. If the appeal is approved, the subgrantee would submit a revised final PRC for payment. Only those PRCs submitted as a result of an amendment can be accepted after the October 31 PRC deadline.

NHTSA requires that the HGSP complete the final drawdown for each fiscal year by December 30th. Subgrantees are encouraged to monitor their reimbursements regularly to prevent last minute appeals. PRCs may not be reimbursed if the final federal drawdown has been performed.