

Connecticut Department of Transportation Highway Safety Office

Policy and Procedures Manual



May 2019

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Chapter I. Introductions

A. Background and Mission

The purpose of the Connecticut Highway Safety Office (HSO) Policy and Procedures Manual is to establish consistent program and project management procedures for staff to guide the administration of the State's highway safety program in compliance with the U.S. Department of Transportation (U.S.DOT), National Highway Traffic Safety Administration (NHTSA) regulations. Best practice requires that the HSO have a current Manual that documents standard operating procedures and the management of the traffic safety program. The Manual contains a written record of approved current administration and financial procedures. It serves as a guide to assist Connecticut HSO staff and administrators in performing their assigned functions.

The mission of the HSO is to prevent roadway fatalities and injuries as a result of crashes related to driver behavior. Under the Highway Safety Act of 1966 (U.S. 23 USC- Chapter4) the Governor is required to implement a highway safety program through a designated State agency suitably equipped and organized to carry out the program. An appointed Governor's Highway Safety Representative oversees the program and supporting Section 402 and 405 highway safety grant funds made available to the States to carry out their annual Highway Safety Plans. The Connecticut Highway Safety program is an extension of this Federal requirement. The primary objectives of the HSO are to plan, coordinate, and implement effective highway safety programs and to provide technical leadership, support and policy direction to highway safety partners.

B. Manual Update

The HSO reviews the contents of the Manual at least on an annual basis to ensure that the procedures remain current and accurate. Program and regulatory revisions received from the State and Federal sources will be made and distributed immediately upon receipt of notification. Revisions requiring immediate attention may be initiated at any time. As of May 2019, all staff members (see organizational chart page 5) will be advised that the electronic file will be located on the HSO share drive: <\\SDCDBS60\Groups\HWSafety>.

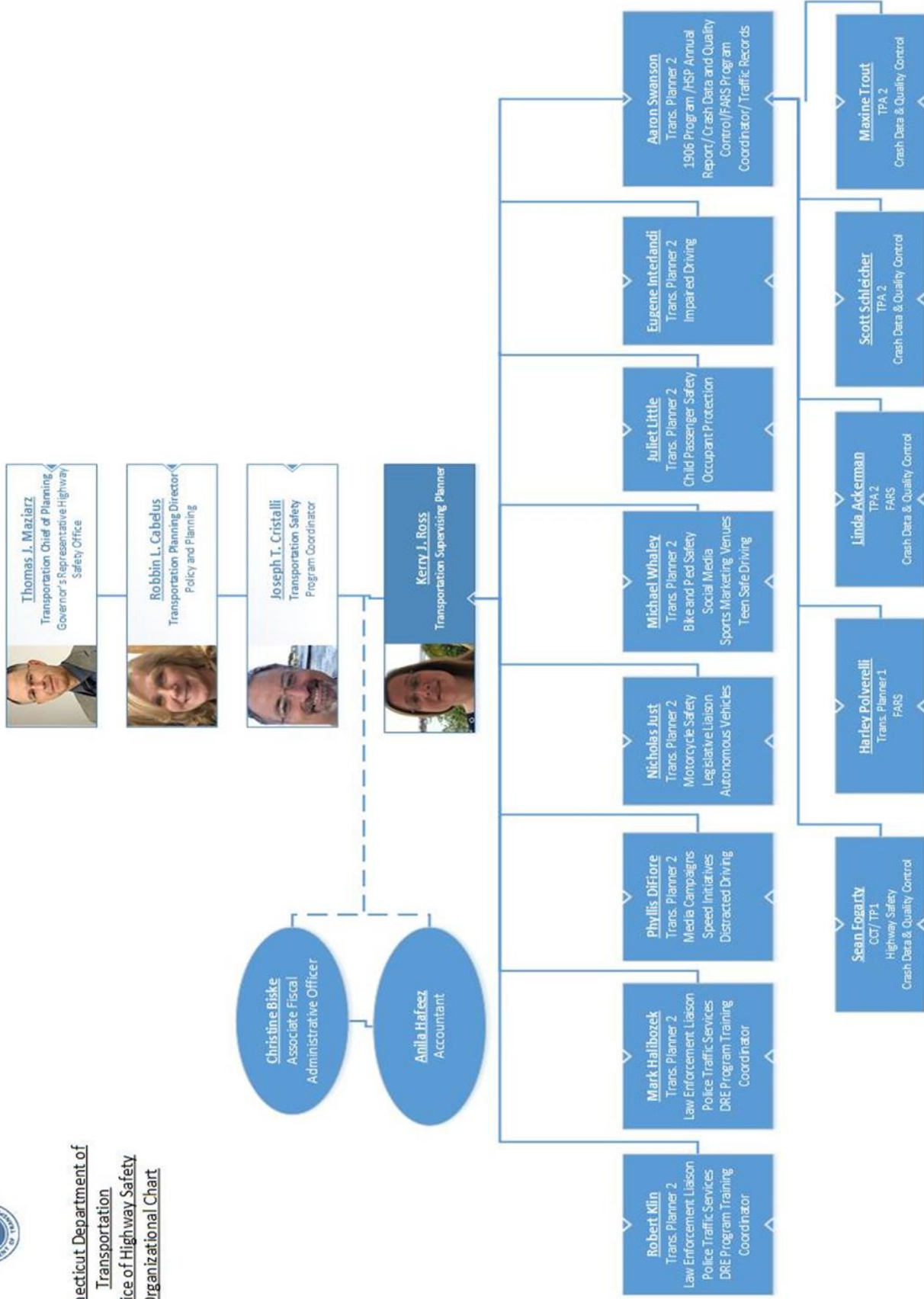
C. Reference to State Laws and Department Policy and Procedures

The U.S. Congress authorizes traffic safety funds to be appropriated to the U.S DOT, NHTSA. NHTSA apportions and distributed these funds to the States. NHTSA apportions and provides a limitation and obligations that indicates the amount of funds available for each State. The States liquidate these funds through the annual State Highway Safety Plan (HSP) which is subject to NHTSA review and approval. Federal regulations govern the daily administration of traffic safety grants at the State level. Administrators of traffic safety grants shall 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 **Highway Safety Act of 1966** states that the State traffic safety program operates under the provisions of the Federal Highway Safety Act of 1966, 23USC 402, etseq., specifically 402(b)(1). The corresponding regulation contained in the Code of Federal Regulations (CFR), 23 CFR Part 1200.10-15 requires the State's Highway Safety Plan (HSP) to have certain features before it is approved. These features are contained in a number of Federal regulations and guidelines (See Resource A. Federal Regulations, Documents and Guidelines). The Federal Highway Safety Act of 1966 makes the State's Governor responsible for preparing and administering a statewide traffic safety program designed to reduce traffic crashes and the resulting injuries, fatalities and property damage. The Governor has named the HSO of the Connecticut Department of Transportation (CTDOT) to act as his or her representative for the State's traffic safety program. The HSO is located within the Bureau of Policy and Planning of the CTDOT.



**Connecticut Department of
Transportation
Office of Highway Safety
Organizational Chart**



The **OMB Uniform Guidance for FY 2016 Grants** is effective with all FY2016 grants, the U.S. Department of Transportation adopted

the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200), referred to as the Uniform Guidance. This part supersedes and repeals the requirements of the DOT Common Rules (49 CFR part 18-Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments and 49 CFR part 19-Uniform Administrative Requirements-Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations), except that grants and cooperative agreements executed prior to December 26, 2014, shall continue to be subject to 49 CFR parts 18 and 19 as in effect on the date of such grants or agreements.

Other Applicable Office of Management and Budget Circulars include, beginning with the FY2016 highway safety grants, the Federal regulations at 2 CFR Parts 200 and 1201 supersede requirements from OMB Circulars A-21, A-50, A87, A-89, A-102, A-110, A-122 and A-133. NHTSA grantees are responsible for following all standards in 2 CFR Part 200 as modified by 2 CFR Part 1202 (See Appendix B. OMB Circulars).

Chapter II. Planning

A. Overview and Eligible Fund Uses

Each Federal fiscal year (October 1 – September 30), The HSO develops a Highway Safety Plan (HSP) to qualify for Federal highway safety funding. The HSP is prepared and submitted by the HSO Transportation Principal Safety Program Coordinator to the Director of Policy and Planning and staff for review and comment. Upon approval, the HSP is forwarded to NHTSA Region 2 Office on or before July 1st. The NHTSA Region 2 Office (the region in which the HSO is assigned) has access to the plan from the email site as does the Federal Highway Administration (FHWA). NHTSA must approve or disapprove the HSP within 45 days after receipt.

At the beginning of the HSP development process, the HSO considers a number of factors for determining project priorities, with an emphasis areas including:

- Federal legislation and regulation
- State statutes
- Federal and national priorities and goals
- State and local problems

Additionally, the actions and activities of Federal and State legislative bodies, community-based organizations, local and national interest groups, State and local traffic safety related non-profit organizations, and local governments are considered. Projects may be proposed by members of these organizations, directly or indirectly. The goal is to ensure that all projects in the HSP are data-driven by Federal law.

B. Highway Safety Plan Development Process and Calendar

The HSP is required by U.S. DOT, NHTSA regulations. The federal regulations outline the required contents of the HSP: planning process, performance plan, strategies and projects, performance report, program cost summary, certifications and assurances, and Section 405 grant application.

The HSP describes the processes used to identify the State's traffic safety problems, establish performance measures and propose the projects and activities that Connecticut plans to implement to reach its performance targets. Performance measures for each target track progress from a baseline toward meeting the target by the specified date.

The HSP development process consists of a number of stages:

- Problem identification
- Planning to select and prioritize targets and countermeasure strategies
- Identification of performance measures
- Participation from traffic safety related partners
- Development of funding priorities, the Program Cost Summary and list of projects
- Implementation

The HSP is developed through discussions and meetings coordinated by HSO staff. The initial planning meetings, which are attended by HSO staff only, allow for the review of comments provided by Federal, State and local partners on prior year activities, the assignment of staff to draft the HSP program areas, the development of an initial budget, and the production of rough drafts for each program area. Once an initial HSP draft is produced, the development meetings are expanded to include other HSO traffic safety partners who provide input on potential strategies. Regional NHTSA and divisional FHWA representatives are invited to meet with the HSO during the planning process to comment on and make recommendations early in the planning process.

The following table illustrates the twelve-month planning calendar for the HSO planning and programming process.

Table 1. Planning and Programming Process Calendar

Month	Activity
January	Debrief the staff on previous year program results and review the NHTSA Region 2 Office Priority Letter to help set State goals. Conduct problem identification process including review of prior year State traffic crash data and other related data sources.
February	Request information from partner agencies and stakeholders to review previous year statistics and upcoming challenges. Work to identify partner priorities, program area direction, potential strategies and overall direction of the traffic safety program. Review the response to the previous year’s Annual Report and the prior year’s HSP approval letter, program assessment recommendations, and Management Review recommendations.
March	Program Managers review data to set priority areas, specific goals, strategies and quantifiable statewide safety performance targets within each program area. Coordinate same with the SHSP. Set NHTSA/GHSA performance measures.
April	Review partner input, receive data analysis from HSO data contractor. Complete problem ID, review performance measures and begin setting performance goals and objectives based on proposed/planned tasks and activities.
May	Finalize performance goals and objectives and plan countermeasures based on partner input and planned NHTSA mobilization schedules. Countermeasures include activities outlined in proposed tasks/projects. Prioritize and plan projects based on anticipated project funding levels and carry-forward funds.
June	Finish the draft HSP and obtain Certifications Statement signature from the Governor’s Highway Safety Representative. Draft the Section 405 applications. Submit the HSP to NHTSA Region 2 prior to June 15 for review/comment.

July	Submit final HSP to NHTSA prior to July 1. Prepare Single Point of Contact (SPOC) for review of HSP by the state Clearinghouse committee.
August	Respond to any requests for information reference the HSP from the Regional Office. Conduct on-site monitoring visits with sub-recipients.
September	
October	Implement HSP.
November	Begin preparation of Annual Evaluation Report for previous fiscal year.
December	Submit Annual Evaluation Report to NHTSA Region 2 Office by December 31. Grants Tracking System (GTS) grant year closeout.

**Funds are obligated in GTS once released by NHTSA.

C. Coordination with State Strategic Highway Safety Plan

The HSO coordinates closely with the State staff responsible for development of the SHSP to maximize integration and utilization of data analysis resources, fully represent driver behavior issues and strategies, and tap into statewide safety committees to obtain input from State and local traffic safety partners for the HSO HSP. The HSO ensures that the targets, performance measures and objectives contained in the SHSP are consistent with the annual development of the HSP and incorporated to the fullest extent possible. The HSO reviews the SHSP and HSP to identify any gaps in addressing driver behavior issues and eliminate any redundancy to ensure maximum use of resources.

Connecticut includes in the HSP a description of the efforts made by the State to coordinate the HSP, and the outcomes of the coordination, data collection and information systems with the State SHSP.

D. Identification of State and Local Problems (Data Analysis Procedures)

The HSP includes a description of the data sources and processes used by Connecticut to identify its highway safety problems and identifies the participants involved (committees, stakeholders, constituent groups, etc.). The information and all data sources utilized in these processes are listed. The Core required performance measures are examined as part of this initial problem identification process (see Sections E. and F. for additional information).

The purpose of the HSP problem identification process is to:

- Understand the scope of Connecticut’s traffic crash problem and causation factors.
- Develop effective countermeasures to reduce or eliminate the problems.
- Design evaluation mechanisms to measure changes in problem severity.
- Manage influencing factors by using statistical crash data to highlight a particular problem in order to obtain the necessary support for instituting an effective countermeasure.

The problem identification process used by the HSO includes analysis of traffic safety data from established statewide sources. The process is completed by the Program Managers and the HSO data analyst in the late winter/spring of each year. The statistics analyzed are historical data collected over time through a uniform process. These statistics and sources may include the:

- Connecticut Transportation Safety Research Center at the University of Connecticut Crash Data Repository — State traffic crash database - crash, vehicle, and person data.

- Connecticut Department of Transportation (CTDOT) — Data on average daily traffic counts and vehicle miles traveled
- NHTSA — Federal Fatality Analysis Reporting System (FARS) and DESPP
- Department of Motor Vehicles (DMV) — Vehicle and Driver Information - the State’s driver license, vehicle registration, and citation/conviction files
- Observational Seat Belt Use Surveys
- Connecticut Justice Information System (CJIS) Citation Data
- Strategic Highway Safety Plan (SHSP)
- DUI Tracking System

The results of this problem identification process assist the staff in establishing the statewide priority areas on which HSO focuses its traffic safety efforts.

E. Key Program Areas, Targets, and Strategies

Using the data and information gathered through the problem identification process, HSO then selects key program areas for emphasis and coordinates the development of priority traffic safety performance targets, performance measures and strategies for each program area using a planning process documented in the HSP.

i. Description of Target Setting Processes

The HSO HSP includes a brief description of the processes used by Connecticut to define its highway safety targets and develop projects and activities to address its problems and achieve its targets. The description of the process is required to be thorough and complete. In describing these processes, the HSO lists the information and identifies all data sources consulted. The HSO process for setting targets is based on data trends and a resource allocation assessment. The HSP identifies all participants, agencies and organizations involved in the process and the manner in which they were involved.

ii. Performance Measures

The performance plan included in the HSO HSP sets a target for each performance measure using State and FARS data (as required under 23 CFR Part 1200.11). A baseline is established for each and progress is tracked to determine Connecticut’s success in achieving its safety goals. Performance measures are reviewed and updated each year, as necessary.

iii. Core Performance Measures

The HSO HSP includes the following core NHTSA/GHSA performance measures and targets that address both roadway user outcomes and behaviors and law enforcement activities, as required under federal statute:

OUTCOME AND BEHAVIOR MEASURES

1. Fatalities (actual-FARS)
2. Number of serious injuries (State crash file)
3. Fatality rate per 100M VMT (FARS, FHWA)

4. Number of unrestrained passenger vehicle occupant fatalities, all seating positions (FARS)
5. Number of fatalities involving driver or motorcycle operator with .08 BAC or above (FARS)
6. Number of speeding-related fatalities (FARS)
7. Number of motorcyclist fatalities (FARS)
8. Number of un-helmeted motorcyclist fatalities (FARS)
9. Number of drivers age 20 or younger involved in fatal crashes (FARS)
10. Number of pedestrian fatalities (FARS)
11. Number of bicycle fatalities (FARS)
12. Percent observed belt use for passenger vehicles – front seat outboard occupants (Connecticut survey)

ACTIVITY MEASURES

13. Number of seat belt citations issued during grant-funded enforcement activities (grant activity reports)
14. Number of impaired driving citations issued and arrests made during grant-funded enforcement activities (grant activity reports)
15. Number of speeding citations issued and arrests made during grant-funded enforcement activities (grant activity reports)

Performance measures (and corresponding performance targets) are developed for each program area that receives HSO funding. For programs that HSO funds outside the Core measures, the HSP includes performance measures as well as documentation of current safety levels, quantifiable annual performance targets, and justification for each performance target that explains why the target is appropriate and data-driven.

The performance measures common to Connecticut’s HSP and the State Highway Safety Improvement Program (HSIP) (fatalities, fatality rate and serious injuries) are defined identically, as coordinated through Connecticut’s SHSP. The State’s annual targets support the longer-range SHSP targets.

F. Section 405 Application Information

Although the Highway Safety Plan and the Section 405 applications are considered a consolidated application, the Connecticut HSO prepares these as separate documents. For the 405 application, Connecticut is required to provide specific information that varies depending on the National Priority Safety Program incentive grant(s) for which Connecticut wishes to receive funding consideration.

G. Performance Report

Within the HSP, the HSO is required to provide a program-area level report on Connecticut’s success in meeting its performance targets that were identified in the previous fiscal year’s HSP. NHTSA has provided and Connecticut has chosen to use a suggested template for reporting this information.

This is NOT the same level of information that Connecticut is required to provide in the comprehensive Annual Report (AR) under 23 CFR 1200.33. This is a much briefer status report focusing mainly on the prior year’s results for the State’s Core performance measures

H. Funding and the Program Cost Summary - HSP Appendix B

The HSO Transportation Principal Safety Program Coordinator is responsible for annually allocating the estimated amount of revenue by program area for the HSP budget based on the information gathered in the problem identification, performance target and strategy processes to ensure the greatest potential impact on the State's overall goal of reducing traffic safety related crashes, deaths and injuries. The process for making the budget allocation decision is documented in the HSP. The tasks and related costs for Planning and Administration (P&A) are required to be included in a P&A program area within the HSP.

The Program Cost Summary Form (HS 217) or its electronic equivalent is required annually. The Summary provides Connecticut's proposed allocations of funds (including carry-forward funds) by program area based on the targets and activities identified in the HSP and the projects and activities. The funding level used is an estimate of available funding for the upcoming fiscal year.

Within 30 days of any reallocation of funds between program areas or changes to the HSP, the HSO must complete and submit Federal form HS-217 and an updated list of projects under each program area to the NHTSA Region 2 Office for review and approval (per 23 CFR Part 1200.32).

Prior to and as a condition of reimbursement, the project list is also required to be updated to include identifying project numbers for each project on the list. (This may also be necessary if the project numbers are not available at the time the HSP is submitted to NHTSA for approval.)

List of Projects

Under federal statute, the HSO is required to include a list of projects for each program area and an estimate of Federal funds needed for each project Connecticut proposes to conduct for the upcoming fiscal year to meet the identified performance targets. All projects identified on the list are described in the HSP. HSO reports at the project level in the Grant Tracking System (GTS), which satisfies the requirements of 23 CFR 1200.11, 1200.15, 1200.32 and 1200.33

I. Benefit to Locals

Connecticut is required to ensure that at least 40 percent of all (new) Federal funds apportioned under Section 402 for any fiscal year are expended by the political (local) subdivisions of the State in carrying out local highway safety programs.

When sub-grantees are directed to Connecticut state agencies and local benefit is claimed, the HSO is responsible for ensuring that local benefit source documentation is readily available on site, including evidence of an active local voice in the initiation, development and implementation of the programs. There are exceptions for a political subdivision that has not had an active voice but agrees in advance of implementation to accept or requests the benefits of the program. Evidence of the acceptance or request must be established in writing and maintained on file until all such funds are expended.

In the event the salary and benefits of a State employee are used to meet the 40 percent requirement, HSO must have documentation in place before any work is carried out stating that the local government consented and accepted the work of the State employee on its behalf.

With regard to State expenditures such as Connecticut State Police enforcement or statewide paid media, the Connecticut HSO may designate such expenditures as benefiting local government to meet the 40 percent requirement. The HSO may credit such expenditures only where the political subdivision has had either an active voice or agreed in advance of implementation to accept the benefits of the program. The active voice or pre-agreement must be documented annually in writing from the local government.

Section 154 and 164 transfer funds obligated and spent on alcohol-impaired driving countermeasures (not hazard elimination) or directed to State and local law enforcement agencies for the enforcement of impaired driving laws or regulations (154AL and 164AL) take on the characteristics and requirements of the Section 402 program. No matching funds are required for these transfer funds; per Section 154 (c) (4) and Section 164 (b) (4), the Federal share of the project cost must be 100 percent. However, at least 40 percent of the annual 154AL and 164AL funds must be used by or for the benefit of political (local) subdivisions of the State of Connecticut.

J. Transfer Funds

In addition to the Section 402 funds, Connecticut may be eligible to receive funds from other Federal transfer program sources.

An annual determination is made by the U.S. DOT FHWA regarding Connecticut's inability to enact or enforce specified State traffic safety laws or policies to address a program area as prescribed by the U.S. Congress in the current reauthorization. Information regarding Connecticut's laws and policies is requested by the U.S. DOT to determine the State's eligibility. The State is notified annually through a letter to the Connecticut Department of Transportation (CTDOT) and the Secretary for the Department of Safety and Homeland Security (Governor's Highway Safety Representative) from the U.S. Secretary of Transportation of any transfers of funds assessed against the State under a particular section. CTDOT and the HSO Program Coordinator determine the expenditure of certain transfer funds and notify the U.S. DOT accordingly by letter, known as the "spilt letter," no later than 60 days after the funds have been transferred. Funds that are committed for the expenditure of State DOT projects are the primary responsibility of that agency.

The Federal P&A share may not exceed 50 percent of total P&A costs. Beginning with FY2014, up to 15 percent of the new Section 154 or 164 funds may be designated for P&A purposes. However such funds may only be expended for P&A activities that support alcohol-impaired driving projects funded by Section 154 or 164 funds (see [Appendix F to 23 CFR Part 1200 P&A Costs](#)).

The HSO and NHTSA are responsible for the oversight of transfer funds transferred to NHTSA's Section 402 program for alcohol-impaired driving programs under MAP-21. State DOT and FHWA are responsible for the oversight of funds released for HSIP eligible activities under MAP-21. All alcohol-impaired driving funds and Hazard Elimination funds transferred to the Section 402 program under SAFETEA-LU remain the responsibility of the HSO and NHTSA.

For behavior related activities, the use of Section 154 and 164 funds is limited to supporting alcohol impaired driving projects and may not be used to support drug-impairment related projects. These funds may be used for paid media to support alcohol-impaired driving countermeasures or for purchase of equipment and training of officers for enforcement of DUI-related laws. Connecticut may not use penalty transfer funds for general law enforcement, training or equipment purchases.

K. Advertising

The Uniform Guidelines for the Section 402 program provide that "the State should enlist the support of a variety of media, including mass media, to improve public awareness and knowledge and to support enforcement efforts about seat belts, air bags, and child safety seats."

The limited purchase of media time or space (television and radio ads, ads for social media, banners and posters) for traffic safety grant-funded PI&E campaigns to reach a large audience is permitted and must be specifically approved by the HSO and be included in the HSO Highway Safety Plan (HSP). Examples of allowable advertising materials are provided in the NHTSA Memorandum.

Subrecipients that obtain grant funds to support paid advertising are subject to the same requirements as the HSO and must provide the required Federal reporting information in their progress reports to the HSO. See Chapter II. Planning, Section O. Advertising, for guidance on the specific Federal requirements pertaining to paid advertising.

Federal funds are to be used only for certain specified **advertising** and **public relations** costs. See 2 C.F.R. § 200.421. The only allowable **advertising** costs are for:

- Recruitment of personnel required for performance of a Federal award;
- Procurement of goods and services for the performance of a Federal award;
- Disposal of scrap or surplus materials acquired in the performance of a Federal award except when reimbursed for disposal costs at a predetermined amount; or
- Program outreach and other specific purposes necessary to meet the requirements of the award.

The only allowable **public relations** costs are for:

- Costs specifically required for the Federal award;
- Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the Federal award; or
- Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.

The Uniform Guidance *excludes* all other advertising and public relations costs, and *specifically excludes* “costs of **promotional items** and **memorabilia**, including models, gifts, and souvenirs”. See [2 CFR Part 200.421\(e\)\(3\)](#). Federal grant funds are *never* available to cover the costs of **promotional items** and **memorabilia**. The Uniform Guidance has other provisions that may apply to certain items that fall with the above categories. Certain educational items may be subject to the provision on [Conference Costs. Subpart E](#) on Cost Principles of the Uniform Guidance should be consulted to determine if there are any additional provisions that pertain to a particular item or use of that item.

Sports Marketing

When considering communications, public information and paid media expenditures that involve attendance at sporting and entertainment events that charge admission, specific tests must be applied in order to ensure compliance, see [2 CFR Part 200.438](#). This section states that such costs (i.e. tickets to shows or sports events) are unallowable. The tests that should be applied and additional useful guidance has been provided in the NHTSA Guidelines for Sports Marketing January 22, 2011 which is posted on the GHSA web site in the Members Only section. The HSO must also determine whether any State or local regulations concerning the purchase and acceptance of tickets to entertainment-related events may apply.

L. Certifications and Assurances – HSP Appendix A

Each fiscal year the HSO signs and submits with its HSP Certifications and Assurances indicating that the State is in compliance with all applicable Federal statutes, regulations, and directives in effect during the period for which it is receiving grant funds. The statement provides assurances that Connecticut will comply not only with applicable laws and regulations, but also financial and programmatic requirements and the special funding conditions of the programs. This document, which NHTSA provides in electronic format, must be signed by Connecticut’s Governor’s Highway Safety

Representative, may not be changed in anyway and must be submitted bearing the original signature (an electronic signature is not acceptable). (The NHTSA Region 2 Office should be consulted annually to ensure that the HSO is using the most current version of these documents.)

Sub-recipient Certifications and Assurances: HSO staff ensures that every sub-recipient signs the appropriate Certifications and Assurances as well as requires that every sub-grantee and contract (i.e., purchase orders) include any clauses required by Federal statute and Executive Order and their implementing regulations. HSO staff also ensures that sub-recipients and contractors are aware of the requirements imposed upon them (See [2 CFR Part 200.331\(a\)\(2\)](#)). Federal statute requires that sub-recipients comply with the following certifications and assurances:

- Non-discrimination
- Buy America Act
- Political Activity (Hatch Act)
- Certification Regarding Federal Lobbying
- Restriction on State Lobbying
- Certification Regarding Debarment and Suspension

M. Three Years Plus One Federal Obligation Restriction

Section 402 and Section 405 grant funds are authorized for apportionment or allocation each fiscal year. Connecticut, to the fullest extent possible, expends these funds during the fiscal year and takes this into account when developing the annual HSP funding plan. Grant funds are available for expenditure for three years after the last day of the fiscal year of apportionment or allocation, referred to as “three years plus one”. NHTSA is required to notify the HSO of unexpended grant funds subject to this requirement no later than 180 days before the end of the period of availability. The HSO may then commit the unexpended grant funds to a specific project before the end of the period of availability. These funds must be expended before the end of the succeeding fiscal year and only on that project. At the end of that time period, unexpended grant funds lapse and NHTSA will de-obligate unexpended balances (see 23 CFR Part 1200.41).

N. Fund Liquidation

The HSO promptly obligates and expends Federal highway safety grant funds and tracks fund liquidation including transfer and incentive funds by funding year and source. The oldest funds are expended first whenever possible. The HSO Program Coordinator is responsible for periodically examining the current liquidation of each funding source by year. This examination includes a prompt review of the GTS (Grant Tracking System) Grant Fund Balances Report (#7) and other reports and reconciliation of all categories with HSO records. The HSO will monitor closely the spending rates of all sub-recipients and make periodic projections to ensure the prompt start of projects and determine if there are impediments to full expenditure of funds by the project end. The HSO will de-obligate unspent funds in a timely manner to allow carryover into the next fiscal year.

O. Delegation of Authority

The following table lists signature authority for the HSO traffic safety grant program.

Table 2. Delegation of Signature Authority

Document	Approval Authority
Certifications and Assurances of the Highway Safety Plan Appendix A	<i>Governor’s Highway Safety Representative</i>
Federal Cooperative Agreements	<i>HSO Director/Transportation Principal Safety Program Coordinator</i>
National Highway Traffic Safety Administration	<i>HSO Director/ Transportation Principal Safety</i>

Agreements	Program Coordinator
Federal Grant Applications	HSO Director and/or Governor's Highway Safety Representative/ Transportation Principal Safety Program Coordinator
Internal HSO Planning and Administration, and Program Management grants	HSO Director/ Transportation Principal Safety Program Coordinator/ Project Manager/Fiscal Administration
Traffic Safety Program Grant Agreements and Amendments (any amount)	HSO Director/Transportation Principal Safety Program Coordinator/ Project Manager/Fiscal Administration
State Vouchers for Federal Reimbursement	CTDOT Fiscal Administration
Requests to NHTSA to purchase equipment (\$5,000 or more) with Federal funds	HSO Director/ Transportation Principal Safety Program Coordinator

In the absence of the Governor's Highway Safety Representative, HSO signature authority is delegated to the following individuals in the order noted:

- HSO Director/Transportation Principal Safety Program Coordinator
- HSO Deputy Director/Supervising Transportation Planner
- Program Manager/Transportation Planner II

The NHTSA Region 2 Office must be notified in writing of the name and type of authorization and provided the signature of each person currently assigned signature authority on behalf of the HSO. Whenever a temporary or permanent change occurs in the authorization assignment or the person assigned to the named authorized position, the NHTSA Region 2 Office must immediately be notified in writing and provided the new information.

P. Federal Spending Transparency

The HSO is required to report certain information to NHTSA as mandated in the Federal Funding Accountability and Transparency Act (FFATA) and subsequent Office of Management and Budget (OMB) guidance. This information is then made available to the public at the www.USAspending.gov web site. This includes any Federal grants of \$25,000 or higher that the HSO awarded on or after October 1, 2010. The FFATA Sub-recipient Reporting System (FSRS) is the reporting tool the HSO uses to capture and report sub-award data and/or sub-recipient executive compensation data (see www.fsr.gov).

The HSO must:

- Obtain a DUNS number from Dun & Bradstreet at <http://fedgov.dnb.com/webform> or call (866) 705-5711;
- Register in the System for Award Management (SAM) (www.SAM.gov); and
- Register in FSRS.

Sub-recipients must obtain a DUNS number from Dun and Bradstreet. Sub-recipients are not required to be registered in SAM, however if they do register, the information will transfer to and pre-populate the FSRS web site.

For each sub-award, the following must be entered into the FSRS web site:

- Sub-award amount
- Date of the award (date the grant agreement is signed)
- Project description (grant title)
- Primary place of performance

- Sub-award number
- Executive Compensation

For the system to work properly the correct DUNS numbers must be used and the HSO must be actively registered in SAM. Following entry of information into the FSRS website, a copy of the final report should be saved and one copy printed. The printed copy should be placed in the appropriate spending file and an electronic copy forwarded to the central Fiscal office.

Q. Buy America Act

One of the required certifications and assurance the HSO and its sub-recipients must comply with is the Buy America Act (23 U.S.C. Section 313). The Act prohibits States from using highway grant funds under 23 U.S.C. Chapter 4 to purchase products unless they are produced in the United States (U.S.). The prohibition applies to steel, iron and all manufactured products unless a waiver has been requested from the Secretary of Transportation. The Secretary may waive the requirement if it would be inconsistent with the public interest, the products are not produced in the U.S. in sufficient and reasonably available quantities and of satisfactory quality, or use of the products produced in the U.S. would increase the overall cost by more than 25 percent.

NHTSA has determined that for compliance purposes “American-made” covers any product that is manufactured or assembled in the U.S. This requirement applies to all items purchased with Federal funds including office supplies. There are no waivers for classes of items. The waiver process generally takes 60 days. The waiver determination will state if the waiver applies only to the requestor or to others wishing to purchase the same item. The duration of the waiver is published in the Federal Register and takes effect at the time of publication.

A public interest waiver issued by NHTSA became effective July 30, 2015. The waiver allows Connecticut to purchase any manufactured product with a purchase price of \$5,000 or less, excluding a motor vehicle defined in 49 USC 30102(a)(6), when the product is purchased using Federal grant funds administered under Chapter 4 of Title 23 of the U.S. Code. The purchase of foreign-made cars, motorcycles, trailers and other similar conveyances may be made only with a waiver regardless of price. Effective July 30, 2015, any pending waiver requests for an item with a purchase price of \$5,000 or less were no longer necessary.

Chapter III. Grant Selection and Execution

A. General Regulations Governing Highway Safety Projects

PURPOSE

To provide potential Highway Safety Funding recipients with a comprehensive listing of regulations governing the administration of an approved highway safety project.

GENERAL REGULATIONS

1. The grant shall be administered by a governmental agency, either local or state, having authority and responsibility to conduct the project.
2. Grant expenditures must meet the following criteria:
 - A. **Supplement** rather than replace existing activities.
 - B. Be necessary and reasonable, and supported in the budget narrative.
 - C. Be eligible expenses under federal, state and local laws/regulations.

- D. Conform to the USDOT Final Rule 23CFR Part 1300.
 - E. Be accorded consistent treatment through the application of generally accepted accounting principles.
 - F. Not be included as a cost of any other federally financed program.
 - G. Be net of all applicable credits.
 - H. Incur within an approved grant period.
 - I. Be adequately supported by source documentation.
 - J. Not result in a profit to the grantee.
 - K. Be data driven and performance based.
3. All state agencies must have state budget authority to accept highway safety funds.
 4. Only expenses contained within an approved grant budget may be claimed. Any deviations from the approved budget must have **prior** Highway Safety Office (HSO) approval to be eligible for reimbursement. Back-up documentation (i.e. fully executed time distribution report) and proof of payment (i.e. cancelled checks) must accompany request for reimbursement.
 5. All source documentation for incurred costs must be maintained for review purposes for a three year period following the final reimbursement of the project.
 6. All travel costs outside the state, extensive in-state trips, and conference registrations shall have **prior** written approval from the HSO Program Coordinator.
 7. All agencies shall use purchasing practices and bid procedures that provide maximum open and free competition. In addition, positive efforts should be in effect to utilize small business and minority-owned business sources of supplies and services. The Minority Business Enterprise requirements of Title 49 Code of Federal Regulations (CFR) Part 23 apply to this project.
 8. The APPLICANT shall comply with the regulations of the United States Department of Transportation (Title 49, CFR, Part 21), issued in implementation of Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 United States Code 2000d to 2000d-4. Further, the APPLICANT agrees and warrants that in the performance of this project, it will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religion, national origin, sex, sexual orientation, or physical disability, including but not limited to blindness, unless it is shown to be that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States, or the State of Connecticut, and further agrees to provide the Commission on Human Rights and Opportunities with such information requested by the Commission concerning the employment practices and procedures of the APPLICANT as related to the provisions of this section. (Section 4-114a and 4a-60a of the Connecticut General Statutes, as revised.)
 9. Purchases must be in accordance with normal state and/or agency and/or town procedures. Purchases must also be in accordance with the requirements set forth in the Procurement Standards (based on "OMB Circular A-102, Attachment O"), available upon request. Conformance with the "Buy America Act" (23 U.S.C. 101 Note and 41 U.S.C. 10a) is required.
 10. It is a requirement that all applicants comply with the "Drug Free Workplace Act of 1988" (Title 49 CFR Part 29 Subpart F).
 11. The Highway Safety Office **MUST** be notified (in writing) within thirty (30) days of the receipt of any equipment. Information provided shall consist of: name, model, serial number, cost, date of delivery taken, and a brief description of each article purchased. After the expiration date of this

project, all non-expendable equipment purchased under this project will continue to be used in a Highway Safety-related effort. The APPLICANT shall notify the Highway Safety Office immediately if any equipment purchased under this project ceases to be used in the manner set forth in this project application. In such event, the APPLICANT agrees to refund the residual value of such equipment in an amount to be determined by the Highway Safety Office, or to transfer or otherwise dispose of such equipment as directed by the Highway Safety Office. NO EQUIPMENT WILL BE CONVEYED, SOLD, SALVAGED, TRANSFERRED, OR OTHERWISE BE USED OTHER THAN EXPRESSLY DETAILED IN THIS APPLICATION WITHOUT THE EXPRESS WRITTEN APPROVAL OF THE HIGHWAY SAFETY OFFICE.

12. The APPLICANT shall maintain or cause to be maintained for its useful life, any equipment purchased under this project. Standard procedures governing the ownership, use, and disposition of equipment acquired under this project are covered in the Property Management Standards (based on "OMB Circular A-102, Attachment N").
13. Any contracts entered into as part of a project's performance must receive written approval PRIOR to contract award.
14. Should the APPLICANT agency be audited, and the responsible unit, department, etc. of the grant be included as part of such audit, a copy of that applicable section [of said audit] must be forwarded to the Highway Safety Office.

MONITORING REVIEWS

HSO may conduct a monitoring review of your highway safety project. The purpose of this review is to determine adherence to stated project objectives, to review financial procedures, and to ensure compliance with federal regulations.

COST REIMBURSEMENT

1. Highway safety projects are funded on a cost reimbursement concept. An agency expends its own funds and then proceeds to claim reimbursement for the federal share of incurred project costs.
2. It is the responsibility of the **project director** to ensure that reimbursement requests are submitted on a timely basis.
3. ALL FINAL CLAIMS against this project, together with all supporting financial documentation, MUST be submitted to the Connecticut Highway Safety Office no later than thirty (30) days after the funding period ending date.

COST DOCUMENTATION

The accounting system and cost documentation presently in use by an agency is generally adequate for project purposes. If modification is necessary, HSO will notify you and assistance will be provided.

PROJECT TERMINATION

A project **may** be terminated if HSO concludes that the grantee is not in compliance with the conditions or provisions of a grant. HSO will extend an opportunity for the grantee to demonstrate compliance. Notification of termination will be in writing.

B. Sub-recipient Award Procedures

In alignment with the problem identification, performance targets and key strategies identified in the annual HSP, the HSO employs the following separate and distinct strategies to determine which sub-recipients will receive federal highway safety funds to improve traffic safety in Connecticut:

Strategy 1. HSO identifies appropriate law enforcement agencies to conduct priority area specific overtime enforcement based on problem identification and crash location.

Strategy 2. HSO accepts project proposals and awards grants to fund projects designed to reduce the number of deaths and serious injuries resulting from traffic crashes.

Strategy 3. HSO serves as the sub-recipient and manages a variety of projects designed to improve traffic safety statewide.

C. Pre-Award Risk Assessment

The HSO is required by federal mandate to evaluate and document the risk for each sub-recipient (not contractors) receiving federal funds prior to making the grant award. The HSO, as a pass-through entity, is required to evaluate each sub-recipient's risk of noncompliance with Federal statutes, regulations and the terms and conditions of the sub award for purposes of determining the appropriate level of monitoring. The HSO risk assessment HSO focuses on the four factors listed in [2 CFR Part 200.331\(b\)](#):

1. The sub-recipient's prior experience with the same or similar sub awards;
2. The results of previous audits including whether or not the sub-recipient receives a Single Audit in accordance with Subpart F—Audit Requirements of Part 200.331(b), and the extent to which the same or similar sub award has been audited as a major program;
3. Whether the sub-recipient has new personnel or new or substantially changed systems; and
4. The extent and results of Federal awarding agency monitoring (e.g., if the sub-recipient also receives Federal awards directly from a Federal awarding agency).

Depending on the Program Manager's assessment of risk as noted during the review of the risk factors, the sub-recipient will be noted as high or low risk. Appropriate monitoring according to the designation will follow. See HSO Risk Assessment Forms for details.

If the HSO sub-recipient passes on Federal grant funds via a sub award, the sub-recipient has the same obligation as a

pass-through entity for all requirements of 2 CFR Part 200.331 including conducting a pre-award risk assessment.

i. HSO Employee and Sub-recipient Time Allocation and Certification Requirements

To ensure compliance with timekeeping requirements prior to FY2016, HSO must consult the NHTSA Timekeeping Matrix and compare the various scenarios to the specific funding circumstances of each HSO employee (and sub-recipient employee) to determine the required action for completion of timekeeping records.

[2 CFR Part 200.430](#) requires the HSO to rely on strong internal control standards and allows more flexibility on how to meet those standards. Biannual certifications and personnel activity reports (PAR) are no longer required although the HSO is encouraged to use them. Charges to Federal awards for salaries and wages must be based on records that accurately reflect work performed. Part 430 (i) establishes *Standards for Documentation of Personnel Expenses*. Part 430 (8) states that where the records of the sub-recipient do not meet these standards, the Federal agency may require PARs including certifications that support the records as required by this section.

For HSO employees working on P&A functions, the HSO will ensure that only direct and indirect expenses for salaries and other costs that are attributable to the overall management of Connecticut's HSP and necessary to carry out its functions are charged to P&A. The HSO will ensure that employees who process grant claims or perform other P&A type duties are working on P&A for only the applicable fund program type, e.g., an employee charging 100 percent to 410 or 154AL P&A must work on P&A only for alcohol programs. See [Appendix F to 23 CFR Part 1200 - P&A Costs](#), which states that if the HSO elects to allocate costs based on actual time spent, the recordkeeping system must be approved by the appropriate NHTSA Approving Official.

All employee time and attendance records must be signed by the appropriate supervisor or timekeeper as required by Connecticut law, regulation, rule, policy, or guideline. The attendance record of salaried employees should also be accurately documented whether federally funded or funded by State match.

D. Final Grant Agreement Preparation

i. Special Conditions

In addition to the general required terms and conditions which apply to every traffic safety grant agreement, the HSO may determine that special conditions should be imposed upon a specific sub-recipient. Some reasons for the special condition may be the results of the pre-award risk assessment, nature of the specific strategy being addressed, past experience with the sub-recipient or a special requirement that is not otherwise addressed in the general terms and conditions. If a special condition is imposed upon a sub-recipient, the special condition must be documented in the award letter. Examples of a special condition may include:

The sub-recipient is allowed to charge costs to the grant for activity that takes place within a stated timeframe before the official start date of the grant. This rarely happens, but may occur when preparatory activity is necessary to ensure that the primary grant activity can begin on the start date of the new fiscal year.

The sub-recipient may be required to share equipment purchased when possible under the grant with other agencies in its geographic region.

ii. Sub-recipient requirements

The application agency or organization must submit a final grant agreement, signed by the authorizing official (person with contracting authority) to the HSO. The authorizing official, and in some cases the project director, must also certify and assure that all of the conditions contained in the Sub-recipient Certifications and Assurances, Reporting Requirements and Invoicing Requirements, including any special conditions, will be met.

For local grants, the agreement must be made with the unit of local government or political subdivision of the State, not

with an operating division or function of the local governmental unit or political subdivision of the State. Likewise, for statewide grants, the agreement must be made with the parent agency, not a bureau or division.

iii. Sub-recipient Certification

For each grant proposal, the HSO checks the [Federal Debarment and Suspension List by State](#) to ensure the sub-recipient is not suspended or debarred. Sub-recipients are required to become familiar with the contents of the final grant agreement form; failure to do so is not an acceptable excuse nonperformance or noncompliance.

Either through the submission of the signed project agreement (law enforcement agencies) or at the pre-award meeting (non-law enforcement agencies), the sub-recipient's project director signs the Schedule C, NHTSA Certifications and Assurances to indicate his/her organization's understanding and intended compliance.

E. Sub-recipient Revisions

Revisions to project proposals may be reviewed for approval by the HSO project director managing the grant. Any changes that require moving funds within the grant, changing the project timelines, adjusting the problem solution narrative, or revising the tasks and milestones requires review and approval by the appropriate Program Manager. The procedure for reviewing and approving revisions is as follows (and please note that the revisions are not binding and approved until approved by Program Manager:

- The sub-recipient's project director makes a request for a grant agreement revision via email or by telephone.
- The HSO Program Manager reviews the request and makes a recommendation for approval or denial.
- If the revision is approved, the HSO Program Manager notifies the sub-recipient in writing. All related paperwork is retained in the grant file.
- If the revision is denied, the HSO Program Manager prepares an explanation for and notifies the sub-recipient in writing. All related paperwork is retained in the grant file.

Chapter IV. Grant Administration and Management

A. Overview

This chapter contains information regarding the overall administration and management of the Connecticut Highway Safety Office grant program in accordance with the NHTSA's regulations and guidance.

B. Grant Management

The HSO Program Coordinator is responsible for the management of Connecticut's Section 402 grant, including Planning and Administration. In addition, the HSO Program Managers serve as the subject matter experts and Fiscal Administration is the funding proposal leads for each of the State's priority areas as follows:

Impaired Driving	Transportation Planner II / Program Manager
Occupant Protection	Transportation Planner II / Program Manager

Speed	Transportation Planner II / Program Manager
Traffic Records	Transportation Planner II / Program Manager
Motorcycle Safety	Transportation Planner II / Program Manager
Pedestrian Safety	Transportation Planner II / Program Manager
Distracted Driving	Transportation Planner II / Program Manager
Teen Driving	Transportation Planner II / Program Manager

The Program Manager for each of the above priority areas is responsible for final grant agreement preparation, execution, and administration. The Program Manager also monitors and evaluates sub-recipient performance and expedites invoice processing. The Program Manager also manages any additional incentive/transfer fund grants that the HSO receives each year. Failure to perform these tasks correctly can result in significant grant management and payment problems.

In their oversight role, the Program Manager will ***not***:

- Impose any task upon the sub-recipient or permit any substitute activity not specifically provided for in the grant agreement.
- Give direction to the sub-recipient or its employees, except as provided in this document.
- Approve expenses for activities that do not meet performance specifications contained in the grant agreement.
- Authorize expenditure of funds except in accordance with the specific terms of the grant agreement.
- Offer advice to the sub-recipient that may adversely affect performance, compromise HSO's rights, or provide the basis of a claim against the HSO that may affect any pending or future determination of fault or negligence.
- Allow supplanting (e.g., replacing routine and/or existing State or local expenditures with the use of Federal grant funds and/or using Federal grant funds).
- Promise that a future grant or extension of a grant for another year is approved prior to HSO approval.

The HSO Program Managers are also responsible for the coordination of the enforcement mobilizations and awareness efforts that the HSO initiates during specific, targeted times of the year. For example, the annual *Click it or Ticket* campaign is coordinated every May to encourage motorists to wear their seat belt. The Occupant Protection Program Manager is responsible for the management of the Connecticut's occupant protection funds. This includes identification of the law enforcement agencies that will be asked to participate in the campaign, development and coordination of the enforcement plan with the HSO LEL, and development of the public awareness effort in conjunction with the HSO Community Relations Officer who plans the paid media outreach component.

C. Submission of Claims

The HSO grants are reimbursable in nature -- the sub-recipient must first expend the funds and request reimbursement from the HSO. Sub-recipients are required to use an HSO provided Reimbursement Voucher form to request reimbursement for costs incurred under the terms of grant and project agreements.

i. Conditions

Reimbursement of costs under a final grant/project agreement is contingent upon the following conditions:

- The availability of appropriated funds;
- Actual costs having been incurred and back up documentation provided (services provided, hours worked, etc.) in accordance with the approved project budget; and
- Compliance with the cost principles established in the Office of Management and Budget (OMB) circulars referenced in the grant agreement as well as conditions of the federal award.

ii. Reimbursement Procedures

The HSO has established the following payment procedures for sub-recipients:

- Reimbursements need to be submitted by using the Invoice Summary and Processing Form (ISP) form OR original invoice
- All invoice submissions need to be signed and dated by the sub-grantee's authorizing official.
- Reimbursements should be submitted on a quarterly/monthly per program manager basis during the term of the approved grant (beginning October 1st thru September 30th).
- All reimbursement submission need to include proof of payment (examples: screen shot from system showing vendor and payment amount with voucher number, copy of front and back of canceled check, billing statement from hotel/airline or notarized letter which includes check number and date when expenditure was paid).
- Submission deadline for all federal reimbursements for salary positions should be invoiced to the CT Highway Safety Office (HSO) no later than October 30th.
- Submission deadline for all federal reimbursement for commodity purchases and other pre-approved grant items should be submitted to the HSO no later than December 31st.
- All salary reimbursements should be accompanied by signed timesheets and/or reports. Signature of employee and authorizing Supervisor is required.
- Photocopies of any media coverage (if applicable) or supportive documentation can be included.

TRAVEL REIMBURSEMENT POLICY AND PROCEDURES FOR NON-STATE EMPLOYEES

- All pre-approvals and reimbursements must be signed and dated by the sub-grantee's authorizing official.
- Reimbursements should be submitted on a quarterly/monthly basis, per program, per program manager, during the term of the approved grant (beginning October 1st thru September 30th).
- All reimbursements must include the invoice as well as proof of payment (examples: for airfare or hotel; a billing statement showing a zero balance, a screen shot from system showing vendor and payment amount with voucher number, copy of front and back of canceled check, or notarized letter which includes check number and date when expenditure was paid).
- Deadline for all federal reimbursements for salary positions must be invoiced to the CT Highway Safety Office (HSO) no later than October 30th. Failure to do so may jeopardize your reimbursement.
- Deadline for all federal reimbursements for commodity purchases and other pre-approved grant items should be submitted to the HSO no later than October 30th.
- All salary reimbursements must be accompanied by signed timesheets and/or reports. Signature of both the employee and authorizing Supervisor is required.
- Photocopies of any media coverage (**if applicable**) or supportive documentation can be included.

TRAVEL REIMBURSEMENT POLICY AND PROCEDURES

- All grant-related travel requires pre-approval by the HSO coordinator, even if listed in approved grant application.
- Pre-approvals and request for Reimbursement must be submitted by using the attached form (see Pre-Approval and Reimbursement Travel Form).
 - Note: Every effort should be made to minimize travel costs wherever possible. The sub-grantee should make every effort to travel as close to start and end times of the conference as airline availability allows. Reimbursement for travel that occurs the day before the conference starts and/or the day after the conference ends will only be allowed if there are no other reasonable flight options available. Travel arrangements should be made directly with the hotel and airlines (where applicable), rather than through any other booking site. Every effort should be made to utilize the hotel designated by the conference. The sub-grantee has a responsibility to obtain the best price available when making travel arrangements. Baggage should be limited to one bag, if there is a charge for the bags. If more than one bag will be required (if transporting equipment to/from the conference, or books/materials for a class; or if travel exceeds one week) consideration will be given to pay for an additional bag. (Prior approval will be required).
- Travel reimbursement requests must be submitted no later than thirty (30) days from the first date of travel. Travel reimbursement requests need to be invoiced separately and NOT combined with any other grant invoices.

- All travel expenditures require a paid receipt (except meal receipts) (i.e. canceled check, zero balance invoice) and should be submitted with the reimbursement travel form.
- Meals can be reimbursed if travel is within the departure and arrival times listed below:

	<u>Departure before</u>	<u>Arrival after</u>
Breakfast	7:00 am	9:00 am
Lunch	11:00 am	2:00 pm
Dinner	5:00 pm	7:00 pm

- Grant recipient meal reimbursement requests will be made in accordance with the State of Connecticut Meal reimbursement allowance for Managers unless the individual is a state employee in which case they should adhere to their union’s travel reimbursement rules. (See DAS website for details).
- Approved meal rates for non-state employees are as follows:

Breakfast \$11.00 / Lunch \$15.00 / Dinner \$26.00

- Gratuities on meals will be reimbursed at 15% of the meal reimbursement amount.
- Taxes on meals will be reimbursed on the meal amount at the state meal tax rate.
- If meals are included in conference/seminar/training, those meals should **NOT** be included in the reimbursement request. Copy of the agenda, including any conference/seminar/training itinerary, must be included in the reimbursement package. A daily summary of the meals included in the reimbursement request should be attached.
- Pre-approved mileage reimbursement will be calculated at the State of Connecticut mileage reimbursement rate. The rate for 2019 is \$0.58 unless the agency (sub-grantee) mileage reimbursement rate is less. A MapQuest printout must accompany all mileage reimbursements.
- Eligible expenses(unless otherwise noted in your grant) include all of the following: conference registration, airfare, train, rental car (DRE Travel only), parking, transportation from airport/hotel (i.e. shuttle, taxi, Uber, or Lyft plus reasonable gratuities), luggage, meals, mileage, hotel accommodations and any other state identified eligible travel fees. As noted above, all pre-approved reimbursable expenditures require a paid receipt (with the exception of meals) and must be submitted with the reimbursement form.
- Ineligible items for travel reimbursements are:
 - Rental Car
 - Membership Fees*
 - Airline Upgrades
 - Travel Agent/
Service Fees

* If membership dues or becoming a member of an organization is required in order to attend a conference, this should be discussed beforehand with the HSO coordinator and may be added to the pre-approval, if agreed by the HSO Coordinator.

- **NOTE:** Deadline for any reimbursements must be submitted no later than 30 days from the last date of travel.

Failure to adhere to the above-mentioned requirements may result in delayed payment or refusal of reimbursement.

D. Public Information and Education Outreach

One of the cornerstones of the HSO' efforts to change behavior is Public Information and Education (PI&E) activities. To ensure that the PI&E strategies are appropriate, the HSO does the following:

- Conducts data analysis to identify target populations for outreach.
- Creates an outreach calendar that supports the enforcement mobilization schedule.
- Shares the data analysis and problem identification information with the media contractor that is tasked with development of the creative, implementation of the paid and earned media opportunities, and evaluation of outreach efforts.

The annual HSP includes a paid media and outreach section that describes the initiatives that HSO will implement to enhance high visibility enforcement, engage partners, and impact emphasis area performance targets. Strategies and tactics included in the HSO media plan may vary by campaign based on the target audience and priority area being addressed. The HSO uses TV and radio spots, billboards, digital ads, social media and other paid media opportunities, as well as corporate partnerships, participation in health/safety fairs, sports marketing, and another mediums to encourage the public to engage in safe behaviors when on foot or on the road.

E. Procurement of Goods and Services – Contracts

The HSO periodically monitors all sub-recipient contracts and professional service agreements to verify compliance with established State and/or local procurement procedures (see 2 CFR Part 300.317). The HSO follows Connecticut Department of Transportation procurement rules and regulations for the purchase of goods and services for the direct use and benefit of HSO operations. Questions regarding the procurement rules should be directed to the Fiscal Administration Office.

F. Food/Beverage Costs

HSO and Sub-recipient Purchases

Except under a waiver provided by the State Office of Management and Budget, food and beverage costs are not allowable. Food may be provided during a working breakfast or lunch.

G. Property Purchase and Management

The HSO typically provides grant funds for the purchase of traffic-related law enforcement equipment. For all major equipment purchases and replacement purchases with a useful life of more than one year and an acquisition cost of \$5,000 or more in value, the HSO must obtain written approval from the NHTSA Regional Administrator prior to purchase (see 23 CFR §1200.31 and the NHTSA *Highway Safety Grant Funding Policy for NHTSA/FHWA Field-Administered Grants*). This regulation applies regardless of the portion of Federal or other funds used if the total cost of the equipment to be

purchased is \$5,000 or more. To request approval to purchase equipment, a sub-recipient must send a letter on its letterhead to the HSO that includes a complete description of the equipment, total cost, useful life, and how the equipment will be used to support the State's highway safety program.

Equipment must be used by the sub-recipient for the purpose for which it was acquired as long as needed, whether the program continues to be supported by HSO funds. When no longer needed for the original program, the equipment may be used in other traffic safety activities. If it is determined that the equipment is no longer needed for the purpose acquired or for any other traffic safety purpose, the equipment must be handled in accordance with HSO policy and Federal requirements.

If a sub-recipient desires to dispose of equipment it must notify the HSO. The HSO will then obtain written approval from the NHTSA Region 2 Office. NHTSA approval is not needed if the equipment has exceeded its useful life as determined under Connecticut law and procedures.

Federal requirements specify that the State and their sub-recipients manage and dispose of equipment acquired under 23 USC Chapter 4 in accordance with State laws and procedures. State laws and procedures pertaining to property management are found in the Budget and Accounting Manual, which establishes requirements that all Departments and agencies must follow regarding the management of State property.

i. Sub-recipient Property Management Systems

Sub-recipients must establish and administer a system to procure, control, protect, preserve, use, maintain, and dispose of property furnished to them by the HSO or purchased through a grant, sub grant, or other agreement in accordance with their own property management procedures, provided that the procedures are not in conflict with the standards detailed in this Manual or Federal property management standards (for grants prior to FY 2016 49 CFR Part 18.36, for all other grants [2 CFR Part 200.313 Equipment](#)).

The Law Enforcement Liaison is responsible for maintenance of the HSO equipment tracking system. The Transportation Planner II / Program Manager physically verifies the existence and traffic-safety use of each item. This verification is typically completed during onsite monitoring visits.

Upon completion or termination of a traffic safety grant or sub grant, or if it is determined by the HSO that the equipment is no longer needed for the purpose for which it was acquired, the equipment may become the property of the HSO. Permission for any other disposition must be obtained from the HSO before any action can be taken regarding the equipment. Other possible disposition actions include, but are not limited to:

- Transfer from Federal inventory to State inventory
- Declaration of inoperability and relegation to salvage or sale at auction
- Declaration that equipment is damaged beyond repair or salvage
- Sale at auction and return of proceeds to the HSO for reconciliation with Federal funding

The NHTSA Region 2 Office may authorize that title to equipment acquired under 23 USC Chapter 4 be transferred to the Federal government or to an eligible third party. Any such transfer must comply with the conditions of 23 CFR §1200.31 (e).

ii. Sub-recipient Equipment Inventory

Sub-recipients must maintain an inventory control and property management system to ensure adequate safeguards to prevent loss, damage, or theft of equipment purchased with federal grant funds.

iii. HSO Inventory and Tagging

The HSO uses a centralized inventory control system to identify and track all grant-funded equipment or other property classified as “controlled property” items listing all essential information required by the Connecticut property management guidelines. The HSO, as part of its federally mandated oversight responsibility, monitors all sub-recipients with grant-funded equipment and/or property meeting the State-defined criteria of “controlled property” to ensure compliance with State and Federal property management requirements.

H. Sub-recipient Travel

Reimbursement for out-of-state travel expenses by sub-recipients requires prior written approval from the HSO. To request approval for out-of-state travel, a sub-recipient must ensure that the grant agreement includes a provision for the travel and that there are sufficient funds to cover the cost of the trip. To request travel reimbursement, the sub-recipient must prepare and submit a the travel Pre Approval form supplied by the HSO and Personal Expense Reimbursement Form with the monthly report, or as appropriate.

I. Indirect Costs

Effective with FY 2016, Uniform Guidance issued by the Office of Management and Budget (OMB) became effective for NHTSA funded highway safety grants. Several prior OMB circulars were consolidated into the Uniform Guidance. The following information on Indirect Cost Rates (IDCR) applies to FY2016 grants. (For information regarding the requirements for grants prior to FY2016, reference should be made to 2 CFR Part 225, Appendix E; 2 CFR Part 230 [Non Profits] and Circular A-21 [Educational Institutions].)

Effective with FY2016 grants, a sub-recipient that does not have a previously established IDCR may elect to charge a de minimus rate of 10 percent of modified total direct costs. The HSO may not force or entice the sub-recipient without a federally recognized IDCR to accept a rate. If a sub-recipient has a federally negotiated IDCR and requests that rate, the HSO must pay that rate and may not request or require the sub-recipient to offer a lower or zero IDCR.

The requirement that the HSO must use a federally negotiated IDCR applies to sub grants/award; it does not apply to contracts. The HSO must use Connecticut policies and procedures when procuring property and services via contract.

J. Program Income

Any income earned by a sub-recipient as a result of an HSO-provided Federal grant must be fully accounted for and applied to project purposes or used to reduce costs. As defined in [23 CFR Part 1200.34](#) and [2 CFR Part 1201.80](#), program income means gross income earned by the sub-recipient directly generated by a program supported activity or earned only as a result of the grant agreement during the period of time between the effective date and the expiration date of the grant award. Such earnings may include but are not limited to:

- Income from fees for services performed.
- Sale of commodities or items fabricated under the grant.
- Usage or rental fees from real or personal property (equipment) acquired with grant funds.
- Payment of principal and interest on loans made with grant funds.

The HSO must approve a sub-recipient's request to earn program income. There must be an indication in the HSO HSP project description that the grant will generate program income and the total income earned must be reported by the HSO in the Annual Report (AR). There also must be a clause in the grant agreement that states that the grant will earn program income and the sub-recipient will expend the monies to fulfill the objectives of the program area under which it was generated.

Program income may be used to meet cost sharing or matching requirements only upon written approval of the NHTSA Region 2 Office. Use in this manner will not increase the commitment of Federal funds.

Sub-recipients must record the receipt of program income as a part of the grant project transactions in accordance with the grant agreement. Sub-recipients must also record and report the expenditure and disbursement of program income revenues as a part of the grant transactions in accordance with the grant agreement.

K. Supplanting and Maintenance of Effort

A sub-recipient may not use grant funds to supplant State or local funds, or, other resources that would otherwise have been made available for the grant program.

MAP-21 mandates Maintenance of Effort (MOE) calculations for FY 2013-2017 when a state receives Section 405 funding for occupant protection, state traffic safety information systems and impaired driving countermeasures. Connecticut is required to maintain aggregate levels of expenditures for all State and local sources at or above the average level in fiscal years 2010 and 2011. "Local sources" means the amount of State funds provided to and spent by locals. MOE consists of direct State expenditures, State match and the HSO and other State agencies, such as Connecticut State Police, Department of Motor Vehicles, etc. MOE calculations are due to NHTSA in March following the closeout of the previous federal fiscal year. As such, in December, HSO contacts state partners in traffic safety to request totals of state funds spent by the partner to improve highway safety in the previous fiscal year. Some examples of expenditures include:

Connecticut State Police Payroll for patrol officers, toxicology lab staff, Academy staff, and the DSP statistician

Division of Criminal Justice Traffic Safety Resource Prosecutor salary

Department of Motor Vehicles Per Se Hearing Attorney salary

Note: For FY18 and beyond, per FAST Act, a certification of MOE needs to be available for NHTSA review.

L. Grant File Maintenance

Sound fiscal and program management of the HSO traffic safety program can be verified through the maintenance of complete, accurate and accessible files. The HSO must establish a physical project file for every grant. The contents of the file of record will vary, depending on the type of agreement. The file of record may include any or all of the following:

- Signed Grant Request Form/Project Agreement
- Technical/cost analysis
- Pre-award cost evaluation
- Original signed agreements and any amendments

- Documents referenced in the agreement (official resolutions or proclamations of local governing bodies, letter indicating the delegation of signature authority for various project related reports, etc.)
- Correspondence
- Claims with all supporting documentation
- Progress Reports with all supporting documentation
- Risk Assessment documentation
- Monitoring reports
- Pre-approvals
- Equipment inventory forms
- Project accomplishment reports
- Data collection and trainings conducted
- Indirect cost approval letter
- Match documentation if required of sub-recipients
- Other supporting documentation

Each project file contains the original document or reference to the document that verifies the legal and administrative actions necessary for the award, implementation, monitoring, and evaluation of each project. File content requirements for the various project types are detailed below.

i. Section 402 Files

For the current fiscal year, file folders for each HSO project are kept in the main filing cabinets in the HSO’s office. Each file should include the following:

- HSO project proposal
- Certifications and Assurances
- Monthly reporting (or as appropriate)
- Quarterly spending spreadsheet
- Risk Assessment (if applicable)

In addition, for funds spent related to mobilizations, the folder for that mobilization should house the project agreements signed by the law enforcement agencies as well as the final statistics report, including funds spent. Copies of risk assessments for each law enforcement agency are conducted at the beginning of the fiscal year and kept in the project

folder. For funds spent related to paid media, the folder should include the paid media contractor contract, the strategic communications plan, and a quarterly spending spreadsheet. For funds spent related to sub-recipients, the folder should include the signed project agreement with certifications and assurances, the award letter, the revised schedule B (if applicable), appropriate documents related to approval of indirect costs (if applicable), correspondence, monthly reports, the HSO monitoring reports, reimbursement vouchers, and a risk assessment (if applicable).

ii. Public Access

All file information is a matter of public record. However, proper file management precludes public access as a file may include information of a sensitive nature such as personnel salaries, budget information, and internal correspondence. Access to the file of record is generally limited to those governmental officials (HSO DSHS and/or NHTSA staff and auditors) responsible for project submission, operation, and closeout.

iii. File Retention

All grant records must be retained for three years from the date of final payment, until completion of audits, or until pending litigation has been fully resolved, whichever occurs last. After this time, all documents should be archived, not destroyed. A clause addressing this policy is included in each traffic safety grant agreement and contract. The term “records” includes all books, documents, papers, accounting records, and other evidence pertaining to costs incurred and work performed. The HSO Accounting Specialist is responsible for maintenance of the grant filing system in accordance with this policy.

M. Monitoring

The HSO is responsible for managing the operations of grant and sub grantee supported activities. As such, HSO monitors the sub grantee’s activities as necessary to ensure that the grant funding is used for authorized purposes; in compliance with Federal statutes, regulations and the terms and conditions of the grant; and to monitor progress in achieving goals/targets, objectives, and performance measures. Monitoring covers all program functions and/or activities.

Monitoring Guidelines

The HSO maintains regular contact with the all sub grantees’ project directors. Some sub grantees may require frequent contact with the HSO to fulfill the obligations of its grant, while others may not. Ongoing contact may come in the form of telephone conversations, face-to-face meetings, and email or written correspondence. These may be required to clarify communications, answer questions, and generally provide support to the sub grantee. The Program Manager must maintain copies of all correspondence in the sub grantee’s file and, if applicable, prepare a Telephone Monitoring Report (TMR) to detail specific information discussed during the phone call. The TMR will be placed in the sub grantee’s file as well.

All sub grantees are also monitored via administrative reports that they are required to submit monthly (or as appropriate) for review by the HSO. The report must be accompanied by the reimbursement voucher. The report may include different information depending on the objectives outlined in the grant application/project agreement.

For non-law enforcement sub grantees, the monthly report form may request information or reference efforts made to specifically meet the objectives outlined in the grant application. Again, given that all sub grantees’ grant applications are different, the specific information requested on the monthly report may differ from one sub grantee to another. For law enforcement grants, the Program Manager monitors the agency’s processes for scheduling, approving, tracking, accounting, and supervision of overtime to ensure there are adequate checks and balances.

When reviewing administrative reports, the Program Manager should review the information supplied to ensure that the sub grantee is following the project proposal/project agreement stipulations, managing the project in a responsible and

effective manner and that funds are being spent in a timely manner. The Program Manager should contact the sub grantee's project director promptly with any questions or revisions that need to be made to the project.

The frequency of contact with a sub grantee's project director depends on the type of initiative being conducted, the experience of the project director, any problems encountered, and assessments made by the Program Manager toward progress in achieving grant goals. The Program Manager should monitor work under the agreement with sufficient scrutiny to be sure that it is progressing according to the plan and to quickly identify any major problems or variances. Careful monitoring of work is the best way to ensure compliance with the grant terms and conditions and prevent disputes.

Ongoing monitoring may involve any sub grantee personnel responsible for project management or oversight such as the financial officer and any other key personnel to review sub grantees' internal controls. Copies of all correspondence relating to on-going monitoring are to be kept in the HSO grant file. A note to the file should be provided to document all discussions using a Telephone Monitoring form. This documentation becomes essential during the course of the project in case of changes in the project activities, budget, or personnel. The documentation is also used at end of the project to evaluate grant and sub grantee performance.

Warning signs that may indicate a need for closer monitoring include:

- Late project start
- Low activity level
- Slow expenditure rate
- Late reports
- Low morale/poor attitude
- Incorrect claims
- Frequent personnel changes
- Revisions to the grant
- No records or inconclusive records
- Evasive answers
- Submission of questionable claims or back-up documentation
- Failure to obtain required HSO approvals

On-Site Monitoring Guidelines

In addition to on-going monitoring and review of monthly reports, the HSO conducts on-site visits for monitoring purposes. The sub grantees will be randomly selected for on-site monitoring must have participated in several mobilizations and been allocated more than \$25,000 during the fiscal year. The HSO staff may, however, determine that an on-site visit is warranted regardless of whether or not the sub grantee was selected at random. Reasons for an on-site visit may include resolution of a problem uncovered during the fiscal year or view of inventory purchased with HSO funds.

In addition, depending upon the assessment of risk posed by the sub grantee the HSO may impose additional monitoring to ensure proper accountability and compliance with program requirements and achievement of performance goals.

On-site visits are conducted by the Program Manager that coordinated the mobilization/grant and take place in advance of the end of the Federal fiscal year (September 30). The HSO Law Enforcement Liaison may be asked to participate as well. On-site monitoring includes an examination of all issues related to the effective and efficient operation of the project. The following, though not all-inclusive, are the most important items to review:

- ✓ Progress toward achievement of objectives and performance goals
 - Samples of evidence of progress might include:
 - Attendance rosters for training projects or events
 - Citations and warnings for enforcement projects

- Newspaper clippings of events/public information activities
- Analyses and reports for data or problem identification projects
- Survey or questionnaire results
- Personnel training records
- ✓ Adherence to milestones and project agreement
- ✓ Status of budget/accounting records to determine if:
 - Expenditures are on schedule
 - Costs are in the approved budget or any subsequent amendment
 - Any necessary prior approvals for travel, equipment purchases, or changes have been obtained
 - Appropriate procedures have been followed for all expenditures
 - Appropriate supporting documentation is available and filed
 - Reimbursements are up to date
- ✓ Accounting records
- ✓ Any necessary pre-approvals (such as out-of-state travel)
- ✓ Supporting documentation (e.g., signature authority letter, verification of costs, invoices, subcontracts)
- ✓ Equipment purchased or leased as part of the project (e.g., inventory), including inspection to ensure that it is being used for the purpose for which it was bought or leased under the grant agreement

The Program Manager may review personnel records, timesheets, accounting records, and other supporting documentation as they relate to the above monitoring areas. Additional source documents that may need to be reviewed include:

Source Documents Reviewed During Onsite Monitoring

Document Type	Notes
Time sheets	Time sheets, pay records, payroll registers, and possibly personnel (salary rate) records must be reviewed to determine that salary and wage costs are fully supported. Check for both supervisor’s and employee’s signature.
Fringe benefits	If reimbursable, fringe benefits (such as health insurance, pension plan, etc.) must correspond to the Grant agreement.
Travel costs	Only travel directly associated with the grant may be reimbursed and must be preapproved.

Document Type	Notes
Claims and payments	Only those costs in the approved budget may be reimbursed.

In advance of the on-site visit, the Program Manager should do the following:

- Plan each on-site visit well in advance (preferably three to four weeks). Set appointments with the sub grantee’s project staff.
- Carefully review the grant/project agreement to determine which activities in the action plan should have been accomplished by the on-site monitoring date.
- Note any special terms or conditions that need monitoring.
- Review all correspondence, statistics, performance reports, and requests for claim reimbursement submitted prior to the visit.
- Provide the sub grantee a list of the types of documents to be reviewed, including time sheets, purchase vouchers, and forms.
- Note items requiring follow-up from previous on-site visits and/or ongoing monitoring.

The HSO Program Manager will complete the required on-site monitoring record form, sign the form according to the instructions provided and attach copies of all appropriate records and other documents reviewed during the visit and file in the sub grantee’s file. The checklist used by the Program Manager to plan for the on-site visit, with attachments, should be placed in the sub grantee’s file and in the monitoring book. The sub grantee may receive a copy of the Monitoring Form upon request. If corrective action is needed, determination of the appropriate action is made by the HSO Program Coordinator with consultation with NHTSA Region 2. A letter detailing corrective action to be taken shall be submitted to the sub grantee. Any possible fraud or misuse of funds will be directed to the State Auditor to investigate. Any recovery of funds required will follow a process outlined by the State Auditor following the investigation. Any additional monitoring documentation should be included in the grant file.

N. Fraud Prevention

The HSO has taken steps to ensure that monitoring efforts address the fraud detection and prevention. To ensure responsible use of federal highway safety funds, the HSO implemented the following law enforcement grant monitoring procedures:

- Grants will be monitored by Program Managers.
- Program Managers will raise any concerns with the Transportation Program Safety Coordinator.
- The Transportation Program Safety Coordinator will bring concerns to the Policy and Planning, The Governor’s Representative and NHTSA Region 2 Program Manager.

O. Internal Controls

The HSO conducts the following internal controls to ensure compliance with Federal statutes, regulations, and terms and conditions of the Federal award:

- Establish and maintain effective internal controls over the Federal award that provides reasonable assurance that the sub-recipient is managing the Federal award in compliance with Federal statutes, regulations and terms and conditions of the Federal award;
- Ensure compliance with Federal statutes, regulations, and terms and conditions of the Federal award;
- HSO will take prompt action when instances of non-compliance are identified, including non-compliance identified in audit findings (see Monitoring Section).
- HSO will take reasonable measures to safeguard and protect personally identifiable information and other information as appropriate.

P. Sub-recipient Appeals

An applicant may appeal the following HSO decisions:

- **Denial of a project proposal**
- **Withholding payment of a claim**
- **Requiring a refund of grant money**
- **Suspension or cancellation of a grant or part of a grant**

Within 15 days following receipt of notification of the decision, the applicant must send a written request to meet with the HSO Program Manager and other appropriate staff to address the repeal and present supporting documentation. Written notice of the decision of the HSO Program Manager following the meeting will be sent to the applicant or sub-recipient within five days of the decision.

If the applicant or sub-recipient wishes to further appeal the HSO Program Manager's decision, it must submit, within 15 days after receipt of notification of the HSO Program Manager's decision, a written request to meet with the HSO Program Coordinator to present supporting documentation. Written notice of the decision of the HSO Program coordinator will be sent to the applicant or sub-recipient within five days of the decision.

Chapter V. Fiscal Procedures

A. Reimbursement Policy and Procedures for Highway Safety Grants

B. Federal Grant Tracking System (GTS)

i. Types of GTS Transactions

GTS handles five major types of automated transactions that are detailed below. Each transaction type depends on the order of completion, validity, and accuracy.

- **Obligation Limitation** – Establishes the amount of federal funds available for expenditure under NHTSA 402 and designated 405 incentive grant funds. The amounts of these funds available for the “Obligation Limitation” are downloaded into GTS.
- **Obligation Cost Summary** - Produces financial documents that obligate funds for the federal computerized accounting system. The overall process involves entering obligations for the current year and carry-forward funds into the GTS system. All entered information is verified and posted. After all posting has been processed; GTS automatically sends an electronic approved copy to the NHTSA Region 2 Office and to the Federal Accounting System.
- **Advance of Funds** - The advance request transaction allows Connecticut to request federal funds electronically and prior to submission of a voucher. Prior to requesting federal funds or an advance request, federal funds must be obligated.
- **Advance Reduction** - Only States using the advance method of reimbursement with an outstanding advance balance can complete this transaction. Advance reduction transactions result when a State issues a check to NHTSA for either reducing an outstanding advance balance or paying NHTSA an amount owed that resulted from an audit finding. Paying an amount that resulted from an audit finding can also be accomplished through a Voucher Reduction transaction.
- **Voucher** - Voucher transactions allow Connecticut to process vouchers. Expenditures of funds must have a voucher at the same level that the funds were obligated at the program, project, task, or sub-task level. Voucher reductions can also be entered just like a regular progress voucher, except that the amount entered will be a credit entry only.

ii. GTS Reports

A variety of GTS reports are available to streamline the HSO fiscal management process and reduce the workload associated with meeting Federal reporting requirements. These reports are:

- **HSP Transactions Report** - Itemizes all Highway Safety Program (HSP) transactions, provides detailed information on Federal funds, and assists in determining data entry errors.
- **HSP Cost Summary Report** - Provides detailed information by project, program area, and specific funding sources sub-totaled by NHTSA fund sections. The format of this report replicates the Federal HS-217 Cost Summary Form and shows the increase or decrease for each program area. This report may be printed in detail, showing each project or task, or summarized by program level amounts only.
- **HSP Approved Program Amounts Report** - Details the same information as the HSP Cost Summary report but does not report the decrease or increase for each program area.
- **Obligated Programs Amount Report** - Itemizes all detailed information by project, program area, NHTSA sections, or other obligations. It also shows the amount of current and carry-forward funds.
- **Voucher Transactions Report** - Details all voucher transactions.
- **Status of Obligations and Expenditures** - For information only, it shows the unobligated and unexpended amounts for each program area.
- **Status of Current and Carry Forward Funds** - Separates the obligations, expenditures, and unexpended funds by current fiscal year and by carry-forward (from previous years). It also shows Federal share-to-local benefit, and

- State and local expenditures.
- Shows Federal share-to-local benefit, and State and local expenditures.

C. Matching Funds

The HSO Program coordinator is responsible for ensuring that the P&A grant complies with applicable Federal regulations including the provision of a match of State or local funds in the amount of 50 percent of the costs claimed for eligible P&A functions (see NHTSA “Highway Safety Grant Funding Policy for Field- Administered Grants”, Part I, A and B. See Chapter V. Fiscal Procedures, Section C. Matching Funds).

Match is defined as the direct expenditure of actual State funds or State or local funds that are expended in support of other qualifying traffic safety programs (such as the salaries of highway safety related, State-funded employees) and have not been utilized by another Federal, State or local agency as matching funds for a separate Federal project.

The Fiscal Administration Office are responsible for calculating, documenting and recording required match by program. When processing vouchers, in addition to actual costs to be reimbursed to the State, federally required match funds must also be calculated annually by and entered into the GTS. They should familiarize themselves with program match requirements for all sections of funding and ensure that these match requirements are met and properly documented. All program match requirements can be found in the NHTSA Grants Management Manual (http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/00_Manl_Contents1_01.html) and the final rule for all sections of funding.

The State must have documentation to support an audit. The HSO/Fiscal Administration will ensure that the Federal contribution does not exceed 15 percent of the total new funds Connecticut receives annually under Section 402 and for Section 154 and 164 transfer funds (when used for section 402 purposes to support alcohol-impaired driving programs). See Appendix F of 23 CFR Part 1200 and the [NHTSA Highway Safety Grant Funding Guidance Part I.A. and B.](#)

D. Grant Tracking Spreadsheet

A Grant Tracking Spreadsheet is developed to assist the Accountant and the HSO staff track the current financial status and other related information for each approved grant agreement. The spreadsheet is created each fiscal year by the Accountant as new grant agreements are approved.

The spreadsheet should contain the following information for each grant agreement:

- Funding source
- Program area
- HSP Project number
- Project name
- Approval status
- Approval date
- Proposed grant amount
- Match information, if any

- State accounting system number
- State agency agreement number, if applicable

The Grant Tracking Spreadsheet should be reviewed at the monthly fiscal meeting by the Fiscal staff for accuracy and completeness, to check the financial status of each grant agreement, and to ensure continuous compliance with all State and Federal requirements. In addition, the Program Managers are provided a cumulative details spreadsheet that outlines all payments made (and to which section of funding) since the previous monthly fiscal meeting.

E. Allowable Costs

i. Federal Regulations – Allowable Costs

[2 CFR Part 200 Uniform Guidance](#) (see Subpart E) is the controlling Federal regulation for determining allowable costs. Except where otherwise authorized by statute, costs must meet the following general criteria to be allowable under Federal grant awards:

- Be necessary and reasonable for the performance of the Federal award and allocable under these principles.
- Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose has been allocated to the Federal award as an indirect cost.
- Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments only.
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period (see Part 200.306, Cost sharing or matching paragraph (b)).
- Be adequately documented (see Part 200.300, Statutory and national policy requirements, through 200.309, Period of performance of this part).

The [NHTSA Highway Safety Grant Funding Guidance, Part III and IV](#) Allowable Costs under “Specified Conditions or Limitations for Selected Items” and “Unallowable Costs for Selected Items” are available on line and should also be consulted.

F. Single Audit Procedures – Federal 2 CFR Part 200 Subpart F

The Federal directive for audits of states, local governments and nonprofits is detailed within the OMB Uniform Guidance at [2 CFR Part 200 Subpart F 200.500 - 521](#). The threshold for the audit requirement is \$750,000 or more. The Federal regulation implements the Single Audit Act amendments of 1996 and provides uniform single audit requirements for all non-Federal sub-recipients including State and local governments, colleges and universities, hospitals, and other non-

profit organizations.

Sub-recipients expending at or above the application threshold in Federal awards from all sources must complete and submit a single audit. To communicate this requirement, the HSO includes a standard requirement in all grant agreements that describes the conditions that are subject to a single audit or review. The requirement also states that sub-recipients must submit copies of any audits and review reports which they have had prepared to the HSO for informational purposes if requested regardless of whether the criteria for audit or review are met.

To comply with single audit procedure requirements, the HSO Operations Support Specialist accesses the Federal Audit Clearinghouse to determine whether audits for any sub-recipients have been posted. The Operations Support Specialist also checks the [Federal Excluded Parties List System, System for Award Management \(SAM\)](#) site or collects a certification from the sub-recipient, or adds a clause or condition to the covered transaction (per 2 CFR Section 180.300).

The HSO will determine whether the audit meets the Uniform Guidance requirements. For FY2016, the sub-recipient's auditor must report in findings any known questioned costs that are greater than \$25,000 for a type of compliance requirement for a major program (see Part 200.516). As provided in Part 200.331, as a pass-through entity, the HSO is responsible for issuing a management decision for audit findings that relate to Federal awards it makes to sub-recipients within six months of acceptance of the audit report by the FAC. The sub-recipient (agency being audited) must initiate and proceed with corrective action as rapidly as possible and corrective action should begin no later than upon receipt of the audit report.

The HSO must ensure that sub-recipients take appropriate and timely corrective action in addressing audit findings. In cases of continued inability or unwillingness to have an audit conducted as required, the HSO will take appropriate action using sanctions that include: withholding a percentage of Federal awards until the audit is completed satisfactorily, withholding or disallowing overhead costs, suspending Federal awards until the audit is conducted, or terminating the Federal award (refer to the appeals process detailed on page 36 of the Manual for additional information).

Chapter VI. Annual Report (AR)

A. Overview

The HSO is responsible for submitting an Annual Report to the NHTSA Region 2 office within 90 days after the end of each Federal fiscal year (December 31) (see 23 CFR §1200.35). The Regional Office utilizes a standard checklist to review the AR and provides a formal review letter to HSO. The review ensures that HSO adequately follows specified requirements and procedures in developing the plan, and compares the targets and performance measures in the Highway Safety Plan (HSP) to the AR and the most recently available data to measure Connecticut's safety performance progress.

B. Federal Requirements

i. Required AR Contents

Connecticut's AR must include the following:

- A general assessment of the State's progress in achieving highway safety performance measure targets identified in the Highway Safety Plan (HSP);
- A general description of the projects and activities funded and implemented under the HSP;
- The amount of Federal funds expended on projects from the HSP; and

- How the projects funded during the fiscal year contributed to meeting the state’s highway safety targets. As data becomes available, the State should report progress from prior year projects that have contributed to meeting current Connecticut highway safety targets.

ii. Progress Report

The HSO uses the information contained in the sub-recipients’ final reports, year-end statistics, and fund expenditure reports to compile the progress report section that includes:

- Identification of the highway safety performance targets established in the HSP and a general assessment of Connecticut’s progress in working toward achievement of those targets;
- A general description of each of the projects and activities funded and implemented under the HSP (like projects and activities may be aggregated for this description);
- Identification of the final amount of Federal funds expended on each project. The final voucher that is generated when the HSO enters data into the GTS system at the project level will meet this requirement;
- A description of how the funded projects contributed to meeting the highway safety targets. This includes projects from a prior year if data is recently available which indicates the project contributed to meeting the current highway safety targets; and
- Paid media projects may be reported within the applicable individual program area or grouped in a separate summary report. If a separate summary report for paid media is provided, a reference should also be included in the respective program area to identify the contribution to the program area performance measure target.

C. Annual Report (AR) Development Process Calendar

Table 5. AR Development Process Calendar

Timeline	Activity
October 15 – November 1	HSO reviews the HSP and any amended projects from the previous fiscal year.
November 1 – December 1	<p>HSO develops a general description of each funded and implemented project and activity including the total Federal fund expenditures (like projects and activities may be aggregated).</p> <p>For each program area, HSO develops a general summary of the following:</p> <ul style="list-style-type: none"> • Problem statement • Objectives • Performance measures • Performance targets • Description of each project and activity funded and implemented • Description of how the projects contributed to meeting the target • Federal funding amount expended and source for each project implemented <p>Paid media projects may be reported within the applicable individual program area or may be grouped.</p> <p>HSO develops any optional sections to be included.</p>

December 1- 15	HSO analyzes and assembles data (through November 30 of the calendar year) for each HSP core, other and activity performance measure to determine Connecticut’s progress in achieving performance targets for the year. Update State crash data and trends with the most recent available data.
December 1-20	HSO assembles the AR components into a first draft for review.
December 15	HSO produces final Financial Obligation Closeout (voucher) and obtains HSO Administrator approval.
December 20	HSO staff member tasked with drafting the AR, submits it for final review and approval by the HSO Program Coordinator.
December 31	HSO submits final AR to NHTSA Region 2 Office
January 2	HSO distributes copies of the AR to the HSO email list and posts it on the HSO web site (optional).

VII. Closeout

A. Overview

Federal fiscal year closeout activities begin when the HSO/Fiscal Office receives all required progress reports and final invoices from its sub-recipients and vendors.

B. Deadlines, Penalties and Extensions

The HSO/Fiscal Office is required to submit Connecticut’s final billing for the closing grant year to NHTSA by December 31. In order to meet the annual closeout deadline, HSO establishes a cut-off date after which HSO can no longer reimburse a sub-recipient. Prior to the established cut-off date, the HSO program managers work with the sub-recipients and vendors to ensure that all final reimbursement vouchers and invoices for the fiscal year are received prior to the deadline. Any invoices received from sub-recipients after the established deadline may not be processed or approved for payment.

Connecticut’s HSP for each fiscal year and the State’s authority to incur costs under that plan expire on the last day of the fiscal year. Grant funds remaining at the end of the fiscal year are available for expenditure during the next fiscal year provided Connecticut has a new HSP approved by NHTSA and the remaining funds (carry forward) are identified and programmed in the HSP and in an updated and approved HS 217.

C. Grant File Closeout

After the final Federal reimbursement voucher for the grant year has been submitted, the HSO closes out each grant number and file for that fiscal year. The Program Managers are responsible for completing the grant file closeout. Each file is reviewed for completeness, accuracy of filing and resolution of any pending matters.

D. Financial Obligation Closeout Summary

The financial obligation closeout is a final accounting of all HSO expenditures for the year. The financial obligation closeout includes a copy of the final official voucher for total expenses incurred which satisfies the requirements of 23 CFR Part 1200.33. The following information for expenses claimed in each program area is included in the final voucher:

- Program area for which expenses were incurred and an itemization of project numbers and amount of Federal funds expended for each project;

- Federal funds obligated;
- Amount of Federal funds allocated to local benefit (March 31 and with the final voucher);
- Cumulative total cost to date;
- Cumulative Federal funds expended;
- Previous amount claimed;
- Amount claimed this period; and
- Matching rate or special matching write-off used (if applicable)

In addition, the NHTSA Region 2 Office conducts a first and last voucher review in every State each fiscal year after closeout and no later than mid-March.

Definitions and Acronyms

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

Accrued expenditures - The charges incurred by the sub-recipient during a given period requiring the provision of funds for: (1) Goods and other tangible property received; (2) services performed by employees, sub-recipient, contractors, and other payees; and (3) other amounts becoming owed under programs for which no current services or performance is required, such as annuities, insurance claims, and other benefit payments. Accrued income means the sum of: (1) earnings during a given period from services performed by the grantee and goods and other tangible property delivered to purchasers, and (2) amounts becoming owed to the grantee for which no current services or performance is required by the grantee.

Acquisition cost - The net invoice unit price of purchased equipment including the cost of modifications, attachments, accessories, or auxiliary apparatus necessary to make the property usable for the purpose for which it was acquired. Other charges such as the cost of installation, transportation, taxes, duty or protective in-transit insurance, should be included or excluded from the unit acquisition cost in accordance with the sub-recipient's regular accounting practices.

Administrative requirements - Those matters common to grants in general, such as financial management, kinds and frequency of reports, and retention of records. These are distinguished from programmatic requirements, which concern matters that can be treated only on a program-by-program or grant-by-grant basis, such as kinds of activities that can be supported by grants under a particular program.

AR – Annual Report

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.

Awarding agency - With respect to a grant, the Federal agency, and with respect to a sub-grant (award), the party that awarded the sub-grant.

Cash contributions - The sub-recipient's cash outlay, including the outlay of money contributed to the sub-recipient by other public agencies and institutions, and private organizations and individuals. When authorized by Federal legislation, Federal funds received from other assistance agreements may be considered as sub-recipient cash contributions.

CFR – Code of Federal Regulations

Contract - (except as used in the definitions for grant and sub-grant' in this section and except where qualified by Federal) a procurement contract under a grant or sub-grant, and a procurement subcontract under a contract. Per Uniform Guidance 2 CFR Part 200.23, a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or sub-award.

Contractor - an entity that receives a contract as defined in 2 CFR Part 200.22 Contract.

Cost sharing or matching - The value of the third party in-kind contributions and the portion of the costs of a federally assisted project or program not borne by the Federal Government. Cost-type contract means a contract or subcontract under a grant in which the contractor or subcontractor is paid on the basis of the costs it incurs, with or without a fee.

Designee – A person or legal entity authorized by contract to perform certain duties on behalf of the HSO.

Equipment - Tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. A grantee may use its own definition of equipment provided that the definition would at minimum include all equipment as defined above.

FARS – Fatality Analysis Reporting System

FFATA - Federal Funding Accountability and Transparency Act

FHWA – Federal Highway Administration

FSRS – FFATA Sub-award Reporting System

GHSA – Governor’s Highway Safety Association

GM – Grant Manager

Government - A State or local government or a federally recognized Indian tribal government.

Grant - An award of financial assistance, including cooperative agreements, in the form of money, or property in lieu of money, by the Federal Government to an eligible grantee. The term does not include technical assistance which provides services instead of money or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Also, the term does not include assistance, such as a fellowship or other lump sum award, which the grantee is not required to account for.

GTS - Grant Tracking System

HSO – Office of Highway Safety

HSIP – Highway Safety Improvement Program

HSP – Highway Safety Plan

Local government - A county, municipality, city, town, township, local public authority (including any public and Indian housing agency under the United States Housing Act of 1937) school district, special district, intrastate district, council of governments (whether or not incorporated as a nonprofit corporation under state law), any other regional or interstate government entity, or any agency or instrumentality of a local government.

MAP-21 – Moving Ahead for Progress in the 21st Century

Monitoring – A process whereby the HSO assesses program progress and compliance by reviewing project related reports and files, financial records, and interviews sub-recipients.

NHTSA – The National Highway Traffic Safety Administration

Obligations - The amount of orders placed, contracts and sub-grants awarded, goods and services received, and similar transactions during a given period that will require payment by the sub-recipient during the same or a future period.

OMB - The United States Office of Management and Budget.

Outlays (expenditures) - Charges made to the project or program. They may be reported on a cash or accrual basis. For reports prepared on a cash basis, outlays are the sum of actual cash disbursement for direct charges for goods and services, the amount of indirect expense incurred, the value of in-kind contributions applied, and the amount of cash advances and payments made to sub-recipients and contractors. For reports prepared on an accrued expenditure basis, outlays are the sum of actual cash disbursements, the amount of indirect expense incurred, the value of in-kind contributions applied, and the new increase (or decrease) in the amounts owed by the sub-recipient for goods and other property received, for services performed by sub-recipients, contractors, vendors, employees, and other payees, and other amounts becoming owed under programs for which no current services or performance are required, such as annuities, insurance claims, and other benefit payments.

P & A – Planning and Administration

PI&E – Public Information and Education

Prior approval - Documentation evidencing consent prior to incurring specific cost.

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

Program Manager or PM – The staff person at the HSO assigned to monitor and oversee project activities.

Project – Activities proposed or implemented by the HSO to address highway safety problems falling within one or more program areas.

Project Agreement– The written agreement between this Department and a sub-recipient under which the Department agrees to provide funds in exchange for the sub-recipient’s performance of one or more projects supporting HSO programs.

Project Director – The person assigned by the sub-recipient to assume direct responsibility for administering all phases of the project agreement.

RFP – Request for Proposal

Scope of Work – The objectives and activities noted on the Project Agreement, which the sub-recipient agrees to perform in compliance with instruction provided by the HSO. The sub-recipient must provide and charge only for those services requested by the HSO.

SAFETEA-LU – Safe, Accountable, Flexible, Efficient, Transportation Equity Act – A Legacy for Users, Public Law 109-59

Share - When referring to the awarding agency's portion of real property, equipment or supplies, means the same percentage as the awarding agency's portion of the acquiring party's total costs under the grant to which the acquisition costs under the grant to which the acquisition cost of the property was charged. Only costs are to be counted, not the value of third-party in-kind contributions.

SHSP – Strategic Highway Safety Plan

Sub-grant - An award of financial assistance in the form of money, or property in lieu of money, made under a grant by a sub-recipient to another entity. The term includes financial assistance when provided by contractual legal agreement, but does not include procurement purchases, nor does it include any form of assistance which is excluded from the definition of "grant" in this part.

Sub-recipient - a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A sub-recipient may also be a recipient of other Federal awards directly from a Federal awarding agency (previously referred to as a grantee).

Supplies - All tangible personal property other than equipment.

Suspension - Depending on the context, either temporary withdrawal of the authority to obligate grant funds pending corrective action by the sub-recipient or a decision to terminate the grant, or an action taken by a suspending official in accordance with agency regulations implementing E.O. 12549 to immediately exclude a person from participating in grant transactions for a period, pending completion of an investigation and such legal or debarment proceedings as may ensue.

Termination - Permanent withdrawal of the authority to obligate.

Uniform Guidance – Effective December 26, 2014, the Federal Office of Management and Budget (OMB) issued Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Agencies which supersedes requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. Parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up. It is also referred to as the Supercircular.

Resources

Resource A. Federal Regulations, Documents and Guidelines

Resource B. OMB Circulars

Resource C. Selected Items of Cost Addressed in the Uniform Guidance

Resource A – Federal Regulations, Documents, and Guidelines

The following regulatory items govern the daily administration of traffic safety grants at the State level. Administrators of traffic safety grants should be familiar with and follow each cited title and rule to effectively design and manage programs. Many of these items are cited within the Policy Manual.

Caution! Federal guidance and regulations may change. To ensure that the most recent version is being utilized, it is recommended that the reader view the regulations on line.

The [NHTSA Highway Safety Grants Management Resources](#) should be checked regularly for updates. In 2013 NHTSA reorganized the previous Highway Safety Grant Management Manual into key categories and topical searches. Several items detailed below are available within the Resources page.

Covering All Highway Safety Grants

Title	Revisions as of Date
NHTSA Highway Safety Grant Funding Guidance	7/15/2015
OMB Uniform Guidance – for FY2016 and forward 2 CFR Part 200	Technical corrections 9/10/15
49 CFR Part 18 — DOT Common Rule-States http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=24f8e3f1b31d28b37764b06a0ee6a6f3&rgn=div5&view=text&node=49:1.0.1.1.12&idno=49Resource page for 49 CFR - Common Rule	07/24/2007 For FY2016 replaced by Uniform Guidance
OMB Audits-State/Local Gov. OMB Circular A-133 - Audit of State/Local Govs. & Non-Profit Organ. (same as 49 CFR Part 90)	06/27/03 For FY2016 replaced by Uniform Guidance
OMB Circular A-133. 2009 Highway Safety Compliance Supplement 2009 Compliance Supplement. OMB Circular A-133 (NHTSA portion)	6/24/2009 For FY2016 replaced by Uniform Guidance

Implementation Guide for Office of Management and Budget Circular A-87 (ASMB C-10) Cost Principles and Procedures for Developing Cost Allocation Plans and Indirect Cost Rates for Agreements with the Federal Government	4/08/1997 For FY2016 replaced by Uniform Guidance
State Certifications and Assurances Statements – Appendix A NHTSA Highway Safety Grants Management Resources/Certifications and Assurances	1/23/2013
Lobbying Guidance http://www.nhtsa.gov/About+NHTSA/Programs+&+Grants/Resources+Guide23 CFR Part 1200 Appendix A - Certifications NHTSA Highway Safety Grant Funding Guidance - Appendix B	1/23/2013
NHTSA Logo Guidance Use of NHTSA Logo Guidance	1/18/2000
Performance Measures Traffic Safety Performance Measures for States and Federal Agencies	8/01/2008

Resource B – OMB Circulars

Office of Management and Budget (OMB) circulars are frequently used reference materials in administering grants.

Effective with FY16 grants, NHTSA requires compliance with the OMB Uniform Guidance at [2 CFR Part 200](#) which consolidates and replaces several federal regulations listed below.

The following table lists OMB circulars that were applicable to the HSO program prior to FY2016:

OMB Circulars Applicable to the Traffic Safety Program prior to FY2016

Document Title	Revisions as of Date
OMB Circular A-21 — http://www.whitehouse.gov/omb/fedreg/2005/083105_a21.pdf 2 CFR Part 220 "Cost Principles for Institutions of Higher Education"	8/31/2005 For FY2016 replaced by Uniform Guidance
OMB Circular A-87 — 2 CFR Part 225 "Cost Principles for State, Local and Indian Tribal Governments" – go to - NHTSA Highway Safety Grants Management Resources	7/24/2007 For FY2016 replaced by Uniform Guidance
OMB Circular A-110 — 49 CFR Part 19 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations" – go to - NHTSA Highway Safety Grants Management Resources	7/24/2007 For FY2016 replaced by Uniform Guidance
OMB Circular A-122 — 2 CFR Part 230 "Cost Principles for Non-Profit Organizations" – go to NHTSA Highway Safety Grants Management Resources	7/24/2007 For FY2016 replaced by Uniform Guidance
OMB Circular A-133 — "Audits of States, Local Government, and Non-profit Organizations"	6/27/2003

Resource C. Selected Items of Cost Addressed in the Uniform Guidance

Effective with FY2016 grants, the HSO must comply with the OMB Uniform Guidance at [2 CFR Part 200](#) which consolidated and replaced several federal regulations including OMB Circular A-87.

The following items are covered at [2 CFR Part 200 General Provisions for Selected Items of Cost](#). Because the Federal regulations have been consolidated, some items are not pertinent to the HSO Advertising and public relation costs

1. Advisory councils
2. Alcoholic beverages
3. Alumni/ae services
4. Audit services
5. Bad debts
6. Bonding costs
7. Collections of improper payments
8. Commencement and convocation costs
9. Compensation – personal services
10. Compensation – fringe benefits
11. Conferences
12. Contingency provisions
13. Contributions and donations
14. Defense and prosecution of criminal and civil proceedings and claims
15. Depreciation
16. Employee health and welfare costs
17. Entertainment costs
18. Equipment and other capital expenditures
19. Exchange rates
20. Fines, penalties, damages, and settlements
21. Fund raising and investment management costs
22. Gains and losses on disposition of depreciable assets
23. General costs of government
24. Goods or services for personal use
25. Idle facilities and idle capacity
26. Insurance and indemnification
27. Intellectual property
28. Interest
29. Lobbying
30. Losses on other awards or contracts
31. Maintenance and repair costs
32. Materials and supplies costs, including costs of computing devices
33. Memberships, subscriptions and professional activity costs
34. Organization costs
35. Participant support costs
36. Plant and security costs
37. Pre-award costs

38. Professional service costs
39. Proposal costs
40. Publication and printing costs
41. Rearrangement and reconversion costs
42. Recruiting costs
43. Relocation costs of employees
44. Rental costs of real property and equipment
45. Scholarships and student aid costs
46. Selling and marketing
47. Specialized service facilities
48. Student activity costs
49. Taxes (including Value Added Tax)
50. Termination costs
51. Training and education costs
52. Travel costs
53. Trustees

Appendix A. Certification and Assurances

EQUIPMENT

Equipment acquired under this agreement for use in highway safety program areas shall be used and kept in operation for highway safety purposes by the State; or the State, by formal agreement with appropriate officials of a political subdivision or State agency, shall cause such equipment to be used and kept in operation for highway safety purposes 23 CFR 1200.31

NONDISCRIMINATION

(Applies to sub-recipients as well as States)

The State highway safety agency will comply with all Federal statutes and implementing regulations relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (Pub. L. 88-352), which prohibits discrimination on the basis of race, color or national origin (and 49 CFR Part 21); (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681-1683 and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), and the Americans with Disabilities Act of 1990 (Pub. L. 101-336), as amended (42 U.S.C. 12101, *et seq.*), which prohibits discrimination on the basis of disabilities (and 49 CFR Part 27); (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101-6107), which prohibits discrimination on the basis of age; (e) the Civil Rights Restoration Act of 1987 (Pub. L. 100-259), which requires Federal-aid recipients and all sub-recipients to prevent discrimination and ensure nondiscrimination in all of their programs and activities; (f) the Drug Abuse Office and Treatment Act of 1972 (Pub. L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (g) the comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (Pub. L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (h) Sections 523 and 527 of the Public Health Service Act of 1912, as amended (42 U.S.C. 290dd-3 and 290ee-3), relating to confidentiality of alcohol and drug abuse patient records; (i) Title VIII of the Civil Rights Act of 1968, as amended (42 U.S.C. 3601, *et seq.*), relating to nondiscrimination in the sale, rental or financing of housing; (j) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (k) the requirements of any other nondiscrimination statute(s) which may apply to the application.

BUY AMERICA ACT

(Applies to sub-recipients as well as States)

The State will comply with the provisions of the Buy America Act (49 U.S.C. 5323(j)), which contains the following requirements:

Only steel, iron and manufactured products produced in the United States may be purchased with Federal funds unless the Secretary of Transportation determines that such domestic purchases would be inconsistent with the public interest, that such materials are not reasonably available and of a satisfactory quality, or that inclusion of domestic materials will increase the cost of the overall project contract by more than 25 percent. Clear justification for the purchase of non-domestic items must be in the form of a waiver request submitted to and approved by the Secretary of Transportation.

POLITICAL ACTIVITY (HATCH ACT)

(Applies to sub-recipients as well as States)

The State will comply with provisions of the Hatch Act (5 U.S.C. 1501-1508) which limits the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

CERTIFICATION REGARDING FEDERAL LOBBYING

(Applies to sub-recipients as well as States)

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
3. The undersigned shall require that the language of this certification be included in the award documents for all sub-award at all tiers (including subcontracts, subgrants, and contracts under grant, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

RESTRICTION ON STATE LOBBYING

(Applies to sub-recipients as well as States)

None of the funds under this program will 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 proposal 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 communications 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 proposal.

CERTIFICATION REGARDING DEBARMENT AND SUSPENSION

(Applies to sub-recipients as well as States)

Instructions for Primary Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms *covered transaction*, *debarred*, *suspended*, *ineligible*, *lower tier covered transaction*, *participant*, *person*, *primary covered transaction*, *principal*, *proposal*, and *voluntarily excluded*, as used in this clause, have the meaning set out in the Definitions and coverage sections of 49 CFR Part 29. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR Part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR Part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the list of Parties Excluded from Federal Procurement and Non-procurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR Part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

CERTIFICATION REGARDING DEBARMENT AND SUSPENSION

The prospective primary participant certifies to the best of its knowledge and belief, that its principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
- (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of record, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or Local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
- (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.

Where the prospective primary participant is unable to certify to any of the Statements in this certification, such prospective participant shall attach an explanation to this proposal.

Instructions for Lower Tier Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
3. The prospective lower tier participant shall provide immediate written notice to the person to whom this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
4. The terms *covered transaction*, *debarred*, *suspended*, *ineligible*, *lower tier covered transaction*, *participant*, *person*, *primary covered transaction*, *principal*, *proposal*, and *voluntarily excluded*, as used in this clause, have

the meanings set out in the Definition and Coverage sections of 49 CFR Part 29. You may contact the person to whom this proposal is submitted for assistance in obtaining a copy of those regulations.

5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR Part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
6. The prospective lower tier participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion—Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions. (See below)
7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR Part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Non-procurement Programs.
8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR Part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion—Lower Tier Covered Transactions:

1. The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
2. Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

OTHER FEDERAL REQUIREMENTS

(23 U.S.C. 402(b)(1)(F))

The State will actively encourage all relevant law enforcement agencies in the State to follow the guidelines established for vehicular pursuits issued by the International Association of Chiefs of Police that are currently in effect. (23 U.S.C. 402(j))

The State will not expend Section 402 funds to carry out a program to purchase, operate, or maintain an automated traffic enforcement system. (23 U.S.C. 402(c)(4))

Failure to comply with applicable Federal statutes and regulations may subject State officials to civil or criminal penalties and/or place the State in a high risk grantee status in accordance with 49 CFR 18.12.

The State and each sub-recipient will not use 23 U.S.C. Chapter 4 grant funds for programs to check helmet usage or to create checkpoints that specifically target motorcyclists.

These Certifications and Assurances based on personal knowledge, after appropriate inquiry, and I understand that the Government will rely on these representations in awarding grant funds.

Signature of Certifying Official: _____

Date: _____

HIGHWAY SAFETY PROGRAM COST SUMMARY

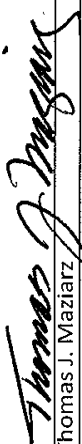
HS Form 217

State of Connecticut

Federal Fiscal Year : 2017

6/27/2016

Program Area	Approved Program Costs	Federally Funded Programs			State/Local Funds	Federal Share to Local
		Carry Forward Funds	Current Year Funds	Current Balance		
Section 402						
AL	\$135,000.00	\$135,000.00	\$0.00	\$135,000.00	\$33,750.00	\$54,000.00
CR	\$500,000.00	\$220,000.00	\$280,000.00	\$500,000.00	\$125,000.00	\$200,000.00
MC	\$430,000.00	\$219,000.00	\$211,000.00	\$430,000.00	\$107,500.00	\$172,000.00
OP	\$1,315,000.00	\$750,000.00	\$565,000.00	\$1,315,000.00	\$328,750.00	\$526,000.00
PA	\$300,000.00	\$115,000.00	\$185,000.00	\$300,000.00	\$300,000.00	\$120,000.00
PT	\$545,000.00	\$172,000.00	\$373,000.00	\$545,000.00	\$136,250.00	\$218,000.00
PS	\$670,000.00	\$94,000.00	\$576,000.00	\$670,000.00	\$167,500.00	\$268,000.00
TR	\$610,000.00	\$200,000.00	\$410,000.00	\$610,000.00	\$152,500.00	\$244,000.00
Total NHTSA (402)	\$4,505,000.00	\$1,905,000.00	\$2,600,000.00	\$4,505,000.00	\$1,351,250.00	\$1,802,000.00
SAFETEA-LU						
K10 (1906)	\$600,000.00	\$0.00	\$600,000.00	\$600,000.00	\$150,000.00	\$0.00
154 AL	\$6,672,000.00	\$2,902,000.00	\$3,770,000.00	\$6,672,000.00	\$0.00	\$2,668,800.00
154 HE	\$1,040,000.00	\$1,040,000.00	\$0.00	\$1,040,000.00	\$0.00	\$0.00
154 PM	\$2,000,000.00	\$770,000.00	\$1,230,000.00	\$2,000,000.00	\$0.00	\$800,000.00
Total NHTSA (OTHER)	\$10,312,000.00	\$4,712,000.00	\$5,600,000.00	\$10,312,000.00	\$150,000.00	\$3,468,800.00
Section 405						
405b (OP)	\$665,500.00	\$165,500.00	\$500,000.00	\$665,500.00	\$166,375.00	\$0.00
405c (TR)	\$905,000.00	\$505,000.00	\$400,000.00	\$905,000.00	\$226,250.00	\$0.00
405d (DUI)	\$3,658,000.00	\$2,158,000.00	\$1,500,000.00	\$3,658,000.00	\$914,500.00	\$0.00
405 Interlock	\$900,000.00	\$690,000.00	\$210,000.00	\$900,000.00	\$225,000.00	\$0.00
405e (DD)	\$4,015,500.00	\$2,515,500.00	\$1,500,000.00	\$4,015,500.00	\$1,003,875.00	\$0.00
405f (MC)	\$90,000.00	\$45,000.00	\$45,000.00	\$90,000.00	\$22,500.00	\$0.00
Total NHTSA (405)	\$10,234,000.00	\$6,079,000.00	\$4,155,000.00	\$10,234,000.00	\$2,558,500.00	\$0.00
TOTAL NHTSA & FHWA	\$25,051,000.00	\$12,696,000.00	\$12,355,000.00	\$25,051,000.00	\$4,059,750.00	\$5,270,800.00

State Official Authorized Signature: 
 Name: Thomas J. Maziarz
 Title: Governor's Highway Safety Representative
 Date: 6-27-2016

**Connecticut Department of Transportation – Highway Safety Office
Risk Assessment Form**



Grant recipient: _____ Grant recipient DUNS#: _____

Description: _____

Federal Fiscal Year: _____ Review Date: _____

Monitor Period: _____

Pre-Risk Assessment – Project Approval

1. Determine if the grant recipient had prior experience with same or similar sub-awards under this program area

- a. Did grant recipient receive a grant during the prior fiscal year? Yes/No
- b. Has grant recipient received a grant during the prior 3 fiscal years? Yes/No
- c. Has this recipient ever received a grant from the HSO? Yes/No

2. Determine the results of previous audits

- a. Did the grant recipient submit a signed copy of “Attachment A” Single Agency Auditing Requirements and Procedures? Yes/No/NA
- b. Was the same or similar sub award audited last year? Yes/No/NA

3. Determine if grant recipient has new personnel or new/substantially changed systems

- a. Are personnel and systems generally the same as during the previous award period? Yes/No

If “NO” project monitoring will occur (i.e. Email correspondence, desk monitoring, on- site visits, etc.)

If the grant recipient has had a grant with the HSO in the prior three years answer the following as part of pre-risk assessment. If the grant recipient has NOT had a grant during prior three years answer these as part of /post-risk assessment/project close out. Normal desk monitoring will occur for all new sub grantees

4. Determine the extent and results of Federal awarding agency monitoring

- a. Did the federal agency determine that there were no financial or compliance issues?
Yes/No/NA

**Connecticut Department of Transportation – Highway Safety Office
Risk Assessment Form**

5. **Determine if the entity has been consistently on time and/or accurate in the submission of the following:**

- a. Applications Yes/No
- b. Fiscal reporting Yes/No

6. **Identified deficiencies**

- a. During project monitoring was the grant free of deficiencies? Yes/No/NA
- b. If “NO”, were they addressed? Yes/No/NA

7. **Authorized Purposes**

- a. Did the activities of grant recipient use award for authorized purposes? Yes/No/NA

ASSESED NEED FOR MONITORING

0-3 No's	Grant recipient is considered low risk for monitoring	LOW
4-7 No's	Sub recipient is considered medium risk for monitoring	MED
8-14 No's	Grant recipient is considered high risk for monitoring	HIGH

Connecticut Department of Transportation – Highway Safety Office Risk Assessment Form

Post-Risk Assessment – Project Closeout

1. **Determine the extent and results of Federal awarding agency monitoring**
 - a. Did the federal agency determine that there were no financial or compliance issues?
Yes/No/NA
2. **Determine if the entity has been consistently on time and/or accurate in the submission of the following:**
 - c. Applications Yes/No
 - d. Fiscal reporting Yes/No
3. **Identified deficiencies**
 - c. During project monitoring was the grant free of deficiencies? Yes/No/NA
 - d. If “NO”, were they addressed? Yes/No/NA
4. **Authorized Purposes**
 - a. Did the activities of grant recipient use award for authorized purposes? Yes/No/NA

Based on the rating scale in the Risk Assessment Form, grant recipients will be placed in one of the following risk areas:

High Risk

1. Request a review by Connecticut Department of Transportation Internal Audits.
2. Require 100% documentation for reimbursement.
3. Withhold full or partial payments pending single audit results, reimbursement documentation or quarterly reports (NHTSA).
4. Review the corrective actions and determine if they followed up on the corrective actions.
5. Provide training and technical assistance on program related matter.
6. Consider whether the results of the audits et al. necessitate adjustments to the pass through entities own records.
7. Consider taking enforcement action against the non-compliant grant recipient.

Medium Risk

1. Schedule a financial review with the grant recipient.
2. Withhold full or partial payments pending single audit results, reimbursement documentation or quarterly reports (NHTSA).
3. Provide training and technical assistance on program related matter.

Low Risk

1. Provide standard monitoring.



Highway Safety Office Site Visit

Date: _____

Site Visit Location: _____

HSO Official making site visit: _____

Type of Site Visit:

DUI Checkpoint: _____ Seat Belt/CPS Clinic Checkpoint: _____

Office visit: _____ Special Event/ Meeting: _____

Description of Event: _____

Official Contacted: _____

Telephone Number: _____

Email: _____

Supporting informational facts concerning the site visit. (i.e., physical location of visit, condition of equipment, logistical problems with set up)

Submitted By

_____ Dated: _____



**CT Department of Transportation
Highway Safety Office**

**Project Monitoring
Checklist and Report**

Date: _____ Project Number: _____

Grantee/Agency: _____ Project Title: _____

Site Visit Loc.: _____ Grant Amount: \$ _____

Visit Number: _____ Time Period Covered: _____

Participant Name & Title

1. _____ 3. _____

2. _____ 4. _____

Was everyone present who should have participated? Yes No (explain)

1. Preparation for Visit

Project agreement reviewed? Yes No

Performance reports submitted? Yes No N/A

Claims for reimbursement reviewed? Yes No N/A

Grant correspondence and other required documents reviewed? Yes No N/A

2. Purpose of Visit (check if applicable)

Routine on-site monitoring, as specified in the Project Agreement.

To monitor project's training class or other activities.

Monitoring in response to identified problems. If checked, please explain.

Enforcement Program Checkpoint

Other. Please explain.

3. Grant Status

Is project being implemented on schedule? Yes No (explain) N/A

To the best of my knowledge all procedures relating to grant management followed and documented (see Policy & Procedures Manual) Yes No (explain) N/A

Have grant requirements been complied with (see Project Agreement, including submission of required documentation)? Yes No (explain) N/A

Is the project fully staffed with qualified and trained personnel? Yes No (explain) N/A

Are project revisions or an amendment required? Yes (explain) No N/A

4. Performance Information			
Is documentation satisfactory to justify activities and reimbursement?	Yes <input type="checkbox"/>	No (explain) <input type="checkbox"/>	N/A <input type="checkbox"/>
Are objectives and performance measures being met?	Yes <input type="checkbox"/>	No (explain) <input type="checkbox"/>	N/A <input type="checkbox"/>
5. Objective Listing and Individual Status - if applicable			
Number	Objective	Status	
Are activities on schedule according to the Project Agreement?	Yes <input type="checkbox"/>	No (explain) <input type="checkbox"/>	N/A <input type="checkbox"/>
Were any unique or special activities or accomplishments identified?	Yes (explain) <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6. Financial Records and Claims for Reimbursement			
Are claims for reimbursement submitted on time, correct, and accompanied by documentation for expenditures?	Yes <input type="checkbox"/>	No (explain) <input type="checkbox"/>	N/A <input type="checkbox"/>
Were any problems identified with the financial reporting to date?	Yes (explain) <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7. Property Management			
Has any equipment been purchased with grant funds?	Yes (explain) <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
If Yes, does the grantee have a system in place to control, protect, preserve, use, maintain and inventory the property?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Random check of equipment purchased conducted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
If Yes, what items checked?	_____		

8. Summary of Visit			
Is technical assistance or training needed?	Yes (explain)	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are corrective actions recommended?	Yes (explain)	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments and main points addressed during your visit.			
9. HSO Program Manager Signature			
_____	_____	_____	_____
Name	Title	Date Reviewed	
Supervisor Signature			
_____	_____	_____	_____
Name	Title	Date Reviewed	
Reviewed By (Optional)			
_____	_____	_____	_____
Name	Title	Date Reviewed	
Original of this Monitoring Report Form sent to HSO on:	_____	Date	
Copy of this Monitoring Report Form given/sent to Grantee on:	_____	Date	

10. Additional Comments

Instructions for Monitoring Form

You may delete this entire instruction page before printing or submitting the form. It is anticipated that many of the detail items will be checked as N/A as they may not be reviewed in every situation. This form serves to provide documentation for on-site monitoring, which may in some cases deal with only one issue rather than the entire project. Some answers to specific Yes or No questions require an explanation. If sufficient space is not available on this form, additional sheets may be added.

Date – Record the date the on-site monitoring visit was conducted.

Project Number – Record the Project Number. This number should be on the Highway Safety Project Agreement, Conditions and Certifications (Project Agreement).

Grantee – Record the name of the grantee as it appears on the Project Agreement.

Project Title – Record the project title as it appears on the Project Agreement.

Site Location – Record the site location of the on-site monitoring visit. Provide a description and address, if applicable. Example: City Offices, 1111 Grant Street.

Visit Number – Consecutive number for on-site visits made, starting with 1.

Time Period Covered – Time period covered by this grant visit.

Report For: – Primarily for non-Law Enforcement Grant use to Identify Quarter of report.

Participant Name and Title – List the name(s) and title(s) of all those who participated in the monitoring visit.

1. **Preparation for Visit** – Note whether specific documents have been reviewed and pre-visit actions taken.

2. **Purpose of Visit** – Briefly describe the purpose of the visit. *Examples: (1) Routine monitoring in compliance with Project Agreement; (2) In response to (stipulate specific issue or problem); or, (3) To review and participate in project's training class or other activities.*

3. **Grant Status** – Note the status of important grant activities.

4. **Performance Information** – Note whether required reports and documents were submitted and complete, including appropriate supporting documentation, and whether performance requirements are being met. Explain any "No" and any exemplary or special activities or actions, including Best Practices.

5. **Objective Listing and Individual Status** – Include in this section the objectives for the grant and progress on each one.

6. **Financial Records and Claims for Reimbursement** – Identify which financial records were reviewed and indicate what type of sampling was used to choose records. Photo copies should be made of documents received and attached to the report. Note whether required Claims for Reimbursement and documents were submitted and complete, including supporting documentation. Describe any findings.

7. **Property Management** – Describe any equipment purchased with grant funds and the presence, or lack of, an inventory system.

8. **Summary of Visit** – Indicate whether any technical assistance was provided and, if so, briefly describe what assistance was given. If no assistance was provided, indicate whether or not any training or technical assistance might be expected later in the project and when. Indicate whether any corrective action is needed. If so, briefly describe the action, designate who is responsible, and provide a date for completion. Summarize the main points addressed during the visit. *Note: Use additional sheets as needed to record all information. Include any comments needed for other sections of the report.*

9. **DTS Signature** – The Highway Safety Office (HSO) staff person doing the on-site monitoring should sign the form. If the review was completed by more than one person, both should sign the form.

Grantee Signature – The Grantee representative present at the on-site monitoring should sign the form. Only one signature from a grantee representative is required.

Reviewed By – If reviewed by an appropriate ConnDOT/HSO manager at the next level above the person doing the on-site monitoring, they should add their name and title.

10. **Additional Comments** – An optional page for additional comments when needed.

Provide the original of this form to the Project File and one copy to the grantee. One copy should be retained in the working file.

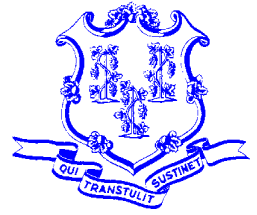


Connecticut Department of Transportation

Highway Safety Office

2800 Berlin Turnpike, PO Box 317546

Newington, CT 06131-7546



PRE-APPROVAL AND REIMBURSEMENT POLICY AND PROCEDURES FOR HIGHWAY SAFETY GRANT AND GRANT ACTIVITIES

- *All pre-approvals and reimbursements must be signed and dated by the sub-grantee's authorizing official.*
- *Reimbursements should be submitted on a quarterly/monthly basis, per program, per program manager, during the term of the approved grant (beginning October 1st thru September 30th).*
- *All reimbursements must include the invoice as well as proof of payment (examples: for airfare or hotel; a billing statement showing a zero balance, a screen shot from system showing vendor and payment amount with voucher number, copy of front and back of canceled check, or notarized letter which includes check number and date when expenditure was paid).*
- *Deadline for all federal reimbursements for salary positions must be invoiced to the CT Highway Safety Office (HSO) no later than October 30th. Failure to do so may jeopardize your reimbursement.*
- *Deadline for all federal reimbursements for commodity purchases and other pre-approved grant items should be submitted to the HSO no later than October 30th.*
- *All salary reimbursements must be accompanied by signed timesheets and/or reports. Signature of both the employee and authorizing Supervisor is required.*
- *Photocopies of any media coverage (if **applicable**) or supportive documentation can be included.*

TRAVEL REIMBURSEMENT POLICY AND PROCEDURES

- *All grant-related travel requires pre-approval by the HSO coordinator, even if listed in approved grant application.*
- *Pre-approvals and request for Reimbursement must be submitted by using the attached form (see Pre-Approval and Reimbursement Travel Form).*

- *Note: Every effort should be made to minimize travel costs wherever possible. The sub-grantee should make every effort to travel as close to start and end times of the conference as airline availability allows. Reimbursement for travel that occurs the day before the conference starts and/or the day after the conference ends will only be allowed if there are no other reasonable flight options available. Travel arrangements should be made directly with the hotel and airlines (where applicable), rather than through any other booking site. Every effort should be made to utilize the hotel designated by the conference. The sub-grantee has a responsibility to obtain the best price available when making travel arrangements. Baggage should be limited to one bag, if there is a charge for the bags. If more than one bag will be required (if transporting equipment to/from the conference, or books/materials for a class; or if travel exceeds one week) consideration will be given to pay for an additional bag. (Prior approval will be required).*

- *Travel reimbursement requests must be submitted no later than thirty (30) days from the first date of travel. Travel reimbursement requests need to be invoiced separately and NOT combined with any other grant invoices.*
- *All travel expenditures require a paid receipt (except meal receipts) (i.e. canceled check, zero balance invoice) and should be submitted with the reimbursement travel form.*
- *Meals can be reimbursed if travel is within the departure and arrival times listed below:*

	<u>Departure before</u>	<u>Arrival after</u>
<i>Breakfast</i>	<i>7:00 am</i>	<i>9:00 am</i>
<i>Lunch</i>	<i>11:00 am</i>	<i>2:00 pm</i>
<i>Dinner</i>	<i>5:00 pm</i>	<i>7:00 pm</i>

- *Grant recipient meal reimbursement requests will be made in accordance with the State of Connecticut Meal reimbursement allowance for Managers unless the individual is a state employee in which case they should adhere to their union's travel reimbursement rules. (See DAS website for details).*
- *Approved meal rates for non-state employees are as follows:*

Breakfast \$11.00 / Lunch \$15.00 / Dinner \$26.00

- *Gratuities on meals will be reimbursed at 15% of the meal reimbursement amount.*
- *Taxes on meals will be reimbursed on the meal amount at the state meal tax rate.*
- *If meals are included in conference/seminar/training, those meals should **NOT** be included in the reimbursement request. Copy of the agenda, including any conference/seminar/training*

itinerary, must be included in the reimbursement package. A daily summary of the meals included in the reimbursement request should be attached.

- *Pre-approved mileage reimbursement will be calculated at the State of Connecticut mileage reimbursement rate. The rate for 2019 is \$0.58 unless the agency (sub-grantee) mileage reimbursement rate is less. A MapQuest printout must accompany all mileage reimbursements.*
- *Eligible expenses(unless otherwise noted in your grant) include all of the following: conference registration, airfare, train, rental car (DRE Travel only), parking, transportation from airport/hotel (i.e. shuttle, taxi, Uber, or Lyft plus reasonable gratuities), luggage, meals, mileage, hotel accommodations and any other state identified eligible travel fees. As noted above, all pre-approved reimbursable expenditures require a paid receipt (with the exception of meals) and must be submitted with the reimbursement form.*
- *Ineligible items for travel reimbursements are:*
 - *Rental Car*
 - *Membership Fees**
 - *Airline Upgrades*
 - *Travel Agent/Service Fees*

** If membership dues or becoming a member of an organization is required in order to attend a conference, this should be discussed beforehand with the HSO coordinator and may be added to the pre-approval, if agreed by the HSO Coordinator.*

- ***NOTE:** Deadline for any reimbursements must be submitted no later than 30 days from the last date of travel.*

Failure to adhere to the above-mentioned requirements may result in delayed payment or refusal of reimbursement.

Connecticut Desk and On-Site Monitoring Form

For High Visibility Enforcement Grants and other Program Grants Monitoring

Type (check one): Desk On-Site (for non-HVE grants)

Grant Number: _____ Grant Year: _____

Grantee: _____

Project Title: _____

Federal Funds: _____

Reviewer Name: _____ Date Monitored: _____

Staff interviewed: _____

Reporting:

Are Objectives and Performance Measures being met? Yes No

Does agency participate in statewide programs? Yes No

Adherence to project timeline? Yes No

Will all grant activities be completed by the end of the grant year?

Yes No

Are status reports turned in on a timely basis? (monthly/quarterly)

Yes No

Has grantee complied with special condition(s) defined in contract agreement?

Yes No

Budget:

Are grant funds being expended in a timely manner? Yes No

Explain if answer is "no".

Will all funds be expended by the end of the grant year? Yes No

Are expenditures consistent with those approved in the budget?

Yes No

Equipment (on-site monitoring):

Have equipment purchases made on the grant been verified at the location and are they in proper use and condition? N/A

Personnel:

Are methods in place to account for the overtime of personnel for grant related activity? Yes No N/A

Are activity sheets completed for all personnel working on the grant and signed by a supervisor? Yes No N/A

Additional Comments or Noteworthy Items