



## Notable Rapid Response Questions from January 2021

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### *Funding*

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#### **Can a Council sub-recipient use the cost of volunteer services as match?**

Yes, if the volunteer service is a vital and necessary part of the approved project or activity.

[45 CFR 75](#) §75.306 provides details.

#### **Can the Council or a sub-recipient of the Council purchase gift cards or offer small financial incentives to people who are participating in a Council project or activity?**

Gift cards and other financial incentives are not allowable with Federal funds. However, participant support costs are an allowable cost (see below for the definition of participant support costs).

[45 CFR 75.456](#) allows Participant Support costs as defined in 75.2. These expenses are allowable with the prior approval of the HHS awarding agency.

Participant support costs are defined as direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conference or training projects.

When in-person events are not possible, participant support costs are minimal. The Council should continue to work with the sub-recipient on other ways to use the funds to support their work. For example, consider using resources to film/record training sessions that can be placed on a website for on-demand use. Consider using self-advocates, family members, and people from diverse backgrounds as speakers for the recorded session or as an "editorial group" to review the materials - consider paying them for their work! Use funds to translate the training sessions (consider language interpretation, sign language interpretation, and closed captioning for the recording and any written materials).

If you would like to explore other ideas, please contact an ITACC staff member.

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*Federal Reports*

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**How long do we have to keep copies of our federal reports and documents on file?**

The [federal retention regulation](#) indicates records must be kept for three years however; the records must be kept longer under specific circumstances.

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*State plan development 2022-2026*

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**What elements of the draft State Plan for 2022-2026 must be made available for public comment?**

At a minimum the goals and objectives should be made available to the public for their comment. Remember to make the information available in accessible formats (including language translation).