



Notable Rapid Response Questions from February 2021

Funding

What are the best fiscal resources for a new Council fiscal staff employee?

The resources that are most helpful to fiscal managers are:

- ✓ The DD Act (Public Law 106-402).
- ✓ 45 CFR Part 1326 Subparts A-D (Subpart D is specific to Councils).
- ✓ 45 CFR 75 (this aligns with 2 CFR 200, but tailored for HHS grantees).
- ✓ Information memorandums issued by the funding agency (sometimes the funding agency is identified as ADD, AIDD, AoD, or OIDD).
- ✓ Program Instructions issued by the funding agency.
- ✓ The Notice of Award issued to the DD Council and the DSA.
- ✓ [HHS Grants Policy document](#). Allowable cost information is in Section II.

ITACC staff (in partnership with ACL and OIDD) developed three basic fiscal modules that cover the following:

- ✓ Fiscal Basic Training #1: funding, OGM Role, Statutes and Regulations, Formula Grant, NOA, Federal Financial Reports.
- ✓ Fiscal Basic Training #2: Match.
- ✓ Fiscal Basic Training #3: Cost Principles, Budget, Staff Allocation.

Each month a "Notable Rapid Response" FAQ document is created from the Rapid Response questions asked by members of the DD Council Network. This document includes a "funding" questions section. You can find a tab at this [link](#).

Documenting personnel expenses

Any employee cost charged to a federal grant must maintain a time and effort report. (See 45 CFR 75 §75.430 (i) Standards for documentation of personnel expenses).

This applies to any sub-recipient that receives federal funds from the Council as well as Council staff that is being paid from federal funds.

In general – personnel expenses must be based on records that accurately reflect the work performed.

For Council employees working on multiple cost objectives (administrative and state plan activities), documentation should be on file that shows the employee name, reporting period, fiscal year, and job title. There should be a line item for “Administrative” with the percentage spent on administrative tasks, and hours worked for the reporting period (for example, bi-weekly or monthly). Then a line item for “State plan activities” with the percentage spent on state plan tasks and hours worked for the reporting period.

Can my DSA provide in-kind contributions as match for the federal award?

Yes! The DD Act indicates that contributions by the designated State agency to provide support services to the Council may be counted as part of the non-Federal share of the cost of projects supported under Title B (Public Law 106-402, Section 126 (b)(2)(B)).

If your DSA requests reimbursement of necessary costs to support the Council (5% of the annual grant award amount or \$50,000 – whichever is less), the DSA must provide double the amount of the reimbursement. For example, if a DSA requests the Council reimbursement them for \$50,000 of their expenses, the DSA must have provided a minimum of \$100,000 in support costs. The amount eligible to be used as match would be anything over the reimbursement amount.

Federal Reports

Is the PPR due on March 31, 2021?

No. A new date will be announced later.

Is the FFY 2021 State plan update due March 31, 2021?

No. A State Plan update (and Annual Work Plan update) is not required for FFY 2021.

State plan development 2022-2026

Do the self-advocacy requirements have to be in one objective?

The expectation is that there will be a goal or objective for the required self-advocacy activities. The self-advocacy efforts include 1) establishing or strengthening a self-advocacy program led by people with developmental disabilities; 2) supporting opportunities for self-advocate leaders to provide training to other self-advocates who may become leaders, and 3) supporting and expanding participation in cross-disability, culturally diverse leadership coalitions.

Reminder! The DD Act requires Council staff to report separate information on the self-advocacy goal or objective (Public Law 106-402, Section 125 (c)(7)(D)). Creating a goal or objective with all self-advocacy activities included can assist the Council staff with data collection, monitoring, and evaluation activities to determine progress made and impact for people with developmental disabilities.

Other

Do you know of any good plain language resources that would give us guidelines and examples?

There is a federal resource that provides writing tips for plain language. There are several tables with “do’s and don’ts”, and a listing of concrete words and other great tips!

<https://www.plainlanguage.gov/resources/articles/dash-writing-tips/>

There are several “apps” that help you write more clearly. These applications highlight lengthy, complex sentences and common errors. This will help you shorten sentences or split them into several sentences. Some highlight hard words that can be changed to make clearer (for example, use instead of utilize). Most show the readability grade level.

<https://readable.com/>

www.hemingwayapp.com

Are the State Plan assurances the same as a Memorandum of Understanding (MOU) with the Designated State Agency (DSA)?

No. The assurances are required as part of your State/Territory 5-year plan. The Memorandum of Understanding is not required but at the request of the Council, the DSA shall enter a MOU with the Council that outlines the roles and responsibilities of the Designated State Agency.