

FY 2021 Notable Rapid Response Funding Related Questions

Can we purchase supplies for our Council members to participate in meetings?

Yes, but these costs must come from the administrative portion of the budget and be necessary and reasonable.

Can federal funds be used for advertising and public relations?

It depends on the cost. 45 CFR 75, Section 75.421 provides information on the allowable and unallowable costs associated with advertising and public relations.

Can a former grantee receive income from a former project the Council funded?

45 CFR 75, Section 75.307 (f) *Income after the period of performance* addresses this question.

Are dollars leveraged reported on the SF-425?

No. Dollars leveraged are reported on the Program Performance Report (PPR).

Where do I find my Council's grant number?

The grant number is on the Notice of Award at the top of the award next to the heading "Grant No."

Do we have to make our funds available through a competitive process?

In general, yes unless the conditions are met for noncompetitive proposals.

- ✓ 45 CFR 75 (Section 75.101 - Applicability) indicates the terms and conditions flow down to subrecipients unless it is specifically stated that the subrecipient is excluded.
- ✓ 45 CFR 75 (Section 75.328) addresses Competition. (a) states all procurement transactions must be conducted in a manner providing full and open competition..."
- ✓ 45 CFR 75 (Section 75.326) addresses Procurement by States and includes the wording "including subrecipients of a State will follow sections 75.327 through 75.335" - this includes the competition section.
- ✓ 45 CFR 75 (Section 75.329) (f) addresses procurement by noncompetitive proposals and may only be used when one or more listed circumstances apply.

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.

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's 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.

Cost sharing/match - Can unrecovered indirect costs be used as match?

Yes! 45 CFR 75 - Section 75.306 (c) provides guidance.

Cost sharing or matching

(c) Unrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with prior approval of the HHS awarding agency. Unrecovered indirect cost means the difference between the amount charged to the

Federal award and the amount which could have been charged to the Federal award under the non-Federal entity's approved negotiated indirect cost rate.

Are UCEDD's exempt from providing match because they are a DD Network partner?

No. The DD Act does not provide an exemption for University Centers who are grantees (sub-recipients) of a DD Council. The DD Act provides guidance about the maximum amount of federal funding that can be used for projects and activities (see [PL 106-402](#), Section 126).

My Council requires 33% match, and it looks like the DD Act indicates a 25% match - which is correct?

The DD Act indicates that a Council can only pay up to 75% of the total cost of a project with federal funds. This means 25% of the total cost of the project would be the cost sharing or match from the person or organization requesting federal funds.

Are DD Network partners (P&A's and UCEDD's) subject to match requirements if they receive Council funds?

Yes. DD Network partners that are implementing state plan activities for the Council are subject to match requirements the same as any other sub-recipient. Match apply to the project or activity and these requirements are not set aside based on their role as a P&A or UCEDD.

Can we pay for Council members to travel to meetings and trainings?

It depends. The DD Act supports reimbursement based on Council policy for supporting Council members for reasonable and necessary expenses for attending Council meetings and performing Council duties. Councils may also support member and staff travel to authorized training and technical assistance activities, in-service training, and leadership development activities such as the OIDD Technical Assistance Institute, the NACDD Conference, the Disability Policy Seminar. Council members should not participate in Council funded training and leadership development activities.

We received a grant application that included a request to use funds to purchase technology as part of their project work – is that okay?

If the cost is necessary for the federally funded project or activity, this could be allowable as a "participant support cost". We recommend the Council objectively evaluate whether the costs are necessary for participants to be involved in the project and not merely "nice" for the Council to provide. Determine how the Council (or grantee) will handle a situation where a piece of technology or an internet "hot spot" resources was provided, and a person did not participate in the project, or the technology and/or resource was stolen or lost.