**MANAGEMENT REVIEW ELEMENTS – HIGHWAY SAFETY PROGRAM**

**State Management Review in FY 2017 ONLY- Self Assessment Checklist**

***Note: Some Findings and Management Considerations are referenced as “Fiscal year (FY) 17” or as “FY15 & 16”. These references are needed to distinguish between Elements that are applicable to 23 CFR Part 1300 which went into effect in FY17 and Elements applicable to 23 CFR Part 1200 which was effective in FYs 15 & 16. The FY refers to the FY in which the funds related to the finding were expended, NOT the FY in which the funds were awarded.***

**State of:** **Projected Review Dates:** **SHSO Reviewer:**

**I. ORGANIZATION AND STAFFING Responsible SHSO Staff Member:**

**I – A: Authority and Functions**

|  |  |  |  |
| --- | --- | --- | --- |
| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| Legislation or Executive Order | Maintain copy of State enabling legislation or Executive Order (EO) on hand that establishes the authority, organization, placement and functions required of the SHSO. Make available any applicable State regulations and SHSO Policies and Procedures.  **Resources:** [**23 CFR Part 1200.4**](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=23:1.0.2.13.1#se23.1.1200_14)  **State Law/EO: XXXX** | Yes  No |  |
| 1. Policy | F: Ensure that legislation or EO states Governor is responsible for SHSO program administration and have copy of document on hand. Demonstrate that the SHSO has been provided adequate powers, is suitably equipped and is organized to carry out the program.  **Resources:**  **[23 USC Chapter 4, Section 402 (b)(1)(A)](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/07_Sect402Leg23USC_Chap4.html) State Law/EO: XXXX** | Yes  No |  |
| 2. Authority | F: Ensure SHSO has authority to develop and implement the Highway Safety Plan (HSP), collect data, maintain or access traffic records systems, review and comment to the Governor, award grants, provide technical and financial assistance and adequately staff the SHSO.  **Resources: *FYs 15 & 16:*** [**23 CFR 1200.4(b) (1 - 6)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.1.1.4)  ***FY17:* [23 CFR § 1300.4(b)(1-7)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_14&rgn=div8)** | Yes  No |  |
| 3. Functions | F: Ensure SHSO conducts the required functions  **Resources: : *FYs 15 & 16:*** [**23 CFR 1200.4(c)(1 - 10)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.1.1.4)  ***FY17:*** [**23 CFR § 1300.4(c)(1-12)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_14&rgn=div8)**,** [GHSA Member Only Site/SHSO Organization/Sample Position Descriptions](http://my.ghsa.org/index.asp) | Yes  No |  |
|  | RA: Define the role of the law enforcement liaisons (LELs), establish specific performance goals/milestones and provide for periodic performance evaluations  **Commendations: Illinois, Kansas LEL Program organization** | Yes  No  N/A |  |
|  | **NHTSA TIP**: Review current staffing level for adequacy to carry out functions; address each program area; meet deadlines; conduct data analysis for problem identification, target setting and evaluation; and, conduct monitoring. |  |  |
|  | RA: Determine that there are staff assignments for each program area | Yes  No  N/A |  |
|  | RA: Ensure that an individual or entity with relevant training is assigned the function of data analysis for the stated tasks | Yes  No  N/A |  |
|  | RA: Ensure that the task of conducting monitoring has been adequately staffed to ensure completion of all planned monitoring | Yes  No  N/A |  |
| Basis for making program coordinator assignments | RA: Be able to describe the rationale and basis for division of program staff assignments to ensure efficiency – program, geographic areas, other? | Yes  No  N/A |  |

**I – B: Organization and Staffing**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| (i) SHSO Organization Chart | Maintain an accurate, current copy of the SHSO organization chart | Yes  No  Not Applicable (N/A) |  |
|  | RA: Hire a law enforcement liaison (LEL) position to assist with increasing active participation by law enforcement agencies in SHSO enforcement activities and initiatives | Yes  No  N/A |  |
| (ii) Placement of SHSO within agency | RA: Identify placement of the SHSO on the host State agency’s organization chart | Yes  No  N/A |  |
| (iii) Content of SHSO organization chart | RA: Confirm that all current organizational units and the names of each current staff member are included | Yes  No  N/A |  |
|  | RA: Ensure that staff position descriptions are kept current and agree with organization chart information | Yes  No  N/A |  |
| 1. Appointment of the GR | F: Ensure that the SHSO can document the appointment of the current GR by the Governor  **Resources: *FYs 15 & 16:*** [**23 CFR Part 1200.3**](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=23:1.0.2.13.1#se23.1.1200_13)  ***FY17:*** [**23 CFR Part 1300.3**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_13&rgn=div8) | Yes  No  N/A |  |
| 2. Name and title of SHSO Director if not the GR and their access to GR | RA: Self explanatory | Yes  No |  |

**I – C: Policies and Procedures**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| (i)SHSO Policies and Procedures (P&P) Manual | RA: Establish a P&P Manual specific to the federally funded highway safety program which encompasses the major functions listed using GHSA and other State manuals as models  **Resources:** [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)  **Commendations: Alaska, Nebraska, Oklahoma** | Yes  No  N/A |  |
| (ii) Current information | RA: Develop a system which is documented in a policy to periodically review, update and track changes to the P&P Manual to ensure that is it up to date  **Resources:** [GHSA Policies and Procedures Manual, Ch. I, Sec. B](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual) | Yes  No  N/A |  |
| 1. Specific and detailed | RA: Ensure that the policies provide clear guidance and contain sufficient details to clarify the various issues related to managing the program | Yes  No  N/A |  |
|  | RA: Includes within the P&P Manual any applicable forms or electronic links to the forms to help staff become familiar with their contents | Yes  No  N/A |  |
| 2. Improvement of processes | RA: Conduct periodic reviews of the policies and incorporate necessary modifications to continuously improve the processes | Yes  No  N/A |  |
| 3. Staff aware of P&P | RA: Post the P&P Manual electronically on the intranet (internet) for easy staff access, notify staff where it is located and periodically remind staff to use the P&P Manual | Yes  No  N/A |  |
| 4. Staff using P&P | RA: Periodically examine grant files and review key procedures to determine that all staff is consistently following the current policies in the P&P Manual | Yes  No  N/A |  |
|  | RA: Provide regular training on sections of the P&P Manual to all staff through staff meetings, electronic updates and/or periodic reminders | Yes  No  N/A |  |
| 5. SHSO resources | RA: Identify and ensure staff utilize available resources in the development of the policies  **Resources:** [NHTSA Highway Safety Grant Resources](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide) **, [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), [NHTSA State Traffic Safety Information website](http://www-nrd.nhtsa.dot.gov/departments/nrd-30/ncsa/STSI/USA%20WEB%20REPORT.HTM)** | Yes  No  N/A |  |
| 6. Procedures on costs allowability and terms and conditions | F: Ensure that the SHSO P&P Manual includes written procedures to determine the allowability of costs per the Uniform Guidance and the terms and conditions of the Federal award  **Resources: *FY 15:*** [**2 CFR § 225 Appendix (A)(B)**](https://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf)  ***FY16* and beyond*:*** [**2 CFR § 200.302(b)(7)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a6a7e7f74a19f9dac059867664149516&mc=true&node=se2.1.200_1302&rgn=div8) | Yes  No  N/A |  |
|  | RA: Ensure that the SHSO P&P Manual includes written procedures on the terms and conditions of the Federal award | Yes  No  N/A |  |

**I – D: Delegations of Authority**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| Written delegation of authority | RA: Ensure that the SHSO has available the current written delegation of authority and responsibility to carry out assigned functions. | Yes  No  N/A |  |
| 1. Procedure for delegation of authority and includes signatory authority | RA: Develop and implement a procedure for a written delegation of authority and ensure that it provides for signatory authority to authenticate official documents  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual) **See Ch. II** | Yes  No  N/A |  |
| 2. Carrying out assigned functions in absences | RA: Provide for an alternative person to be authorized to sign documents when the Governor’s Representative and/or the Coordinator are not available | Yes  No  N/A |  |
|  | RA: Update the delegation of authority documents immediately upon changes being made to the named persons or their titles | Yes  No  N/A |  |

**I –E: Personnel Development and Training**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Identify and meet training needs for management and staff | RA: Inventory and maintain a record of past training courses taken by staff and develop an annual staff development plan for each employee | Yes  No  N/A |  |
|  | RA: Consider sending staff to repeat attendance at NHTSA training courses as needed | Yes  No  N/A |  |
|  | RA: Develop a formal process, including formalized learning activities and timelines with benchmarks, to train new employees and document the process in the Policies and Procedures Manual | Yes  No  N/A |  |
|  | RA: Conduct in-service training for staff on SHSO policies and procedures and the federal grant management manual | Yes  No  N/A |  |
| 1a. Ensure that appropriate staff attend NHTSA and GHSA courses | RA: Assign staff involved with Highway Safety Performance Plan (HSP) development and project oversight, including managers, to attend the NHTSA Program Management and Managing Federal Finances and GTS, Data Analysis and Evaluation or equivalent courses  **Resources: [RITA Transportation Safety Institute](http://www.rita.dot.gov/tsi/about/highway_safety)** | Yes  No  N/A |  |
|  | RA: Assign new program staff to attend the applicable NHTSA program management course (Impaired Driving, Occupant Protection, Traffic Records, etc.) within 12 months of hire | Yes  No  N/A |  |
|  | RA: Collaborate with NHTSA and other States in hosting and participating in training courses to reduce staff time for travel and address travel restrictions | Yes  No  N/A |  |
|  | RA: Send the GR, SHSO Coordinator or Director and other high level managers to the GHSA Executive Seminar when offered | Yes  No  N/A |  |
|  | RA: Ensure that applicable staff participate in all GHSA sponsored trainings and webinars | Yes  No  N/A |  |
|  | RA: Ensure that program management staff with financial responsibilities have attended the NHTSA Managing Federal Finances Course as needed | Yes  No  N/A |  |
|  | RA: Provide annual in-house training for program management staff on their State and Federal financial management duties | Yes  No  N/A |  |
|  | RA: Assign SHSO staff to attend essential specialized conferences and national and regional traffic safety meetings to enhance knowledge and improve future planning skills | Yes  No  N/A |  |
| 1b. Participation in regional and national highway safety conferences | RA: Assign SHSO staff to attend essential specialized conferences and national and regional traffic safety meetings to enhance knowledge and improve future planning skills | Yes  No  N/A |  |
| 1c. Adequate guidelines for authorization and payment of training | RA: Establish and implement a policy to adequately prescribe the process for staff to request written approval to attend training including justification, cost and funding source | Yes  No  N/A |  |
| 1d. Provide internal training on data analysis and evaluation | RA: Provide internal training on grant policy and procedures relating to data analysis and evaluation, performance measure target setting and evidence-based project selection | Yes  No  N/A |  |
| 2. Assess adequacy, frequency and content of training to develop subrecipients | RA: Survey subrecipients periodically to determine need and interest in attendance at applicable NHTSA sponsored and professional development courses | Yes  No  N/A |  |
|  | RA: Provide up-to-date grant management training to subrecipients annually e.g. briefing, manual, webinar, etc.  **Commendation: Nebraska (manual), New Jersey (new subrecipients), North Carolina (manual), South Dakota (all subrecipients)** | Yes  No  N/A |  |
| 3. Determine if there are any roadblocks to delivering necessary and effective training | RA: Identify and attempt to address any restrictions, such as travel or cost, which prevent delivery of effective or needed training | Yes  No |  |

**II. PROGRAM MANAGEMENT Responsible SHSO Staff Member:**

**II – A. Planning**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Required policies and procedures for the planning process | RA: Ensure that the SHSO policy on the planning process addresses each of the federally required elements  **Resources: *FYs 15 & 16:*** [**23 CFR Part 1200.11(a)**](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=23:1.0.2.13.1#se23.1.1200_114)  ***FY17:*** [**23 CFR § 1300.11(a)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_111&rgn=div8) | Yes  No  N/A |  |
|  | RA: Provide written, current documentation to identify the data sources being utilized in the planning process as well as the names of the participants involved in the process | Yes  No  N/A |  |
|  | RA: Broaden the SHSO planning outreach to both State and local partners and include diverse and non-traditional groups  **Commendations: Michigan, Vermont** | Yes  No  N/A |  |
|  | RA: Use the information and input received from partners during the planning process to assist with the SHSO HSP decision making | Yes  No  N/A |  |
| 2. SHSO staff following planning policies | RA: Ensure that the policies and procedures regarding the planning processes are actually being followed by the SHSO staff | Yes  No  N/A |  |
|  | RA: Ensure that the SHSO can accurately describe and demonstrate the current process used by the SHSO to develop and implement the HSP  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. II** | Yes  No |  |
|  | RA: Use the GHSA HSP Guidance as a reference when developing the annual HSP  **Resources: [GHSA Guidance for Developing HSPs](http://www.ghsa.org/resources/guidance-developing-highway-safety-plans)** | Yes  No  N/A |  |

**II -B: Program Performance**

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| --- | --- | --- | --- |
| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| 1. Resolution of NHTSA recommendations or required actions | F or RA: Prior to the MR, review the current and two prior fiscal years’ NHTSA HSP Content Review Guide (CRG), NHTSA reviews of the HSPs, HSP approval letters, Annual Report reviews, Annual Report response letters and any related comments and correspondence to determine if all recommendations or required actions have been addressed by the SHSO  **Resources: *FY17:*** [**23 CFR § 1300.14(a)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_114&rgn=div8) | Yes  No  N/A |  |
|  | RA: Ensure that previous compliance issues have been fully resolved and demonstrate that a process is in place to prevent future occurrences | Yes  No  N/A |  |
|  | RA: If conditions were placed by NHTSA on the HSP approval, ensure that all have been resolved, will not recur and a process is in place to avoid future conditions | Yes  No  N/A |  |
|  | RA: If the HSP approval included considerations or improvement opportunity suggestions that were accepted by the SHSO, ensure that steps have been taken to implement them | Yes  No  N/A |  |
| 2. Performance data for most recent 3-year period for progress in meeting priority targets | RA: Examine HSP targets, FARS data, trends and other factors to determine if “progress” has been made. If not, document reasons and issues as well as SHSO actions to improve performance  **Commendations: Michigan, Minnesota, Pennsylvania, South Dakota, Wisconsin** | Yes  No  N/A |  |
|  | RA: Consider expanding nighttime seat belt enforcement efforts and include as part of the grant objectives within applicable grants to address low nighttime seat belt usage in nighttime fatalities. Provide subrecipients, through LELs, with information on best practices to overcome perceived obstacles to implementing nighttime seat belt enforcement. | Yes  No  N/A |  |
|  | RA: Review the occupant protection program to enhance strategic planning in the areas of funding, geographic coverage, implementation and coordination across countermeasures and subrecipients, program evaluations and revisions. | Yes  No  N/A |  |
|  | **NHTSA TIP**: When considering lack of progress, multiple factors including number of years will be considered as well as: SHSO following HSP process, strategies comprehensive, projects adequately funded, adequate staffing, correct geographic focus, proper implementation of projects, interfering outside factors, i.e. law changes, politics, etc. |  |  |

**II – C: Project Selection**

|  |  |  |  |
| --- | --- | --- | --- |
| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| 1: Follow procedure for soliciting grant applications | RA: Ensure that the SHSO follows the project solicitation/application policies and procedures | Yes  No  N/A |  |
| (i) Consideration of prior performance | RA: Be able to describe the method used by the SHSO to consider successes, and, to address any challenges or issues encountered with poor performance | Yes  No  N/A |  |
| (ii) Consideration of administrative difficulties | RA: Be able to describe the method used by the SHSO to address any administrative difficulties (e.g. incomplete, late or lack of reporting) | Yes  No  N/A |  |
| (iii) Grading and evaluation of grant applications | RA: Document the policy and the procedure used to review all grant applications which provides a system to ensure fairness, comprehensiveness and application of problem ID in the grant selection process  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. IV**  **Commendation: Nebraska** | Yes  No  N/A |  |
|  | RA: Provide a step in the grant review process for SHSO fiscal staff to check the proposed budget of grant applications for accuracy and compliance with State and Federal regulations | Yes  No  N/A |  |
|  | RA: Develop and adhere to a standardized, objective, documented scoring process for grant proposals to ensure project selection is based on identified needs and proven countermeasures with written justification to support scoring | Yes  No  N/A |  |
|  | RA: Establish a formal checklist with standard criteria to evaluate proposals individually and as a team which is required for all grant applications. The criteria should include: measurable goals, goals in support of the HSP goals and performance measures, past performance, data-driven problem ID, project description, budget content and effective strategies. | Yes  No  N/A |  |
|  | RA: In areas where deficiencies have been detected, provide clear guidance and technical assistance to subrecipients throughout project review period and implementation of projects | Yes  No  N/A |  |
| 2. Project selection strategies and use of evidence-based strategies/projects | F: Ensure that the SHSO is following the project selection strategies outlined in the HSP and that the strategies are documented as evidence-based  **Resources: *FYs 15 & 16:*** [**23 CFR Part 1200.11(a)(1)**](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=23:1.0.2.13.1#se23.1.1200_14)  ***FY17:*** [**23 CFR § 1300.11(a)(1)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_111&rgn=div8)  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. II,**  [**Countermeasures That Work: A Highway Safety Guide for State Highway Safety Offices**](http://www.ghsa.org/resources/countermeasures2015) | Yes  No |  |
|  | RA: Ensure that a broad-based approach is taken to identifying problems including the use of non-traditional data sources | Yes  No  N/A |  |
|  | RA: Ensure that all aspects of identified problems have been examined by the SHSO and are able to describe the rationale for the decisions made is included in the HSP | Yes  No  N/A |  |

**II – D: Program Planning**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| Process for planning and programming and SHSO establishment and adherence to time-framed schedule for major events in the process | RA: Develop and implement a policy which provides for adequate, effective and consistent application of each of the steps of the planning and programming processes listed in the NHTSA MR Elements IID including calculation of Maintenance of Effort and obligation of funds to the required Federal system with the SHSO policies and procedures | Yes  No  N/A |  |
|  | RA: Establish, publish and implement a grant development calendar for the completion of each of the planning steps within the SHSO policy for the planning and programming process (refer also to GHSA sample in Policy Manual)  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. II**  **Commendations: Maine, New York** | Yes  No  N/A |  |
|  | RA: At the completion of each annual planning cycle conduct an internal after-action review to determine if any enhancements should be made to the planning process for the next fiscal year | Yes  No  N/A |  |
|  | RA: Ensure that the Annual Report contains each of the federally required elements  **Resources:**  **[23 CFR Part 1300.35](https://ecfr.io/Title-23/pt23.1.1300" \l "se23.1.1300_135), [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. VI** | Yes  No |  |
|  | RA: Use the GHSA Annual Report Guidance to develop the Annual Report and consider inclusion of the suggested optional information  **Resources:** [**GHSA Annual Report Guidance**](http://www.ghsa.org/resources/annual-report-guidance) | Yes  No  N/A |  |
|  | F: Ensure that complete and accurate documentation by the SHSO is available to demonstrate compliance for each applicable year for all State sources with the MOE requirements for Section 405 Occupant Protection, State Traffic Safety System Improvements and Impaired Driving Countermeasures grant programs  **Resources:** [**GHSA Policy Manual Chapter II, Section H**](http://www.ghsa.org/html/resources/mgmt/polproc.html)**,** [**NHTSA Highway Safety Grant Management Resources/MOE Guidance**](http://www.nhtsa.gov/About+NHTSA/Highway+Safety+Grant+Programs/Resources+Guide)**,** [**GHSA Maintenance of Effort Advisory**](http://www.ghsa.org/resources/maintenance-effort-moe-advisory) | Yes  No |  |

**II – E: Implementation**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Separation of duties between individuals who develop versus approve the sub grants | RA: Identify in the SHSO policy the titles of staff authorized to develop sub grants and to approve grant agreements and their specific duties ensuring the duties have been separated | Yes  No  N/A |  |
|  | RA: Document all changes to approved grant agreements with an explanation, budgetary note, initials of the approving employee and the date of the approval | Yes  No  N/A |  |
| 2. Funded projects listed in HSP | F: Ensure that every funded project is listed in the HSP or in an HSP revision submitted to the NHTSA Regional Office  **Resources: : *FYs 15 & 16:*** [**23 CFR 1200.33(e)(3)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.1.1.4)  ***FY17:*** [**23 CFR § 1300.33(e)(3)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_133&rgn=div8) | Yes  No |  |
| 3. Written guidance for staff and subrecipients on projects | RA: Provide written guidance for SHSO staff and subrecipients on the preparation, implementation, administration and evaluation of projects | Yes  No |  |
| 4. Determine whether the SHSO, as a pass-through entity, does the following: | | | |
| 4a. Award information to subrecipients | ***FY15:***  F: Inform each subrecipient of the: CFDA title, CFDA number, award name, award number and name of Federal agency (NHTSA)  **Resources:** [**OMB Circular A-133, Subpart D, Section 400 (d)(1)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf) | Yes  No  N/A |  |
| Advise subrecipients of requirements | F: Advise sub recipients by letter or in project agreement of the requirements imposed on them by Federal laws, regulations and the provisions of contracts or grant agreements as well as any supplemental requirements imposed by the pass-through entity  **Resources:** [**OMB Circular A-133, Subpart D, Section 400 (d)(2)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf) | Yes  No |  |
| 4b. Award information to subrecipients | ***FY16 & beyond:***  F: Ensure every subaward is clearly identified to the subrecipient as a subaward and includes the following (including action if any changes are made in subsequent subaward modifications): Federal Award Identification, subrecipient name, subrecipient’s unique entity identifier; Federal Award Identification Number (FAIN); Federal award date; subaward performance start and end date; amount of Federal funds obligated by the action; total amount of Federal funds obligated to the subrecipient; total amount of Federal award; award project description (FATA), name of Federal awarding agency, pass-through entity and contact information for awarding official; CFDA number and name; whether the award is Research and Development; indirect cost rate (if any) including if de minimis rate is charged; requirements imposed by Federal statutes, regulations and terms and conditions of the award; any additional requirements; an approved federally recognized indirect cost rate (if any) negotiated with the Federal government or the pass-through entity or the 10 percent di minimis rate; requirement for access by auditors to records and financial statements and appropriate terms and conditions concerning closeout of the award.  **Resources:** [**2 CFR Part 200.331(a) (1-6)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a9734d9ad44b4d0d2f7555da1ac55128&mc=true&node=se2.1.200_1331&rgn=div8) | Yes  No |  |
| 5. Project agreements under GTS voucher | F: Develop and implement a procedure and track actual activity to ensure that there is a project agreement (and supporting documentation) that can be made promptly available for NHTSA’s examination for each project that has expenses claimed under a GTS voucher  **Resources: *FYs 15 & 16:*** [**23 CFR 1200.33 (c)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.1.1.4)  ***FY17:*** [**23 CFR § 1300.33(c)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_133&rgn=div8) | Yes  No |  |
| 6. Content of project agreement  \*in addition to those in II.E.4. B. | F: Develop and execute a written grant agreement with each entity that is expending Federal highway safety grant funds including State agencies which contains each item enumerated in MR Element II.E.(6) | Yes  No |  |
|  | RA: Establish and publish a written policy that specifies the standard content of the SHSO grant agreement including the provision of sample forms  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. III** | Yes  No  N/A |  |
|  | RA: Provide guidance to potential subrecipients in how to write comprehensive and complete grant proposals including evidence-based targets (with baseline), objectives, problem statements, evidence-based performance measures and an appropriate level of budget justification with sufficient documentation or a fiscal summary reference to ensure identified costs are allowable | Yes  No  N/A |  |
|  | RA: Require State agency subrecipients to submit comprehensive and complete grant proposals which include the same level of detail and elements as other subrecipients | Yes  No  N/A |  |
|  | RA: Develop a simplified grant proposal and application process for similar law enforcement projects (i.e. mobilizations) which already includes the applicable problem ID data, evidence-based targets and evidence-based performance measures for their area  **Commendation: Kansas** | Yes  No  N/A |  |
|  | RA: Provide and periodically update a Project Director’s Manual to establish the current grant application procedures and provide guidance in understanding the grant management requirements  **Commendations: Nebraska, North Carolina** | Yes  No  N/A |  |
|  | RA: Ensure that the SHSO annually develops the grant application for its in-house activities and contracts which contains the same information (problem ID, project description, evidence-based targets, objectives, evidence-based performance measures and budget) as is required of subrecipients  **Resources:** [**GHSA Policy Manual Chapter IV, Section H**](http://www.ghsa.org/html/resources/mgmt/polproc.html) | Yes  No  N/A |  |
|  | RA: Develop and implement a process to manage the SHSO in-house grants and contracts, monitor the activities and maintain a documented file including all required documentation | Yes  No  N/A |  |
| 6 (i)Project number | F: Ensure that a unique project identifier has been assigned by the SHSO to every project  **Resources: *FYs 15 & 16:*** [**23 CFR Part 1200.33 (c)**](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=0ff5e4ac1f085eb10b765b1f4239f69f&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.3.1.4)  ***FY17:*** [**23 CFR § 1300.33(c)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_133&rgn=div8) | Yes  No  N/A |  |
| 6 (ii). Problem statement | RA: Ensure that grant project agreements contain relevant, locally based, timely data which defines the safety problem and links the data to the specific strategies selected | Yes  No |  |
|  | RA: Assist subrecipients with accessing additional data sources and analysis to develop problem identification statements to result in solid baselines and more descriptive objectives | Yes  No  N/A |  |
| 6 (ii). Evidence-based project targets/goals, objectives, countermeasures | RA: Ensure that each grant agreement where applicable includes evidence-based, specific, measurable, achievable and time-oriented targets, objectives and countermeasures | Yes  No  N/A |  |
|  | RA: Ensure that productivity levels are appropriately established in law enforcement grants to be in line with the level of effort reasonably to be expected for the outlined tasks. Consider requiring law enforcement to record all activity and contact with motorists, not just citation written. | Yes  No  N/A |  |
| 6i(v). Budget | RA: Ensure that each grant agreement contains specific, complete and accurate budget information | Yes  No  N/A |  |
| 6 (v). Evidence-based performance measures | RA: Ensure that each grant agreement includes applicable evidence-based performance measures with a baseline and performance target(s)  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. II Sec. G** | Yes  No  N/A |  |
| 6 (vi). Project revision parameters | RA: Identify the process and timeline for submission by subrecipients of proposed revisions to approved grants  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. IV Sec. G** | Yes  No  N/A |  |
|  | RA: Ensure that SHSO staff review proposed revisions for eligibility under the funding source and to determine whether the revision will change the scope or intent of the project | Yes  No  N/A |  |
| 6 (vii). Appropriate subrecipient training | RA: Establish the SHSO policy for appropriate and required or suggested subrecipient training or special skills where applicable to qualify for certain types of grants i.e. SFST, ARIDE, radar/lidar, OP. | Yes  No  N/A |  |
| 6 (viii). Costs reasonable, allocable and necessary | F: Establish and follow specific criteria (applied uniformly and consistently) for subrecipient and SHSO eligibility to use funds for the development and acquisition of PI&E materials to ensure that the items purchased are allowable costs  **Resources: *FY15:*** [**2 CFR § 225, Appendix A, C(1)**](https://www.whitehouse.gov/sites/default/files/omb/fedreg/2005/083105_a87.pdf)  ***FY16 and beyond:*** [**2 CFR §§ 200.403 – 200.405**](http://www.ecfr.gov/cgi-bin/text-idx?SID=7280eb4e2293be1362af8606c7a13622&mc=true&node=sp2.1.200.e&rgn=div6)  [NHTSA Highway Safety Grants Funding Guidance, III,D.2](http://www.nhtsa.gov/About+NHTSA/Highway+Safety+Grant+Programs/HSGrantFunding_Guidance); **[GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. V Sec. D;** [2 CFR Part 200 Subpart E, Cost Principles](http://www.ecfr.gov/cgi-bin/text-idx?SID=f727dea8cefaa787c1dac16dca1da6a6&mc=true&node=sp2.1.200.e&rgn=div6); NHTSA 1/19/16 and 2/13/16 Memos on Use of NHTSA Funds to Purchase Items for Distribution | Yes  No  N/A |  |
|  | **NHTSA TIP:** Review items addressed in NHTSA Memo, “Use of NHTSA Highway Safety Grant Funds for Certain Purchases, May 18, 2016. Watch for restrictive use of various funding sources, such as, Section 405, 1906, 154 and 164. |  |  |
|  | RA: Distinguish clearly within the SHSO funding criteria between the definitions and activities permitted for allowable costs for recognition awards; safety supplies and equipment; educational materials; and advertising media vs. unallowable costs for promotional items | Yes  No  N/A |  |
|  | F: Ensure that expenditures from Sections 405, 154 and 164 funding sources are restricted to the uses allowed by those sections | Yes  No  N/A |  |
| 6(ix). Reporting requirements | RA: Require (and notify) each subrecipient to submit periodic (monthly/quarterly) and final progress reports to the SHSO using a format prescribed by the SHSO and in compliance with published deadlines  **Commendations: California, Texas** | Yes  No  N/A |  |
|  | RA: Establish and implement a process to ensure that each subrecipient submits a complete final progress report using the SHSO prescribed format and in compliance with the stated deadline  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. VII** | Yes  No  N/A |  |
|  | RA: Develop a process to use the information provided in the subrecipient final reports to develop the SHSO Annual Report and in making future project funding decisions | Yes  No  N/A |  |
|  | RA: Consider and determine for each project whether the project’s size, cost, length or scope suggests that the SHSO should have a formal scientific or process evaluation completed by a university or other third party evaluator | Yes  No  N/A |  |
|  | RA: If a formal evaluation is indicated, determine the process for selection and acquisition of the appropriate evaluation services | Yes  No  N/A |  |
|  | RA: Provide a process that ensures responsibility within the SHSO for reviewing the results of all completed project evaluation reports and making a determination of how the information should be distributed and used within the future planning process | Yes  No  N/A |  |
| 7.Boiler plate requirements – subrecipient certifications and assurances | F: Ensure that every grant agreement, contract and MOU includes all clauses required by federal statute and Executive Order and their implementing regulations and that the subrecipient or contractor is aware of the requirements imposed upon them (see 7 listed in MR Element)  **Resources: *FYs 15 & 16:*** [**23 CFR § 1200 Appendix A**](http://www.ecfr.gov/cgi-bin/text-idx?SID=d8181a485cb4993c031ee3bd3f052cae&mc=true&node=ap23.1.1200_162.a&rgn=div9)  ***FY17:*** [**23 CFR § 1300, Appendix A**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4e5051e858b6b12eafee4c2bd2a5e6f&mc=true&node=se23.1.1300_133&rgn=div8)  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. IV** | Yes  No |  |
|  | F: Buy America - Ensure that all goods purchased with Federal grant funds are manufactured or assembled in the United States unless under $5,000 in value; or, if $5,000 or more in value: a waiver request has been submitted by the SHSO and approved by the Secretary of Transportation; or, there is a blanket waiver approved for the item for the applicable fiscal year  **Resources:** [**23 USC Section 313**](https://www.gpo.gov/fdsys/pkg/USCODE-2011-title23/pdf/USCODE-2011-title23-chap3-sec313.pdf) | Yes  No  N/A |  |
|  | F: Ensure that the annual HSP, subrecipient agreements, contracts and MOUs contain the most current and the complete federally required State certifications and assurances statements  **Resources:** [**Appendix A-State Certifications and Assurances**](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=23:1.0.2.13.1#ap23.1.1200_162.a) | Yes  No  N/A |  |
|  | F: Ensure that no federal funds are used to check for motorcycle helmet usage (beginning with FY17) | Yes  No  N/A |  |
|  | F: Ensure that all subrecipient agreements and contracts include the required debarment and suspension certification statement and checks the list (annually) before approving a grant  **Resources:** [**Appendix A-State Certifications and Assurances**](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=23:1.0.2.13.1#ap23.1.1200_162.a) | Yes  No  N/A |  |
|  | RA: Develop and document the specific procedures and timelines for grant suspension and termination and ensure all subrecipients are aware of them | Yes  No  N/A |  |
| 7a. Written procedure to ensure suspensions and debarments are identified | RA: Ensure that SHSO has a written procedure to ensure subrecipients are not suspended or debarred such as a checklist and does check the list to ensure that Federal highway safety funds are made only to agencies or individuals who are not debarred or suspended at [www.SAM.gov](http://www.SAM.gov) | Yes  No  N/A |  |
| 7b. Written documentation of compliance | RA: Ensure that written documentation is maintained to validate that the SHSO is complying with the procedure to exclude suspended or disbarred agencies or individuals | Yes  No  N/A |  |
| 8. SHSO plan for development of procedures for project implementation | RA: Establish and implement a procedure which details the policy for project implementation  **Resources:** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. III** | Yes  No  N/A |  |
| 8a. Project implementation schedule | RA: Prescribe within each grant agreement the expected project milestones and deliverables to be completed by the subrecipient | Yes  No  N/A |  |
| 8b. Commitment of obligated funds to approved projects | RA: Establish and implement a policy that describes the process, responsibility and deadline for commitment of all obligated funds to approved projects | Yes  No  N/A |  |
| 8c. Pre-award/orientation sessions with project personnel | RA: Conduct group or individual pre-award orientation seminars or briefings for all subrecipient personnel and ensure that all new and high value/risk grantees attend the training  **Resources: New Jersey** | Yes  No  N/A |  |
|  | RA: Develop and distribute a subrecipient Project Director’s Manual (or make web link available) to all subrecipients  **Resources: Nebraska, North Carolina** | Yes  No  N/A |  |
|  | RA: Develop and use a checklist to ensure that all key grant elements (including other issues e.g. A-133 audits) are reviewed by the SHSO with subrecipients either during negotiations or at a pre-award conference  **Resources: [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. IV Sec. C** | Yes  No  N/A |  |
|  | RA: Document in the file all guidance given to subrecipients including phone conversations if significant items are discussed | Yes  No  N/A |  |
|  | RA: Ensure that multiple year grants are correctly identified within the SHSO records in the current and subsequent years and correctly reflects the approved division of expenditures among the years | Yes  No  N/A |  |
|  | RA: Provide for the evaluation of the subrecipient’s performance each year of a multiple year grant and use the results in the consideration of continuing the grant | Yes  No  N/A |  |
| 9. SHSO award of grants and contracts prior to project start date | RA: Ensure that projects/contracts do not begin work before start date and that there are no significant delays in executing agreements and implementing projects. Document the cause should any such delays occur. | Yes  No |  |
| 10. Streamline grant process to reduce paperwork | RA: Investigate the streamlining of paperwork or development of a system for development guidance, submission, processing and tracking of grant proposals, reports, financial claims and monitoring reports  **Commendations: Connecticut, Georgia, Maine, Michigan, New Jersey, New York, Pennsylvania, Texas, Vermont** | Yes  No  N/A |  |
|  | RA: In lieu of an electronic system, ensure the maximum use and coordination of electronic software to reduce administrative tasks, the number of databases or spreadsheets used and the amount of paperwork generated to track grant-related information efficiently  **Commendations: Missouri** | Yes  No  N/A |  |
|  | RA: If applicable, establish policy and procedures which specifically apply to the unique features of the electronic grant management system to ensure full compliance of the system with all applicable State and Federal regulations, policies and business rules | Yes  No  N/A |  |
|  | RA: Ensure that staff are adequately trained and coached to ensure that all staff fully and consistently utilize the electronic system features | Yes  No  N/A |  |
|  | RA: Where feasible, encourage subrecipients being funded for multiple activities to complete one grant agreement provided all Federal funding sources are appropriately identified and able to be separately tracked by the SHSO | Yes  No  N/A |  |
|  | RA: Where feasible, consider allowing a subrecipient to enter into a multi-year agreement and if so, provide for annual review and authorization | Yes  No  N/A |  |
|  | RA: Ensure that the grant objectives and deliverables are identified by Federal fiscal year in the grant agreements and contracts | Yes  No  N/A |  |
|  | RA: If a subrecipient is unable to purchase equipment valued at $5,000 or more in the first year, ensure that the SHSO repeats their request for prior approval by NHTSA for purchase of the equipment in the second year of multi-year agreement | Yes  No  N/A |  |

**II – F: Monitoring/Subrecipient Risk Evaluation *FY16 & beyond:***

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Evidence of SHSO evaluation of subrecipient risk of noncompliance | F: Ensure that the SHSO has established a procedure and documents in writing the annual evaluation of every subrecipient ‘s risk of noncompliance for the purpose of determining the appropriate monitoring  **Resources:** [**2 CFR Part 200.331(b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=e584ce8fe78518ef789da0a70c2aa308&mc=true&node=se2.1.200_1331&rgn=div8) | Yes  No |  |
|  | **NHTSA TIP**: SHSOs should consider the following: subrecipient’s prior experience with the same or similar subawards; results of previous audits; whether there are new personnel or new/substantially changed systems; and, extent and results of any Federal awarding agency monitoring. |  |  |
|  | RA: Require all applicants to answer appropriate pre-award risk assessment questions, such as those involving personnel updates or financial systems, before SHSO staff determine risk levels. | Yes  No |  |
| 2. Procedure for conduct of risk evaluation and application of results | RA: Establish a procedure, and track implementation, to identify how the risk assessment evaluation will be conducted and the method for applying the results | Yes  No |  |
| 3. Evidence of use by SHSO of risk evaluation results | F: Document that the results of each risk assessment evaluation are actually used to determine the level and type of monitoring  **Resources:** [**2 CFR Part 200.331(b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=e584ce8fe78518ef789da0a70c2aa308&mc=true&node=se2.1.200_1331&rgn=div8) | Yes  No |  |
|  | **NHTSA TIP**: SHSOs should use monitoring tools, such as: training and technical assistance; on-site reviews of program operations; and audit services described in [2 CFR Part 200.425](http://www.ecfr.gov/cgi-bin/text-idx?SID=e584ce8fe78518ef789da0a70c2aa308&mc=true&node=se2.1.200_1425&rgn=div8) |  |  |

**II – G: Monitoring**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Monitoring coverage | F: Monitor grant and sub grants to assure coverage of each program, function and activity in compliance with applicable Federal requirements covering each program, function and activity  **Resources:**  ***FY15:*** [**49 CFR 18.40**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-40)  ***FY16 & beyond:*** [**2 CFR Part 200.328(a)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&node=se2.1.200_1328&rgn=div8)  **\*Commendations: Alabama, California, Georgia, Maine, Michigan, Oklahoma, Oregon, Texas** | Yes  No |  |
| 2.Ensure awards used only for authorized purposes and performance targets achieved | F: Conduct monitoring of the activities of subrecipients to ensure that Federal awards are used only for authorized purposes and in compliance with laws, regulations and provisions of contracts or grant agreements.  **Resources:**  ***FY15:*** [**OMB Circular A-133, Subpart D, Section 400 (d)(3)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf)  ***FY16 & beyond:*** [**2 CFR Part 200.331(d)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1331) | Yes  No |  |
|  | F: Ensure that the processes linking the risk assessment required of the SHSO by 2 CFR Part 331(b) to project monitoring are clearly defined and used including possible corrective plans and follow-up requirements.  **Resources:**  ***FY16 & beyond:*** [**2 CFR Part 200.331(b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&node=se2.1.200_1328&rgn=div8) | Yes  No |  |
|  | F: Ensure that the monitoring program examines the achievement of the project’s performance targets and documents the results. Ensure that action is taken and documented if progress has not occurred.  **Resources:**  ***FY15:*** [**OMB Circular A-133, Subpart D, Section 400 (d)(3)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf)  ***FY16 & beyond:*** [**2 CFR Part 200.331(d)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1331) | Yes  No |  |
| 2a. Review of financial and program reports by SHSO | RA: Require that the SHSO monitoring of each subrecipient include a review of the financial and program reports required by the SHSO  **Resources: *FY16 & beyond:*** [**2 CFR Part 200.331(d)(1)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1331) | Yes  No |  |
|  | RA: For law enforcement subrecipients, require submission of progress reports, enforcement data and officer log sheets with vouchers to ensure correct activity is being billed and to assess productivity. Require traffic unit grants to provide monthly activity logs documenting work performed for each shift and each officer. | Yes  No  N/A |  |
|  | RA: Require law enforcement subrecipient reports to assess their progress in meeting project targets and objectives (not just activity reporting) | Yes  No  N/A |  |
| 2b. Follow up on deficiencies | RA: Ensure there is a procedure that requires SHSO staff to follow up and document corrective actions for all deficiencies detected through audits, on-site reviews and other monitoring activities  **Resources: *FY16 & beyond:*** [**2 CFR Part 200.331(d)(2)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1331) | Yes  No |  |
| 3. Monitoring policy and procedure | RA: Develop and ensure consistent implementation of a subrecipient monitoring system and monitoring policy to be used by the SHSO staff  **Resources:** [**GHSA Monitoring Advisory**](http://www.ghsa.org/resources/monitoring-advisory),  **[GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. V** | Yes  No  N/A |  |
|  | RA: Ensure that the monitoring selection criteria includes the factors from the required risk assessment process to assist in determining on-site monitoring need. | Yes  No  N/A |  |
|  | RA: Establish monitoring criteria for State agency grantees which are at least as stringent as that for other subrecipients | Yes  No  N/A |  |
|  | RA: Implement fully the procedures required by the SHSO monitoring policy | Yes  No  N/A |  |
|  | RA: Ensure that project files contain the written documentation for each completed monitoring activity | Yes  No  N/A |  |
|  | F: Determine and fully implement the State policy for monitoring contracts with contractors (i.e. contracted for services by SHSO through purchase orders)  **Resources: State Law/Policy XXXX** | Yes  No |  |
|  | RA: Utilize monitoring process to ensure that all claimed expenditures are eligible for funding | Yes  No  N/A |  |
|  | RA: If Electronic Grants System – Ensure that electronic grant system business rules for monitoring comply with the SHSO monitoring policy  **Commendation: Texas** | Yes  No  N/A |  |
|  | RA: Provide monitoring training for staff and subrecipients | Yes  No  N/A |  |
| 3. Content of SHSO monitoring policy and procedures: | | | |
| 3a.(i). Review of reports and timely action on deficiencies | RA: Ensure that the monitoring policy includes a requirement that the required financial and program reports are reviewed and that timely and appropriate action is taken on all detected deficiencies | Yes  No  N/A |  |
| 3a.(ii). Onsite monitoring | RA: Ensure that the monitoring policy states the selection criteria for distinguishing the various types of monitoring (onsite, desk review, phone call) and requires some level of onsite monitoring | Yes  No  N/A |  |
|  | RA: Schedule monitoring visits in a timeframe which can result in early detection and resolution of issues | Yes  No  N/A |  |
| 3a.(iii) Internal controls for subrecipients (see also G below) | RA: During monitoring visits, require that a review be conducted by the SHSO of the internal controls used by each subrecipient with special attention to law enforcement and other agencies receiving wage reimbursement | Yes  No  N/A |  |
|  | RA: Ensure that the monitoring policy includes the procedure for examining subrecipient internal controls | Yes  No  N/A |  |
| 3a.(iv) Monitoring subrecipients’ processes for overtime | RA: Provide ongoing oversight of planned activities, particularly for overtime grants, to ensure that performance productivity is reasonable and in conformance with all grant conditions. Document any discussions or actions taken by the SHSO with individual grantees to address these issues. | Yes  No  N/A |  |
|  | RA: Examine the processes used by subrecipients for scheduling, approval, tracking, accounting and supervision of overtime to ensure adequate checks, balances and safeguards are utilized | Yes  No  N/A |  |
| 3a.(v) Progress in achieving goals/targets, objectives and performance measures | RA: Utilize the monitoring visit to evaluate progress in achieving targets, objectives and performance measures and to identify subrecipient performance and progress issues and resolve them promptly | Yes  No  N/A |  |
| 3a.(vi). Protocol when fraud or misuse of funds and to which agency referred | RA: Ensure that the monitoring policy includes the protocol to be followed by SHSO monitoring staff when possible fraud or misuse of funds is detected including identification of the individual or agency to which such matters should be referred  **Commendation: Texas** | Yes  No  N/A |  |
| 3b. Adherence to onsite monitoring policy including frequency | RA: Establish in the monitoring policy the criteria for the frequency of onsite monitoring and ensure SHSO staff adherence to the schedule | Yes  No  N/A |  |
|  | RA: Ensure that the frequency and type of monitoring required is realistically based upon the available staff resources | Yes  No  N/A |  |
|  | RA: Develop a tracking system to be used by management to ensure the monitoring policy is followed including all steps of the monitoring process, completion of all scheduled visits and of the related documentation | Yes  No  N/A |  |
|  | RA: Assign management to periodically select a sample of current subrecipient files and review them for internal compliance with the SHSO monitoring policy | Yes  No  N/A |  |
| 4. Individual and title in SHSO responsible for monitoring | RA: Self explanatory | Yes  No |  |
| 5. Basis for staff assignment to monitoring responsibility in cost effective and efficient manner | RA: Identify the basis for assigning staff to the monitoring of grants such as, by program area, geographically, fiscal duties or as a primary assignment and ensure sufficient time is available to effectively complete monitoring | Yes  No  N/A |  |
|  | RA: Ensure that the assignment method used takes into consideration cost, efficiency, adequacy and the available expertise and skills | Yes  No  N/A |  |
|  | RA: Consider assigning fiscal staff to complete or assist program staff in exceptional circumstances such as, onsite monitoring of high dollar, high risk and very large State agency grants | Yes  No  N/A |  |
| 6. Identify factors to determine which projects will receive an onsite monitoring visit | RA: Describe the factor(s) which are used by the SHSO to select subrecipients for onsite monitoring, such as, priority programs, dollar amounts, large equipment purchases, complex projects, geographic area, risk analysis, total cost of the grant agreement | Yes  No  N/A |  |
| 7. Filing system for monitoring reports and follow up on findings | RA: Develop a standard set of monitoring forms/checklists for each type of monitoring and require that the form be followed and used for every monitoring activity  **Resources:** [**GHSA Monitoring Forms SHSO Samples**](http://www.ghsa.org/resources/monitoring-advisory) | Yes  No  N/A |  |
|  | RA: Provide a copy of the monitoring results to the subrecipient to ensure that they are aware the activity occurred and have been notified of any corrective actions | Yes  No  N/A |  |
|  | RA: Establish a system which ensures that all monitoring documentation is appropriately filed on a timely basis | Yes  No  N/A |  |
|  | RA: Develop a procedure for management to ensure that all required follow up with the subrecipient is completed properly and promptly | Yes  No  N/A |  |
| 8. Use of monitoring in improving SHSO program management processes | RA: Incorporate monitoring findings, positive and negative, into the SHSO program management process for consideration of improving the planning, implementation, vouchering, reporting and HSP review and approval processes | Yes  No  N/A |  |
| 9. Effective method for suspending/terminating project and recovering funds | RA: Identify in the monitoring policy the progressive action which will be taken by the SHSO, dependent upon the severity of non-compliance identified (error, fraud, illegal activity, misuse of funds, etc.), up to and including withholding future payments or return of Federal funds | Yes  No  N/A |  |
|  | RA: Assess whether the subsequent action taken has resulted in the appropriate corrective action and make necessary policy adjustments | Yes  No  N/A |  |
| 9(i) Past use of method by SHSO | RA: Self explanatory | Yes  No |  |
| 9(ii). Fund recovery method | RA: Identify in the monitoring policy the process for denial of a grant payment or requesting the return of Federal funds and when funds are recovered, document the procedure followed by the SHSO | Yes  No  N/A |  |

**II – H: Internal Controls - *FY16 & beyond:***

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. SHSO establish and maintain effective internal control over Federal awards | F: Ensure that adequate accounting procedures, separation of duties and other basic internal controls are in place to detect possible waste, fraud and mismanagement  **Resources:** [**2 CFR Part 200.303(a)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1303) | Yes  No  N/A |  |
|  | RA: Ensure that financial staff review all supporting documentation for vouchers and that equipment is inventoried | Yes  No  N/A |  |
| 2. Comply with Federal statutes, regulations and terms | F: Ensure that the SHSO complies with Federal statutes, regulations and the terms and conditions of the Federal awards  **Resources:** [**2 CFR Part 200.303(b)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1303) | Yes  No |  |
| 3. Evaluate and monitor compliance | F: Establish and implement a procedure to evaluate and monitor non-Federal entity’s compliance with statutes, regulations and the terms and conditions of the Federal award  **Resources:** [**2 CFR Part 200.303(c)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1303) | Yes  No |  |
| 4. Take prompt action when noncompliance | F: Ensure that prompt corrective action is taken when noncompliance is identified including noncompliance identified in audit findings  **Resources:** [**2 CFR Part 200.303(d**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1303)**)** | Yes  No |  |
| 5. Safeguard protected personally identifiable information | F: Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive  **Resources: [2 CFR Part 200.303(e)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1303)** | Yes  No |  |

**II – I: Legislation/Lobbying**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. SHSO allowed to do with legislation | RA: List within the legislative policy the specific activities which the GR and the SHSO are permitted to complete by both State and Federal laws and regulations  **Resources:** [**23 CFR Part 1200, Appendix A Certifications on Lobbying**](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=23:1.0.2.13.1#ap23.1.1200_162.a)  **State Law/Regulations: XXXX** | Yes  No  N/A |  |
| 2. SHSO prohibited from doing | F: Ensure that no Federal funds are used for lobbying a Federal or State legislator on a specific legislative proposal  **Resources: [NHTSA Highway Safety Grant Resources-Grants Funding Guidance IV.E.1](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide)**  ***FY16 & beyond:*** [**2 CFR Part 200.450**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1450) | Yes  No |  |
|  | RA: List within the legislative policy the specific activities which the GR, SHSO and subrecipients are restricted from completing by State and Federal laws and regulations | Yes  No |  |
|  | RA: Periodically review with all SHSO staff the State and Federal laws and regulatory prohibitions regarding lobbying to better ensure staff compliance | Yes  No |  |

**II – J: Program Strengths**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| SHSO notable program strengths | RA: Document any SHSO best practicesand significant improvements or achievements to share with the NHTSA MR Team, publish in the Annual Report, use as examples in training or submit for award recognition  **Resources:** [GHSA Members Only Page/GHSA MR Commendation Summary Report](http://my.ghsa.org/index.asp) | Yes  No  N/A |  |

**III. FINANCIAL MANAGEMENT Responsible SHSO Staff Member:**

**III – A: Financial Management Systems**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Account for and track Federal funds in accordance with the same State laws and procedures | F: Ensure that the SHSO financial system is designed and maintained to expend and account for Federal grant funds in accordance with the State laws and procedures for expending and accounting for State funds  **Resources:**  ***FY15:*** [**49 CFR Part 18.20(a)**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20)  ***FY16 & beyond:*** [**2 CFR Part 200.302(a)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1302) | Yes  No |  |
|  | F: Establish a system and provide oversight to ensure the funds are tracked from receipt of the claim to payment of the subrecipient | Yes  No |  |
|  | F: Provide and follow fiscal control and accounting procedures as well as requiring it of subrecipients and cost-type contractors, sufficient to—  (1) permit preparation of required reports and the statutes authorizing the grant, and  (2) permit the tracing of funds to a level of expenditures adequate to establish that funds have not been used in violation of the restrictions and prohibitions of applicable statutes | Yes  No |  |
|  | **NHTSA TIP**: Ensure that each State agency has a designated account number in the State accounting system, be aware of the SHSO account number and the State requirements to submit vouchers for payment, demonstrate how the SHSO reconciles with the State accounting system, be able to walk through the procedure for processing a grantee voucher, and, ensure that in processing vouchers the SHSO is following State requirements. Ensure that all vouchers have been processed in compliance with the State accounting system requirements. | Yes  No |  |
| 2. State’s fiscal control and accounting procedures for expending and accounting for grant funds sufficient to permit: | | | |
| 2.(i). -Preparation of reports required by this regulation and laws authorizing the grant | F: Implement and document in the procedures of the State the fiscal and accounting processes and procedures in place that ensure the SHSO’s ability to accurately prepare all reports required by the regulations and laws authorizing the grant funding  **Resources:**  ***FY15:*** [**49 CFR Part 18.20(a)(1)(2)**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20)  ***FY16 & beyond:*** [**2 CFR Part 200.302(a)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1302)  **Commendations: Iowa, Michigan, New Hampshire, Oklahoma** | Yes  No |  |
|  | **NHTSA TIP**: Be prepared to share forms used to submit SHSO reimbursement vouchers to the State for payment and explain process for State agencies to submit and maintain supporting documentation with claims. | Yes  No |  |
| 2.(ii). - Tracing of funds to adequate expenditure level to assure use in compliance with restrictions and prohibitions | F: Implement and establish in SHSO policy the internal budget controls, processes and procedures that ensure compliance with this part and that SHSO can document and track all expenditures to a level adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes and funding source  **Resources:**  ***FY15:*** [**49 CFR Part 18.20(a)(1)(2)**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20)  ***FY16 & beyond:*** [**2 CFR Part 200.302(a)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1302) | Yes  No |  |
|  | RA: Establish and maintain a centralized recordkeeping system to track all steps of claim processing so that the current status of each claim can be quickly identified and all required processes are completed | Yes  No  N/A |  |
| 3. Program managers’ review | RA: Identify whether the program managers or another SHSO staff member is responsible for reviewing the vouchers submitted by subrecipients for accuracy, appropriateness and completeness | Yes  No |  |
| 4. Separation of duties for internal control | RA: Establish internal controls to provide an adequate separation of duties between program and financial management staff or provide necessary oversight to ensure sufficient checks and balances | Yes  No  N/A |  |
|  | NHTSA TIP: Ensure that accounts payable and accounts receivable are administered by two different staff. Program managers should not be able to both review and process the payment of vouchers. | Yes  No |  |

**III – B: Grant Payments-Vouchers**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Deadlines for submitting vouchers – monthly/quarterly | F: Submit required GTS voucher by the 15th of the month for every month (unless qualify for quarterly voucher) including first month of new fiscal year (can be for old or new fiscal year) and complete fiscal year closeout by December 31  **Resources: *FYs 15 & 16:*** [**23 CFR Part 1200.33(d)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.4.1.4)  ***FY17:*** [**23 CFR § 1300.33(d)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=se23.1.1300_133&rgn=div8)  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. VI** | Yes  No |  |
|  | RA: Notify the NHTSA Regional Office promptly and request a time extension if it appears that circumstances may prevent the SHSO from completing the fiscal year closeout by December 31 | Yes  No  N/A |  |
|  | F: Reconcile and verify that appropriate documentation exists to support match requirements in each applicable project and consistently from project to project and track to ensure compliance | Yes  No |  |
|  | RA: Designate backup staff to be trained to perform GTS responsibilities for assigned staff using documented standard procedures | Yes  No  N/A |  |
| 1. GTS VOUCHER REVIEW by MR TEAM | The NHTSA Regional Office also conducts a first and last voucher review in every State each fiscal year after closeout and no later than mid-March. *If the three required voucher reviews in each FY were previously conducted, no additional voucher reviews are required during the MR unless additional voucher reviews are warranted.*  **Resources: NHTSA Program Managers Letter on First and Last Voucher Reviews, NHTSA Sample First and Last Voucher Review Form** | | |
| 1a. Trace funds to expenditures for compliance with restrictions | F: Implement internal and external controls and procedures to ensure that all expenditures are documented, can be tracked to source documentation within the SHSO, or within the subrecipient if periodically monitored, that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes and that they reconcile with SHSO GTS submissions  **Resources:**  ***FY15:*** [**49 CFR Part 18.20(a)**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20)  ***FY16 & beyond:*** [**2 CFR Part 200.302(a)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1302) | Yes  No |  |
|  | F: If source documentation for subrecipient claims is not submitted to the SHSO, monitor financial source documentation at the subrecipient site periodically or through random requests for documentation to be submitted to the SHSO for compliance examination | Yes  No |  |
|  | RA: Resolve GTS error notices as they occur to ensure timely corrections are made | Yes  No  N/A |  |
| 1b. Claimed costs adequately documented and documentation available for review | F: Ensure that all costs are documented and that the documentation is available for review, such as, cancelled checks, paid bills, payrolls, time and attendance records, etc.  **Resources:**  ***FY15:***  **[2 CFR Part 225, Appendix (A)(C.1(j)](http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf)**  ***FY16 & beyond:*** [**2 CFR Part 200.403(g)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1403) | Yes  No  N/A |  |
|  | F: Establish a policy that requires all subrecipient and contractor claims, invoices and related documentation be reviewed for adequacy and approved by SHSO staff before funds are drawn down through GTS | Yes  No  N/A |  |
|  | RA: Periodically have staff sample the GTS voucher amount to compare the applicable receipts and deposits in the State accounting system to ensure that they reconcile | Yes  No  N/A |  |
|  | RA: Establish checks and balances within the SHSO claim approval system to validate all claim approvals | Yes  No  N/A |  |
|  | RA: Where subrecipients have multiple Federal/State grants, ensure that all charges to highway safety are correctly proportioned based upon documentation to ensure the program is charged appropriately. If subrecipient has an approved indirect cost rate, determine if costs incurred for a common or joint purpose could be classified as an indirect cost. | Yes  No  N/A |  |
|  | RA: Indicate the date received and the date the claim was paid on all submitted claims to track the timeliness of claim processing | Yes  No  N/A |  |
|  | RA: Document all errors detected during claim reviews in writing in the claim file, how they were corrected, how the corrections were communicated to the subrecipient and the reviewer’s name and the date of the review | Yes  No  N/A |  |
| 1c. Reconciliation of vouchered amounts with permitted time periods for costs | F: Ensure that the amounts vouchered to GTS comply with the time period allowed for incurring costs and the expiration of the right to incur costs  **Resources:**  ***FY15:*** [**49 CFR Part 18.23(a)**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20)  ***FY15 & 16:* [23 CFR Part 1200.40 (a)](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23" \l "23:1.0.2.13.1.4.1.4)**  ***FY17 & beyond:*** [**23 CFR § 1300.40(a)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=se23.1.1300_140&rgn=div8) | Yes  No |  |
| 1d. Allowable costs | F: Establish a systematic process for the review of all claimed subrecipient expenditures to ensure that Federal funds are reimbursed only for allowed highway safety related costs (e.g. necessary, reasonable, allocable and in accordance with the applicable regulations and guidance and have not been used in violation of the restrictions and prohibitions of applicable statutes  **Resources:**  ***FY15:*** [**2 CFR Part 225, Appendix A**](http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf)  ***FY16 & beyond:*** [**2 CFR Part 200 Subpart E**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d5d105896f61316d7cdd11ba311a7f06&mc=true&n=pt2.1.200&r=PART&ty=HTML#sp2.1.200.e) | Yes  No |  |
|  | F: Ensure that costs are planned and charged only to the appropriate funding source in compliance with the restrictions prescribed for their use e.g. Section 164 used only for alcohol-impaired driving countermeasures or law enforcement or related to enforcement of alcohol-impaired driving laws | Yes  No |  |
|  | F: Ensure that reimbursed claimed costs of subrecipients do not constitute supplanting such as, reimbursement for an individual’s salary while pursuing training unless the salary is already supported under an approved project | Yes  No |  |
|  | F: When a project has components both related and unrelated to highway safety, ensure that the Federal share is based proportionately on the projected use for the Federal grant purpose  **Resources:** [NHTSA Highway Safety Grant Resources](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide) | Yes  No |  |
|  | RA: Develop a travel policy for subrecipients and include pre-and post travel requirements in grant agreements, require prior approval of travel requests and projected costs associated with conferences and consider requiring trip reports and agendas be submitted with the claim | Yes  No |  |
| 1e. Minimal time elapsed between transfer of funds and disbursement | RA: Institute procedures including an internal performance goal (i.e. number of days between claim receipt and payment) to ensure high priority to the prompt payment of claims after the Federal reimbursement has been received by the SHSO | Yes  No |  |
| 1f. Handling of Program Income (if any) | F: Monitor and ensure all grants which may generate program income are required to account for the funds and expend them only to further their program objectives of the program area under which it was funded  **Resources: *FY15 & 16:* [23 CFR Part 1200.34](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23" \l "23:1.0.2.13.1.4.1.4)**  ***FY17 & beyond:*** [**2 CFR § 200. 307**](http://www.ecfr.gov/cgi-bin/text-idx?SID=7280eb4e2293be1362af8606c7a13622&mc=true&node=se2.1.200_1307&rgn=div8)  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. V Sec. J** | Yes  No |  |
|  | RA: Ensure that the SHSO policy on program income acknowledges that donations (monetary or in-kind) are considered program income if funds received are directly generated or earned as a result of the grant agreement | Yes  No |  |
|  | RA: Establish a policy to define, detect and track program income until fully expended (may also be deducted from total allowable costs to determine net costs) and ensure that conditions are imposed in the grant agreement to require accountability and reporting of all program income by subrecipients | Yes  No  N/A |  |
|  | RA: Identify in the annual HSP any projects which are planned to generate program income | Yes  No  N/A |  |
|  | RA: Track and audit applicable subrecipients claims and reports periodically to ensure proper accounting and expenditure of program income | Yes  No  N/A |  |
| 2. HSP Funding Considerations | | | |
| 2a. Federal funds obligated to HSP using HS Form 217 or electronic equivalent | F: Track the receipt of Federal fund obligations and ensure that funds are obligated on a HS Form 217 or its electronic equivalent for the annual HSP and updated subsequently during the fiscal year within 30 days of each grant award  **Resources: *FY15 & 16:*** [**23 CFR Part 1200.15(d)(1)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.4.1.4)**, [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Chs. II and VII** | Yes  No  N/A |  |
| 2b. Obligated Federal funds committed to projects within reasonable time | RA: Establish and implement a policy that provides for the process, responsibility and a reasonable timeframe for prompt commitment by the SHSO of all obligated funds to approved projects | Yes  No  N/A |  |
|  | RA: Document the specific rationale and anticipated timeframe for expenditure of any Federal funds which are not going to be promptly obligated | Yes  No  N/A |  |

**III – C: Audits \*\*CAVEAT: In many States, an agency or sub agency other than the SHSO has primary responsibility for ensuring the State’s compliance with the Single Audit Act. Even in those cases, the SHSO will be held ultimately accountable by NHTSA for compliance with the provisions of the Single Audit Act by subrecipients receiving NHTSA funds. The following section is worded using the assumption that either a State agency with the SHSO ensuring their compliance, or, the SHSO itself is ensuring that each action is being completed with regard to NHTSA funded subrecipients.**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| Findings from last State audit report to determine action taken in instances of noncompliance with Federal laws and regulations | F: Review the findings for the A-133 audit for the State during the MR period and determine that any corrective actions indicated which resulted in noncompliance with Federal regulations have been fully corrected and documented in writing  **Resources:**  ***FY15:*** [49 CFR Part 18.26(b)(3)](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20), [OMB Circular A-133, Subpart D, Section 400 (d)(5)](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf)  ***FY16 & beyond:*** [2 CFR Part 200.521(c)(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a5c9aeb63782153248e11be8b3ec0f1e&mc=true&node=se2.1.200_1521&rgn=div8), [2 CFR Part 200.331(d)(3)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=a5c9aeb63782153248e11be8b3ec0f1e&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1331),  **[GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. VI, Sec. F** | Yes  No |  |
|  | RA: Ensure that each sub recipient is informed of the Single Audit requirements and the information method used by the SHSO is documented i.e. grant agreement, certification, award letter, etc. | Yes  No |  |
|  | RA: Determine the completion schedule and track the completion of the State’s A-133 audits | Yes  No  N/A |  |
| 1. Has the State as a pass-through entity performed the following: | | | |
| 1a. Ensure subrecipients of $750,000 or more have met requirements  ***FY16 & beyond:*** | F: Ensure that subrecipients expending $750,000 or more) in Federal awards during the subrecipient’s fiscal year have met the audit requirements of OMB Circular A-133 for that fiscal year  **Resources:** [**2 CFR Part 501(a)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=a5c9aeb63782153248e11be8b3ec0f1e&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1501) |  |  |
| 1b. Ensure subrecipients of $500,000 or more have met requirements  ***FY15:*** | F: Ensure that subrecipients expending $500,000 or more (note: increases to $750,000 or more beginning in 2015) in Federal awards during the subrecipient’s fiscal year have met the audit requirements of OMB Circular A-133 for that fiscal year  **Resources:** [**OMB Circular A-133, Subpart D, Section 400 (d)(4)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf) | Yes  No  N/A |  |
| 1a. and 1b. | RA: Ensure that the SHSO is checking for audit compliance prior to contract negotiations and grant execution each year | Yes  No  N/A |  |
|  | F: Monitor the activities of subrecipients as needed to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations and the provisions of contracts or grant agreements and that performance goals are achieved  **Commendation: Illinois, Kansas, Maine, Minnesota, North Carolina, South Dakota** | Yes  No |  |
|  | RA: Create a list (or ensure that the responsible State agency has done so) of all subrecipients annually and track their response to the Single Audit certification requirement to ensure full compliance  **Commendation: North Carolina, Washington** | Yes  No  N/A |  |
| 1c. Issue a decision of audit findings | F: Issue a management decision on audit findings within six months after receipt of the subrecipient’s audit report and ensure that the subrecipient takes appropriate and timely corrective action  **Resources:**  ***FY15:***[**49 CFR Part 18.26(b)(3)**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20)**,** [**OMB Circular A-133, Subpart D, Section 400 (d)(5)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf)  ***FY16 & beyond:*** [**2 CFR Part 200.521(c)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=a5c9aeb63782153248e11be8b3ec0f1e&mc=true&node=se2.1.200_1521&rgn=div8) | Yes  No |  |
|  | RA: Develop an audit finding monitoring system to track all audit findings from Single Audits that relate to NHTSA grant fund activities | Yes  No  N/A |  |
|  | RA: Check the Federal Excluded Parties List System or collect a certification from the subrecipient, or add a clause or condition to the covered transaction (2 CFR Section 180.300 – an OMB requirement) | Yes  No  N/A |  |
| 1d. Adjust pass-through entity’s records | F: Determine whether subrecipient audit results, on-site reviews or other monitoring require the adjustment of the pass-through entity’s records  **Resources:**  ***FY15:*** [**OMB Circular A-133, Subpart D, Section 400 (d)(6)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf)  ***FY16 & beyond:*** [**2 CFR Part 331(g)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=a5c9aeb63782153248e11be8b3ec0f1e&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1331) | Yes  No  N/A |  |
| 1e. Subrecipients permit access to records | F: Ensure that SHSO has a policy that subrecipients are required to permit the SHSO and auditors access to all applicable records and financial statements  **Resources:**  ***FY15:*** [**2 CFR Part 200 Subpart F (Audits) and Appendices**](http://www.ecfr.gov/cgi-bin/text-idx?SID=00edfa4e33dfa0201f97589e3924f3b8&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl), **[OMB Circular A-133, Subpart D, Section 400 (d)(7)](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/04a_A133_6_27_03.pdf)**  ***FY16 & beyond:*** [**2 CFR Part 331(a)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=a5c9aeb63782153248e11be8b3ec0f1e&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1331) | Yes  No  N/A |  |
| 2. Federal Audit Clearinghouse web site | RA: Check regularly the Federal Audit Clearinghouse web site, or a similar State website, for postings to determine if a report is available for current subrecipients  **Resources:** [**Federal Single Audit Database**](https://harvester.census.gov/facweb/) | Yes  No  N/A |  |

**III – D: Matching Funds**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. (a-c) Compliance with Federal matching rates for each funding source (except Planning and Administration, see III-F) | F: Document and maintain on file for each fiscal year the SHSO’s source of eligible program-related actual matching funds for each Federal funding source in accordance with the specific requirements for the funding category and funding year (MAP-21 vs. SAFETEA-LU). MAP-21 and FAST Act is 20% or sliding rate for Section 402 and each Section 405 program. No match required for Section 154 and 164  **Resources: [NHTSA Highway Safety Grant Resources-Grants Funding Guidance, Part II, B and Appendix A](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide)**,[**NHTSA Order 462-6C State Matching Rates**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/13_402StateMatchRequirements.html)  ***FY15 & 16:*** [**23 CFR Part 1200.20(f) for section 405**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.4.1.4)  ***FY17:*** [**23 CFR § 1300.20(f)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=se23.1.1300_120&rgn=div8)  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. VI, Sec. A**  **Commendation: Oregon** | Yes  No |  |
|  | F: Ensure that the documented matching funds are from similar programs that fall within the general thrust of the program matched i.e. Section 405 occupant protection dollars must be matched with occupant protection program dollars | Yes  No |  |
|  | F: Reconcile at fiscal year close out the actual amount of program match supported by documents within the project files with the program match entered into the GTS system so that the amounts are in full agreement | Yes  No |  |
|  | F: Notify outside agencies that when certifying program match for the SHSO to document that the same funds are not being used for any other State program, within or outside of the SHSO, as program match for other Federal programs | Yes  No |  |
|  | RA: Provide match documentation as a formal letter between the agencies to serve as an agreement the funding will not be used for other Federal programs and is not paid by the Federal government and that is signed by an authorized official of the granting agency. | Yes  No |  |

**III – E: 40% Local Benefit Requirement**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Documentation of the 40% local benefit requirement for Section 402 | F: Trace local benefit documentation to ensure the correct amount has been obligated and entered as actually expended into the GTS system to meet the 40% local benefit requirement (pertains to Section 402) NOTE: BIA local benefit is 95 percent  **Resources: *FY15 & 16:*** [**23 CFR Part 1200 Appendix E**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.4.1.4)  ***FY17:*** [**23 CFR Part 1300 Appendix C**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=71a2382a7d6ac863ba6d3fd421fb042e&mc=true&n=sp23.1.1300.g&r=SUBPART&ty=HTML#ap23.1.1300_161.c)[**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. II, Sec. M** | Yes  No |  |
|  | F: Periodically determine that the supporting source documentation for the 40% local benefit reconciles fully with the entries made to obligated funds in the HS 217 Cost Summary (Federal Share to Local) and in the GTS system  **Resources: NHTSA Guidance on Local Benefit 12-1-11** | Yes  No |  |
|  | RA: Periodically monitor actual local grant expenditures during the fiscal year (and no later than the third quarter) to ensure that amounts designated for local benefit are actually and fully expended and be prepared to take corrective action if needed | Yes  No  N/A |  |
|  | RA: Be aware that when using grants to State agencies to demonstrate compliance with the local benefit requirement, the State agency grants become subject to audit for compliance | Yes  No  N/A |  |
|  | F: Report a dollar amount of local benefit expenditures in GTS by March 31 each year and reconcile at closeout to ensure full compliance when preparing the final voucher | Yes  No |  |
|  | RA: If on March 31 local benefit appears significantly low, research to determine and document the cause and take corrective action if needed | Yes  No |  |
| 2. Active voice of local government entities | F: Ensure that source documentation that verifies local benefit consent, active voice or acceptance is available annually in each State grant file designated “local benefit” (not required for direct grants to local agencies)  **Resources: *FY15 & 16:***[**23 CFR Part 1200 Appendix E (c) (3)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.4.1.4)  ***FY17:*** [**23 CFR Part 1300 Appendix C (c) (3)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=71a2382a7d6ac863ba6d3fd421fb042e&mc=true&n=sp23.1.1300.g&r=SUBPART&ty=HTML#ap23.1.1300_161.c) | Yes  No |  |
|  | RA: Ensure required documentation evidencing local consent and acceptance is in place before any work is carried out if the State proposes to use the salary and benefits of a State employee toward meeting the local benefit requirement  **Resources:** [**NHTSA Highway Safety Grant Resources-Political Subdivision Guidance**](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide) | Yes  No  N/A |  |
| 3. Documentation of local benefit for Section 154 and 164 funds if used for SHSO alcohol-impaired driving programs | F: Trace local benefit documentation entered into the GTS system by March 31 and full entry by fiscal year close out annually to determine full reconciliation with source documentation to meet the 40% local benefit requirement (pertains to Sections 154AL and 164AL)  **Resources:** [**23 USC Part 154**](https://www.gpo.gov/fdsys/granule/USCODE-2011-title23/USCODE-2011-title23-chap1-sec154)**,** [**23 USC Part 164**](https://www.gpo.gov/fdsys/granule/USCODE-2011-title23/USCODE-2011-title23-chap1-sec164)**,** [NHTSA Highway Safety Grant Resources-Grants Funding Guidance IID; Appendix A, and Section 154 and 164 Guidance](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide) | Yes  No |  |

**III – F: Planning and Administration (P&A) and Program Management** (Both terms are defined at beginning of this MR Element. P&A: ***FY15 & 16:*** [**23 CFR Part 1200 Appendix F(b)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#ap23.1.1200_162.f)**, *FY17:*** [**23 CFR § 1300 Appendix D(b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.d&rgn=div9)**. Program Management:** : ***FY15 & 16:*** [**23 CFR Part 1200 Appendix F(b)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#ap23.1.1200_162.f)**, *FY17:*** [**23 CFR § 1300 Appendix D(b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.d&rgn=div9)**.**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Verify all P&A and program management expenditures are consistent with sound management practices and documentation supports P&A minimum 50% match (or sliding rate) Section 402 and 410 | F: Ensure that the SHSO P&A grant annually documents fully the P&A expenditures and the required match of State or local funds in the amount of 50% (or the applicable sliding scale rate) of the costs claimed for eligible P&A functions. P&A applies to Sections 402, 154 and 164 and SAFETEA-LU 406 and 410.  **Resources: *FY17:*** [**23 CFR § 1300 Appendix D(b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.d&rgn=div9)**.**  ***FY15 & 16:*** [**23 CFR Part 1200 Appendix F**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#ap23.1.1200_162.f)  [NHTSA Highway Safety Grant Resources-Grants Funding Guidance Part IIA](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide),[**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. IV Sec. H** | Yes  No |  |
|  | F: Ensure that the SHSO has documented all program management expenses to be consistent with sound management practices and regulations | Yes  No |  |
|  | RA: At the end of the fiscal year, carry over and plan to spend any unexpended P&A funds provided the funds were originally programmed in GTS no later than September 30 | Yes  No  N/A |  |
| 2. Verify Federal contribution for P&A does not exceed 13 percent (beginning FY14) | F: Ensure that annually the Federal funds contribution for P&A activities does not exceed 13 percent (FY2014 and forward) of the total Section 402 funds received by the State (and sections 410, 154 and 164 when used for 402 purposes)  **Resources:**  ***FY17:*** [**23 CFR § 1300 Appendix D**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.d&rgn=div9)  ***FY15 & 16:*** [**23 CFR Part 1200 Appendix F**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#ap23.1.1200_162.f)  [**NHTSA Highway Safety Grant Resources-Grants Funding Guidance, Part IIA(1)**](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide),[**23 USC Part 154**](https://www.gpo.gov/fdsys/granule/USCODE-2011-title23/USCODE-2011-title23-chap1-sec154)**,** [**23 USC Part 164**](https://www.gpo.gov/fdsys/granule/USCODE-2011-title23/USCODE-2011-title23-chap1-sec164) | Yes  No  N/A |  |
| 3. Documentation for P&A tasks reconciliation with HSP | F: Develop and provide documentation that verifies an annual reconciliation of the P&A tasks and related costs with those required to be described in the P&A module of the HSP  **Resources:**  ***FY17:*** [**23 CFR § 1300.13(a)(2)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=837f7ffd2916d556cac594337292252e&mc=true&node=se23.1.1300_113&rgn=div8)  ***FY15 & 16:*** [**23 CFR Part 1200.13 (a)(2)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#23:1.0.2.13.1.4.1.4) | Yes  No  N/A |  |
| 4. Indirect costs as P&A match and application | F: Ensure that there is appropriate written evidence of indirect costs used as P&A match funds by the SHSO and ensure that it is applied only to P&A expenditures  **Resources:**  ***FY17:*** [**23 CFR § 1300 Appendix D(b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.d&rgn=div9)**.**  ***FY15 & 16:*** [**23 CFR Part 1200 Appendix F (b)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#ap23.1.1200_162.f) | Yes  No |  |
| 5. Salaries and other costs charged to P&A | F: Ensure that only direct and indirect expenses for salaries and other costs that are attributable to the overall management of the State's HSP and necessary to carry out its functions are charged to P&A  **Resources:**  ***FY17:*** [**23 CFR § 1300 Appendix D**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.d&rgn=div9)  ***FY15 & 16:*** [**23 CFR Part 1200 Appendix F**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#ap23.1.1200_162.f) | Yes  No |  |
|  | F: Ensure that all related P&A costs, such as travel, equipment, supplies, etc. are charged to P&A and not directly to programs | Yes  No |  |
| 6. Salaries and costs charged to program management | F: Ensure that only direct and indirect expenses for salaries and other costs that are attributable to the program management functions of the SHSO programs and necessary to carry out its functions are charged to program management and to the specific program area  **Resources:**  ***FY17:*** [**23 CFR § 1300 Appendix D**](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.d&rgn=div9)**.**  ***FY15 & 16:*** [**23 CFR Part 1200 Appendix F**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#ap23.1.1200_162.f) | Yes  No |  |
|  | F: Periodically examine the cost data to ensure continued accuracy and amend the data when significant changes occur | Yes  No |  |
|  | F: Determine that only highway safety related time is being charged to the highway safety program | Yes  No |  |

**III – G. Project Equipment**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. System for tracking, managing and disposing of acquired equipment | F: Use, manage and dispose of equipment acquired with Federal funds in accordance with the State’s law and procedures (including value threshold) and Federal regulations – this provision applies to the SHSO, subrecipients and contractors  **Resources:**  ***FY17:*** [**23 CFR § 1300.31(c)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=837f7ffd2916d556cac594337292252e&mc=true&node=se23.1.1300_131&rgn=div8)  ***FY15 & 16:* [23 CFR Part 1200.31(c)](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23" \l "23:1.0.2.13.1.4.1.4)**  **[GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. V, Sec. G, NHTSA Equipment Management Q & A, State Law/Policy: XXXXX**  **Commendations: Nebraska** | Yes  No |  |
|  | F: Ensure that the type of equipment proposed to be purchased with Federal funds is an allowable cost  **Resources: [NHTSA Highway Safety Grant Resources-Grants Funding Guidance Part III and IV](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide)** | Yes  No |  |
|  | MC: Track the full market value of the equipment and the percent Federal share as separate values in the equipment tracking system so that the total value of the inventory can be determined | Yes  No |  |
| 2. State’s inventory requirements for tracking SHSO and subrecipient equipment | F: Document, manage and track the equipment acquired with Federal funds in full compliance with the State’s law and procedures (including frequency and value thresholds) and Federal regulations – this provision applies to SHSO, subrecipients and contractors  **Resources:**  ***FY15:*** [**49 CFR Part 18.32(b)**](http://www.gpo.gov/fdsys/granule/CFR-2011-title49-vol1/CFR-2011-title49-vol1-sec18-20)  ***FY16 & beyond:*** [**2 CFR Part 200.313(a)(3)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=2b4476dc3f178a225c494e40d35414f2&mc=true&node=se2.1.200_1313&rgn=div8)  **Commendations: Michigan** | Yes  No |  |
|  | RA: Develop and implement an effective equipment tracking system to be used by the SHSO for tracking both SHSO and subrecipient-acquired equipment and ensure that it is used for the authorized purpose | Yes  No  N/A |  |
| 3. NHTSA approvals requested and received for acquisition and disposal of equipment $5,000 or more | F: Establish and implement a policy to ensure that prior written approval from the NHTSA Regional Office is obtained either in the annual HSP or by a letter for the purchase or disposition by the SHSO or a subrecipient of each equipment item *(including software/information technology systems) valu*ed at $5,000 or more including the cost of any accessories necessary to make the item operational ($5,000 or more is based upon TOTAL cost of equipment, not just the Federal share)  **Resources:**  ***FYs15 and 16:*** [**23 CFR § 1200.31(d)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=d8181a485cb4993c031ee3bd3f052cae&mc=true&node=se23.1.1200_131&rgn=div8)  ***FY16 & beyond:*** [**2 CFR §§ 200.33**](http://www.ecfr.gov/cgi-bin/text-idx?SID=7280eb4e2293be1362af8606c7a13622&mc=true&node=se2.1.200_133&rgn=div8)**,** [**200.58**](http://www.ecfr.gov/cgi-bin/text-idx?SID=7280eb4e2293be1362af8606c7a13622&mc=true&node=se2.1.200_158&rgn=div8)  ***FY17:*** [**23 CFR § 1300.31(d)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=837f7ffd2916d556cac594337292252e&mc=true&node=se23.1.1300_131&rgn=div8)  **[GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. IV, Sec. E** | Yes  No |  |
|  | RA: Ensure that subrecipients are informed of the Federal requirement that they must receive prior written approval from the SHSO (and NHTSA) before acquiring or disposing of equipment valued at $5,000 or more | Yes  No  N/A |  |
|  | RA: Develop and implement a policy defining useful life by equipment type | Yes  No  N/A |  |
| 4. Compliance by SHSO and subrecipients with written State procurement laws, rules, etc. | F: Inspect and document during subrecipient onsite monitoring visits, and for the SHSO, all equipment acquired to ensure equipment is available and being used for its authorized purpose  **Resources:**  ***FYs 15 & 16:*** [**23 CFR Part 1200.31(c)**](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=23:1.0.2.13.1&idno=23#se23.1.1200_131)  ***FY17:*** [**23 CFR § 1300.31(c)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=837f7ffd2916d556cac594337292252e&mc=true&node=se23.1.1300_131&rgn=div8)  **State Law/Policy: XXXXX** | Yes  No |  |
|  | F: Require and verify when possible (or require subrecipients certify compliance) that subrecipients use their own procurement procedures which reflect applicable State and local laws and regulations and which conform to applicable Federal law and standards | Yes  No |  |
|  | RA: Recommend that equipment purchased in whole or in part with traffic safety funds be appropriately tagged by the subrecipient to indicate the item was acquired with Federal traffic safety funds | Yes  No  N/A |  |

**III – H: Contracts/Professional Service Agreements**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. State procurement laws, regulations, etc., on contracts and professional service agreements | F: Develop and implement a policy to establish a SHSO procedure to ensure that State procurement laws, regulations, rules, policy and guidelines are followed by the SHSO regarding contracts and professional service agreements (and not just for grants)  **Resources:**  ***FY15:*** [**49 CFR Part 18.36(a)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/03_DOTComRul_49CFR18.html)  ***FY16 & beyond:*** [**2 CFR Part 200.317**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2b4476dc3f178a225c494e40d35414f2&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1317)  **State Law/Policy: XXXX**  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. III, Sec. E** | Yes  No |  |
| 2. Grantees and subrecipient procurement procedures | F: Develop and implement a policy to require that grantees and subrecipients use their own procurement procedures for grant-funded contracts and professional service agreements that reflect applicable State and local procurement laws and regulations and that they conform to applicable Federal, State and local law and regulations  **Resources:**  ***FY15:***[**49 CFR Part 18.36**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/03_DOTComRul_49CFR18.html)  ***FY16 & beyond:* [2 CFR Part 200.318](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2b4476dc3f178a225c494e40d35414f2&mc=true&n=pt2.1.200&r=PART&ty=HTML" \l "se2.1.200_1318)**  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. III, Sec. E** | Yes  No |  |
| 2a. State and subrecipients following established procedures | F: Monitor periodically the SHSO and all subrecipient contracts and professional service agreements to verify compliance with the established State and/or local procurement procedures  **Resources:**  ***FYs 14 & 15:* [49 CFR Part 18.36(a)](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/03_DOTComRul_49CFR18.html)**  ***FY16 & beyond:*** [**2 CFR Part 200.318**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2b4476dc3f178a225c494e40d35414f2&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1318) | Yes  No |  |
| 3. State purchase orders and contracts contain required Federal clauses | F: Ensure that each State purchase order or other contract includes all clauses required by Federal statutes and executive orders  **Resources:**  ***FY15:*** [**49 CFR Part 18.36(a)**](http://www.nhtsa.gov/nhtsa/whatsup/tea21/GrantMan/HTML/03_DOTComRul_49CFR18.html)  ***FY16 & beyond:*** [**2 CFR Part 200.317 - 200.326**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e1d15b89746debbc6dee6b2de19af47d&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#sg2.1.200_1316.sg3)  [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. II, Sec. P** | Yes  No |  |

**III – I: Indirect Costs - *FY16 & beyond***

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| Indirect costs if claimed are correct rate and appropriately documented | F: If the SHSO wants to claim Federal funds to pay SHSO indirect costs, or, to reimburse subrecipients (State or local government agency or non-profit organization or Institutions of Higher Education) for indirect costs, ensure that appropriate evidence is available as outlined within Federal regulations and that the correct rate is charged  **Resources:** [**2 CFR Part 200.331(a)(4)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2b4476dc3f178a225c494e40d35414f2&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1331) | Yes  No  N/A |  |
|  | RA: Establish annually a list (or use electronic grants system to flag) of all subrecipients approved to charge indirect costs pursuant to an approval letter from a Federal cognizant agency and track the list to determine that copies of all required letters are maintained with the SHSO files | Yes  No  N/A |  |
|  | F: Ensure that claims received from subrecipients which include indirect costs are determined to be charged accurately | Yes  No |  |
| **NHTSA TIPS:** |  |  |  |
| 1.State or local government receiving more than $35 million in total Federal funds in a FY | Ensure that the SHSO has on file a copy of the ICR approval letter from the Federal cognizant agency  **Resources:** [**2 CFR Part 200 Appendix VII D (1) (b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=2ed7f6701ae78c55bb531173a590e054&mc=true&node=ap2.1.200_1521.vii&rgn=div9) | Yes  No  N/A |  |
| 2. Non-profit organizations (NPO) | Ensure that the SHSO has on file a copy of the ICR approval letter by the Federal cognizant agency  **Resources:** [**2 CFR Part 200 Appendix IV**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2ed7f6701ae78c55bb531173a590e054&mc=true&n=pt2.1.200&r=PART&ty=HTML#ap2.1.200_1521.iv) | Yes  No  N/A |  |
| 3. Institutions of Higher Education (IHE) | Ensure that the SHSO has on file a copy of the ICR approval letter from the U.S. Department of Health and Human Service or U. S. Department of Defense  **Resources:** [**2 CFR Part 200 Appendix III B (11) (a) (1)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2ed7f6701ae78c55bb531173a590e054&mc=true&n=pt2.1.200&r=PART&ty=HTML#ap2.1.200_1521.iii) | Yes  No  N/A |  |
| 4. Indian Tribe | If the Indian Tribe has an approved Federal rate, ensure that the SHSO has on file a copy of the approval letter from the U.S. Department of Interior  **Resources:** [**2 CFR Part 200 Appendix VII D (1) (c)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=2ed7f6701ae78c55bb531173a590e054&mc=true&node=ap2.1.200_1521.vii&rgn=div9) | Yes  No  N/A |  |
| 5. State or local government or NPO with State-negotiated rate receiving less than $35 million in total Federal funds with a SHSO negotiated rate | If a non-federal entity receives Federal funds only as a subrecipient of the SHSO, and the SHSO has negotiated an ICR with the entity (subject to the reasonable test), ensure that the SHSO has documentation of the negotiated rate and that it has monitored the indirect cost claims (or another qualified State agency which would negotiate and monitor on behalf of the SHSO)  **Resources:** [**2 CFR Part 200 Appendix VII D (1) (b)**](http://www.ecfr.gov/cgi-bin/text-idx?SID=2ed7f6701ae78c55bb531173a590e054&mc=true&node=ap2.1.200_1521.vii&rgn=div9)**,** [**2 CFR Part 200 Appendix IV**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2ed7f6701ae78c55bb531173a590e054&mc=true&n=pt2.1.200&r=PART&ty=HTML#ap2.1.200_1521.iv) **and** [**2 CFR Part 200.331 (a) (4)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=2ed7f6701ae78c55bb531173a590e054&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1331) | Yes  No  N/A |  |
|  | If the subrecipient has a federally negotiated indirect cost rate, ensure that the SHSO has documentation showing it has accepted the rate and that the rate is clearly stated | Yes  No  N/A |  |
| 7. State interagency services | If the subrecipient is a State agency and is receiving interagency services (indirect costs) in lieu of determining actual indirect costs, ensure that the allowed 10 percent standard indirect cost allowance is applied ONLY to direct salary and wage costs excluding overtime, shift premiums and fringe benefits  **Resources:** [**2 CFR Part 200.417**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=6b2fe3f69cc9ea9b87105f4a757d2f01&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1417) | Yes  No  N/A |  |
|  | RA: Separately and clearly note within interagency agreements to which budget item the 10% was applied to ensure application only to direct salary and wage costs (excluding overtime, shift premiums and fringe benefits) | Yes  No  N/A |  |
|  | RA: Establish annually a list (or use electronic grants system to flag) of all subrecipients approved to charge indirect costs pursuant to an approval letter from a Federal cognizant agency and track the list to determine that copies of all required letters are maintained with the SHSO files | Yes  No  N/A |  |
| 8. De minimus rate | Ensure that the 10 percent de minimus rate is only applied to Modified Total Direct Costs (MTDC) including limiting the first $25,000 of each subaward or subcontract (maximum of $2,500 indirect cost reimbursement) being awarded by the subrecipient – to be eligible, the agency must never have received a negotiated ICR and receives less than $35 million in total Federal funds  **Resources:** [**2 CFR Part 200.68**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=6b2fe3f69cc9ea9b87105f4a757d2f01&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_168) **and** [**2 CFR Part 200.414 (f)**](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=6b2fe3f69cc9ea9b87105f4a757d2f01&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1414) | Yes  No  N/A |  |

**III – J: Indirect Costs - *FY15***

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| Indirect costs appropriately documented | F: If the SHSO wants to claim Federal funds to pay SHSO indirect costs, or, to reimburse subrecipients for indirect costs, ensure that appropriate evidence is available as outlined within Federal regulations  **Resources: [2 CFR Part 225, Appendix E. Sections C, D, and E.3](http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf) [OMB Circular A-122, Attachment A, Section E.2.G.](http://www.whitehouse.gov/omb/circulars_a122_2004/)** and ASMB C-10 -“A Guide for State, Local and Indian Tribal Governments - Cost Principles and Procedures for Developing Cost Allocation Plans**. [GHSA-NHTSA Indirect Costs Q&A, Rev. 7-23-10](http://www.nhtsa.gov/About+NHTSA/Programs+&+Grants/Indirect+Costs+Questions+and+Answers).** | Yes  No  N/A |  |
| 1. Approval letter from Federal cognizant agency | F: Require that subrecipients approved by the SHSO to receive indirect costs shall provide to the SHSO **annually** a **current** approval letter from the cognizant Federal agency stating the negotiated indirect cost rate (IDC)  **Resources:** [**2 CFR Part 225, Appendix E. Section E**](http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf)**,** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. V, Sec. I** | Yes  No |  |
|  | RA: Establish annually a list (or use electronic grants system to flag) of all subrecipients approved to charge indirect costs pursuant to an approval letter from a Federal cognizant agency and track the list to determine that copies of all required letters are maintained with the SHSO files | Yes  No  N/A |  |
|  | F: Ensure that claims received from subrecipients which include indirect costs are determined to be charged accurately | Yes  No |  |
|  | RA: Regardless of the existence and amount of a Federal approved IDC, establish the maximum indirect cost rate which the SHSO will pay to subrecipients in order to maximize the amount of funding available for programs | Yes  No  N/A |  |
| 2. If none, preparation and retention of an indirect cost rate plan negotiated and monitored by the SHSO | F: If the subrecipient does not have a Federal approval letter and is to be reimbursed for indirect costs, the subrecipient (State, local or non-profit) shall prepare and retain an indirect cost rate plan that is negotiated (subject to reasonableness test), approved and monitored by the SHSO (or another qualified State agency which would negotiate and monitor on behalf of the SHSO)  **Resources:** [**2 CFR Part 225, Appendix E. Section D, 1, b**](http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf)**,** [**2 CFR Part 230, Appendix A, Section C**](http://www.gpo.gov/fdsys/granule/CFR-2012-title2-vol1/CFR-2012-title2-vol1-part230-appA/content-detail.html)**,** [**GHSA Policies and Procedures Manual**](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)**, See Ch. V, Sec. I** | Yes  No |  |
|  | F: If the SHSO reimburses direct costs which are related to salaries and wages, ensure that the SHSO treats like costs in the same manner as those of other State agencies, either as direct or indirect, to ensure consistency | Yes  No |  |
|  | RA: Establish and implement a policy that requires that the SHSO review and monitor indirect cost rate plans negotiated with the SHSO by subrecipients | Yes  No  N/A |  |
|  | RA: Establish and publish a policy for subrecipients to inform them whether the SHSO will authorize payment of any indirect costs and if so, the applicable requirements, or, state that the SHSO will reimburse direct costs only | Yes  No  N/A |  |
| 3. State agency (only) subrecipients standard indirect cost allowance (interagency services) | F: If paying indirect costs to a State agency subrecipient, ensure the SHSO is using either: (1) a negotiated indirect cost rate (IDC) by a cognizant Federal agency or (2) application of a standard indirect cost allowance equal to 10% of the direct salary and wage costs of providing the service (excluding overtime, shift premiums, and fringe benefits). The SHSO may negotiate with the State agency to pay a lower IDC than the inter agency rate as long as it does not create a greater cost than if the 10% rate had been paid on only direct salaries. NOTE: If the State agency has a Federal IDC rate that is lower than 10%, that rate must be used.  **Resources:** [**2 CFR Part 225, Appendix A**](http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a87.pdf)**,** [**GHSA-NHTSA Indirect Costs Q&A, Rev. 7-23-10**](http://www.nhtsa.gov/About+NHTSA/Programs+&+Grants/Indirect+Costs+Questions+and+Answers) | Yes  No |  |
| 4. State Interagency agreements notation of indirect costs | RA: Separately and clearly note within interagency agreements to which budget item the 10% was applied to ensure application only to direct salary and wage costs (excluding overtime, shift premiums and fringe benefits) | Yes  No  N/A |  |

**III – K: Paybacks**

| **MR Element** | **(F) Required Action (RA) Recommended Action**  **Resources/Commendations** | **Criteria Met?** | **SHSO Response and Timeline** |
| --- | --- | --- | --- |
| 1. Procedure followed by SHSO for paying back any funds to the Federal agency | Determine if the SHSO has resolved all paybacks from prior audit or Management Review Findings, unallowable costs, overpayments or errors (Caution: MR may be used as vehicle to advance collection.) | Yes  No |  |

**IV – Project File Review**

|  |  |  |  |
| --- | --- | --- | --- |
| A. Using the NHTSA MR Project Review Checklist Form, or a form developed by the SHSO, periodically assign SHSO staff to select projects based upon the NHTSA MR Element Project File Review Non-statistical Sampling Procedure including a representation from each of the three FYs of the upcoming MR (or since the files were last reviewed by the SHSO) and from each of the various NHTSA program areas and grant programs in which significant amounts of funds were expended during the time period to determine compliance with the MR Elements. See MR Elements for the non-statistical sampling method that may be used by NHTSA during the MR. | | | |
| B. Refer to the MR Elements for the 6 steps of the Project File Review Process which will be used by NHTSA during the MR. | | | |
|  | **(RA) Recommended Action** | **Criteria Met?** | **SHSO Response and Timeline** |
| (i). | RA: Establish and implement a policy to provide for the periodic review of the SHSO subrecipient project files using the prescribed sampling method to select projects and a standard checklist form to conduct the review  **Resources: NHTSA Project File Review Checklist Form** | Yes  No  N/A |  |
| (ii). | RA: If recurring problems are identified, expand the review as appropriate to determine the overall scope and impact of the problem | Yes  No  N/A |  |
| (iii). | RA: Summarize major issues identified during the Project File Review, take corrective action where needed to resolve all identified problems, fully document the action (date, action, employee signature) and provide update training for SHSO staff to prevent future similar errors | Yes  No  N/A |  |
| (iv). | RA: Develop and maintain an organized and current project filing system to ensure that all documentation to support the subrecipient applications, claims and SHSO monitoring activity is kept current and easily accessible | Yes  No  N/A |  |
| (v). | RA: Assign a (or all) SHSO staff responsibility for controlling and managing access to project files to ensure they are available, complete and organized | Yes  No  N/A |  |