**GHSA - State Highway Safety Office**

**Management Review and Deadline Reminder Table FY21**

**INSTRUCTIONS:** This Table is intended to assist States in several ways: tracking key MR Elements, identifying important deadlines, and identifying best practices related to the Highway Safety Performance Plan, monitoring and grant management. The Table is **not** a complete list of best practices. This table contains the priority and most frequently cited Management Review (MR) Elements only, consequently, not all Elements are included. For a complete list of MR Elements, please refer to the NHTSA MR Elements FY23Rev. dated 10-26-22.

Each State should review the Table and customize it to their own specific time schedule and practices. The Table is a Word document and can be downloaded and easily modified to also produce checklists or other useful reminder tables by activity type depending on the current needs of the State. The color code key is listed at the bottom of each page.

| **HSO STATUS** | **TIMEFRAME** | **ITEM** | **TIPS** | **MR REFERENCE/FEDERAL REGULATION/GHSA RESOURCES** |
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|  | **Monthly** | **15th** working day\* after the end of EACH month: Grant Tracking System (GTS) Voucher submitted  \*Quarterly if the transferred annualized rate is less than $1 million | The monthly voucher pertains to all funding expended not only “new” funding. | MR Part III. B.1  [23 CFR Part 1300.33 (d)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=dc44361372b66a04fa1dcf7c707b8c8f&mc=true&n=pt23.1.1300&r=PART&ty=HTML#se23.1.1300_133) |
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|  | **Quarterly** | Review the State highway safety office (HSO) Monitoring Policy to ensure it is accurate, in compliance with State and Federal regulations, is communicated to staff, a monitoring schedule is published, evidence of monitoring is contained in the project files, the monitoring completion progress is tracked and the status of completion is reported back to management. | A manager should be assigned to ensure that the annual monitoring schedule is fully completed including the follow up with any projects which were found to need attention or corrective action. | MR Part II. G.1  [**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)  [GHSA Monitoring Advisory](http://www.ghsa.org/resources/monitoring-advisory) |
|  |  | Determine if any projects are generating program income and ensure the income is being reported, tracked and expended appropriately. | The HSO Policies and Procedures (P&P) Manual should contain a policy on Program Income. Standard language should be available for inclusion in subrecipient manuals and grant application forms. The Highway Safety Plan (HSP) should identify any projects which are planned to generate program income. | MR Part III.B.1.e  [2 CFR § 200. 307](http://www.ecfr.gov/cgi-bin/text-idx?SID=7280eb4e2293be1362af8606c7a13622&mc=true&node=se2.1.200_1307&rgn=div8) and [2 CFR § 1201.80](http://www.ecfr.gov/cgi-bin/text-idx?SID=fddea36cb34ffc557386f40509c9c6c4&mc=true&node=se2.1.1201_180&rgn=div8)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. V, Sec. J |
|  |  | Review with staff the GTS Fund Balance Report by funding category type from (may need NHTSA Regional Office assistance) to ensure old fund balances are being spent down and determine the amount of funds that have not been obligated/allocated to specific grants or projects. | Periodic review of the fund balance report assists in keeping the staff aware of the importance of spending down balances and provides opportunities for reprogramming funds during the fiscal year.  States are required to track the disposition of unexpended balances to ensure funds do not lapse in the fifth year of receipt.  The HSO should look back at least 5 years to capture and address older grant programs. | [23 CFR Part 1300.41](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=dc44361372b66a04fa1dcf7c707b8c8f&mc=true&n=pt23.1.1300&r=PART&ty=HTML#se23.1.1300_141)  MR Part III. B. 3 |
|  |  | Ensure that evidence of local share consent/acceptance is in each State grant file designated “local share” and agrees with the information inputted into the GTS system. This applies only to section 402 funds and to section 154 and 164 transfer funds if used for section 402 purposes.  On April 10, 2023, NHTSA stated effective immediately with FY 2023 the State may aggregate in GTS the 40 percent local expenditures for Sections 402, Section 154 and Section 164 to meet the 40 percent requirement. The expenditures will no longer be tracked separately in GTS. | States should review their projected local expenditures to determine if they may need to designate State grants to local share and if the project meets the requirements. To avoid documentation issues, State grants should not be designated to local share unless needed.  The 2023 NHTSA Final Rule made significant changes to the requirements for HSOs to use State projects for local share. Check carefully and discuss with Regional Office. | MR Part III. E.  [23 CFR Part 1300.13(b)](https://www.ecfr.gov/current/title-23/chapter-III/part-1300#p-1300.13(b))  [23 USC Part 154](https://www.gpo.gov/fdsys/granule/USCODE-2011-title23/USCODE-2011-title23-chap1-sec154) and [23 USC Part 164](https://www.gpo.gov/fdsys/granule/USCODE-2011-title23/USCODE-2011-title23-chap1-sec164)  [FHWA Final Rule Open Container 23 CFR Part 1270](https://www.ecfr.gov/cgi-bin/text-idx?SID=59e06e0b548b841a2aac02aaf249fc89&mc=true&node=pt23.1.1270&rgn=div5) and [FHWA Final Rule Repeat Intoxicated Driver 23 CFR Part 1275](https://www.ecfr.gov/cgi-bin/text-idx?SID=59e06e0b548b841a2aac02aaf249fc89&mc=true&node=pt23.1.1275&rgn=div5)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. II, Sec. K  [NHTSA Highway Safety Grant Resources-Political Subdivisions](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide) |
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|  | **Annually** | Examine the potential for the HSO to streamline grant-related paperwork including electronic submission of grant proposals, performance reports and financial claims. | Many HSOs have implemented an on-line system for administering all grant-related paperwork. If an on-line system is not available, fully utilize other software for streamlining documentation and tracking grant-related information.  Before considering an electronic process, the State should establish that it has the statutory authority to accept electronic signatures. | MR Part II. F.9. |
|  |  | Review the HSO’s prior Management Review (MR), Corrective Action Plan, HSP and AR reviews and any outstanding Program Assessment Recommendations to determine if there are outstanding items which should be completed regarding MR required actions or recommendations, recommendations regarding projects or related to the implementation of the HSP. | A proactive approach to resolving outstanding items will assist the HSO in responding to inquiries from the NHTSA Region and in preparing for the next MR or Program Assessment. | MR Part II. C.1 |
|  |  | Review the delegation of authority documents to ensure the names and titles provided are accurate. | Consider providing for alternate delegation of authority and signature authority in case of the temporary absence of the designee(s) | MR Part 1. D. |
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|  | **Non-Specific Date** | Federal funds must be obligated within 30 days of each grant award |  | MR Part III B.2b. |
|  |  | Sec. 154 Open Container – a split letter is due 60 days after the funds are made available by FHWA. HSO activities must be included in the HSP or an amendment to the HSP. |  | [NHTSA Highway Safety Grant Resources-Section 154 and 164](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide)  [FHWA Final Rule Open Container 23 CFR Part 1270](https://www.ecfr.gov/cgi-bin/text-idx?SID=59e06e0b548b841a2aac02aaf249fc89&mc=true&node=pt23.1.1270&rgn=div5) |
|  |  | Sec. 164 Repeat Offender - a split letter is due 60 days after funds are made available by FHWA. HSO activities must be included in the HSP or an amendment to the HSP. |  | [NHTSA Highway Safety Grants Management Resources - Section 154 and 164](http://www.nhtsa.gov/About+NHTSA/Highway+Safety+Grant+Programs/Resources+Guide)  [FHWA Final Rule Repeat Intoxicated Driver 23 CFR Part 1275](https://www.ecfr.gov/cgi-bin/text-idx?SID=59e06e0b548b841a2aac02aaf249fc89&mc=true&node=pt23.1.1275&rgn=div5) |
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|  | **January** | **3**: For the calendar year, send any proposed seat belt survey designs to NHTSA for approval  **28**: Final GTS Voucher due including Local Share expenditure final entry (see also March 31 requirement) and Match  28: Final Financial Obligation Closeout Summary GTS  **28**: Annual Report submitted to Region | The HSO must submit proposed survey design alternations for NHTSA approval as specified at least three months before data collection begins (proposed alterations include but not limited to: sample design, seat belt use rate estimation method, variance estimation method and data collection protocol) | MR Part III B  [23 CFR Part 1340](https://www.ecfr.gov/current/title-23/chapter-III/part-1340)  [23 CFR Part 1300.33(d)](https://www.ecfr.gov/current/title-23/chapter-III/part-1300/subpart-D#p-1300.33(d))  [23 CFR Part 1300.35](https://www.ecfr.gov/current/title-23/chapter-III/part-1300/subpart-D/section-1300.35)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)  See Ch. VII Annual Report, Ch. VIII Closeout |
|  |  | Continue to conduct planning conferences with partners and the public, especially overrepresented and underserved populations, to obtain their input and feedback and use for the THSP development. Review program data and targets to determine a preliminary funding distribution and overall program direction. Begin working with the NHTSA Regional Program Manager to clearly understand the THSP requirements and share initial drafts of the THSP or sections of the THSP as completed to obtain early feedback and suggested modifications. | It is recommended to begin working with the NHTSA Regional Program Manager early in the THSP development process in order to ensure that the HSO has a clear understanding of the requirements. By submitting draft sections for comment as they are prepared the HSO may avoid having to make significant corrections or additions close to the submission deadline. This may also avoid having conditions placed upon the THSP approval. | [GHSA Guidance for Developing HSPs](http://www.ghsa.org/resources/guidance-developing-highway-safety-plans) |
|  |  | Begin the periodic process of reviewing and updating the HSO Policies and Procedures (P & P) Manual | The HSO should have a current P & P Manual. The GHSA P&P Manual is a model available on line. There should be a policy in the HSO Manual which defines the periodic (at least annually) procedure for revising the manual at least every three years. The policy should require that all HSO staff be aware of, have easy access to and regularly use the Manual. It is preferable that the HSO Manual be posted on line to assist in ensuring that the most current policy is being used by staff. If more restrictive State policies exist or are adopted by the HSO, ensure that the HSO is in full compliance with its provisions. | MR Part 1.C.  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual) |
|  |  | Ensure that the appropriate match letters (documentation) and financial records to reconcile with and document correspondence for the current fiscal year have been obtained and are readily available in the HSO files | States have flexibility to aggregate all expenditures for highway safety activities by the State and local governments to meet the requirement, or, to provide the 20 percent match by program area. When aggregating, any eligible expenditure under Section 402 or any of the Section 405 programs may be counted toward the requirement under either program. | MR Part III.D.1.  [23 CFR § 1300.20(f)](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=se23.1.1300_120&rgn=div8)  [NHTSA Guidance August 2019 Non-Federal Share](https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/nhtsa_guidance_for_non-federal_share.pdf) |
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|  | **February (or later/earlier)** | Send out Request for Project Proposals for new fiscal year  Review with staff their plans to ensure the HSO is meeting Single Audit Requirements | A review should be conducted periodically to ensure that the HSO Single Audit policy is current; subrecipients receive required CFDA information, the audit reports are being tracked, obtained and reviewed; subrecipients are required to permit access to records; collaboration is taking place and is being documented with other similar State agencies; and that follow up is conducted and completed when non-compliance exceptions are found (but only when relevant to the highway safety program).  The HSO should regularly check the Federal Audit Clearinghouse web site and any available State resources or websites for audit postings. | MR Part III. C.  [2 CFR § 200.521(c)(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=7280eb4e2293be1362af8606c7a13622&mc=true&node=se2.1.200_1521&rgn=div8) and [2 CFR Part 200.332(d)(3)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=49f02854d57ba0f85817e59f7b771721&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1332)  [Federal Single Audit Database](https://harvester.census.gov/facweb/) |
|  |  | Assess and track staff development and training needs | Ensure that based upon job duties staff have attended the appropriate NHTSA sponsored courses including Program Management, Federal Finances and Tracking Grants, Data, Impaired Driving and Occupant Protection and GHSA Executive Seminar/Emerging Leaders (where applicable).  Document and track staff training status to demonstrate management awareness of for current and retraining staff needs and training status.  Consider cross training where possible and affordable to provide broader awareness of Federal requirements.  Consider conducting training courses within the State if travel restrictions prohibit attendance at out of state locations or other actions to ensure effective training is delivered. | MR Part I.E.  GHSA State Profiles and Sample Position Descriptions (Members Only login) |
|  |  | The BIL reauthorization act eliminated the Maintenance of Effort requirement beginning with FY 2024. For the immediate prior years Congress had prevented NHTSA for enforcing the MOE requirements. |  | [NHTSA Guidance August 2019 Maintenance of Effort](https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/nhtsa_moe_fast_act_guidance.pdf)  [GHSA Maintenance of Effort Advisory](http://www.ghsa.org/resources/maintenance-effort-moe-advisory) |
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|  | **March** | **1**: Annual reporting requirements for the State’s preceding calendar year’s seat belt use survey and related information | The NHTSA seat belt use survey design and reporting requirements changed effective May 2, 2011, for calendar year 2012. Site selection is required to be redesigned every five years. Consult the federal regulation for the information required to be reported using the prescribed reporting form. | [23 CFR Part 1340](https://www.ecfr.gov/current/title-23/chapter-III/part-1340) |
|  |  | Develop revenue estimates and draft initial HSP budget for new fiscal year |  | GHSA Policy |
|  |  | **31**: Verify that the dollar amount of local share expenditure entries to date have been made in GTS (also to be reconciled with the final GTS voucher) |  | MR Part III.E.  [23 CFR § 1300 Appendix C](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.c&rgn=div9) |
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|  | **April** | Periodically verify that the appropriate time allocation and time documentation has been accurately charged and timesheets completed for every HSO employee and sub recipient receiving salary support from Federal funds. | Care should be taken to evaluate and identify the applicable time documentation regulation for each HSO employee or subrecipient employee charged to Federal funds. The MR Team will sample timesheets for subrecipients and SHSO employees. | MR Part III. F. and II.H.10  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. IV, Sec. H |
|  |  | Verify that all Planning and Administration (P&A) and program management expenditures are consistent with sound management practices and compliant with Federal regulations. | The HSO documentation must confirm the 50 percent minimum (or sliding scale) P&A match requirement is met annually, verify the 18 (effective FY24) percent limit on Section 402 funds received each fiscal year used for the Federal P&A contribution and that all salaries and other costs attributed to P&A and to program management are being charged correctly. | MR Part III. F.  [23 CFR Part 1300.13 (a)](https://www.ecfr.gov/current/title-23/chapter-III/part-1300#p-1300.13(a)) |
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|  | **May** | Check progress of the scheduled monitoring visits for the current fiscal year | The annual Monitoring Schedule List should be periodically checked to identify outstanding reports or missing reviews of submitted reports. The frequency of monitoring should take into consideration the pre-award risk assessment results. Sufficient time must be allowed within the fiscal year to complete the necessary work. Special attention should be made to grants containing overtime to ensure adequate checks and balances and safeguards are in place and are being followed.  A spot check of randomly selected project files should be made to determine if the completed monitoring reports are present in the file. | MR Part II. G and H  [GHSA Monitoring Advisory](http://www.ghsa.org/resources/monitoring-advisory) |
|  |  | Develop HSO in-house grants, or other documentation of activity and expenditures, for new fiscal year | Ensure that the in-house grants, or other method used by the SHSO, are prepared, reported and tracked using the same procedures for other subrecipients. |  |
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|  | **June** | Review project proposals and make tentative grant selections for new fiscal year | The budget allocation for projects should be consistent with problem identification which is informed by the feedback obtained during the public participation and engagement activities. Documentation is required of any CARES Act waivers requested by the SHSO in FY20 and its impact on performance progress. |  |
|  |  | Determine that the correct mandatory State and subrecipient/vendor Certifications and Assurances are used for the annual AGA submission. | This is typically most important to check when there has been a new reauthorization but should be checked prior to submitting each HSP. NHTSA provides the current version. There is a new certification regarding Conflict of Interest for FY24.  The **full language** of the federally required certifications and assurances for the HSO (with the exception of use of the modifier “subrecipient” instead of “State” must be included in all subrecipient agreements and vendor contracts and updated annually. Ensure that there is a procedure to check the Federal list to prevent subrecipients receiving grants if they have been debarred or suspended.  FY17 and forward: Federal grant funds cannot be used to check for motorcycle helmet usage including observational surveys. | MR Part II. F.6  [23 CFR § 1300 Appendix A](http://www.ecfr.gov/cgi-bin/text-idx?SID=36ebdb7cf5337e4a82fbd48b72fe81d2&mc=true&node=ap23.1.1300_161.a&rgn=div9)  [SAM Search for Federal Debarment and Suspension](https://www.sam.gov/SAM/pages/public/searchRecords/search.jsf)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. II, Sec. N |
|  |  | Conduct final internal review of draft THSP to ensure that all of the required information has been provided. GHSA and NHTSA developed a Recommended/Optional Performance Plan and a Performance Report Chart. It is recommended that the HSO complete and publish the charts in the THSP. For FY24, NHTSA is expected to share revised charts that conform to the changes in the 2023 Final Rule.  Determine the current method for submitting the consolidated application to NHTSA the by the July 1 deadline. | Targets must be set using the most recently available Federal FARS data which should be included in the performance measures. A brief performance report on the core performance measures progress is required to be included within the HSP. | MR Part II. A and B.  [Countermeasures That Work: A Highway Safety Guide for State Highway Safety Offices](http://www.ghsa.org/resources/countermeasures2015)  [NCHRP Report 622 Effectiveness of Behavioral Highway Safety Countermeasures](http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_622.pdf)  [GHSA Traffic Safety Performance Measures materials](https://www.ghsa.org/resources/performance-measures) |
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|  | **July** | **1**: THSP (every three years beginning with FY24) required to be submitted to NHTSA for review and approval | This is a firm date. | MR Part II. B  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)  See Ch. II Planning |
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|  | **August** | 1: Annual Grant Application (AGA), signed Certifications and Assurances and Section 405 grant applications for new fiscal year required to be submitted to NHTSA for review and approval | Requests to the NHTSA Regional Office for the purchase of equipment (including software/information technology systems) valued at $5,000 should be included in the AGA. This additional step ensures that all necessary approvals have been submitted.  Letter requests may also be submitted periodically throughout the year. (Prior written approval must also be received for the subsequent disposition of the equipment.)  Special attention should be given to providing the required level of detail for Section 405 (c) funded projects.  When a State plans to use funds for Paid Media, the HSO should document in the AGA specific information describing the program – see the NHTSA Guidance for Purchasing Advertising.  When considering communications, paid media and public information expenditures that involve attendance at sporting and entertainment events that charge admission, specific tests must be applied to determine if the activity is an allowable cost (see NHTSA Guidelines). | [23 CFR § 1300.31(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=837f7ffd2916d556cac594337292252e&mc=true&node=se23.1.1300_131&rgn=div8)  ([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))  MR Part III. G. (3) and (4)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual)  See Ch. II Planning  [NHTSA Section 405c Expenditures Program Clarification 1/29/19](https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/final_external_405c_program_clarification_1-29-2019-tag.pdf)  [NHTSA Highway Safety Grant Resources-Advertising](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide)  NHTSA Guidelines for Sports Marketing Involving Attendance at Events |
|  |  | Check that the HSO property management process is: documented and in full compliance with the State’s law and procedures; is established in a written procedure; is current; is being fully implemented and tracked by the HSO; and, that if equipment value is $5,000 or more (including software/information technology systems), the HSO has a verified approval in the AGA or a letter for its purchase from the NHTSA Region in the file or a disposition approval letter (whichever is applicable) | Equipment should be inspected and documented in accordance with the HSO policy which has been developed in compliance with any State policy. The HSO must have received the prior written approval of the NHTSA Regional Administrator for purchase of all equipment valued at $5,000 or more (including necessary accessories). When that equipment is ready for disposal, the HSO must also have received the prior written approval of the NHTSA Region. | MR Part III. G.  [23 CFR § 1300.31(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=837f7ffd2916d556cac594337292252e&mc=true&node=se23.1.1300_131&rgn=div8)  [2 CFR § 200.313(a)(3)](http://www.ecfr.gov/cgi-bin/text-idx?SID=7280eb4e2293be1362af8606c7a13622&mc=true&node=se2.1.200_1313&rgn=div8)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. V Sec.G |
|  |  | Ensure all HSO staff have access to and are familiar with the NHTSA Highway Safety Grants Management Resources Guide available online at the NHTSA website. | The on-line manual should be bookmarked on every staff member’s computer for easy reference to ensure that the most up-to-date version is being used. Supervisors should review a section of the manual with staff at a monthly meeting to refresh their knowledge. | [NHTSA Highway Safety Grant Resources](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide) |
|  |  | If the HSO is using Federal funds for paying indirect costs to subrecipients (State or local agencies), ensure compliance with the requirements for approving indirect cost reimbursement and the difference in the requirements and documentation required to be maintained for State agencies versus local subrecipients.  The 10% de minimis rate is available if the agency receives less than $35 million in Federal funds annually.  Ensure when a local government or non-profit agency’s indirect cost rate plan is negotiated by the HSO, the HSO is periodically reviewing (subject to reasonableness test), approving and monitoring (or another qualified State agency which would negotiate and monitor on behalf of the HSO) the plan to provide reasonable assurance that the federal regulations are being followed. | To avoid later issues, HSOs should consider eliminating or reducing subrecipient indirect cost rates and instead budget only specific direct costs. Caution: the same costs may not be reported as both indirect and direct. The general costs of government are unallowable. Ask: would the activity still exist and result in the same costs being incurred if the grant were terminated?  If indirect costs are charged by the HSO to the in-house grant, the HSO’s State agency’s indirect cost rate approval letter must be on file and renewed annually. | MR Part III. I.  [2 CFR Part 200.68, .332(a)(4), .414(f), .417, and Appendices III, IV, VII](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=674b6434d020ddec4ab14d486f72c5e5&mc=true&n=pt2.1.200&r=PART&ty=HTML)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. V, Sec. I |
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|  | **September** | After approval of AGA received from NHTSA, notify successful subrecipients and finalize subrecipient agreements for new fiscal year.  Ensure that every subaward contains all of the items in the information required by the Uniform Guidance. | The subaward must include the FAIN (Federal Award Identification Number). Where more than one funding source is used and needs to be split across multiple FAINs, the HSO should select the minimum number of FAINS that represent the year(s) of funding most likely to be used. However, the actual FAIN for all federal awards received and expended must be properly documented before closeout.  Reference to an ICR is also required in the project agreement. | MR Part II. F.  [2 CFR Part 200.332(a)(4), .414(f) and .425(d)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=674b6434d020ddec4ab14d486f72c5e5&mc=true&n=pt2.1.200&r=PART&ty=HTML)    [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Chapter IV, Sec. D  NHTSA Guidance Memo November 23, 2022 |
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|  | **October** | Establish and implement the monitoring schedule for new fiscal year grants |  |  |
|  |  | Review prior fiscal year’s monitoring schedule for completion and issue a status report | The HSO should document the completion of the previously published Monitoring Schedule to demonstrate full compliance with its internal policy. |  |
|  |  | Review the Federal Spending Transparency reporting requirements and use the FFATA Sub-Award Reporting System (FSRS) to report sub-award and sub-awardee executive compensation data by the last day of the month following the month in which the sub award was made (beginning on October 29, 2010) | The HSO shall register in the System for Award Management (SAM) at [SAM](https://www.sam.gov/SAM/pages/public/searchRecords/search.jsf)  and in FSRS at [www.fsrs.gov](http://www.fsrs.gov). Sub awardees receiving $30,000 or more in Federal gross revenue must obtain a UEI number and report certain information following each grant award. The HSO should develop a policy and form for applicable sub recipients to provide the required information and a method to track that the HSO has received and inputted the information into the FSRS. | [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual). See Ch. II, Section R  [Federal Transparency Requirements](http://www.ghsa.org/resources/transparency-requirements) |
|  |  | As the new grant year starts, verify that the allocation of staff costs is reasonable and auditable.  Periodically verify that the appropriate time allocation and time documentation has been completed for every HSO employee and subrecipient employee receiving salary support from Federal funds.  Federal grant funds cannot be used for “general costs of government”. In August 2019 NHTSA provided new guidance for grants that requires State reimburse activity hours for law enforcement and prosecutors, rather than as full or part-time positions.  The BIL and as described in the 2023 NHTSA Final Rule allows Section 405(d) funds to be used for compensating law enforcement officers to carry out safety grant activities to replace an officer who is receiving drug recognition expert training or serving as an instructor. | Staff costs must be allocated to the proper program areas/modules.  Care should be taken to establish and monitor a timekeeping system for each HSO employee or subrecipient charged to Federal funds for both program management and planning and administration work. | MR Part II.F.10 and Part III. F.  [NHTSA Guidance August 2019 Paying for Law Enforcement and Prosecutors' Activities](https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/nhtsa_guidance_for_paying_for_law_enforcement_and_prosecutors.pdf)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. II Section H and Ch. IV Sec. H  [23 CFR Part 1300.23 (i)(1)(B)](https://www.ecfr.gov/current/title-23/chapter-III/part-1300#p-1300.23(j)(1)(iii)(B)) |
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|  | **November (or earlier)** | Begin data analysis, problem identification, public participation and engagement planning and activities, internal planning and input- solicitation processes every three years for the Triennial HSP and to determine if any updates to the THSP are necessary to be included in the Annual Grant Application (two off years).  Ensure that each of the planned strategies refer to one of the required minimum set of 11 core outcome and 1 behavior performance measure. There are also 3 activity performance measures for which targets are not required however the results must be reported annually in the HSO Annual Report (AR).  It is strongly recommended that all states also conduct annual attitude surveys. GHSA has suggested nine questions for occupant protection, impaired driving and speeding that States may use or they may use equivalent questions.  Model Performance Measures for a State Traffic Records System are available to help States monitor and improve the quality of the data in their traffic records systems.  The Model Minimum Uniform Crash Criteria web site is also helpful. | Check the HSO processes for developing the THSP for compliance with the specific requirements regarding public participation and engagement, performance targets, performance measures, data, analysis, participation, documentation and evidence-based project selection. Use comprehensive sources, including geospatial and sociodemographic, of data relevant to effective highway safety planning to make decisions and to assess program performance. | MR Part II.1.  [23 CFR Part 1300.11](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=a20e66874419ed085f5dff3d61cb0011&mc=true&n=pt23.1.1300&r=PART&ty=HTML#se23.1.1300_111)  [23 CFR Part 1300.12](https://www.ecfr.gov/current/title-23/chapter-III/part-1300/subpart-B/section-1300.12)  [Countermeasures That Work: A Highway Safety Guide for State Highway Safety Offices](http://www.ghsa.org/resources/countermeasures2015)  [NCHRP Report 622 Effectiveness of Behavioral Highway Safety Countermeasures](http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_622.pdf)  [GHSA Traffic Safety Performance Measures materials](https://www.ghsa.org/resources/performance-measures)  [GHSA Attitudes Survey documents](http://www.ghsa.org/resources/attitudes-survey)  [Model Performance Measures for a State Traffic Records System](http://www.ghsa.org/resources/performance-measures)  <https://www.nhtsa.gov/mmucc> |
|  |  | Review the Section 405 grant program requirements to determine whether the State continues to be qualified or may become newly qualified for the upcoming fiscal year. | NHTSA provides a review of the Section 405 applications to identify missing legal qualifications for each Section 405 grant program. Early submission for review of changes or proposed changes to applicable State laws through the Regional Office is recommended. |  |
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|  | **December** | Begin preparation of HSO Annual Report for prior fiscal year (due beginning with FY23 within 120 days after the end of the fiscal year)  Ensure that each of the federally required report elements are included in the Annual Report.  GHSA and NHTSA developed a Recommended/Optional Core Performance Measure Target Chart. It is recommended that the HSO complete and publish the chart in the Annual Report to compare progress to date with progress from the previously closed FARS calendar year(s). | If the HSO enters claims at the project level within GTS, the submission of the final voucher will satisfy the requirement for reporting funds expended by project.  If funds have been expended on Paid Media, States are encouraged to report on the purchase of media with Federal funds and its effectiveness in their Annual Report.  If section 2011 funds have been expended during the fiscal year, include a summary within the Annual Report pursuant to 23 CFR 1200.33 for each fiscal year until all Child Restraint grant funds are expended. See the regulation for the specific information required to be included in the report.  The results of the annual State Attitudes Survey, if conducted, is required to be reported. | MR Part II.B.16  [23 CFR Part 1300.35](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=dc44361372b66a04fa1dcf7c707b8c8f&mc=true&n=pt23.1.1300&r=PART&ty=HTML#se23.1.1300_135)  [GHSA Policies and Procedures Manual](http://www.ghsa.org/resources/ghsa-policies-and-procedures-manual), See Ch. VII  [GHSA Annual Report Guidance](http://www.ghsa.org/resources/annual-report-guidance)  [NHTSA Highway Safety Grant Resources](https://www.nhtsa.gov/highway-safety-grants-program/resources-guide)  [23 USC 405 Section 2011](http://www.nhtsa.gov/nhtsa/whatsup/tea21/grantman/html/Sec_2011_Booster.html)  [Implementing Guidance for Child Restraint Grant Programs](http://www.nhtsa.dot.gov/nhtsa/whatsup/tea21/GrantMan/HTML/2011_FRImplementingGuidance.pdf)  [GHSA/NHTSA Recommended Optional Core Performance Measure Target Chart](file:///Users/bettyel2020/Documents/GHSA/Closed%20projects/2020-21%20GHSA%20Consulting/MR%20Element%20Rev%202021/GHSA/NHTSA%20Recommended%20Optional%20Core%20Performance%20Measure%20Target%20Chart) |