### Chapter III

Project Development

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### III. Project Development

Chapter III describes the process used by the Highway Safety Office (HSO) for the development and selection of statewide and local traffic safety grant proposals.

### A. Overview

This section provides an overview of the proposal development and selection process used by the HSO.

In alignment with the problem identification, performance targets and key countermeasure strategies identified in the Triennial Highway Safety Plan (THSP), the HSO solicits proposals and awards grants to fund projects designed to reduce the number of deaths and serious injuries resulting from traffic crashes.

Traffic safety projects are initiated as a result of several types of “needs” including:

* Statewide and local problem identification
* State agency initiative
* Public participation and engagement outcomes
* Community initiative
* Key events

[NOTE: The grant agreement process and form described in this and in the subsequent chapters is the one used by the Alaska Highway Safety Office. Alaska utilizes an advisory Grant Review Team as part of this process. The information in this and related chapters may need to be modified to align with the process and form actually used by your State.]

The development of final grant agreements is a two-step process. Proposed grant applications are first submitted to the HSO by potential subrecipients following a prescribed process and deadlines. For successful applicants, the proposal form then becomes the grant application and final grant agreement. This chapter describes the proposal process.

Proposed grant applications must include the most current data available to identify a specific traffic safety problem, a workable solution linked to the identified problem, performance targets, detailed action plans, and budgets that demonstrate an understanding of the various issues to be resolved and a reasonable approach to resolving the identified problem. Proposed projects must be data driven and the HSO must be able to show that the countermeasure strategies chosen are evidence-based.

The HSO final grant agreement is a legally binding document when fully executed by both parties. It has as attachments other documents such as terms and conditions, detailed project descriptions, the approved budget, and certain required certifications and assurances.

RESOURCES: [Partnering with Highway Safety Offices: Tips and Tactics for Success](https://www.ghsa.org/resources/partnering18)

### B. Request for Proposal

This section provides an overview of the Request for Proposal (RFP) package which is produced and circulated by the HSO annually to prospective subrecipients and other interested parties.

The HSO annually develops an RFP for use by interested applicants. The HSO RFP contains the information needed by applicants to submit a proposed grant application.

In the event it becomes necessary to change or revise any part of the HSO RFP, those changes or revisions will be posted on the HSO web site and notice given to prior recipients. No changes or revisions will be made after both parties have signed a final grant agreement.

All proposals remain confidential until the grant agreement is signed by the Program Manager and the applicant. After both parties have signed, the grant agreements are public records as defined in the State’s “Public Records Act”.

The responsibility for compiling the necessary information to revise and finalize the annual RFP is assigned to the *[insert title]*. The RFP should be posted on the HSO web site.

### C. Project Director’s Manual

This section provides an overview of the HSO’s Project Director’s Manual which is developed to assist potential subrecipients in understanding the requirements.

The purpose of the Project Director’s Manual is to establish program and grant management procedures and provide guidance to subrecipients for the development and administration of grant agreements. The guidance should assist subrecipients in understanding grant development requirements including an outline of the specific objectives of the project, budget, performance targets, performance measures and commitment of responsibility by the HSO and the subrecipient. The Manual shall contain the following:

* Grant application
* Key elements of the grant application
* Grant review and approval process
* Progress report forms
* Reimbursement voucher forms (invoices)
* Grant revision instructions
* Equipment record requirements
* Subrecipient certifications and assurances
* Applicable Federal regulations and any recent revisions
* Timelines
* Other information

Revisions will be made as soon as possible to accommodate any changes in State or Federal laws or regulations. Periodic training may be provided for HSO staff when revisions are made to the Manual.

The Manual is available online at the HSO web site (if one is available) and a copy of the most current Manual may be requested from the HSO by a subrecipient.

### D. Grant Development Calendar

This section establishes a process and timeline for the development of project proposals and grants.

NOTE: The following process utilizes a review team to assist in reviewing proposed grant applications. Your State may use another grant review process.

The HSO highway safety grant application process is comprised of three steps.

During the month of *[insert title]*, grant application solicitation notices containing the issues to be addressed including identified problems and goals are sent (and published on the HSO web site if one is available) by the HSO to public and private agencies who will best be able to help attain the HSO goals.

Potential subrecipients are asked to submit to the HSO a grant application form containing a problem statement, a description of proposed activities and a complete budget. It is emphasized that to be funded, projects must have a direct link to the HSO identified problems and targets.

The HSO *[insert position title]* reviews each application to verify that it does address the identified problems and meets all of the application requirements, and, reviews the budget component of each of the proposals. If necessary, the *[insert position title]* works with the potential subrecipient to resolve any questions and develop a fully detailed and complete proposed grant application prior to the Grant Review Team referral. The Grant Review Team scores the proposals. The HTSO *[insert title]* resolves any remaining questions. The HSO Administrator then makes the final grant selection determination and approval.

**NOTE**: The HSO will identify project proposals which require priority handling in order to ensure an October 1 startup date, for example, a project which must begin grant work in the October to ensure full completion of the required activities. Most grants should have an October 1 start date.

**Table 6. Grant Development Calendar**

|  |  |
| --- | --- |
| **Month** | **Activity** |
| Mid May | Post RFP on HSO web site  |
| May - June | Receive and review proposed grant applications and contact applicants for clarification or missing information |
| June – July  | * Develop HSO in-house grants
* Invite HSO Grant Advisory Review Team to review proposed grant applications
 |
| July 1 | * Submit THSP to the National Highway Traffic Safety Administration (NHTSA) Regional Office including selected countermeasure strategies.
* Review of proposed grant applications by Grant Review Team and identify agreements for potential funding
 |
| August 1 | * Submit Annual Grant Application (AGA) including selected projects and subrecipients to NHTSA Regional Office
 |
| August 15 | * Complete grant negotiations and make final selection
* Submit HSO in-house grants for Department approval
 |
| September 1 | * Notify successful applicants, *complete pre-award risk assessment*, and finalize grant agreements
* Issue Notice to Proceed to selected subrecipients
* Obtain approval for grants and contracts from the appropriate Department officials
 |
| October 1 | * Implement subrecipient grant agreements
* Ensure that any new or amended project agreements have been submitted to the Regional Administrator for approval as amendments to the AGA, when needed
 |

### E. Grant Proposal Preparation Process

This section describes the grant proposal development process and explains some of the associated factors and requirements

Proposed grant projects must support the problem identification, performance target, and countermeasure strategies established for the program areas in the HSO THSP. Grant projects implement the THSP as described and listed in the AGA, see Chapter II Planning, Section B.

The purposes for developing proposed grant applications are to:

* Produce a clearly defined problem statement
* Produce a clearly specified work statement
* Clearly define specific targets, objectives and performance measures
* Clearly define respective roles and responsibilities
* Achieve understanding among all parties
* Reach consensus
* Ensure accountability

The key elements of a proposed grant application are:

* Problem identification
* Specific Objectives and Targets (applicable targets are listed in the THSP)
* Performance measures
* Tasks and activities
* Milestones or action plan
* Training needs
* Evaluation plan
* Budget
* Reporting requirements
* Financial planning
* Subrecipient certifications and assurances (federally required terms and conditions)

The proposed grant application development process begins with the submission of proposals to the HSO by applicants. Section 1 of the grant application is the Authorization cover page which requires the applicant to identify the primary emphasis area described by their proposal and provide their agency name, address and authorizing official signature.

Section 2 is the Description of Activity which describes six elements in narrative form:

1. Problem identification
2. Agency qualifications
3. Objectives and Performance Targets
4. Activities
5. Evaluation
6. Budget narrative

Proposed grant applications should include the most current data available to identify a specific traffic safety problem, a workable solution (evidence-based countermeasure strategy, see Chapter II Planning, Section F) linked to the identified problem, a specific performance target and detailed action plans and budgets that demonstrate an understanding of the various issues and a reasonable approach to resolving the identified problem.

Proposals must pertain directly to the HSO problem identification results including applicable reference to public participation and engagement outcomes which are provided in the current year’s HSO RFP. The HSO review of proposed grant applications will be conducted on the basis of the issues identified including problem identification, the reasonableness of the problem solution, and other factors pertinent to the resolution of the identified problem.

Section 3 of the proposed grant application contains information and instructions for the Required Proposal Contents. Additional guidance is provided in the HSO RFP on reporting and invoicing requirements, funding (allowable and unallowable costs), lobbying restrictions and subrecipient certifications and assurances (See Chapter II. Planning, Section N. Certifications and Assurances)

## i. Time Period

The grant period is the time during which the subrecipient may incur reimbursable costs to carry out the project. The grant period should be long enough to allow the project to be completed. The typical time period is October 1 through September 30. Based on specific circumstances and project goals the HSO may also approve other grant time periods within a fiscal year and extend grant time periods, which still requires an annual grant application, although generally not longer than three years. See subsection x. Grant Extensions.

[NOTE: The following policy may vary in other States.]

The HSO only issues one year grant agreements. Agencies interested in submitting multiple year proposals must resubmit their grant agreement on an annual basis.

## ii. Problem Identification

The problem identification section of each proposed grant application should include a problem statement which is supported by specific crash data analysis, program and community needs assessment information, public participation and engagement outcomes or other relevant data. The HSO may assist potential applicants with obtaining the necessary data.

Applicants should review the key funding priorities and problem areas identified in the HSO RFP for the upcoming grant year. All proposed grant applications must support the primary target of reducing the number of injuries and deaths resulting from traffic crashes. The problem identification section must focus on one or more of the primary or secondary targets and program areas described in the HSO RFP.

The problem identification section is a key element of the final grant agreement. Additional guidance for preparation of the problem identification statement can be found in Chapter II. Planning, Section E. Identification of State and Local Problems (Data Analysis Procedure and PP&E) and should be referenced by applicants and HSO staff.

## iii. Agency Qualifications

The HSO must determine if the applicant agency is qualified to receive Federal highway safety grant funds and is the appropriate agency to conduct the proposed project activity based on past experience, education, skills and/or community or statewide leadership authority. The applicant must provide information in the proposed grant application regarding the agency’s background, such as, prior funds managed, relevant project experience, etc. to allow the HSO pre-award risk assessment to be completed. This is especially important if the HSO has no past experience working with the applicant.

Eligible agencies must be able to perform the following:

* Deliver services promptly
* Manage public funds efficiently and provide good internal controls
* Collaborate with other community, governmental and private organizations
* Develop data-driven problem solving plans
* Adequately evaluate the success of a project

## iv. Project Objectives and Targets

Proposed grant applications must address one or more of the HSO primary or secondary targets stated in the HSO RFP in order to receive consideration. The project objectives stated in the proposed grant application’s Description of Activity should clearly state the ultimate specific outcome the applicant hopes to accomplish and in measurable terms. For example, “increase enforcement of DWI laws as measured by…”, or, “reduce the incidence of incorrect use of child restraints as measured by…”

A guideline called the SMART principle to assess performance targets is recommended. SMART stands for:

* Specific
* Measurable
* Action-oriented
* Realistic
* Time-framed

It is generally preferred that targets be based on outcomes (i.e., seat belt use rate) rather than be output or activity based (i.e., number of contacts made). Depending on the exact nature of the funded activity, in a few cases a combination of outcome and output based targets or just output targets may be most appropriate.

## v. Project Activities

Activities must be identified in the proposed grant application and must clearly explain in detail the anticipated activities that will be funded. This explanation should show a logical sequence of events that will take place to accomplish the objective and achieve the HSO’s performance target(s). The proposed activity must be an evidence-based countermeasure strategy which meets the Federal requirements, see Chapter II Planning. Section F (iii). In selecting the strategies and projects, the subrecipient should be guided by the data and data analysis supporting the effectiveness of the proposed countermeasures. Effective FY 2024 innovative countermeasures that contain promise based on limited practical applications are allowed when there is a justification including data, data analysis, research evaluation and/or substantive anecdotal evidence supporting its effectiveness.

In selecting countermeasure activities, the project proposal should clearly identify both the target audience and the target area, see Table 7. Target Audiences and Target Areas.

**Table 7. Target Audiences and Target Areas**

|  |  |
| --- | --- |
| **Target Audiences:** | **Target Areas:** |
| * Impaired drivers
 | * A specific segment of roadway during night time, on weekends, or during daylight hours
 |
| * Speeding motorists
 | * Northeast quadrant of city
 |
| * Unbuckled vehicle occupants
 | * Jurisdiction wide during daylight hours
 |

The selected countermeasures must relate directly to the proposal’s project objectives and to the performance targets and emphasis areas provided in the HSO RFP.

See also Chapter II. Planning, Section F. Performance Plan, Countermeasure Strategies and Performance Report for countermeasure development resources.

[NOTE: This policy may vary in your State.]

Some activities have multiple applicants who will complete similar work, such as law enforcement mobilizations. For these activities, the HSO has developed and distributed “pro forma” project descriptions and budget formats to be used in grant applications submitted by those subrecipients.

## vi. Performance Measures/Evaluation

Performance measures are required to be clearly defined in each project proposal in Section 2 - Description of Activity of the proposed grant application. Activities and funding should be directly related to the HSO performance measures and targets in the THSP which were established through data analysis and problem identification. Subrecipients must detail how they will evaluate and measure the effectiveness of their project toward achieving its targets. Evaluation should be expressed in terms of what they intend to measure (numbers, attitudes, knowledge, etc.), what they plan to accomplish, or a measure of what will change. These measures and standards provide guidelines to determine the efficiency and effectiveness of the grant. Performance measures must be negotiated and acceptable to all grant personnel. A well thought-out project evaluation process is critical.

Performance measures may be shown as specific requirements, for example:

* “Improve seat belt usage by X percentage points from (date) to (date) ”
* “Increase child restraint usage by X percentage points from (date) to (date)”

For some types of projects, however, the work unit must be specific, for example:

* “Submit one report”
* “Produce one public service announcement”

Additional guidance for preparation of performance measures can be found in Chapter II. Planning, Section G. Performance Measures and should be referenced by applicants and HSO staff.

Evaluation brings the traffic safety process full circle as the results help the HSO determine whether any of the preceding steps need adjustment. For this reason, evaluation is an ongoing process in the management of the State’s traffic safety program. To validly evaluate a project, performance measures must have been identified ahead of time as they will comprise the basis for the evaluation design. Evaluation allows all involved to:

* Assess project or program effectiveness
* Improve countermeasures
* Allocate scarce resources more efficiently

The following should be considered by the HSO when considering evaluation:

* Require all grants and contracts contain an evaluation component
* Select scientific evaluation vs. process evaluation (based on size of project, type of activity)
* Select evaluator, objectives and grant length
* Determine baseline and timing of data collection
* Develop an overall program evaluation process to assess long-term impact

The HSO will review and analyze grant progress reports and evaluation reports and interpret analysis results to determine the appropriate application of the information within the program.

The results of the evaluation can be used to:

* Summarize findings for distribution to appropriate persons and organizations i.e. web site publication
* Incorporate results into future program planning
* Publish, distribute and encourage use of the HSO Annual Report
* Present information to the media and elected officials

## vii. Budget

The *[insert position title]* and the applicant negotiate the content of the budget during grant development. The proposed budget eventually becomes incorporated into the final project agreement. This section explains some of the considerations and requirements involved in preparing the budget.

Section 3 of the HSO RFP provides applicants with a Budget Summary form which must be completed and submitted with the proposed grant application. A detailed cost breakdown must be negotiated to justify proposed costs. The approved project budget should be as detailed as appropriate for fiscal control.

The HSO Budget Summary form includes the following line items:

1. Salaries and Wages
2. Fringe Benefits
3. Travel and Subsistence
4. Contractual Services
5. Equipment (each individual piece of equipment valued at $5,000 or more must be identified)
6. Other Direct Costs

For each line item, the applicant is required to identify both the HSO share requested and the Applicant matching share (if applicable). Local or applicant resources used and in-kind contributions such as personnel costs, etc., should be itemized and added in the total budget.

The method of payment is a negotiated item, within the constraints of Federal or State guidelines. No reimbursement is allowed before work has been performed or costs have been incurred.

[NOTE: The provisions of the following paragraph may vary in other States.]

The following deviations by the subrecipient from the approved budget require the PRIOR approval of the HSO:

1. A specific item of cost not included in the approved budget.
2. An increase in the number of a specific item over and above the total authorized.
3. A transfer between major budget categories in excess of a total of 10 percent of the category being increased. (For transfers of less than a total of 10 percent of the category being increased, an email notification describing the action being taken shall be sent to the HSO by the subrecipient.)

Costs incurred before the grant agreement is signed by the HSO are not eligible for reimbursement. Costs incurred after the grant agreement expires are also not eligible for reimbursement.

Subrecipients may be reimbursed on the basis of actual cost, cost per unit, specific rates, fixed costs, or a combination of these methods. Explanations of the methods of payment follow.

**Actual Cost:**Actual cost agreements authorize the HSO to reimburse the subrecipient for all costs incurred under the project, subject to cost principles included in [2 CFR Part 200, Subpart E](http://www.ecfr.gov/cgi-bin/text-idx?SID=21cb732fbc280a1b9439181aeb58fdc8&node=sp2.1.200.e&rgn=div6) and [2 CFR Part 200.403 in particular](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRea20080eff2ea53/section-200.403). This is the most common type of agreement.

Traffic safety grants are limited to the amounts and items authorized in the budget. Adjustments between cost categories within the budget are allowed only with prior written approval from the HSO.

**Cost Per Unit of Work:**Some contracts for services, but not grants, may be reimbursed based on units of work performed. This method of payment uses a negotiated per-unit cost, with each component documented and approved in a detailed cost proposal. This method of payment eliminates the need to document each element included in the subrecipient invoice, requiring instead that the performance of work be documented. However, the negotiated rate must be based on documented actual costs and experience in performing the prescribed task. ***EXAMPLES:*** $100 per person trained or $40 per car seat distributed. The NHTSA Regional Office should be consulted prior to making such arrangements.

**Fixed Amount Award:** The HSO cannot offer a fixed amount award for grants because by Federal rule this method cannot be used in programs which require mandatory cost sharing or match, see [2 CFR Part 200.201(b)](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-C/section-200.201#p-200.201(b)).

**Overtime Rate:** Most grants involving increased enforcement of traffic laws rely on the payment of overtime hours for patrol officers. The overtime pay rate for officers is based on actual cost per employee in accordance with the subrecipient’s policy for payroll and salary rate. When a project includes overtime salary or wages, traffic safety funds can pay for the additional cost of fringe benefits directly associated with the overtime hours not covered by the employee’s basic benefit package (an example of an eligible fringe benefit cost associated with overtime would be an employer’s contribution to a retirement plan). The costs of fringe benefits are allowable to the extent that the benefits are reasonable and are required by law, employee agreement, or an established policy. See, Chapter VI. Fiscal Procedures, Section E(vi) Compensation Models for Law Enforcement Overtime.

**Allowable Costs**: Reference should be made to Chapter VI. Fiscal Procedures, Section E. Allowable Costs for discussion of subrecipient allowable costs.

**Proportionate Funding for Equipment:** For all activities and equipment to be funded, which have components both related and unrelated to a highway safety grant, the Federal share shall be based proportionately on the projected utilization for the National Highway Traffic Safety Administration’s (NHTSA) grant purposes. For example, the NHTSA participation in the cost of Gas Chromatograph Mass Spectrometers for quantitative testing of drug evidential samples shall be on a pro rata basis. If a police department plans to use this equipment 20 percent of the time to identify drugged driving evidence and 80 percent of the time to identify evidence for the narcotics squad, the NHTSA participation must not exceed 20 percent of the total cost of the equipment. See NHTSA Highway Safety Grant Funding Guidance Part II.E. See also Chapter VI Fiscal Procedures, Section E. Allowable Costs.

## viii. Contractual Services

Contractual services are services of individual consultants or consulting firms engaged in performing special services pertinent to traffic safety. All subrecipients awarding subcontracts shall comply with the terms and conditions of [2 CFR Part 200.317](http://www.ecfr.gov/cgi-bin/text-idx?SID=53e06ff69dcb6de8a22fa89277a33161&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1317). The HSO shall monitor periodically all subrecipient contracts and professional service agreements to verify compliance with the established State and/or local procurement procedures.

Beginning with FY 2022, there is a preference for purchase, acquisition or use of goods, products or materials produced in the United States including contracts and purchase orders, see [2 CFR Part 200.322](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=&mc=true&r=SUBPART&n=sp2.1.200.d). When contracting [2 CFR Part 200.321](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=&mc=true&r=SUBPART&n=sp2.1.200.d) also requires contracting with small and minority businesses, women’s business enterprises and labor surplus area firms.

A subrecipient shall not enter into any subcontract without prior written concurrence by the HSO. The costs of such services are identified under the category of “contractual services” in the Section 2 Budget Summary of the grant application. Subcontracts shall contain all required provisions of the subrecipient’s grant agreement terms and conditions. No subcontract will relieve the subrecipient of its responsibilities under the grant agreement. Subcontracts can be between governmental agencies as well as with non-government entities for professional services.

It is recommended that the State’s official contract and procurement manual be maintained in the State’s HSO.

## ix. Travel and Subsistence

Travel directly related to traffic safety and linked to the grant objective(s) is allowable at prevailing State rates and subject to State travel regulations provided the expenses are for specific services benefiting the HSO’s highway safety program, see [2 CFR Part 200.475](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-C/section-200.201#p-200.201(b)).

The Department’s reimbursement for airfare, car rental, per diem, and other travel costs will be based on the subrecipient’s travel policy, but reimbursement of travel costs cannot exceed established State rates, unless negotiated in the grant agreement. See Chapter V. Grant Administration and Management, Section H. Subrecipient Travel.

**x. Grant Extensions**

If both the HSO and the subrecipient agree that the project has demonstrated great merit and has potential long-range benefit, or if the project scope is modified or expanded, the subrecipient may apply for additional or another year of funding assistance. The *[insert position title]* should explain this requirement to the potential subrecipient during project negotiations.

Although not mandatory, a general rule is to limit grant projects to not more than three years. Any project being considered for extension beyond three years should be reviewed for exceptional project performance and:

* Include revisions or expansions to the scope of the project (assuming that the subrecipient will continue the portion of the project previously supported with Federal funds)
* Document a continued need for the project
* Receive specific approval from the HSO Administrator

Like any grant agreement, multi-year projects may be stopped or cancelled for cause or convenience, including termination for poor or non-performance. A letter to the subrecipient is required if funds are notavailable to continue the project.

**xi. Subrecipient Matching Funds**

**NOTE: Some States require that subrecipients provide a minimum match for certain grants. Other States do not require any match to be provided by subrecipients but instead provide the required Federal matching funds by directly soliciting match from State and local agencies in a consolidated manner. Both methods are acceptable as long as the minimum Federal matching requirements are met. If the HSO requires matching funds be provided, the specific requirements should be added to this subsection.**

See Chapter IV. Grant Selection and Execution, Section H. Development of Highway Safety Office Internal Grants, and, Chapter VI. Fiscal Procedures, Section C. Matching Funds.

### F. State Agency Grant Agreements

This section provides information on the preparation of grant agreements for grants between the HSO and State agencies for traffic safety grant activities.

NOTE: The HSO should develop a policy and a procedure to describe the requirements of the State for executing agreements and providing reimbursements between the HSO and other State agencies.

The cost of services provided by one agency to another within the governmental unit may include allowable direct costs of the service plus a pro-rated share of indirect costs. A “de minimus” indirect cost allowance equal to ten percent of the direct salary and wage cost of providing the service (excluding overtime, shift premiums, and fringe benefits) may be used in lieu of determining the actual indirect costs of the service. These services do not include centralized services included in central service cost allocation plans as described in Appendix V to Part 200—State/Local Government and Indian Tribe-Wide Central Service Cost Allocation Plans. See [2 CFR Part 200.417](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=1df0bcaca1728d5c16e44beff6c3b19b&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1417).

See also Chapter V, Grant Administration and Management, Section I. Indirect Cost and Section N. Monitoring.

### G. Multiple Funding Sources

### *This section establishes the requirement for proposal applicants who request a project which will be funded by more than one Federal highway safety program.*

NOTE: The following policy may vary in your State.

If a single applicant is requesting a grant to be funded under multiple Federal program funding sections, the applicant is required to submit a separate grant application, which includes specific dollar amounts, to the HSO for each Federal program funding source.