



Governor's Traffic Safety Bureau

Policy and Procedure Manual

2024

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Chapter 1 - Introduction

Section 1.01: Purpose and Overview

The purpose of this Policy and Procedure Manual (PPM) is to provide consistent guidance in the administration of the Iowa Governor's Traffic Safety Bureau ([GTSB](#)) behavioral highway safety program, so that it follows state and federal regulations. The PPM contains a written record of approved administrative and financial procedures, which all GTSB staff must follow in the performance of their assigned job duties. This PPM does not address all regulations and occasional reference to other Iowa state government manuals and policies may be necessary.

Section 1.02: GTSB

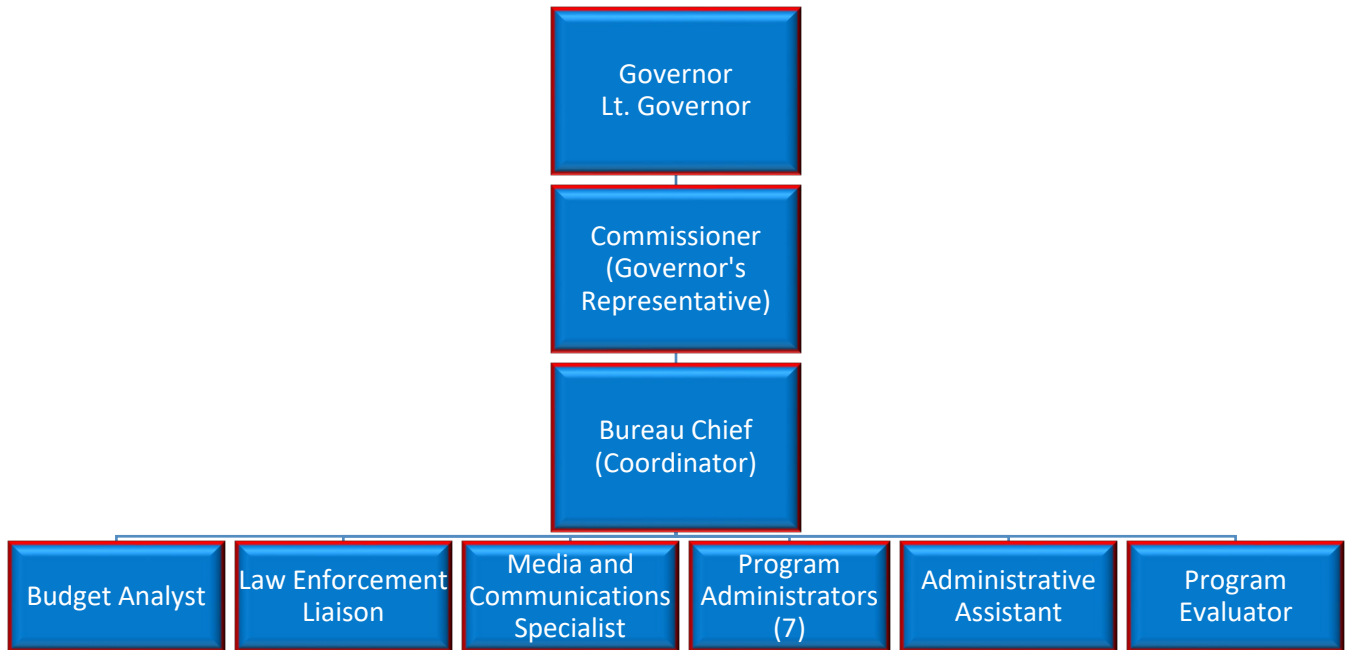
Located within the Iowa Department of Public Safety ([DPS](#)), the GTSB is charged with the administration of federal highway safety behavioral grant program funding. In 1966, an Act of Congress created the National Highway Safety Program. It provides that "each State shall have a highway safety program ... designed to reduce traffic crashes and the resulting deaths, injuries and property damage." At the national level, the program is administered by the National Highway Traffic Safety Administration ([NHTSA](#)) and Federal Highway Administration ([FHWA](#)), two agencies housed within the U.S. Department of Transportation ([USDOT](#)). These agencies develop policy, conduct national research and monitor state highway traffic safety programs. The GTSB awards federal highway behavioral safety grant funds to state and local agencies, and nonprofit and for-profit organizations to implement projects to improve highway safety and reduce deaths and serious injuries resulting from motor vehicle crashes.

The Iowa Department of Public Safety Commissioner serves as the Governor's Highway Safety Representative (GR), a position each state must have to qualify for federal highway safety funding. The GTSB Bureau Chief is the "Coordinator" and serves as the GR's designee providing day-to-day management and oversight of the highway safety grant program.

The GTSB is responsible for coordinating and managing the State and Community (Section 402) Highway Safety Program and the National Priority Safety Program (Section 405). Funds are used for short-term support of highway safety initiatives, with the intent that other sources of funding will be used in the future to sustain programs over the long-term. The federal grant program operates on a reimbursement basis; grantees expend their own funds and then submit a claim with supporting documentation to the GTSB for reimbursement.

The GTSB uses a program management approach, whereby a Program Administrator (PA) or other staff member is assigned to manage a behavioral highway safety program, such as occupant protection, impaired driving or speed/aggressive driving, and individual grant agreements under these programs. The GTSB staff focuses on reducing fatal crashes within their assigned program area to achieve state fatality and serious injury goals. They also are encouraged to identify and engage potential highway safety partners not currently involved in the planning and implementation of traffic safety programs and projects. Encouraging broader community involvement in the highway safety planning process ensures that diverse communities, particularly those representing the underserved and people of color, have a voice in the development and implementation of strategies to reduce inequities in traffic safety.

GTSB ORGANIZATIONAL CHART



Section 1.03: Mission Statement

The GTSB mission:

To identify traffic safety issues and, through partnerships with city, county, state and local organizations, develop and implement strategies to reduce deaths and injuries on Iowa's roadways utilizing federally funded grants to improve traffic safety in the State of Iowa.

The GTSB vision:

A place where motorists, pedestrians and cyclists share the safest roads in the nation

Section 1.04: Conduct and Expectations

The GTSB staff are expected to read and understand all policies and procedures associated with their respective positions and to:

- Comply with U.S. and State of Iowa laws and observe the rights expressed in both the U.S. and Iowa Constitutions.
- Comply with all regulations, policies and procedures governing the conduct of public employees.

- Comply with all applicable federal regulations governing the selection, execution, administration, and monitoring of federal grant programs, projects and activities.
- Consider all applicable Governors Highway Safety Association ([GHSA](#)) guidelines addressing the selection, execution, administration and monitoring of federal grant projects and activities.
- Use public resources in a responsible, ethical, moral, legal and cost-effective manner.
- Recognize the public's right to an accounting of activities, practices and records.
- Recognize and make use of the [Uniform Guidelines](#) for State Highway Safety Programs developed by NHTSA.

Section 1.05: Federal Laws and Regulations

Two sections of the Code of Federal Regulations (CFR) govern the operation of state highway safety programs.

[23 CFR Part 1300](#) – **Uniform Procedures for State Highway Safety Grant Programs.** By regulation, NHTSA prescribes the requirements for the operation of the state highway safety grant programs. The Infrastructure and Investment Jobs Act ([IIJA](#)), also known as the Bipartisan Infrastructure Law ([BIL](#)), was signed into law on November 15, 2021. 23 CFR Part 1300 details the operational requirements under IIJA.

[2 CFR Part 200](#) – **Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards** or the “Uniform Act” was developed to establish consistency and uniformity among federal agencies in the implementation and management of grants and cooperative agreements with state, local and federally recognized Tribal governments. The Uniform Act applies to the recipients (states) and subrecipients (local government, nonprofits and other entities) of federal grant funds.

The U.S. Congress annually appropriates traffic safety funds to NHTSA. The agency then distributes a portion of these funds to the GTSB to address the state’s priority highway safety programs detailed in a Triennial Highway Safety Plan, which is the highway safety program planning document. The 3HSP also includes Certifications and Assurances and other measures that must be agreed to by the state and all its subrecipients.

Section 1.06: State Laws and Regulations

The GTSB is charged with the management and coordination of statewide traffic safety activities. The laws and regulations of the State of Iowa, along with the GTSB policies and procedures, govern operations and programs. Laws and regulations that pertain to the GTSB are found in Iowa Code [I.A.C. 661](#)

Section 1.07: Additional Sources of Policies and Procedures

Most of the referenced federal regulations and other cited procedural documents can be found in [NHTSA’s Highway Safety Grants Management Resources](#). Other resources are available from [GHSA](#).

Section 1.08: Maintaining the GTSB Policy and Procedure Manual

The GTSB will review the contents of the PPM on an annual basis to ensure they are accurate and reflect current federal and state laws and procedures. All regulatory revisions received from state and federal sources will be made available to the GTSB staff upon receipt and subsequently addressed in the PPM.

The GTSB Bureau Chief is responsible for updating the PPM and distributing it to new employees during their probationary period. Revisions requiring immediate attention may be initiated at any time. The PPM is accessible on the GTSB internal network drive and staff will be notified when it is updated. Where applicable, the GTSB staff performance evaluations may be tied to the PPM.

Chapter 2 - Planning

Section 2.01: Overview

The goal of the behavioral highway safety program is to ensure all roadway users arrive at their destination safely. To accomplish this, the GTSB develops the Triennial Highway Safety Plan (3HSP) and Annual Grant Application (AGA) for a three-year planning cycle. The initial 3HSP is updated in years two and three by the submission of an AGA. The 3HSP and the AGA outline and implement a data-driven highway safety program of projects that use proven and innovative countermeasures to reduce unsafe driver behaviors that cause motor vehicle crashes resulting in property damage, serious injuries and/or fatalities.

When developing the 3HSP, the GTSB reviews:

- Federal legislation and regulations
- State statutes and codes
- National priorities and goals
- State and local data for highway safety problem [identification](#)

Funding to implement the 3HSP comes from Section 402 and Section 405.

Section 402

Section 402 funds may be used for education, enforcement and other programs that:

- Reduce alcohol and drug impaired driving.
- Eliminate speeding.
- Eliminate school bus deaths and injuries.
- Reduce crashes caused by drivers engaged in unsafe behaviors.
- Encourage the use of occupant protection devices.
- Improve motorcycle, pedestrian and bicyclist safety.
- Improve driver safety performance.
- Support traffic records development and management.
- Support emergency medical services.
- Increase awareness of commercial motor vehicles by other road users.
- Support driver education programs.
- Combat aggressive and distracted driving.
- Support child passenger safety and public education that addresses the danger of leaving an unattended child or passenger in a vehicle.
- Support teen driver safety.
- Increase the safety of older drivers.

Benefit to locals

The GTSB is required to ensure that at least 40% of all federal funds provided under Section 402 for any fiscal year are expended by local political subdivisions (agencies) to carry out local highway safety programs.

When subgrants are directed to other state agencies and local benefit is claimed, the GTSB is responsible for ensuring that local benefit source documentation is readily available in the subrecipient project file. This should include evidence of an active local voice in the initiation, development and implementation of the programs. The local government entity's application for funding suffices as evidence. There are exceptions for a political subdivision that has not had an active voice but agrees in advance of implementation to accept or request the program benefits. There must be written evidence of this acceptance or request and it must be maintained on file until all funds are expended.

In the event the salary and benefits of a state employee are used to meet the 40% requirement, the GTSB must have documentation in place before any work is carried out. This documentation must state the local government consented and accepted the work of the state employee on its behalf.

Regarding using state expenditures such as Iowa State Patrol ([ISP](#)) enforcement or statewide paid media to meet the 40% requirement, the GTSB may designate these expenditures as a benefit to local government.

Section 405

Section 405 program funds may be used for:

- Occupant Protection (405b)
 - To qualify for this funding, Iowa must have an occupant protection plan, participate in national mobilizations, have an active network of child restraint inspection stations and maintain a sufficient number of Child Passenger Safety ([CPS](#)) technicians. Iowa must use 10% of funding to implement programs to provide child passenger safety programs among low-income and underserved populations.
- Traffic Safety Information Systems (405c)
 - To qualify for this funding, Iowa must have a Traffic Records Coordinating Committee, a designated traffic records coordinator and a traffic records strategic plan. Grant funds may be used to improve core traffic safety databases by collecting key data, purchasing necessary equipment, improving compatibility and interoperability, traffic data research and training, and adoption of the Model Minimum Uniform Crash Criteria ([MMUCC](#)).
- Impaired Driving Countermeasures (405d)
 - Impaired driving incentive grants are used to reduce the risk of driving under the influence of alcohol, drugs or a combination of the two.
- Alcohol Ignition Interlock (405d - subset)
 - Iowa is eligible if they have an all-offender ignition interlock law, a specific requirement for interlock use after conviction, or laws requiring interlock use for test refusal and compliance-based removal requirements.
- 24/7 Sobriety (405d – subset)
 - Iowa must have a law that requires all individuals convicted of driving while intoxicated to receive restricted driving privileges for at least 30 days and must have a law or program that authorizes a local or statewide 24/7 sobriety program.
- Distracted Driving (405e)
 - Iowa must include distracted driving awareness in their driver's license examination to be eligible for 50% of funding. To qualify for the other 50%, the state must enact either

a prohibition on texting, a prohibition on handheld cell phone use or ban the use of all electronic devices for all drivers aged 18 and younger.

- Motorcycle Safety (405f)
 - Iowa must satisfy two out of seven eligibility criteria to receive funds, and the use of funds is limited to only certain motorcycle training and awareness programs.
- Nonmotorized Safety (405g)
 - Iowa is eligible if the annual combined non-motorized fatalities exceed 15% of the total annual crash fatalities using the most recently available final data from NHTSA's Federal Fatality Analysis Reporting System ([FARS](#)). The IJA provides that eligible states may use grant funds for training law enforcement, enforcement mobilizations, public education and awareness programs, and collecting traffic safety data.
- Preventing Roadside Deaths (405h)
 - Iowa is eligible if it submits a plan describing how they would use funds. The grant funds may be used for purchasing e-digital alerting technology, educating the public about roadside safety, and allow law enforcement and traffic safety data collection to take place.
- Driver and Officer Safety Education (405i)
 - Iowa is eligible if it either enacts a qualifying law or adopts a program, or if the state demonstrates that it is taking meaningful steps towards implementing programs to train drivers and police officers on the safe conduct of traffic stops.

The GTSB planning process provides opportunities to discuss highway safety priorities with existing and potential state and local traffic safety partners. For example, subrecipients can provide input during monitoring visits and through other means with their GTSB Program Administrator (PA). A GTSB representative is expected to take part in traffic safety meetings where local issues are discussed and assistance is rendered to help with grant planning and management. It is expected that state data-driven enforcement programs foster effective community collaboration to increase public safety and support data collection. Analysis is also required to ensure transparency; identify disparities in traffic enforcement; and inform traffic enforcement policies, procedures and activities.

The actions and activities of community-based organizations, local and national interest groups, state and local traffic safety related nonprofit organizations, and local governments are also considered. Projects may be proposed by these organizations. *All projects in the 3HSP must be data driven.* The GTSB provides a list of projects for each program area and an estimate of federal funds needed for each project. All projects on the list are described in the 3HSP.

Section 2.02: Prohibition on Use of Grant Funds

No federal grant funds may be used for the:

- Creation of checkpoints that specifically target helmet usage by motorcyclists.
- Creation of a program to purchase, operate or maintain an automated traffic enforcement system (ATES), *except in construction work zones or school zones*. Any ATES project for construction of work zones or school zones must comply with guidelines established by the Secretary of the USDOT. The GTSB Bureau Chief may consult with the Regional NHTSA office if establishment of any ATES project is contemplated.

Funds may be used to purchase hand-held radar and other devices operated by law enforcement to make on-the-scene traffic stops for the issuance of citations or other law enforcement actions.

Section 2.03: Triennial Highway Safety Plan and Annual Grant Application

3HSP

The 3HSP serves as Iowa's application for federal behavioral highway safety grant funding. At the beginning of a three-year planning cycle, the GTSB develops the 3HSP and submits it to the NHTSA Regional Office for review and approval.

The 3HSP documents the highway safety program and demonstrates that it establishes data-driven performance targets and identifies the countermeasures that will be implemented to achieve the former. The contents of the 3HSP must include the following:

- Highway safety planning process
- Problem identification
- Public participation and engagement planning
- Performance plan
- Countermeasure strategies for programming funds
- Performance report
- Education program to address the danger of leaving an unattended child or passenger in a vehicle
- Teen traffic safety program
- Certifications and assurances
- Support documentation for the Section 405 grant application

A data-driven approach to identifying problems, setting performance goals and identifying strategies is required. Data are obtained from the following sources, among others:

- Fatality Analysis Reporting System (FARS)
- Iowa state crash, conviction, vehicle, roadway, traffic and survey data
- GTSB program effectiveness studies
- U.S. Census and other demographic databases
- Emergency departments, hospital discharge records and Iowa Department of Health and Human Services
- National surveys
- Observational seatbelt survey
- The courts
- Iowa Department of Transportation
- Iowa Drivers License Bureau

The performance-based planning process is inclusive and considers issues and strategies to advance the equity and engagement of underserved communities as identified by the GTSB and their highway safety partners. The GTSB uses the high-visibility and sustained enforcement task force model for all its enforcement grants, which is a proven countermeasure.

The 3HSP includes a comprehensive evidence-based *High-Visibility and Saturation Patrols Enforcement* strategy, as required by NHTSA. The 3HSP details how the GTSB works with state and local law enforcement partners to address the state’s most pressing traffic safety problems.

Annual Grant Application (AGA)

During the three-year planning cycle, the GTSB develops an AGA for years one, two and three and annually submits it to NHTSA in advance of the corresponding fiscal year. The AGA revises and updates the 3HSP in years two and three by providing project level information on the GTSB behavioral highway safety program. The AGA must align with the 3HSP.

To be approved by NHTSA, the AGA must include:

- Updates to the 3HSP
- Project and subrecipient information
- Section 405 grant applications
- Certifications and Assurances

AGA Updates to the 3HSP

- *Analysis:* Any updates to the analysis used in the creation of the 3HSP must be at the same level of detail as the original analysis.
- *Countermeasures and Strategy:* Any adjustments to the countermeasures and strategies must be accompanied by a narrative that explains the reason for the adjustment and how it relates to the GTSB’s most recent Annual Report (AR). Even if no adjustments are being made, an explanation is required.

Performance Plan: Performance measures may be added based on updated traffic safety problem identification or as part of a Section 405 grant. The common performance targets – fatality, fatality rate and serious injury – in the 3HSP may be amended, but no other performance targets may be amended.

AGA Project and Subrecipient Information

For each project funded by the AGA, the following information must be provided:

- Project name and description, including a description of the activities to be conducted, location where the project will be performed, and affected communities
- Federal funding source
- Project agreement number
- Subrecipient, including name and type of organization
- Amount of federal funds
- Eligible use of funds
- Whether the costs are Planning and Administration (P&A) and the amount, if applicable
- Whether this is an expenditure of unexpended grant funds.
- The strategy(ies) in the most recent 3HSP or in an approved update to the 3HSP that the project supports.

AGA Section 405 Grant Applications

The AGA must include the annual Section 405 application. Each program is authorized as a separate section or tier within Section 405, and each has its own eligibility criteria. States must satisfy each tier’s

eligibility criteria to receive funding for that tier. States must submit their Section 405 applications **on or before August 1** as part of the annual grant application process.

AGA Certification and Assurances

The certifications and assurances must be signed by the GR and included in the AGA.

Section 2.04: Highway Safety Plan Development Process and Calendar

The 3HSP describes the processes used to identify traffic safety problems, establishes performance measures and proposes the projects and activities that the GTSB plans to implement to achieve its performance targets. Performance measures track progress from baseline to the targets over a specified period of time.

The 3HSP development process consists of:

- Problem identification
- Input obtained from public engagement with overrepresented and underserved communities
- Required consideration and use of public participation and engagement (PPE) from communities for countermeasure selection and project.
- Selection and prioritization of targets and countermeasure strategies
- Identification of performance measures
- Participation from traffic safety partners
- Development of funding priorities
- Development of program cost summaries and project lists

The 3HSP is developed through a series of internal and external meetings coordinated by the GTSB staff. In addition, each PA obtains formal and informal recommendations, resources and information from traditional and non-traditional partners and stakeholders including public health, emergency medical services, enforcement and adjudication, nonprofits, businesses, and community coalitions.

3HSP Development Calendar

This calendar outlines the process for developing and implementing the 3HSP. Flexibility is important and the timing may shift due to the availability of resources and/or programming targets.

Month	Activity
January	Debrief the staff on previous year’s program results and review the NHTSA Regional Office priority letter intended to help set goals. Conduct problem identification process including review of prior year state traffic crash data and other related data sources.
February	Review NHTSA’s approval letter for previous year’s AR and 3HSP/AGA. Review program assessment recommendations made by independent assessment teams and NHTSA management review recommendations.
March	Request information from partner agencies and stakeholders that includes statistics from the previous year and upcoming challenges. Identify partner priorities, program area direction, potential strategies, and overall direction of the traffic safety program. PAs review data to set priority areas, goals, strategies, and quantifiable statewide safety performance targets for each program area. Ensure

	coordination with the Strategic Highway Safety Plan (SHSP) and set or revise NHTSA/GHSA performance measures, as needed. Complete pre-award risk assessments.
April	Create a draft list of program area projects and budgets. Prepare a paid media/communications plan and a law enforcement plan for inclusion in the draft 3HSP/AGA.
May	Draft the 3HSP/AGA. Update project agreements for the next fiscal year.
June	Finish drafting the 3HSP/AGA and obtain the GR's signature for the Certifications and Assurances. Draft Section 405 applications. Prior to June 15, submit the 3HSP to NHTSA for review comment and make revisions, as needed. Submit the final 3HSP to NHTSA prior to July 1.
July	Finish drafting the AGA and obtain management review and signatures where appropriate. Submit final AGA to NHTSA prior to August 1.
August	Respond to any NHTSA requests for additional information related to the 3HSP/AGA.
September	Complete internal project proposals for all projects in the approved 3HSP/AGA. Sign and execute all approved project agreements prior to September 30.
October	Implement the 3HSP/AGA. Begin conducting on-site monitoring visits with subrecipients for project currently underway.
November	Begin preparing the AR for the previous fiscal year.
December	Submit the AR to NHTSA within 120 days after the end of the fiscal year. Close out the previous year's grants in the Grants Tracking System (GTS).

Section 2.05: Coordination Between the SHSP and 3HSP

The SHSP is a comprehensive, data-driven transportation safety plan that is authored by the [Iowa Department of Transportation](#). The SHSP is aligned with the 3HSP. The SHSP identifies how best to address vehicle crashes through proven countermeasures that address engineering, education, enforcement, and emergency medical services.

The GTSB ensures the targets, performance measures and objectives contained in the SHSP are considered in the development of the 3HSP. The GTSB reviews the SHSP and 3HSP to identify any gaps in addressing roadway user behavioral safety issues, as well as to eliminate redundancy and maximize resources.

The Safe Systems Approach ([SSA](#)) is also considered. This approach is a shift from a conventional safety approach because it focuses on both human mistakes and human vulnerability and designs a system

with many redundancies in place to protect everyone. In support of this approach, safety programs are focused on infrastructure, human behavior, responsible oversight of the vehicle and transportation industry, and emergency response.

The SSA is based on the following six principles:

- Death/serious injury is unacceptable
- Humans make mistakes
- Humans are vulnerable
- Responsibility is shared
- Safety is proactive
- Redundancy is crucial

The performance targets in the 3HSP must be identical to Iowa's Highway Safety Improvement Program (HSIP) targets for the three common performance measures:

- Fatalities
- Fatality rate
- Serious injuries

The alignment of these performance measures is required to demonstrate a comprehensive, unified approach for allocating resources to reduce traffic fatalities and injuries. The American Association of State Highway and Transportation Officials (AASHTO) guidance and publications are considered for the identification of Iowa's 2024 to 2028 emphasis areas.

Failure to be ranked as a priority highway safety issue in the SHSP does not mean the problem is not important. Nor does it mean Iowa will discontinue planned or on-going initiatives that have demonstrated positive results in addressing a non-priority issue.

Section 2.06: Identification of State and Local Traffic Safety Problems

Identification of roadway traffic safety problems is conducted for each program area. Problem identification is the process of gathering information from a variety of sources and using this information to prioritize limited resources for reducing death and serious injury on all roadways. Gathering and analyzing data and other pertinent information to understand the extent of the traffic crash problem, along with conducting outreach to foster meaningful public participation and engagement, are critical to the problem identification process. This ensures that the GTSB identified where crashes are occurring, who is impacted with a focus on reaching underserved communities, and what projects should be implemented to address them.

Data

Fatal and serious injury crashes are analyzed to determine where, when and why these crashes are occurring, and who is involved. The process ensures the GTSB is allocating resources for projects that will have the greatest impact on preventing traffic fatalities and injuries. Numerous data resources are used to determine and prioritize the state's traffic safety problem. The GTSB also reviews federal priorities, recommendations from the most recent NHTSA program assessments, and the latest edition of NHTSA's [Countermeasures That Work](#).

The problem identification process includes analysis of data obtained from these and other sources:

- Federal Fatality Analysis Reporting System (FARS)
- Iowa state crash, conviction, vehicle, roadway, traffic and survey data
- GTSB program effectiveness studies
- U.S. Census and other demographic databases
- Emergency departments, hospital discharge records and the Iowa Department of Health and Human Services
- National surveys

Data elements fall into three general categories: people, vehicles and roadway. These categories are broken down into subgroups and assigned the following characteristics:

Data Category	Subgroups	Characteristics
People	Drivers, occupants, bicyclists, and pedestrians	Age, gender, blood alcohol level, driver's education and experience, training, etc.
Vehicles	Passenger cars, trucks, buses, motorcycles, bicycles, scooters, etc.	Sedans, SUVs, convertibles, airbags, anti-lock brakes, electronic stability control, non-motorized vehicle types
Roadway	Interstate, state, local, and neighborhood	Lighting conditions, surface conditions, pavement markings, roadside controls (guardrail), etc.

Data subgroups are reviewed to determine over-representation, demographic and geographic areas that indicate a traffic safety problem. For example, teen drivers (subgroup) may be overrepresented in crashes when compared to all drivers.

Over-representation is defined as a disproportionately large number of a particular category or type of person as shown through data, especially when compared to the general population or the statistical average. Overrepresentation can be determined by comparing the rate of crashes for a subgroup within a jurisdiction (or geographic area) to the same rate in a comparable or larger jurisdiction. The rate may be expressed either as a percentage or a ratio. Crash identification is also tied to underserved communities.

Percentage Example: If the percentage of adult vehicle occupants that do *not* use seat belts within a jurisdiction (geographic area) is greater than the statewide percentage, then that characteristic is over-represented.

Ratio Example: Dividing nighttime (10 p.m. to 6 a.m.) crashes by the total number of crashes for the local jurisdiction (geographic area) within a given time frame produces a ratio. If that ratio is higher than the statewide ratio, a driving while impaired problem may be indicated since many nighttime crashes typically involve alcohol. Further data investigation may be required.

As an example, asking the questions provided in the chart below may help with data analysis and problem identification:

Question	Examples
Are high crash incidence locations identified?	Specific road sections, highways, streets, intersections, geographic and demographic areas

What appears to be the major crash causation factor?	Alcohol, other drugs, speed, other traffic violations, weather, road condition
What characteristics are over-represented or occur more frequently than would be expected?	Number of crashes involving 16- to 19-year-olds or mature drivers versus other age groups or number of alcohol crashes occurring on a particular roadway segment as compared to other segments
Are there factors that increase crash severity and are/or should they be addressed?	Non-use of occupant protection devices (e.g., seat belts, motorcycle helmets, etc.)

The table below illustrates the type of information that may be applied in the analysis of a crash problem.

Causal Factor	Crash Characteristics	Factors Affecting Severity
Driving Violations	Time of day	Occupant protection use
Loss of control	Inclement weather	Position in vehicle
Weather	Age of driver	Roadway elements (e.g., pavement markings, guardrail, shoulders, roadway surface)
Alcohol involvement	Gender of driver	Occupant protection use
Roadway	Roadway departure	Fatigue, occupant protection use, road elements, impairment

The following are examples of factors that may impede effective problem identification:

- Data access restrictions
- Inability to link automated data systems
- Poor data quality
- Reporting threshold fluctuations (variations among jurisdictions in the minimum damage or crash severity routinely reported)
- Insufficient data (e.g., property damage only, non-reportable crashes, near misses, bicycle crashes)

Public Participation and Engagement

Traffic safety problem identification not only involves data collection and analysis, but also *meaningful* public participation and engagement (PPE) from communities affected by traffic crashes that result in death and serious injury.

PPE is a meaningful process that proactively seeks full representation from communities, considers public comments and feedback, and incorporates that feedback into a project, program or plan. Key terms to consider in the PPE process are:

- **Community:** Populations sharing a particular characteristic or geographic location.
- **Public:** Anyone who resides, works, visits, has an interest in or does business in an area potentially affected by transportation decisions.

- **Equity:** Consistent and systematic fair, just and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.
- **Underserved Populations:** Populations sharing a particular characteristic or geographic location, that have been systematically denied a full opportunity to participate in aspects of economic, social and civic life.
- **Equitable Data:** Data that allow for rigorous assessment to the extent that programs and policies yield consistently fair, just and impartial treatment of individuals.
- **Overrepresentation:** A disproportionately large number of a particular category or type of person that data indicate are impacted, especially when compared to the general population or statistical average.

The 3HSP must include the following:

- **Engagement Planning:** This is the description of GTSB’s public participation and engagement planning efforts in the highway safety planning process and program that includes:
 - A statement of *starting* goals for the public engagement efforts, including how these efforts will contribute to the development of the GTSB strategies for programming funds.
 - Identification of the affected communities, with an emphasis on underserved communities and those overrepresented by the data. This must include a description of how these communities were identified.
- **Engagement Outcomes:** This is a description of the outcomes of the GTSB engagement efforts in the highway safety planning process that include:
 - The steps taken by the GTSB to produce meaningful engagement with affected communities and the results of that engagement.
 - How the affected communities comments and views have been or will be incorporated into the development of the 3HSP.
 -
- **Ongoing Engagement Planning:** This is a description of the public participation and engagement efforts in the GTSB safety programs that will be undertaken during the 3HSP cycle that include:
 - A statement of the GTSB goals for the public engagement efforts.
 - Identification of the affected and potentially affected communities, particularly those that are underserved or overrepresented.
 - Steps the GTSB plans to take to reach and engage with those communities.
 - How the affected communities comments and views will be incorporated into the decision-making process.

To summarize, the public participation and engagement process requires the following:

- Planning
- Engaging
- Evaluating and reporting
- Looking ahead

The GTSB staff attend meetings with federal, state and local government partners and subrecipients throughout the year to identify problems and strategic priorities for PPE. The GTSB staff that attend

regional NHTSA meetings, the GHSA Annual Meeting and the national LifeSavers Conference, among other meetings, also gain knowledge in identifying traffic safety problems.

Section 2.07: Performance Plan

The performance plan is data-driven and addresses:

- Program areas
- Performance measures
- Performance targets
- Strategies

The GTSB uses data and information gathered during the problem identification process to determine emphasis areas. The staff then uses the planning process documented in the 3HSP to develop priority traffic safety performance measures, targets (keeping in mind the need to coordinate with the HSIP, SHSP and 3HSP), countermeasure strategies and planned activities for each program area.

Program Areas

The 3HSP addresses these emphasis areas:

- Communications (media)
- Community Traffic Safety Programs
- Impaired Driving (alcohol and other legal and illegal drugs)
- Motorcycle Safety
- Non-Motorized (pedestrians and bicyclist)
- Occupant Protection (adult and child passenger safety)
- Planning and Administration (P&A)
- Police Traffic Services
- Traffic Records
- Public education regarding the risks of leaving an unattended child or passenger in a vehicle.

Performance Measures

The performance measures shown in the table below include the core measures developed by NHTSA and GHSA, as well as additional performance measures developed specifically by the GTSB to address problems identified during the planning process. The data sources used to establish each performance measure are also shown. Performance measures are reviewed and updated each year as necessary.

	Performance Measure¹	Core	Additional	Data Source
C-1	Total Traffic Fatalities	X		FARS
C-2	Serious Injuries in Traffic Crashes	X		Iowa
C-3	Fatalities/VMT	X		FARS/FHWA
C-4	Unrestrained Passenger Vehicle Occupant Fatalities (all seating positions)	X		FARS
C-5	Alcohol Impaired Driving Fatalities	X		FARS
C-6	Speeding Related Fatalities	X		FARS
C-7	Motorcyclist Fatalities	X		FARS
C-8	Unhelmeted Motorcyclist Fatalities	X		FARS

¹ States may also use state data to set these performance measure targets; however, FARS data is used if it is more current.

C-9	Drivers Ages 20 or Younger Involved in Fatal Crashes	X		FARS
C-10	Pedestrian Fatalities	X		FARS
C-11	Bicyclist Fatalities	X		FARS
B-1	Observed Seat Belt Usage Rate	X		Iowa
IA-1	Rural Fatalities		X	Iowa
IA-2	Distracted Driving Fatalities		X	FARS and Iowa

Performance Targets

Performance targets are developed annually for both the core and additional measures based on data trends and what can realistically be accomplished in the upcoming year given available resources, the economy, legislation and other factors. These targets are data-driven, realistic and attainable, and should guide program investments. Selected targets should represent a reasonable improvement rather than maintenance of the current number or rate.

The 3HSP must include a brief description of the processes used to define the performance targets and the planned activities that will be implemented to achieve these targets. The description of the process should be thorough and complete and identify all data sources consulted. The process for setting performance targets is based on data trends and a resource allocation assessment. The GTSB identifies all participants, agencies and organizations involved in the process, including the role they played and collaboration strategies.

Strategies

The objective of the strategy selection process is to identify evidence-based countermeasures (work activities) that will lead to improvements in traffic safety and performance target achievement. The GTSB uses NHTSA’s [Countermeasures That Work: A Highway Safety Countermeasure Guide for State Highway Safety Offices](#) to identify evidence-based strategies for traffic safety problem areas and references these strategies in the 3HSP. Other strategies may be selected, provided they can be justified and shown to work based on highway safety research and/or other data. The rationale behind selecting “other strategies” must be included in the 3HSP and the AGA.

Section 2.08: Performance Report

The GTSB’s success in meeting the performance targets that were identified in the prior 3HSP is described in a Performance Report. It is important to note that the information in the Performance Report is not as detailed as the information provided in the AR. The Performance Report provides a brief update on the prior fiscal year’s results for the core performance measures.

Section 2.09: Public Outreach

Advertising: When GTSB uses federal funds for paid advertising, the following information must be documented in the 3HSP:

- The program/policy the advertising is supporting.
- If and how the advertising will support an operational enforcement program.
- The amount of funds allocated for the paid advertising.
- The measures that will be used to assess message recognition by the target audience.

Educational Material: Educational material such as brochures, flyers and posters, used to inform the public about highway safety, may be purchased with federal grant funds. However, the use of federal grant funds to purchase promotional items such as pens, key chains or reflectors is not permitted. Educational materials must directly relate to the project objectives, contain substantial (meaningful) information and educational content (not merely a slogan), and have the sole purpose of conveying traffic safety information to the public. All educational material must be approved by the GTSB prior to purchase. Failure to do so will result in non-reimbursement to the subrecipient. All educational material used for public outreach should include the following acknowledgement: *Funded by the Iowa Governor's Traffic Safety Bureau.*

Section 2.10: Certifications and Assurances

The 3HSP and AGA contain Certifications and Assurances, signed by the GR, stating that Iowa complies with all applicable federal statutes, regulations and directives in effect during the grant funding period. These Certifications and Assurances indicate that Iowa will comply not only with applicable laws and regulations, but also financial and programmatic requirements and the program’s special funding conditions. In addition, the GTSB must ensure that every grant agreement includes these same Certifications and Assurances, and the signatory authority acknowledges the subrecipient will comply with them.

The Certification and Assurances address:

- General Requirements
- Intergovernmental Review of Federal Programs
- Federal Funding Accountability and Transparency Act (FFATA)
- Nondiscrimination
- General Assurances
- Drug-Free Workplace Act
- Political Activity (Hatch Act)
- Certification Regarding Federal Lobbying
- Restriction on State Lobbying
- Certification Regarding Debarment and Suspension
- Buy America Act
- Certification on Conflict of Interest
- Prohibition on Using Grant Funds to Check for Motorcycle Helmet Usage
- Policy on Seat Belt Use
- Policy on Banning Text Messaging While Driving

Section 2.11: Delegation of Authority

The Iowa Department of Public Safety Commissioner is the GR. Iowa formally establishes who may act on behalf of the GR in his/her absence. The table outlines Iowa’s signature authority.

DOCUMENT	APPROVAL AUTHORITY
Certifications and Assurances	DPS Commissioner
National Priority Safety Program Application (Section 405)	GTSB Bureau Chief
NHTSA Agreements	GTSB Bureau Chief

Federal Grant Applications	DPS Commissioner
Internal GTSB Planning and Administration and Program Management Grants	GTSB Bureau Chief
Traffic Safety Program Grant Agreements and Amendments	GTSB Bureau Chief
State Vouchers for Federal Reimbursement	GTSB Budget Analyst
Equipment Purchase Requests to NHTSA (\$5,000 or more)	GTSB Bureau Chief

The NHTSA Regional Office must be notified in writing of the name and type of authorization for each person currently assigned signature authority. A sample of the actual signature must be provided. Whenever a temporary or permanent change occurs in the authorization assignment or the person assigned to the named authorized position, the NHTSA Regional Office must be notified in writing.

Section 2.12: 3HSP Submission and Approval

The GTSB is required to submit the 3HSP (Section 402) to NHTSA no later than 11:59 p.m. on **July 1. This deadline is FIRM.** If this deadline falls on a Saturday, Sunday or federal holiday, the applicable deadline is the next business day. The NHTSA Regional Administrator reviews and either approves or disapproves, in writing, the 3HSP within 60 days following receipt. Upon review, NHTSA may request, in writing, additional information to ensure the 3HSP complies with federal rules and regulations. The **GTSB must submit the requested additional information, in writing, within seven business days.** NHTSA may extend the deadline for approval or disapproval of the 3HSP by no more than 90 days to assist the GTSB in submitting the additional information.

Within 60 days of receiving the GTSB’s additional information, the NHTSA Regional Administrator will issue a letter of approval with conditions, if any, to the GR or issue a letter of disapproval to the GR stating the reasons for disapproval. If the 3HSP is disapproved, the GTSB must modify and resubmit it within 30 days after the date of disapproval. The NHTSA Regional Administrator has 30 days to issue a letter of approval or disapproval for the resubmitted 3HSP.

Section 2.13: AGA Submission and Approval

The GTSB is required to submit the AGA to NHTSA no later than 11:59 p.m. on **August 1. This deadline is FIRM.** If this deadline falls on a Saturday, Sunday or federal holiday, the applicable deadline is the next business day. Failure to meet this deadline may result in delayed approval and funding for the Section 402 grant or disqualification from receiving a Section 405 grant, which may, in turn, delay the award of Section 405 grants to all states.

Within 60 days after receipt of the AGA, the NHTSA Administrator will notify the state in writing of grant awards and specify any conditions or limitations on the use of funds.

Chapter 3 - Subrecipient Project Development

Section 3.01: Overview

The GTSB awards grants to fund subrecipient projects designed to reduce deaths and serious injuries resulting from traffic crashes. Each project should address an emphasis area identified in the 3HSP, be data-driven and utilize proven and/or promising countermeasures that will help the GTSB achieve its performance targets.

Grant applications are reviewed for completeness, potential impact on improving safety, reasonableness of the budget request, and the applicant's past performance. All applications must address a problem identified in the 3HSP. The federal fiscal year runs from October 1 through September 30. Projects are funded for one year, and each project period must coincide with the federal fiscal year. Project applications from potential subrecipients may be submitted to the GTSB throughout the federal fiscal year. The PAs will consult with potential subrecipients about the application process and how to register in the electronic grants management program.

Section 3.02: Developing GTSB External Grants

The GTSB must determine if the agency or organization submitting the application is qualified to receive federal highway safety grant funds and has the appropriate expertise, leadership and authority to properly implement and manage the proposed project. Eligible agencies must be able to:

- Deliver services promptly.
- Manage public funds efficiently.
- Have internal management and financial controls.
- Collaborate with other communities, and governmental and private organizations.
- Develop data-driven plans that solve highway safety problems.
- Adequately evaluate the success of a project.
- Demonstrate they are not on any debarment list.

Projects must align with the problem identification, performance targets and strategies in the 3HSP. Activities funded must be identified and clearly explained in detail to support an evidence-based countermeasure. This explanation should show a logical sequence of events that will take place to achieve the GTSB performance target(s). Strategies, projects and proposed countermeasures should be selected based on an analysis of current and relevant data. Innovative and/or promising countermeasures may be implemented if there are data justifying their selection or examples of how the selected countermeasure has been successfully implemented by others.

Section 3.03: Developing GTSB Internal Grants

In advance of the federal fiscal year, the GTSB estimates how much funding is needed for Planning and Administration (P&A) and program management costs to support the operation of the highway safety office and programs. Estimates consider anticipated cost increases as well as recurring costs. Internal projects and grants typically include program management costs, educational/training materials and paid media.

Planning and Administration Costs

P&A costs are direct and indirect expenses attributable to the overall management of the traffic safety program. They are described in the P&A module of the AGA. P&A costs include salaries, travel, equipment, supplies, and other expenses necessary to carry out the GTSB administrative functions. For example, the salary and travel expenses of a GTSB management employee are considered a P&A cost.

These funds are granted internally to the GTSB and a project proposal is completed and approved for P&A. The project proposal should describe the problem and include targets, activities, performance measures and a budget narrative. The GTSB Bureau Chief approves the P&A project proposals.

All GTSB employees must request and be granted approval by the GTSB Bureau Chief for out-of-state travel. All GTSB employees are required to follow state travel policies.

Program Management Costs

Program management costs are those direct and indirect expenses that are attributable to one of the traffic safety program areas. Costs include expenses such as travel, equipment, materials, training, and supplies. For example, travel expenses for a GTSB employee working directly on a grant addressing a program area such as occupant protection are considered program management costs. Other applicable costs include equipment, materials, training, and supplies related to a program area.

P&A Match Requirement

NHTSA participation in P&A activities may not exceed 50% of the total cost of such activities. In addition, NHTSA's contribution for P&A activities may not exceed 18% of the total funds received under Section 402. The GTSB must ensure the internal P&A grant complies with applicable federal regulations including the provision of a 50% match (or the applicable sliding scale rate) of state funds for costs claimed for eligible P&A functions.

Section 3.04: Grant Management Manual (Reserved)

The Grant Management Manual (GMM) is a separate document that is *specifically written* for the subrecipients to aid them in applying for highway safety grants and guide the day-to-day management of their GTSB funded grant projects. The GTSB does not currently have a GMM but may consider generating one in the future for use by their subrecipients.

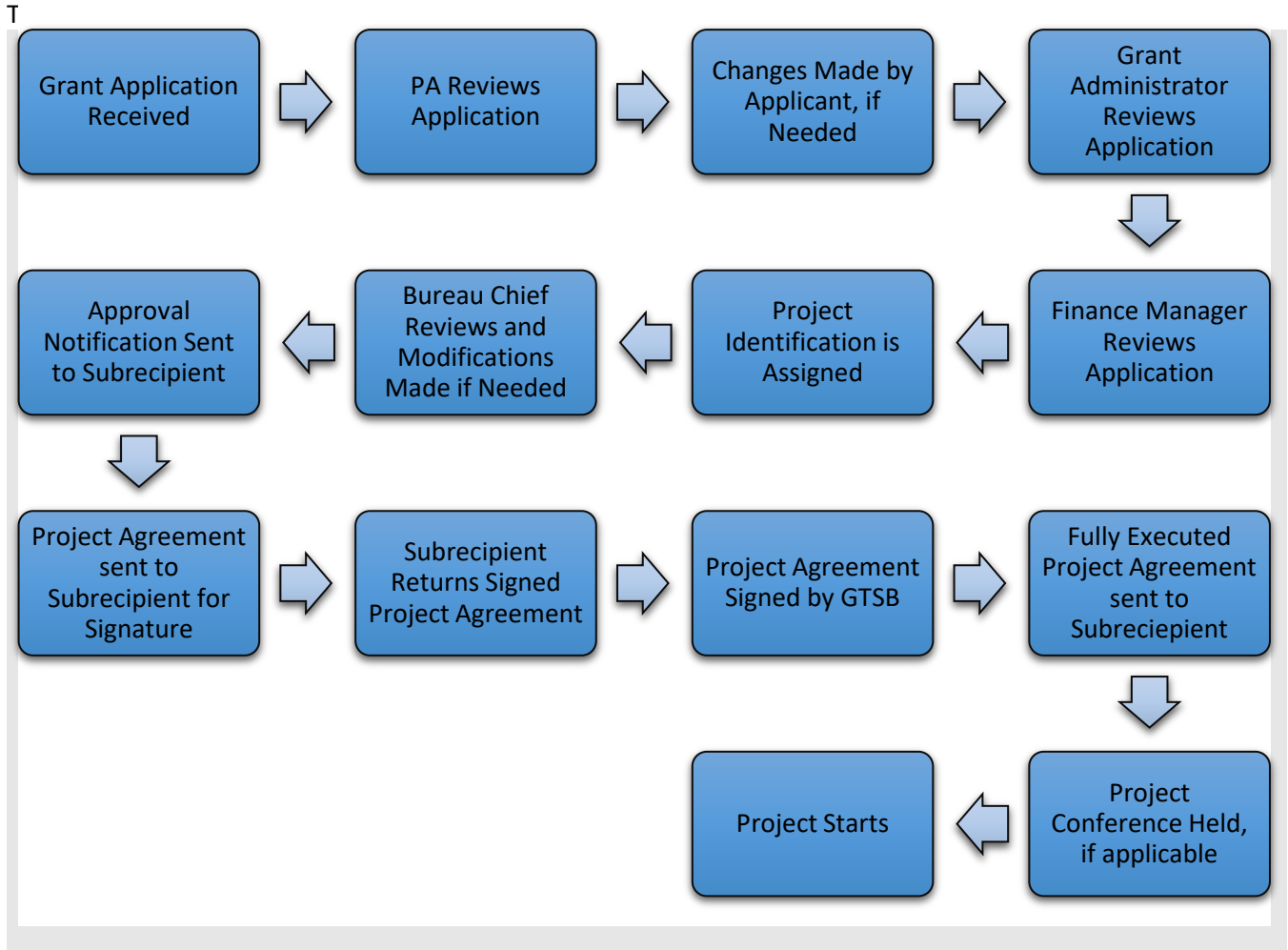
Chapter 4 - Grant Acceptance, Agreement and Execution

Section 4.01: Overview

The process from grant proposal to a fully executed grant agreement may take several months and the GTSB PAs guide this process. *A letter of intent to award funding sent to the recipients for projects beginning October 1 is sufficient to start a project.* Agencies that submitted proposals that are not approved will be notified in writing. Shortly afterward, a fully executed grant agreement is developed and emailed to the subrecipient. A fully executed grant agreement is a legally binding document when signed by both parties and includes the terms and conditions, detailed project descriptions, the approved budget, and required Certifications and Assurances.

The grant agreement must be signed by the subrecipient's authorized official (the person with contracting authority) and submitted to the GTSB. The authorizing official must also certify and assure that all the conditions contained in the Certifications and Assurances, along with reporting and invoicing requirements, including any special conditions, will be met.

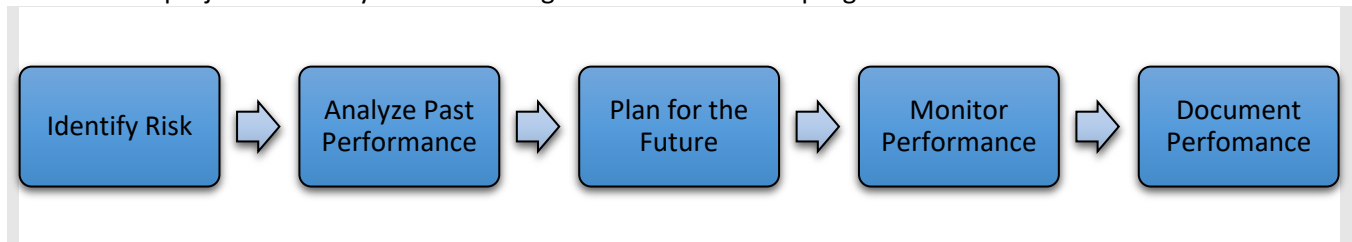
For local grants, the grant agreement may be executed with the unit of local government or political subdivision of the state, or an operating division or function of the local governmental unit, or political subdivision of the state that has proper authorization to obligate funding. For statewide grants, the agreement may be made with the parent agency, or a bureau or division. The GTSB must ensure every subrecipient has not been suspended or debarred by reviewing the Federal Debarment and Suspension List as well as the state database. Both checks should be conducted and documented prior to the final grant award.



Section 4.02: Risk Assessment

The GTSB is required to assess each applicant's risk of noncompliance with federal statutes, regulations and the terms and conditions of the grant agreement. The purpose of the risk assessment is to determine an organization's capacity to manage and/or receive federal grant funds and determine the level of monitoring that is needed. The results of the risk assessment are also used to plan monitoring activities and/or identify support needed to strengthen an applicant's management of its program. *Refer to the Monitoring Chapter for procedures and details.*

A risk assessment is defined as a systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking and includes both a programmatic and fiscal evaluation.



Subrecipients are evaluated for risk based on the following:

- Application content that aligns with performance targets
- Experience with GTSB grants
- Previous monitoring results
- Past performance

The GTSB conducts a risk assessment following application submission and prior to completion of a fully executed agreement.

Section 4.03: Final Grant Agreement Requirements

The Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards [2 CFR Part Uniform 200](#) (Act) requires every grant agreement be clearly identified and include the following information:

- Subrecipient name
- Subrecipient's unique identifier - Federal Award Identification Number (FAIN)
- Date awarded
- Federal award period
- Start and end date
- Total amount of federal funds obligated to the subrecipient
- Award project description (FATA), name of Federal awarding agency, pass-through entity and contact information for awarding official
- Catalogue of Federal Domestic Assistance (CFDA) number and name
- Whether the award is research and development
- Requirements imposed by federal statutes/regulations and the terms and conditions of the award
- Any additional requirements
- An approved federally recognized indirect cost rate negotiated with the Federal government or the pass-through entity or the 10 percent de minimis rate, if applicable
- Requirement for access by auditors to records and financial statements
- Terms and conditions concerning award closeout
- State match

When more than one funding source is used and needs to be split across multiple FAINs, only a single dollar amount indicating the total cost of the project is needed. There is no need to state how much funding is allocated to each FAIN/funding source.

Special Conditions of Approval

In addition to the general terms and conditions, which apply to every grant agreement, the GTSB may determine that special conditions should be imposed for a particular subrecipient. Reasons for the special condition may include:

- Results of the pre-award risk assessment
- Nature of the specific strategy being addressed

- Previous experience with the subrecipient
- Special requirement that is not otherwise addressed in the general terms and conditions

If a special condition is imposed upon a subrecipient, it must be documented in the grant agreement and highlighted in the award letter. An example of a special condition may be the subrecipient is allowed to charge costs to the grant for activities that take place within a stated timeframe before the official start date of the grant. This may occur when preparatory activity is necessary to ensure the primary grant activity can begin at the start of the new fiscal year.

Signatures

When the GTSB executes (signs) the grant agreement, the GTSB is certifying it is legal and payable and:

- Includes all required and applicable provisions.
- Complies with all applicable federal and state laws and regulations.
- Has received federal approval.
- Has been budgeted with available funds.
- Is included in the current or amended 3HSP.
- Has been authorized by the GTSB Bureau Chief.

Subrecipient Requirements

When a subrecipient’s application is submitted to the GTSB for consideration, the subrecipient certifies they have approval from the authorizing official (person with contracting authority) for the applicant agency or organization to do so. In addition, their agency agrees, if offered, to enter into a grant agreement and to comply with the terms and conditions, federal Certifications and Assurances and reporting requirements.

Subrecipient Certification and Assurances

[Certifications and Assurances](#) pertain to subrecipients. These sections provide the terms and conditions governing the grant and certify that a subrecipient will comply with the applicable regulations, policies, guidelines, and requirements as they relate to acceptance and use of federal or state funds for the project.

The subrecipient must be aware of these requirements. These Certifications and Assurance address:

- Non-Discrimination
- Drug-Free Workplace Act of 1988
- Political Activity (Hatch Act)
- Certification Regarding Federal Lobbying
- Restriction on State Lobbying
- Certification Regarding Debarment and Suspension
- Buy America Act
- Prohibition on Using Grant Funds to Check for Motorcycle Helmet Usage
- Policy on Seat Belt Use
- Policy on Banning Text Messaging While Driving

The GTSB may, at its discretion, require the subrecipient to comply with additional state Certifications and Assurances. If a subrecipient fails to comply with federal statutes, regulations or the terms and conditions of a grant agreement, the GTSB may impose additional conditions and/or sanctions.

Section 4.04: Equipment Purchase and Disposition of \$5,000 or More

The GTSB must receive prior written approval from the NHTSA Regional Administrator when using federal grant funds for all major equipment and replacement purchases with a useful life of more than one year and an acquisition cost of \$5,000 or more in value. This *includes software/information technology systems*. This regulation applies to all equipment valued at \$5,000 or more regardless of whether federal funds were to cover all or a portion of the purchase. The unit cost for equipment is the unit's purchase price, including freight and shipping costs, *plus* any accessories necessary to make the equipment operational for its intended purpose. All equipment purchases must comply with federal regulations and formal requests to the NHTSA Regional Office must contain language addressing the [Buy America Act](#).

During grant application review, the GTSB must identify all equipment purchase requests that meet the criteria described above, ensure the equipment has been identified within the 3HSP (inclusion of the equipment request within the 3HSP is not mandatory but is preferred) and obtain written approval from NHTSA. Upon receipt of the approved 3HSP, the GTSB will send a letter to the NHTSA Regional Office requesting approval of *all* equipment exceeding \$5,000. Once received, the NHTSA approval letter is placed in the corresponding subrecipients' grant file. If the letter contains multiple subrecipient requests, than a copy of the letter should be placed in all files.

If the requested equipment is not included in the 3HSP, the GTSB must submit a separate written request to the NHTSA Regional Administrator that includes a complete description of the equipment, subrecipient organization's name, total cost, useful life, and how the equipment will support the traffic safety program. If approved by NHTSA, the GTSB sends written notification by email to the subrecipient indicating they may proceed with the equipment purchase.

A subrecipient *may not* use grant funds for costs associated with the construction, rehabilitation or remodeling of any buildings or structures or for the purchase of office furnishings and fixtures. The GTSB, as part of its oversight responsibility, must systematically monitor all subrecipients with grant-funded equipment in accordance with state laws and procedures to ensure they comply with all federal and any state requirements for property management, inventory and disposition.

Equipment must be used by the subrecipient for the purpose for which it was acquired regardless of whether the program continues to be supported by GTSB funds. When no longer needed for the original program, the equipment may be used for other traffic safety activities. If it is determined the equipment is no longer needed for its originally acquired purpose or any other traffic safety purpose, the equipment must be handled in accordance with Iowa's equipment policies, GTSB policies and federal requirements. The GTSB must obtain written approval from the NHTSA Regional Office before disposing of equipment with a value of \$5,000 or more, unless the equipment has exceeded its useful life as determined under state law and procedures.

Section 4.05: Grant Agreement Modifications

Grant Agreement Revisions

All revisions to a GTSB project agreement, whether programmatic or fiscal, must be made prior to August 1. Any requests for revisions after this date will not be approved. The GTSB reserves the right to limit grant amounts at any time based on performance and/or available funding. Any changes made to the executed agreement limiting grant amounts by the GTSB must be made in writing.

The following deviations from the approved grant agreement require prior written approval by the GTSB:

- Changes to the approved scope of work
- Changes to the approved work plan
- Changes to the approved budget

The GTSB procedure for review and approval of a grant agreement revision is:

- Subrecipient submits an electronic request for a revision that includes a justification
- PAs review requests for agreement modifications and makes recommendation to the Bureau Chief
- Bureau Chief makes final determination on all agreement modification requests
- Notification is provided to the sub recipient of the final decision in writing

If the revision requires a change in the 3HSP, the GTSB will submit an amendment to the NHTSA Regional Office for review and approval. Any work associated with the grant agreement modification may NOT take place until the modification is approved and the subrecipient is notified in writing.

Chapter 5 - Grant Administration and Management

Section 5.01: Overview

The traffic safety grant program is a reimbursement program; the subrecipient conducts the activities described in the grant agreement and then requests reimbursement from the GTSB.

Iowa uses a program management approach for grant administration and management. Each PA administers one or more program areas. The GTSB staff are encouraged to identify and engage with potential traffic safety partners that have not been involved in the planning and implementation of traffic safety programs or projects in the past.

Project training meetings, when needed, are conducted as part of the grant agreement execution. They are conducted to ensure both the subrecipient and the GTSB understand the contract terms and objectives. The PA is responsible for scheduling the meeting and notifying all requested attendees.

Section 5.02: Grant Management, Reporting and Submission of Claims

Subrecipients are required to submit progress reports that keep the GTSB informed of a grant's progress, explain any challenges or successes encountered and how they are being or were addressed, provide background information that can be shared with others and suggest ways in which the GTSB can provide guidance and/or assistance. The GTSB determines the frequency of progress reporting and claims submission. The GTSB can also use this information to strengthen the highway safety program. Progress reports are used to prepare the NHTSA Performance Report, and future 3HSPs and AGAs.

Grant Management

The PA assigned to each grant is responsible for tasks associated with grant administration including application review, grant award/execution, claim review and report processing. Failure to perform these tasks correctly can result in significant grant management and payment problems. It is the GTSB's responsibility to monitor and evaluate the subrecipient's performance and expedite all funds without unnecessary delay.

The GTSB staff should not:

- Impose any task upon the subrecipient or permit any substitute activity not specifically provided for in the grant agreement.
- Give directions to the subrecipient or to employees of the subrecipient, except as described in the grant agreement.
- Approve expenses for activities that do not meet performance targets contained in the grant agreement.
- Authorize expenditure of funds except in accordance with the terms of the grant agreement.
- Offer advice to the subrecipient that may adversely affect performance, compromise the GTSB's rights or provide the basis of a claim against the GTSB that may affect any pending or future determination of fault or negligence.
- Authorize or agree to any change in the grant agreement, standard provisions, certifications, project period, delivery schedule, maximum amount eligible for reimbursement or other terms and conditions of the grant agreement, unless the change is specifically authorized in the grant agreement and approved by the GTSB Bureau Chief.
- Allow supplanting. For example, replacing routine and/or existing state or local expenditures with federal grant funds and/or using federal grant funds for activities that constitute general expenses required to carry out the overall responsibilities of state, local or federally recognized Tribal government unless an exception is approved by the NHTSA Regional Office.
- Promise that a future grant or extension of a grant for another year is approved prior to the GTSB Bureau Chief's approval.

Unless otherwise agreed upon, all subrecipients must submit reimbursement claims to the GTSB within 90 days of the expense being incurred, or in accordance with an agreed schedule that is negotiated between the PA and subrecipient. Failure to submit a report in a timely manner will cause a delay in payment of claims, may jeopardize funding for present and future traffic safety projects and could result in a change to the subrecipient's risk assessment level.

Submission of Reimbursement Claims and Project Reports

Adequate documentation is essential for reimbursement of costs incurred by subrecipients and a good knowledge of reporting and cost accounting procedures is required by the subrecipient. It is vital to abide by NHTSA regulations, so the State of Iowa will be reimbursed by NHTSA for allowable expenses under the Section 402 and 405 programs. The GTSB and the subrecipient must use and maintain adequate cost controls and procedures as outlined in the [Uniform Guidelines](#) for the management and administration of the traffic safety program.

Reimbursement claims must be submitted to the GTSB as provided in accordance with the terms of the project agreement or a schedule negotiated by the subrecipient and PA. Reimbursement of costs under an approved project agreement is contingent upon the following conditions:

- The availability of appropriated funds.
- Proof of actual costs incurred (services provided, hours worked, etc.) in accordance with the approved project budget.
- Compliance with the cost principles established by NHTSA and the *Uniform Guidelines*.

Payment Procedures

For a claim to be paid by the GTSB, the subrecipient must:

- Submit a reimbursement claim to the GTSB that includes supporting documentation for expenditures claimed.
- Submit a project activity report, if applicable, with each claim submission.
- Submit a final activity report and a fully documented final reimbursement claim by November 15.

Payment Rules

The following payment rules apply:

- Reimbursement claims must be submitted within 90 days of the expense being incurred, with exception of the final claim.
- The GTSB will not review or process the final claim until a final activity report has been submitted and verified.
- Claims received after November 15 may not be reimbursed.
- The November 15 deadline may be waived by the GTSB Bureau Chief.

Documentation

The GTSB requires subrecipients to support all reimbursement claims by submitting and maintaining complete financial and programmatic source documents. Unless instructed otherwise, these source documents may include personnel activity reports, receipts and other records of all costs incurred in support of the grant project. All documents considered pertinent to program regulations or the grant agreement must be retained by the subrecipient for the current year, plus two years following submission of the final claim to the GTSB. The subrecipient will make available to the GTSB, NHTSA, the Controller General of the United States, the Auditor of the State of Iowa, or any of their duly authorized representatives any books, documents, papers or records pertaining to the grant agreement with the GTSB.

GTSB Reimbursement Policy

All grant agreements are approved for a “maximum amount eligible for reimbursement.” This is the grant reimbursement amount and the GTSB’s share of the estimated grant cost. Each line item is not to be exceeded and only actual costs will be reimbursed.

Grants do not allow for payment of any profit to the subrecipient. If GTSB or a subrecipient subcontract with a commercial (for profit) firm, the fee becomes an actual cost and is eligible for reimbursement if all other payment criteria meet the terms of the agreement.

Advances

Capital advances are not allowed. Reimbursement will be made only for costs incurred in accordance with the grant agreement during the grant period. The incurrence of cost depends on the accounting system used. If the subrecipient uses an *accrual* accounting system, then cost is incurred when a recorded liability exists. Examples include invoices, bills of lading, vouchers of individual travel performed, and cash receipts for expenses incurred. **Advances for anticipated costs are prohibited.** If the subrecipient uses a *cash* accounting system, then cost is incurred when a cash disbursement has been made.

Subrecipients are responsible for informing their accounting office about the reimbursement claim submission deadlines. The GTSB will review all proposed and submitted costs to determine if they are necessary, reasonable and in compliance with the grant agreement and applicable cost accounting principles and state policies.

Section 5.03: Public Information and Education

Public Information and Education (PI&E) activities are used to help change driver behavior. To ensure that the PI&E strategies are appropriate, the GTSB:

- Conducts data analysis to identify target populations for outreach.
- Creates an outreach calendar that supports the enforcement mobilization schedule.
- Shares the data analysis and problem identification information with the media contractor (if used) that is tasked with development of the creation and implementation of the paid and earned media opportunities, and evaluation of outreach efforts.

The 3HSP includes a paid media and outreach section that describes the initiatives that the GTSB will implement to enhance high visibility enforcement, engage partners and impact emphasis area performance targets.

Strategies and tactics included in the GTSB media plan may vary by campaign based on the target audience and priority area being addressed. The GTSB uses television and radio, billboards, digital ads, social media, corporate partnerships, participation in health/safety fairs, sports marketing, and other mediums to encourage the public to engage in safe behaviors.

PI&E materials fall into two categories — educational and promotional, as described below.

PI&E Educational Materials

Educational materials are an allowable expense if they provide substantial information and educational content to the public (not merely a slogan) and are designed solely for that purpose. Educational material purchases will receive the highest scrutiny and no flexibility in requests. Paper, pamphlets and flash drives that contain educational material are allowable because their purpose is to contain and convey educational information. If a subrecipient chooses to provide educational content on a flash drive, the device must be an economical method for conveying this information.

Examples of allowable educational materials include a pamphlet with statistical information, such as “X number of people lose their lives annually in motor vehicle crashes because they were not properly restrained in a seat belt.” Other examples include:

- The dangers of texting and driving (i.e., statistics, guidance to prevent texting while driving) distributed to driver education teachers for classroom use.
- A folder containing information about child passenger safety (i.e., statistics, car seat/booster seat laws, proper car seat installation and use, danger of leaving children unattended in hot or cold cars) and relevant safety tips provided to parents at a car seat inspection station.
- A flash drive containing training/conference materials given to attendees at a highway safety conference.
- Reproduction of NHTSA or other federal government endorsed material for dissemination to the public.

All PI&E materials developed or purchased with federal funds must be submitted to the GTSB for written approval prior to final production.

Promotional Items

Federal grant funds may not be used to purchase promotional items, giveaways or memorabilia. An unallowable promotional item or giveaway is one used as an incentive or to increase goodwill. A subrecipient that does not comply with this restriction could be required to repay funds.

The GTSB and their subrecipients may use *state funds or privately collected funds or private donations* to purchase promotional items. Purchases are subject to applicable state laws and policies.

Safety Items for Public Distribution

The use of federal funds to purchase safety items for public distribution does not fall within the definition of equipment. These purchases are allowable if they have a compelling safety benefit. Child restraints, bicycle helmets and other similar items whose “sole purpose” is to improve highway safety are allowable for distribution to members of the public provided the items are specifically identified in a grant agreement, based on problem identification, and submitted to the GTBS for approval prior to incurring costs. The project must also contain specific performance criteria justifying the item’s safety benefit. The GTSB will consult with the NHTSA Regional Office, if needed, and the GTSB Bureau Chief must be involved. Written guidance (letter or email) from NHTSA should be obtained and placed in the project file.

Sports Marketing

When considering communications, public information and paid media expenditures that involve attendance at sporting and entertainment events that charge admission, specific tests must be applied to ensure compliance with cost accounting principles found in the *Uniform Guidelines*. *The tests that should be applied and additional useful guidance are provided by NHTSA and GHSA*. The GTSB and its subrecipients must also determine if there are any state or local regulations governing the purchase and acceptance of tickets to entertainment-related events. The GTSB staff and subrecipients cannot accept any tickets or additional benefits. In addition, costs associated with tickets to shows or sports events are unallowable grant expenditures.

Advertising

The GTSB may use federal funds to purchase advertising to convey highway safety messages through a variety of mediums including television, radio, cinema, Internet, print, and outdoor media. When funds are used for advertising, the 3HSP must identify and describe:

- What program the advertising is supporting.

- How the advertising will be implemented to support an operational enforcement program whether it be a periodic mobilization or an on-going saturation or roving patrol.
- The amount allocated for paid advertising.
- The measures that will be used to assess message recognition by and penetration of the primary target audience.

The limited purchase of media time or space (television and radio ads, ads for social media, banners and posters) must be approved and managed by the GTSB and included in the 3HSP. **Subrecipients are not allowed to create, distribute and manage their own media campaigns without the GTSB's approval.**

Federally funded public service announcements or video materials intended for television broadcast must be closed captioned. Federal funds are to be used only for certain specified advertising and public relations costs, which are detailed in the *Uniform Guidelines*.

The GTSB is required to report on the purchase of media and its effectiveness in the AR that is submitted to NHTSA. If a subrecipient is awarded advertising funds, the subrecipient is required to provide a similar report to the GTSB for inclusion in the AR.

Section 5.04: GTSB Internal Procurement of Goods and Services

The GTSB follows State of Iowa procurement rules and regulations for the purchase of goods and services for the direct use and benefit of GTSB operations. Purchase contracts must include the same Certifications and Assurances required of other subrecipients. Contracts for GTSB operations must be periodically monitored like all other grant agreements and professional service contracts to ensure compliance with state procurement procedures.

State Contracts

The State of Iowa has contracts for goods and services that are used by all state agencies, including the GTSB. These contracts have two primary goals – to facilitate the purchasing process and to secure the best pricing by leveraging the state's purchasing power. A procurement officer may purchase according to the terms of the contract without additionally seeking determinations for single source or limited competition, resulting in a significant time savings. Even though it may be possible to secure a lower price on spot purchases, purchasing goods and services through the state contract is mandatory unless specifically stated otherwise.

Section 5.05: Food and Beverage Costs

Food and beverage costs are allowable if provided at classes and conferences but must be pre-approved by the GTSB Bureau Chief and state policy and procedures must be followed.

Section 5.06: Subrecipient Travel Costs

Subrecipient Travel Costs

Travel costs will be reimbursed if they are reasonable and allowable. However, they should not exceed charges normally allowed by the subrecipient's written travel policy, [State of Iowa travel guidelines](#) or [Government Service Administration \(GSA\) approved rates](#), whichever is less. Reimbursement for out-of-state travel expenses incurred by a subrecipient requires prior written approval by the GTSB PA.

To request approval for out-of-state travel, a subrecipient must ensure the grant agreement includes a provision for the travel. To qualify for reimbursement, the travel must be:

- Necessary to assist in the completion of project and program goals and objectives.
- Specific to the purpose of the grant, for example, an impaired driving conference for a community alcohol project.
- Appropriate to the position and responsibility of the individual or individuals traveling. For example, the project director will attend a community project seminar.
- Of direct benefit to the State of Iowa, and the benefit is not available through other means. For example, travel to a national, one-of-a-kind event.

The subrecipient must follow state travel regulations. The GTSB will not reimburse for meals provided during the conference except for “continental breakfast” which does not count as breakfast. Dietary restrictions should be worked out in advance with the conference organizer.

To request travel reimbursement, the subrecipient must prepare and submit the travel portion of the reimbursement claim. **Grant funds may not be used to purchase alcohol.**

Costs of Advisory Councils

If the GTSB convenes an advisory council or committee, costs incurred by this group are not allowed unless authorized by statute, NHTSA or as an indirect cost where allocable to federal awards. The GTSB must obtain authorization from the NHTSA Regional Administrator before vouchering for these costs under an approved highway safety plan. NHTSA will authorize costs for an advisory council or committee if it supports the highway safety program and is an eligible use of grant funds.

Even if an advisory council is authorized by the NHTSA Regional Administrator, the following costs are not allowable:

- All costs, if the advisory council is required to qualify for the grant by which it is funded. For example, the costs of a task force required to qualify for a Section 405 grant may not be reimbursed using Section 405 funds but may be eligible for funding using other NHTSA grant funds.
- General costs of government, as detailed in the *Uniform Guidelines*.
- Travel and associated costs such as mileage, meals and lodging for members of an advisory council who are not GTSB employees.
- Conference and training costs, including associated lodging, registration, travel, and meals for members.
- Unreasonable costs, such as those that are more than normal market value or inconsistent with the GTSB’s typical purchasing policies.

Section 5.07: Property and Equipment Management

Federal and State Requirements and Thresholds

Federal requirements specify the GTSB and its subrecipients manage and dispose of equipment acquired in accordance with state laws and procedures. For equipment with a useful life of more than one year and an acquisition cost of \$5,000 or more, *refer to Chapter 4 for purchase and disposition guidance.*

Property Management Systems

Subrecipients must establish and administer a management system to procure, control, protect, preserve, use, maintain, and dispose of property and equipment. This includes property and equipment

furnished directly by the GTSB. Any property purchased using federal funds, regardless of the unit cost, must be specifically authorized in the grant agreement. Equipment and other property acquired under a grant agreement for use in highway safety projects must be used and kept in operation for the intended traffic safety purpose(s).

Property Records Requirements

The property management requirements include, but are not limited to, the maintenance of accurate property records. These records may include:

- A description of the property
- Manufacturer's serial, model, federal stock, or national stock or other identification number
- Acquisition date
- Location, use and condition of the property and the date the information was reported
- Unit acquisition cost (total cost from all funding sources)
- Ultimate disposition date for equipment over \$5000, including date of disposal and sales price or the method used to determine current fair market value

Inventory Control

Subrecipients must maintain an inventory control system to ensure adequate safeguards to prevent loss, damage or theft of the property. Subrecipients must establish adequate maintenance procedures to keep the property in good condition.

The GTSB uses an inventory control system to identify and track all grant-funded equipment or other property classified as "controlled property" and list all essential information. The GTSB, as part of its oversight responsibility, must systematically monitor all subrecipients with grant-funded equipment and/or property meeting the state-defined criteria of controlled property to ensure they comply with state and federal property management requirements. This oversight must continue until final disposition of the equipment, including after the subrecipient's grant is closed. The GTSB will periodically verify the existence and use of each piece of equipment. This verification is typically completed during onsite monitoring visits. Federal regulations require that a physical inventory be conducted and the results reconciled with the property records at least once every two years.

Disposition

Equipment must be used by the subrecipient in the program or project for which it was acquired, including after the project or program is no longer supported by federal funds. The GTSB must receive prior written approval from the NHTSA Regional Office for the disposition of equipment with a useful life of five years and a value of \$5,000 or more unless the equipment has exceeded its useful life.

Upon completion or termination of a traffic safety grant, or if it is determined by the GTSB that the equipment is no longer needed for the purpose for which it was acquired, the equipment may, at the option of the GTSB, become the GTSB's property. Other possible disposition actions include, but are not limited to:

- Transfer from federal inventory to state inventory.
- Declaration that equipment is damaged beyond repair or salvage.
- Gift to another agency.
- Trade-in to the manufacturer.

The NHTSA Regional Office may authorize transfer of the equipment title to the federal government or to a third party that meets eligibility requirements.

Section 5.08: Indirect & Direct Costs

The total cost of a subrecipient's grant agreement is the sum of the allowable direct costs and approved allocable indirect costs. A cost is determined to be reasonable if it is of a type generally recognized as ordinary and necessary for the performance of the subrecipient's work. Indirect cost documentation must be included with the grant application.

Indirect Costs

Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, contract, project function or activity, but are necessary for the subrecipient's general operation and conduct of the work activities it performs. In theory, costs like heat, electricity, accounting, and personnel *could* be charged directly to a specific project, if meters or other measuring devices could record minutes in a cross-cutting manner specific to the grant funded project. However, this is not practical. Therefore, indirect cost rates are sometimes used to distribute these "overhead" costs to projects.

Indirect costs are determined using one of two methods:

Federally Negotiated Indirect Cost Rate (IDCR)

If a federally established IDCR is used, the indirect costs must be documented by a federal cognizant agency approval letter that is included in the grant file. The GTSB may not force or entice the subrecipient to accept a lower rate. If a subrecipient has a federally negotiated IDCR and requests that rate, the GTSB may not request or require the subrecipient to offer a lower or zero IDCR. If a non-federal agency or subrecipient voluntarily chooses to waive indirect costs or charge less than the full rate, this is allowable, but this voluntary action must be **documented in writing** and included in the grant file.

De Minimis Indirect Cost Rate

Use of the de minimis indirect cost rate of 10%, a federally recognized rate that non-federal entities may use to recover allowable indirect costs on grants, may be used if a negotiated indirect cost rate has never been established. Use of this rate must be **documented in writing** in the grant file.

Direct Costs

Direct costs are those that can be readily and easily identified as required to fulfill the terms of the grant, contract, project, function, or activity during a specific time. Direct costs include:

- Salaries or wages for employees working specifically on a project.
- Other employee fringe benefits allocable for direct labor employees. Fringe benefits are the additional benefits offered to an employee, above the stated salary for the performance of a specific service.
- Consultant services contracted to accomplish specific work on a specific project.
- Travel of direct labor employees.
- Materials, supplies and equipment purchased directly for use on a specific project.
- Communication costs such as mailing services identified with a specific award or activity.

Section 5.09: Program Income

Program income is allowed and the GTSB staff must inform the GTSB Bureau Chief if they are aware of a subrecipient collecting program income for a grant funded project or activity. Any income earned by a subrecipient associated with a GTSB-provided federal grant must be fully accounted for and applied to that project's purpose or used to reduce project costs.

Program income means gross income earned by the subrecipient directly from a grant funded program activity between the effective date and the expiration date of the grant agreement. These earnings may include but are not limited to:

- Income from fees for services performed.
- Sale of commodities or items fabricated under the grant.
- Usage or rental fees from real or personal property (equipment) acquired with grant funds.
- License fees and royalties on patents and copyrights.
- Principal and interest on loans made with grant funds.

Program income does not include interest on grant funds, rebates, credits, discounts, taxes, special assessments, levies, and fines raised by the state or a subrecipient or the interest earned by any of these.

The GTSB must approve a subrecipient's request to earn program income. There must be an indication in the GTSB 3HSP project description that the grant will generate program income and the total income earned must be reported by the GTSB in the AR. There must be a clause in the grant agreement that states the grant will earn program income and the subrecipient will expend the monies to fulfill the objectives of the program area under which it was generated. Program income may be used to meet cost sharing or matching requirements only upon written approval of the NHTSA Regional Office. Use of program income in this manner will not increase the commitment of federal funds.

Subrecipients must record the receipt of program income as a part of grant project transactions in accordance with the grant agreement. Subrecipients must also record and report the expenditure and disbursement of program income revenues as a part of the grant transactions in accordance with the grant agreement.

Section 5.10: Supplanting and Commingling of Funds

The GTSB and subrecipients are prohibited from commingling funds on either a program-by-program or project-by-project basis. Funds specifically budgeted and/or received for one project may not be used to support another. This is critical for grants that receive funding from two or more sources. For instance, alcohol funding can only be used for alcohol expenses and seat belt funding can only be used for seat belt expenses even if the grant is awarded to the same agency.

Federal funds may not be used to supplement existing funds for program activities or to replace or supplant those funds that have been appropriated for the same purpose. If there is the potential of supplanting, the subrecipient will be required to supply documentation demonstrating the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds. The GTSB may request written certification from the subrecipient stating that federal funds will not be used to supplant state or local funds.

Section 5.11: Subrecipient Appeals

An applicant may appeal the following GTSB decisions:

- Denial of a project proposal.
- Withholding payment of a claim.
- Requiring a refund of grant money.
- Suspension or cancellation of all or part of a grant.

Within 15 days following receipt of notification of the decision, the applicant must send a written request to meet with the GTSB PA and other appropriate staff to address their appeal and present supporting documentation. Following the meeting, written notice of the GTSB's decision will be sent to the applicant or subrecipient within five business days.

If the applicant or subrecipient wishes to appeal the GTSB PA's decision, it must submit, within 15 business days after receipt of notification of that decision, a written request to meet with the GTSB Bureau Chief to present supporting documentation. Written notice of the decision of the GTSB Bureau Chief will be sent to the applicant or subrecipient within five business days of the decision.

If the applicant or subrecipient wishes to appeal the GTSB Bureau Chief's decision, it must submit, within 15 business days after receipt of notification of that decision, a written request for appeal to the Iowa DPS Commissioner. The request must contain the reasons for the appeal, citing the specific application or grant for which the appeal is being made.

The DPS Commissioner will review the request for appeal and, within 15 business days after receipt of the request, advise the applicant or subrecipient if the appeal is accepted or rejected. If the appeal is rejected as having no merit, the DPS Commissioner will inform the applicant in writing of the reason for the rejection. If the appeal is accepted, the DPS Commissioner will either find that the appeal has merit and remedy the problem by whatever means within their authority or request the appointment of an officer to hear the appeal as provided by State of Iowa procedures.

Chapter 6 - Grant Monitoring

Section 6.01: Overview

The GTSB is responsible for managing grant operations and activities to ensure compliance with applicable federal requirements. The GTSB staff will conduct periodic monitoring of grants to evaluate current projects, report on progress by subrecipients and ensure compliance with federal and state regulations. Monitoring also provides an opportunity to share information and assist the subrecipient if they are encountering problems and/or would benefit from guidance.

Section 6.02: Types of Monitoring

Projects funded by the GTSB will be monitored on a periodic basis and involve either an onsite visit or desk monitoring. Desk monitoring is an informal process that involves the GTSB staff regularly reviewing subrecipient reports and written and/or emailed correspondence and conducting telephone conversations with the agency. Subrecipients are required to submit activity reports and financial reimbursement claims as described in the project agreement. These regular and consistent reviews of grant activity are designed to help ensure issues with current grants are both identified and rectified in a timely manner.

Section 6.03: Onsite Monitoring

Onsite monitoring will occur at least one time during the current federal fiscal year. Subsequent visits during the federal fiscal year will be determined by the PA.

Onsite monitoring is a formal process by which the subrecipient is notified, in advance, of a visit by a PA or alternate GTSB representative. These visits are designed to determine whether progress is being made by the subrecipient and reports are being submitted on a timely basis, as well as to review relevant project and financial data. Site visits are required at least once during the program year.

Regardless of funding level, the staff representative or GTSB Bureau Chief may deem a site visit necessary at any time during the program year, which may be in addition to required visits. If, for reason beyond the control of the GTSB and subrecipient, a virtual visit may be conducted and considered as an onsite visit. The reasons for substitution of the virtual visit should be documented and placed in the project file.

Preparation for Onsite Monitoring

A PA or other GTSB representative will contact the subrecipient in advance to determine the date and time for the onsite visit. Once a date and time is agreed upon, the PA will confirm the visit by an email that includes information about the monitoring process and a list of documents that will be reviewed during the onsite visit. In advance of the meeting, the PA will complete a site visit form in the electronic grants management system and carefully review the relevant documents and correspondence in the file noting if there is satisfactory progress or any action items for discussion.

Documents Reviewed During Onsite Monitoring

Items which may be reviewed during onsite monitoring include:

- Grant activity reports, schedules, written traffic enforcement warnings and citations, and other supporting documentation
- Equipment audit (every two years)

In addition, the PA may engage the subrecipient in a discussion to determine if the following objectives are being met:

- Are project activities on schedule?
- Are project agreement requirements being met?
- Are/have necessary reports/claims been submitted?
- Is the project fully staffed?
- Has the necessary equipment (if applicable) been secured?
- Have contacts (phone calls, etc.) affecting the project and/or contract been documented, filed and noted?
- Are expenditures on track with projections?
- Has the subrecipient documented public information activity?
- Are goals being achieved?

Documentation and Follow-up

A site visit report must be completed for onsite monitoring. The PA should collect relevant documents discussed during the site visit and place these in the subrecipient's grant file.

Section 6.04: Monitoring Findings, Follow Up and GTSB Action

When project monitoring reveals a deficiency, the problem and solution should be documented. Prior to finalizing recommendations and/or corrective actions, a draft letter containing the following should be submitted to the GTSB Bureau Chief for review:

- Name(s) of GTSB personnel conducting the onsite visit
- Items reviewed
- Observations made of the financial documents
- Corrective recommendations and actions, if applicable
- Requirement that a 30-day follow-up meeting be scheduled, if warranted

Once the letter is finalized, it is emailed to the subrecipient. If a 30-day monitoring follow-up is needed, the date and time is scheduled with the subrecipient following receipt of the GTSB letter. Copies of all monitoring documentation are maintained in the subrecipient's file for future reference and auditing.

Chapter 7 - Fiscal Procedures and Allowances

Section 7.01: Overview

The GTSB relies on federal funding to carry out its functions. Once funding is in place and the grant agreement is executed, the subrecipient may begin work on their project. As work progresses, the subrecipient will submit a request for reimbursement along with applicable reports and documentation.

The GTSB places a high priority on the timely processing and payment of vouchers submitted for reimbursement. Reimbursement of subrecipient costs is contingent upon availability of appropriated funds; actual costs incurred in accordance with the approved project budget; compliance with the cost principles established in the terms and conditions of the grant agreement; and compliance with federal, state and GTSB policies. All reimbursement vouchers are processed through the GTSB electronic grants management program.

All subrecipients are responsible for maintaining an accurate accounting system that is supported by proper documentation. Source documents that support all project related costs must be maintained. All source documents must be made available during a monitoring visit and/or audit and retained for a minimum of three years.

Section 7.02: Allowable Costs (General)

Allowable grant costs are regulated by the *Uniform Guidelines*. Except where otherwise authorized by statute, costs must meet the following general criteria to be allowable under federal grant awards:

- Be necessary and reasonable for the performance of the grant agreement.
- Conform to any limitations or exclusions set forth by the *Uniform Guidelines* or in the grant agreement, as to types or amount of cost items.
- Be consistent with policies and procedures that apply uniformly to both federally financed and non-federally financed GTSB programs and projects.
- Be accorded consistent treatment.
- Not be assigned to a grant agreement or project as a direct cost if any other cost incurred for the same purpose has been allocated to the grant agreement or project as an indirect cost.
- Be determined in accordance with generally accepted accounting principles.

- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior fiscal year.
- Be adequately documented with generally accepted accounting principles.

Section 7.03: Obligation Process

An obligation limitation is the authorization the GTSB receives from NHTSA to proceed with work using federal highway safety funds. After Congress and the President appropriate funds to Iowa, these funds are available in NHTSA's Grants Tracking System (GTS). The GTSB must then obligate the funds in the GTS to make them available for spending. A cost summary, or GTSB's annual spending plan, is part of the 3HSP that is submitted to NHTSA. After NHTSA approves the 3HSP, the cost summary is then entered in GTS on or about October 1.

The cost summary includes an estimate of new obligations and carry-forward funds. Prior to the preparation of the next 3HSP/AGA, the GTSB Bureau Chief determines the forecasted amount for each program area. The projected funding levels, including carry-forward amounts, are used to finalize grant proposals and budgets. NHTSA may provide several funding obligations throughout the federal fiscal year. Each time a new NHTSA fund obligation is available, the GTSB obligates the funds according to current planning documents. The final carry forward process of funds completes the close out of the prior fiscal year.

Section 7.04: Encumbrance

When NHTSA issues a funding letter identifying Iowa's federal award for the coming year, the funds must be available in the state's financial system, so the GTSB can reimburse subrecipients. After grants are awarded, funds must be reserved to reimburse subrecipients. This is called an encumbrance, meaning funds are set aside, so they are available when needed.

Section 7.05: Grant Payment Process, Budgetary Report, and GTS Process

Claim Review Process

The GTSB is responsible for reviewing requests for reimbursement submitted by subrecipients. The GTSB PA reviews claims submitted by subrecipients via the electronic grants management system for reimbursement of grant-related expenses. Once claims are verified as accurate, appropriate and supported with required documentation, claims are processed for payment.

Reimbursement

The GTSB Finance Manager submits a monthly federal reimbursement voucher to NHTSA through GTS. The GTSB works with the various divisions within Iowa to ensure that federal reimbursement vouchers are complete, accurate and in compliance with state and federal policies and procedures. High priority is given to processing claims, so that subrecipients are reimbursed in a timely manner.

Section 7.06: Federal Reimbursement Voucher Submission

The GTSB submits a federal reimbursement voucher to NHTSA monthly. A final voucher is submitted each year by December 31 and all unexpended balances are carried forward to the next fiscal year. Each voucher includes the following information broken down by individual project agreement:

- Project agreement number for which work was performed and payment is sought
- Amount of federal funds sought

- Eligible use of funds
- Amount of federal funds allocated to local benefit by program when applicable (This information must be provided by March 31 and with the final voucher.)
- Matching rate or special matching write-off used
- Cumulative total cost to date by program
- Cumulative federal funds expended
- Amount claimed this voucher submission period
- Federal funds obligated

Copies of each project agreement for which expenses are being claimed and any supporting documentation must be made available for review by the NHTSA Regional Office upon request. Upon approval of the voucher by the NHTSA Regional Office, funds are electronically transferred from NHTSA to the State of Iowa Treasury within 10 business days.

Section 7.07: Federal Funding Accountability and Transparency Act Reporting

Federal Spending Transparency

The GTSB is required to report fiscal information to NHTSA as mandated in the Federal Funding Accountability and Transparency Act (FFATA) and in accordance with guidance provided by the Federal Office of Management and Budget (OMB). This information is then made available to the public at the [USA spending website](#). The Iowa Department of Public Safety Finance Bureau is responsible for all FFATA reporting tied to NHTSA grants and will work cooperatively with the GTSB to ensure accurate and timely submission.

As a recipient of federal funding, the GTSB is responsible for reporting all grants (sub-awards) of \$25,000 or more. The FFATA Sub-award Reporting System (FSRS) is the online tool that GTSB uses to capture and report subrecipient award and/or executive compensation data. The following must be entered in FSRS for each grant:

- Award amount
- Date of the award
- Project description (grant title)
- Primary place of performance
- Sub-award number
- Executive compensation

Section 7.08: Fund Liquidation

The GTSB strives to liquidate funds at a level appropriate to fiscally support a comprehensive data-driven highway safety program. To support fund liquidation the GTSB:

- Monitors the obligation of federal highway safety funds by funding year and source.
- Tracks fund liquidation by funding year and source.
- Reviews and reconciles the quarterly report of carryover and current fiscal year funds.
- Ensures that funds are expeditiously obligated, and older funds **are expended first**.

The GTSB finance team and Bureau Chief periodically examine the current liquidation of each funding source by year and inform NHTSA of any issues regarding unliquidated funds.

Section 7.09: Single Audit and System for Award Management Procedures

Single Audit:

Subrecipients expending \$750,000 or more in federal awards from *all sources* must complete and submit, through the Federal Audit Clearinghouse ([FCH](#)), a single audit report. Iowa ensures all single audits, financial reviews and reports are received and reviewed to determine any potential findings requiring corrective action. The FCH is the official repository for all state and local government and nonprofit audit reports. During monitoring, GTSB staff may pull and review single audits, where applicable. If findings are discovered, the GTSB must ensure that subrecipients take appropriate and timely corrective action. In cases of continued inability or unwillingness to have an audit conducted as required, the GTSB may implement sanctions until the audit is completed satisfactorily.

System for Award Management:

In August or September, the GTSB reviews the System for Award Management ([SAM](#)) website to ensure all GTSB vendors and subrecipients are in good standing. This information must be included in the files for each fiscal year.

Section 7.10: Fiscal Year Closeout

The federal fiscal year ends on September 30. Subrecipients are required to submit all reimbursement claims and a final activity report by November 15, so the GTSB may begin closeout activities as well as compile the AR that must be submitted to NHTSA by January 28. Reimbursement claims not received by November 15 may not be reimbursed.

Chapter 8 - Matching Funds (State Matching Share)

Section 8.01: Overview

Match is defined as state and federal funds that are expended in support of other qualifying highway safety programs and have not been utilized by another federal, state or local agency as matching funds for a separate federal project. The amount of the state match is calculated as a percentage of total (federal and state) program costs.

The GTSB is responsible for calculating and documenting required match by program. Special attention should be paid to unique requirements of specific programs. Written documentation of the state match must be kept on file and updated at least annually, or as determined by the GTSB. The match funds must relate to the program type of the funding source. For all match funds identified and documented by the GTSB, no other program (federal, state or local) may utilize the same dollars as program match.

Section 8.02: Matching Requirements

The GTSB may fulfill federal match requirements by using state resources which are identified in the 3HSP. For this reason, the GTSB may not require subrecipients to match program costs using local funds. The GTSB's match need not be in actual funding dollars (referred to as a hard match), but may be personnel or volunteer time, equipment and/or operating expenses (referred to as a soft match).

Federal match in P&A costs may not exceed 50% of the total cost of P&A or be in accordance with a sliding scale, if applicable. The federal contribution for P&A may not exceed 18% of the total funds the GTSB receives under Section 402.

Chapter 9 - Federal Grant Tracking System

Section 9.01: Overview

NHTSA developed the Grant Tracking System (GTS), which automates the federal grant financial information process. GTS enables the GTSB to produce the required federal financial documents at the program area level and electronically transmit them to NHTSA's Accounting Department.

Section 9.02: Types of GTS Transactions

Types of GTS Transactions

GTS handles five major types of automated transactions that are detailed below. Each transaction type depends on the order of completion, validity and accuracy.

- **Obligation Limitation** – Establishes the amount of federal funds available for expenditure under Section 402 and Section 405. *If applicable* Section 154, Section 164 and Section 1906 grant funds are also included. The amount of each of these funds available for the "Obligation Limitation" are downloaded into GTS.
- **Obligation Cost Summary** – Produces financial documents that obligate funds for the federal computerized accounting system. The overall process involves entering obligations for the current year and carry-forward funds into the GTS system. All entered information is verified and posted. After all posting has been processed, GTS automatically sends an electronic approved copy to the NHTSA Regional Office and the Federal Accounting System.
- **Advance of Funds** – This allows Iowa to request federal funds electronically and prior to submission of a voucher. Prior to requesting federal funds or an advance request, federal funds must be obligated.
- **Advance Reduction** – Only states or territories using the advance method of reimbursement with an outstanding advance balance can complete this transaction. Advance reduction transactions result when the GTSB issues a check to NHTSA for either reducing an outstanding advance balance or paying NHTSA an amount owed that resulted from an audit finding. Paying an amount that resulted from an audit finding can also be accomplished through a Voucher Reduction transaction.
- **Voucher** – Voucher transactions allow the GTSB to process vouchers. Expenditures of funds must have a voucher at the same level that the funds were obligated at the program, project, task or sub-task level. The GTSB Finance Manager will coordinate with the NHTSA Regional Program Manager if a voucher reduction is needed.

Section 9.03: Reports

GTS Reports

A variety of GTS reports are available to streamline GTSB's fiscal management process and reduce the workload associated with meeting federal reporting requirements. These reports include:

- **3HSP Transactions** – Itemizes all highway safety program transactions, provides detailed information on Federal funds and assists in determining data entry errors.
- **3HSP Cost Summary** – Provides detailed information by project, program area and specific

funding sources subtotaled by NHTSA fund sections. The format of this report replicates the Federal HS-217 Cost Summary Form and shows the increase or decrease for each program area. This report may be printed in detail, showing each project or task, or summarized by program level amounts only.

- 3HSP Approved Program Amounts – Details the same information as the 3HSP Cost Summary report but does not report the decrease or increase for each program area.
- Obligated Programs Amount – Itemizes all detailed information by project, program area, NHTSA sections or other obligations. It also shows the amount of current and carry-forward funds.
- Voucher Transactions – Details all voucher transactions.
- Status of Obligations and Expenditures – For information only, this report shows the unobligated and unexpended amounts for each program area.
- Status of Current and Carry Forward Funds – Separates the obligations, expenditures and unexpended funds by current fiscal year and carry-forward (from previous years). It also shows federal share-to-local benefit and state and local expenditures.
- Grant Fund Balance Report – This report details each funding section by amount and year received and enables the GTSB to ensure older funding is being expended within the appropriate federal timeframe.

Chapter 10 – Electronic Grant File Maintenance

Section 10.01: Overview

Proper grant file management and maintenance are important internal controls demonstrating the effectiveness and efficiency of the GTSB operations, reliability of financial reporting and compliance with applicable laws and regulations. Careful management of grant files and the documents they contain help to ensure that:

- Projects are established and subrecipients are selected in a legal manner.
- Appropriate management of projects occurs during implementation, including proper disbursement of funds for approved and incurred costs.
- Projects are adequately monitored and evaluated to ensure the effective use of funds.
- Documents are readily available to state and federal auditors, reviewers and managers to verify completed work, legitimate expenditures and adequate oversight.

The electronic grant file consists of documents that are maintained within the grants management system. The grant file contains complete documentation from project or activity application and approval to close out. **Grant files are public documents and subject to public disclosure.**

Section 10.02: Grant File Contents

The grant file is created when a grant application is initiated for the subrecipient. This file is maintained by the GTSB and depending on the grant type and agreement, the grant file may include:

- Grant application and analysis checklist
- Grant award letter and any relevant correspondence
- Certifications and Assurances, and grant terms and conditions
- Risk assessment analysis and documentation
- Grant adjustment or modification documentation

- Time certifications, if the project supports personnel expenses
- Itemized budget
- Reimbursement claims forms (expenditure reports) with supporting documentation, if applicable
- Status reports and activities
- Public information documentation, if included
- Monitoring forms and reports
- Equipment or property inventories and inspection reports
- Approval letter of from the NHTSA Regional Administrator for equipment purchases over \$5,000
- Progress reports
- Data collection and number of training sessions conducted
- Indirect cost approval letter (required)

For the GTSB's internal grants, the following are also maintained in the grant file:

- Vendor/consultant contracts
- Documentation of public information/education supply purchases and distribution
- Documentation of highway safety specific supply purchases and distribution

Section 10.03: Grant File Retention

All contract and grant agreement records, books, documents, papers, accounting records and other evidence of costs incurred, and work performed must be retained for a minimum of three years from the date of the final annual payment, until completion of audits or until pending litigation has been fully resolved, whichever occurs last.

Chapter 11 - Annual Report

Section 11.01: Overview

The Annual Report (AR) describes the accomplishments and challenges of meeting the goals of the 3HSP. The GTSB submits the AR to the NHTSA Regional Office within 120 days after the end of the fiscal year (January 28th). The NHTSA Regional Office uses a checklist to review the AR and provides a written response indicating that it was either accepted or rejected. The review ensures the GTSB adequately followed specific requirements and procedures in developing the 3HSP and AGA and compares the AR content to the goals and performance measures in the 3HSP and AGA to measure performance and progress.

Section 11.02: Annual Report Content and Development Process

The AR development process should take place throughout the year, as funded activities are reported and information becomes available. The AR content includes both a performance report and activity report.

Performance report

The performance report is an assessment of the state's progress in achieving performance targets identified in the most recent triennial 3HSP, as updated by the AGA. Based on the most currently available data, this includes:

- An explanation of the extent of progress in achieving targets that aligns with the 3HSP.
- A description of the activities conducted under the prior year AGA that contributed to meeting the state’s traffic safety performance targets.

Activity report

The activity report is a description of the state’s evidence-based enforcement program activities, including discussion of the effort undertaken to promote community collaboration and support data collection and analysis. This ensures transparency; identification of disparities in traffic enforcement; and the collection of information regarding enforcement policies, procedures and activities. Information regarding mobilization activities such as participating and reporting agencies, enforcement actions, citation information, and paid and earned media must also be included.

The GTSB Bureau Chief reviews the draft AR to identify if more detailed information is needed. The final version of the AR is submitted within 120 days after the end of the fiscal year (January 28th).

The table below outlines the timeline and process for developing the AR.

Timeline	Activity
October 15 – November 1	The GTSB reviews the 3HSP and any amended projects from the previous fiscal year.
November 1 – December 1	<p>The GTSB develops a general description of each funded and implemented project and activity including the total federal fund expenditures (like projects and activities may be aggregated).</p> <p>For each program area, the GTSB develops a general summary of the following:</p> <ul style="list-style-type: none"> • Problem statement • Objectives • Assessment of state progress: <ul style="list-style-type: none"> ➤ Performance measures ➤ Performance targets • Description of each project and activity funded and implemented • Description of how the projects contributed to meeting the target • Federal funding amount expended and the source for each project implemented (part of the final voucher) <p>Paid media projects may be reported within the applicable individual program area or grouped. The GTSB develops any optional sections to be included.</p>
December 1- 15	The GTSB analyzes and assembles data (through November 30) for each 3HSP core, additional and activity performance measure to determine progress in achieving performance targets for the year. The state crash data and trends are updated with the most recent available data.
December 1-20	The GTSB assembles the AR components into a first draft for review.

December 15	The GTSB produces the final voucher and obtains the GTSB Finance Manager's approval.
December 20	The GTSB staff member tasked with drafting the AR, submits it to the GTSB Bureau Chief for final review and approval .
120 Days after end of Fiscal Year	The GTSB submits the final AR to the NHTSA Regional Office. The GTSB distributes copies of the AR to the GTSB email list and posts it on the GTSB web site.

Section 11.03: Annual Reconciliation

Expiration of the AGA and submission of the final voucher

The AGA for the current fiscal year and the state's authority to incur costs under the AGA expires on the last day of the fiscal year. The GTSB must submit a final voucher within 120 days after expiration of the AGA. The final voucher is the final financial reconciliation for the fiscal year. The NHTSA Regional Administrator may extend the submission of the final voucher by no more than 30 days and this extension is granted only in extraordinary circumstances. A written request describing the extraordinary circumstance is required. Approval, if granted by NHTSA, is provided in writing and indicates the new deadline for final voucher submission.

Disposition of unexpected fund balances

Grant funds that remain unexpended at the end of the fiscal year when the AGA expires, are credited to the state's highway safety account for the new (next) fiscal year. These are *carry-forward fund balances* and are made immediately available for use, **provided the new AGA has been approved by the NHTSA Regional Administrator.**

De-obligation of funds

Unexpended grant funds are not available for expenditure beyond a period of three years after the last day of the fiscal year of fund apportionment or allocation. NHTSA must notify the state of the potential fund de-obligation deadline no later than 180 days prior to the actual de-obligation. The state may commit the unexpended grant funds to a specific project by the de-obligation deadline by providing to the NHTSA Regional Administrator written evidence of the fund commitment, including an executed project agreement. These grant funds are committed to the specific project *and must be expended by the end of the next fiscal year.* The final voucher for the project associated with these funds must be submitted within 120 days after the end of that fiscal year.

The expiration of an AGA does not affect NHTSA's ability to disallow costs and recover funds based on a later audit or other review of the state's responsibility to return any funds due to corrections or other transactions.

Section 11.04: Financial Obligation Closeout Summary

The GTSB Finance Manager completes the final accounting of all expenditures in each program for the fiscal year, that includes the following information:

- Federal funds planned and/or obligated
- Amount of federal funds allocated to local benefit
- Cumulative total cost to date
- Cumulative federal funds expended
- Previous amount claimed

- Amount claimed this period
- Special matching rate, if applicable
- Final federal reimbursement voucher and highway safety cost summary

Chapter 12 - Revising the GTSB Policy and Procedure Manual

Section 12.01: Overview

The GTSB PPM is a fluid document and should be reviewed at least annually for applicability and revisions. To document when changes are made, procedures should carry an “effective,” “reviewed” or “revised” date that is within one calendar year of the current PPM date. Program and regulatory revisions received from state and federal sources should be made upon receipt and distributed to staff.

Policies reflect the “rules” governing the management of the state’s highway safety program. They must be written in clear and concise language and address what the rule is rather than how to implement it.

Procedures tell how, when and where to perform work elements and acts. They describe steps taken to attain a result. They do not explain philosophies, justify practices or express opinions. Procedures should be written so that what needs to be done is easily understood and accomplished by the appropriate GTSB staff.

Revisions requiring immediate attention may be initiated at any time.

Section 12.02: Developing a New Procedure or Form

To develop or revise a policy, procedure or form, the GTSB staff should:

- Look at an existing or similar procedure for proper formatting.
- Follow the approved format of the manual when drafting the procedure.
- Determine the purpose and scope of the new procedure and to whom it applies.
- Describe the process:
 - Arrange the steps in order.
 - Describe each step and provide examples or screenshots, if applicable.
 - Note special conditions, cautions and warnings.
 - Ensure the steps in the procedure are consistent with actual practice and the ability of the GTSB staff performing the task(s) governed by the procedure.
 - Identify other procedures/forms impacted and draft any necessary revisions.
 - Forward it to the GTSB Bureau Chief for approval or modification.

Chapter 13 – PPM Editor’s Guide

Section 13.01: Overview

There is a process for maintaining the GTSB PPM that includes keeping track of all document revisions.

Section 13.02: Electronic File Folders

The GTSB staff member who has oversight of the PPM is responsible for creating and maintaining electronic file folders, as needed, to store both the current approved copy and any working copies that are made during the review/update process. The electronic file is stored on the GTSB common drive for access by all staff.

Section 13.03: Annual Review Process

The previous chapter describes the annual review process. The GTSB policies and procedures may be revised outside of this schedule as necessary. A sample of the Policy and Procedure Log format is shown below.

Policy and Procedure Update Log Format

Date	Policy/Procedure	Submitted By	PPM Section or Link to File	Summary of Update

Chapter 14 – Definitions and Acronyms

Section 14.01 – Definitions

These are the definitions for terms regularly used by the GTSB.

Accrued Expenditures	Subrecipient costs incurred for goods and other tangible property received, services performed by employees, contractors, consultants and others.
Accrued Income	The sum of earnings for services performed by the subrecipient for the delivery of goods and other tangible property delivered to others.
Acquisition Cost	The net invoice unit price of purchased equipment including the cost of modifications, attachments, accessories, shipping, or auxiliary apparatus necessary to make the property usable for the purpose for which it was acquired.
Activity Report	Submitted by the subrecipient, as part of the reimbursement process, outlining the activities that took place to support the grant agreement.
Administrative Requirements	Administrative functions common to all grants such as financial management, kinds and frequency of reports and retention of records.
Agreement Designee	The individual designated by the subrecipient’s authorizing official as the point of contact with the GTSB.
Annual Grant Application (AGA)	An annual application made to NHTSA providing project level information on the GTSB highway safety programs. The AGA must align with the 3HSP.
Annual Report (AR)	Describes the accomplishments and challenges the GTSB encountered in the prior federal fiscal year. It addresses progress made in achieving the

	performance measures, targets and strategies identified in the prior year’s Highway Safety Plan (3HSP) as well as how grant funding was expended.
Annual Report - Subrecipient	Submitted to the GTSB by the subrecipient following completion of the grant period, it details the effectiveness of the highway safety project based on the subrecipient’s goals and objectives.
Audit	A review of programmatic and financial records conducted by a certified public accountant, which is the basis of an organization’s legally required audit report.
Authorizing Official	The subrecipient agency individual that has legislative authority to enter into an agreement with the GTSB.
Buy America Act	Prohibits the use of highway safety grant funds to purchase products, unless they are manufactured in the U.S. This prohibition applies to steel, iron and all manufactured products, unless the Secretary of the USDOT determines it is appropriate to waive the Buy America Act requirement. For compliance purposes, American-made is defined as any product that is manufactured or assembled in the U.S.
Catalogue of Federal Domestic Assistance (CFDA)	A listing of all federal programs available to state and local governments; federally recognized Tribal governments; U.S. territories and possessions; domestic public, quasi-public and private profit and nonprofit organizations and institutions; specialized groups; and individuals. The CFDA number is required on all grant award letters.
Code of Federal Regulations (CFR)	A listing of general and permanent rules published in the Federal Register by the Executive Branch of the U.S. government.
Countermeasures that Work	Produced by NHTSA, this publication is used by the GTSB to select effective, evidence-based countermeasures to address traffic safety problems.
Distracted Driving Program	A program to enforce a statute prohibiting distracted driving.
Equipment	Non-expendable, tangible property having a useful life of more than one year and an acquisition cost of \$5,000 or more used only for traffic safety purposes.
Equipment Tracking System	The subrecipient’s systematic record of all equipment purchases over \$5,000.
Expenditures	Charges made to the project or program, which may be reported on a cash or accrual basis.

Fatal Analysis Reporting System (FARS)	The nationwide database providing NHTSA with yearly traffic safety data regarding fatal injuries suffered in motor vehicle traffic crashes.
Federal Funding Accountability and Transparency Act (FFATA)	A federal database where prime grant award and prime contract recipients report sub-award activity and executive compensation.
Federal Highway Administration (FHWA)	The USDOT agency responsible for administering infrastructure highway programs and projects funded by federal legislation.
Governors Highway Safety Association (GHSA)	The nonprofit association representing state and territorial highway safety offices. GHSA works with and for its members to improve traffic safety, influence national policy, enhance program management, and promote best practices for highway safety offices.
Grant Agreement	A binding document between two or more parties detailing the conditions and terms for the project scope of work and financing. May include interagency agreements.
Grant Tracking System (GTS)	The federal web-based system used to track grant funds and request reimbursement from NHTSA for grant expenditures made by the GTSB.
Highway Safety Plan (3HSP)	The three-year safety plan the GTSB submits to NHTSA for federal transportation grant funds. The 3HSP must be data-driven in establishing performance targets and selecting countermeasure strategies for programming funds that meet the performance targets.
Highway Safety Improvement Program (HSIP)	Core FHWA program to reduce traffic fatalities and serious injuries on all public roads, including roads on Tribal land. The HSIP requires a data-driven, strategic approach with a focus on performance.
Infrastructure and Investment Jobs Act (IIJA) or (BIL)	The funding and authorization bill governing the highway safety grant program. This act is also known as the Bipartisan Infrastructure Law (IIJA).
Impaired Driving Program	A program to address alcohol and/or drug-impaired driving.
Law Enforcement Liaison (LEL)	The individual responsible for promoting Iowa law enforcement agencies' involvement in the 3HSP through education and equitable enforcement of traffic safety laws.
Local Government	A county, municipality, city, town, township, local public authority, school district, special district, intrastate district, council of governments or any

	other regional or interstate government entity, agency or instrument of a local government.
Motorcycle Safety Program	A program to reduce traffic crashes involving motorcyclists.
National Highway Traffic Safety Administration (NHTSA)	The USDOT agency responsible for administering the national behavioral highway traffic safety grant program funded by federal legislation.
Nonmotorized Safety Program	A program to target a decrease in pedestrian and bicyclist fatalities and injuries resulting from crashes involving motor vehicles.
Occupant Protection Program	A program that promotes proper and lawful use of child safety seats and seat belts to reduce unrestrained motor vehicle occupant deaths and serious injuries.
Office of Highway Safety (GTSB)	The office located within the Iowa Department of Public Safety, Office of the Commissioner, responsible for the implementation and management of the state’s behavioral highway safety program.
Office of Management & Budget (OMB)	A Division of the Executive Branch of the U.S. Government that assists the President in meeting policy, budget, management, and regulatory objectives that fulfill statutory responsibilities.
Program Administrator (PA)	The GTSB staff member assigned to manage all aspects of the grant agreement including contract, monitoring, programmatic and financial activity.
Project	Activities proposed or implemented by the GTSB to address highway safety problems falling within one or more program areas.
Project Agreement	A binding document between two or more parties detailing the conditions and terms for the project scope of work and financing. May include interagency agreements.
Project Revision	A change to the project agreement that occurs when the budget, scope and/or activity is/are modified.
Public Service Announcement (PSA)	A message, in the public interest, disseminated at no cost by the media to raise awareness and change public attitudes and behavior about a social issue.
Reimbursement Claim	Details the reimbursable expenditures the subrecipient incurred in support of approved grant activities undertaken to accomplish grant objectives.

Strategic Highway Safety Plan (SHSP)	A statewide-coordinated safety plan that provides a comprehensive framework for reducing highway fatalities and serious injuries on all public roads.
Single Audit	Rigorous, organization-wide examination of an agency that expends federal funds in the amount of \$750,000 or more of all federal funds received annually.
Subrecipient	The local or state government agency, nonprofit or entity receiving a federal highway safety grant from the GTSB.
Supporting Documentation	Reports, invoices, timesheets and other documents a subrecipient submits to the GTSB to support a claim for reimbursement.

Section 14.02 – Acronym Table

Listed below is the table of acronyms used by the GTSB.

3HSP	Triennial Highway Safety Plan
AGA	Annual Grant Application
AR	Annual Report
ATES	Automated Traffic Enforcement System
BIL	Bipartisan Infrastructure Law
GTSB	Iowa Governor’s Traffic Safety Bureau
CFR	Code of Federal Regulations
CFDA	Catalogue of Federal Domestic Assistance
CSP	Child Passenger Safety
DOA	Division of Administration
DPS	Department of Public Safety
FAIN	Federal Award Identification Number
FARS	Federal Fatality Analysis Reporting System
FCH	Federal Audit Clearing House
FFATA	Federal Funding Accountability and Transparency Act
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FSRS	FFATA Sub-Award Reporting System
GHSA	Governors Highway Safety Association
GMM	Grants Management Manual
GR	Governor’s Highway Safety Representative
GSA	Government Service Administration
GTS	Federal Grants Tracking System
GTSB	Governor’s Traffic Safety Bureau
HSIP	Highway Safety Improvement Program
ICDR	Indirect Cost Rate
IIJA	Infrastructure and Investment Jobs Act
ISP	Iowa State Police

LEL	Law Enforcement Liaison
MMUCC	Model Minimum Uniform Crash Criteria
NHTSA	National Highway Traffic Safety Administration
OMB	Federal Office of Management and Budget
PA	Program Administrator
PI&E	Public Information and Education
PPE	Public Participation and Engagement
P&A	Planning and Administration
PPM	Policy and Procedure Manual
SHSP	Strategic Highway Safety Plan
SAM	System for Award Management
SSA	Safe Systems Approach
USDOT	United States Department of Transportation

Chapter 15 - GTSB Resources and Frequently Asked Questions

Section 15.01 – Resources

Title	Resource
3HSP Due Date	23 CFR 1300.11(a)
3HSP Review and Approval Procedures	23 CFR 1300.11(c)(3)
Annual Grant Application Amendment	23 CFR 1300.32
Annual Grant Application Contents	23 CFR 1300.12(b)
Annual Grant Application Due Date	23 CFR 1300.12(a)
Annual Grant Application Expiration	23 CFR 1300.40
Annual Report – Performance Report	23 CFR 1300.35(a)
Annual Report – Activity Report	23 CFR 1300.35(b)
Appeal of NHTSA Written Decisions	23 CFR 1300.36
Apportionment and Obligation of Federal Funds	23 CFR 1300.15
IIJA Definitions	23 CFR 1300.3
Certifications and Assurances	23 CFR 1300.12(b)(4)
Countermeasure Strategies for Programming Funds	23 CFR 1300.11(b)(4)
Equipment Acquisition and Management	23 CFR 1300.31
Financial Management Systems Required	2 CFR 200.302
Funding Conditions for Section 402 Grants	23 CFR 1300.12
Governor’s Representative	23 CFR 1300.4(a)
Grant Non-compliance – Sanctions	23 CFR 1300.51
Internal Controls Required	2 CFR 200.303
GTSB Authority	23 CFR 1300.4(b)
GTSB Functions	23 CFR 1300.4(c)
Performance Plan	23 CFR 1300.11(b)(3)
Performance Report	23 CFR 1300.11(b)(5)
Planning and Administrative Costs	23 CFR 1300.13(a)
Planning Process and Problem Identification	23 CFR 1300.11(b)(1)
Program Income	23 CFR 1300.34

Public Participation and Engagement	23 CFR 1300.11(b)(2)
Risk Assessments	2 CFR 200.332
Section 405 Grants – Scope and Definitions	23 CFR 1300.20(a)(b)
Section 405(b) Grants – Occupant Protection	23 CFR 1300.21
Section 405(c) Grants – Traffic Information System Improvements	23 CFR 1300.22
Section 405(d) Grants – Impaired Driving	23 CFR 1300.23
Section 405(d) Grants – Impaired Driving 24/7 Sobriety Program	23 CFR 1300.23(h)
Section 405(e) Grants – Distracted Driving	23 CFR 1300.24
Section 405(f) Grants – Motorcycle Safety	23 CFR 1300.25
Section 405(g) Grants – Nonmotorized Safety	23 CFR 1300.26
Section 405(h) Grants – Preventing Roadside Deaths	23 CFR 1300.27
Section 405(i) Grants – Driver and Officer Safety Education	23 CFR 1300.28
Section 1906 Grant – Racial Profiling Data Collection	23 CFR 1300.29
Vouchers and Project Agreements	23 CFR 1300.33

Section 15.02 – Frequently Asked Questions

The following frequently asked questions are provided to ensure consistency in the response the GTSB staff provides to subrecipients and other highway safety partners.

Q: Can my agency/organization apply for more than one grant and/or a grant that covers more than one program area?

Yes. Please contact the GTSB for details.

Q: This is the first time my agency/organization has applied for funding and we don't have local data or statistics. What should we do?

The GTSB can provide statewide and local data to support problem identification. Please contact the GTSB for assistance with your data needs.

Q: Can the grant recipient's project director delegate subrecipient-related responsibilities to another agency/organization employee?

Yes. However, the GTSB must be informed of this action.

Q: Why does the GTSB conduct an onsite monitoring visit?

These visits ensure the grant funds are in alignment with the activities described in the grant agreement. Additionally, these visits are also required for specific subrecipients based on the GTSB policies and procedures and National Highway Traffic Safety Administration requirements.

Q: What should be included in my agency/organization's performance report?

Your agency or organization's performance report should include activities conducted throughout the year that are tied to grant objectives. The GTSB will work with your agency or organization on the number of required reports and what information should be included.

Q: Must my agency/organization submit a claim to the GTSB every month even if we haven't spent any grant funds?

No.

Q: If my agency/organization doesn't spend all our grants funds in the current year, what happens to the money?

Remaining funds in your grant agreement may not be rolled over from one fiscal year to the next, even if your agency/organization is awarded a new grant for the same or a similar project. The GTSB redistributes any unused funds in the next fiscal year.

Q: What documentation is needed for overtime reimbursement?

Paystubs or an automated report are sufficient to verify overtime reimbursement. The GTSB staff will coordinate with you on the required documentation.

Q: What equipment may be purchased with grant funds?

Any equipment purchased using grant funds must have a traffic safety focus. All equipment purchases of more than \$5,000 must be approved by the NHTSA Regional Administrator before ordering. The GTSB staff will work with you to address equipment purchases and obtain NHTSA approval, as necessary.

Q: How long must my agency maintain and track equipment purchased with grant funds, and if the equipment is destroyed, must it be reported?

Generally, your agency must maintain the equipment for three to five years as determined by the GTSB. The GTSB staff will work with your agency to address inventory and tracking issues. If equipment purchased with grant funds is destroyed, you must report this to the GTSB immediately.

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