



## **Administrative Guidance:**

### **Expenditure Tracking and Reporting**

The State Plan for Assistive Technology (AT) is submitted annually - usually each spring. A new component of the State Plan for 2018 requires each grantee to report actual expenditure data tracked by specific categories as outlined in the AT Act. This document provides administrative guidance on tracking and reporting expenditure data to meet this new State Plan requirement.

#### **AT Act Requirements for Expenditure Tracking**

Section 4(e)(3)(A) of the AT Act requires States to use not more than 40% of an annual award to carry out state leadership activities if the state does not use flexibility. If a state does claim flexibility in their approved State Plan, Section 4(e)(6)(B)(ii) of the AT Act requires the State to use not more than 30% of an annual award to carry out state leadership activities. (See next paragraph for definition of flexibility). In both cases, Section 4(e)(3)(A) of the AT Act requires all States to use at least 5% of the state leadership funds for transition training or technical assistance activities.

Section 4(e)(6) of the AT Act allows a state to carry out any two or more of the required state-level activities, meaning a state can choose not to conduct up to two activities. If your state has claimed flexibility for a state level activity in a given fiscal year, you do not report data for that activity during that fiscal year and the grant award for that fiscal year would be subject to a maximum 30% of total expenditures for state leadership activities.

#### **Categorizing Expenditures**

The AT Act requires states have a mechanism in place to accurately track all AT Act expenditures by grant award fiscal year and by the categories of state level and state leadership activities. Most direct expenditures like salaries and benefits, contractual expenses, and direct service expenses will be readily attributable to a state level or state leadership or transition

activity. For example, expenditures for purchasing equipment for a device loan program will be state level expenses while staff salaries and travel expenses to deliver training will be state leadership.

One helpful mechanism for determining if an expense should be categorized as state level, state leadership or transition is to identify where the data associated with that expense is reported. Since most all State AT Program activities should have associated data reported, where such data is reported (state level or state leadership activities) provides a good indication of how the expenditures should be categorized. Most staff salaries and benefits can be assigned in total or in pro-rated percentages to state level or state leadership depending on staff job responsibilities and any time and effort logs required for federal record keeping purposes.

For very generic administrative and operational expenditures, like paper, general office supplies, and similar expenditures, an arbitrary ratio allocation can be used such as a 50/50 split. A more accurate pro-ration split can be used in areas where there is sufficient justification to do so. For example, if the personnel split between State Level and State Leadership is 55% State Level and 45% State Leadership, then it would be logical to apply that ratio to office space utility expenses if the space correlates closely with staff positions.

If an indirect cost rate is used, the arbitrary ratio allocation (e.g. 50/50) can be applied to that amount for purposes of reporting by state level and state leadership categories. Please note that any general administrative expenditures should be limited to a small portion of the federal AT Act grant award as the vast majority of AT Act award dollars should be allocated for direct program service costs rather than administrative and overhead costs. It is very difficult to justify claiming the 10% indirect rate allowed by the AT Act along with pro-rated additional administrative costs as direct expenses (usually done as a pro-rated cost allocation plan).

Section 4 AT Act grantees are strongly encouraged to use either the 10% indirect provision to support administrative and overhead costs OR a cost allocation plan where administrative and overhead costs are pro-rated as direct cost expenditures, but not both. Using both mechanisms to pay for administrative costs creates a significant risk for duplicative expenses for same/similar cost items and potential audit findings. Claiming both a 10% indirect rate and direct administrative expenses will also divert a significant amount of available federal funding from support of AT services.

Advisory Council expenses can be pro-rated based on the typical work of the Council. If the agenda topics are routinely balanced between state level and

state leadership activities then a 50/50 split might be appropriate. If the Advisory Council focuses more energy on administrative oversight or policy issues, then a more appropriate split might be 25% state level and 75% state leadership. If the Advisory Council serves any purpose other than that outlined in the AT Act, expenses should be based on less than a 100% total charging to the AT Act grant only the portion of time dedicated to AT Act activities.

Similarly, professional development expenses can be pro-rated based on the typical work responsibilities of those attending (e.g. how they will apply the knowledge gained via the professional development in their job) or it may be more appropriate to allocate such expenses based on the content of the professional development especially if the training activity is narrowly focused on state level or state leadership activities. Very general professional development (e.g. all staff diversity training) can be allocated using arbitrary splits if that is most efficient. For example, professional development expenses for a staff person who oversees the device loan and demonstration program to attend ATIA and CSUN each year to remain current on AT products could be categorized as 100% state level corresponding to the person's FTE classification. A person whose job responsibilities are split between state level and leadership (60%/40%) attending the same conferences could have those travel expenses allocated using the same percentages aligned with the FTE categorization.

The expenditure tracking system used by grantees should be able to consistently categorize expenditures as state level, state leadership or transition based on a clear rationale for each categorization or prorated split.

## **State Plan Expenditure Reporting**

The first expenditure data table in the State Plan is for the closed-out carryover fiscal year AT grant award that was fully liquidated the previous December 31st. (Please note, this data is for a specific year AT Act grant award amount, NOT any specific 12 month period of time as funds from a grant award can be obligated over a 24 month period.) For example, a State Plan submitted in the spring of 2018, the most recent closed-out carryover year grant award will be the FY16 grant award that began 10/1/2015 with the first year ending on 9/30/2016 and the second carryover year ending on 9/30/2017 with 3 month liquidation period ending 12/31/2017.

The actual expenditures for this fiscal year award will be reported by:

- All State Level Activities (State Financing, Reuse, Device Loan, Device Demonstration).

- All State Leadership Activities (All other activities including Training, Technical Assistance, Public Awareness, Information and Assistance, etc.)
- Transition Training and Technical Assistance which will be a duplicate number that is included in the All State Leadership Activities total.

The State Level Activities calculated percentage must be at least 60% of the total award unless the state claimed flexibility in which the percentage must be at least 70%.

The State Leadership Activities calculated percentage must be no more than 40% of the total award unless the state claimed flexibility in which the percentage must be no more than 30%.

The Transition Training and Technical Assistance calculated percentage must be at least 5% of the expenditure amount reported for State Leadership Activities.

The total of all expenditure data must equal the total amount of funds drawn down in the ACL Payment Management System. If you have not liquidated all the funds available in the fiscal year award, your state will have lapsed funding.

The second expenditure data table in the State Plan is for year-to-date (YTD) obligated and liquidated expenditure data for the immediate preceding fiscal year AT grant award along with planned budget allocations for any unobligated remainder of that award. Please note, this data is for a specific year AT Act grant award amount, NOT any specific 12 month period of time as funds from a grant award can be obligated over a 24 month period. For example, a State Plan submitted in the spring of 2018, the immediate preceding fiscal year award will be the FY17 grant award that began 10/1/2016 with the first year ending 9/30/2017 and the second carryover year ending 9/30/18.

The actual year-to-date (YTD) liquidated expenditures for this fiscal year award will be reported in the same categories of All State Level Activities, All State Leadership Activities, and Transition Training and Technical Assistance as is reported in the first table. In addition, YTD obligated but not yet liquidated expenditures will be reported in those same categories along with planned or budgeted expenditures that are not yet obligated. All three of these summed will equal the total grant award amount.

Obligations are binding commitments for goods or services. Obligations include the amounts of orders placed, contracts and sub-grants awarded,

goods and services received, and similar transactions during a given budget period that require payment by the grantee that has not yet been made. Liquidations are payments for obligations.

## **Budgeting Cycle**

The budgeting cycle for a Section 4 AT Act grantee should identify a specific target date for obligation and liquidation the entire fiscal year grant award long before the final deadline for each. This is especially true when grant funds are used for external contracts for which there is no guarantee of funding being liquidated by the final deadline date. The obligation deadline for all grants is September 30 of the carryover year – 24 months from the award date. The liquidation deadline is December 31 of the carryover year – 27 months from the award date. A recommended budget cycle sets April 1 in the carryover year as the target date for liquidation of all funds in the prior fiscal year award. This target date provides ample time to address contractors not submitting invoices on time or other unexpected situations resulting in liquidations not occurring as expected.

Applied to a single fiscal year award, an appropriate budgeting cycle is as follows:

- Award start date of October 1
- Obligate and liquidate that award in the next 18 months
- Target liquidation date of April 1
- April through September is available to de-obligate and re-obligate if necessary
- October through December is available to liquidate if necessary

Using this kind of budgeting cycle will help ensure that all grant funds are liquidated in a timely manner.

*This document is part of a series of administrative guidance documents developed and produced by the Assistive Technology Act Technical Assistance and Training (AT3) Center funded by Grant #90ATTA0001-01-00 from the Administration for Community Living (ACL). Any opinions reflected herein are solely the responsibility of the authors and do not necessarily represent the official views of ACL.*