



DRIVER & MOTOR VEHICLE SERVICES TRANSPORTATION SAFETY OFFICE

Grant Procedures Manual

2025

Contact Information

Driver and Motor Vehicle Services Transportation Safety Office

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Chapter 1 – Introduction

Section 1.01: Purpose

The Oregon Transportation Safety Office ([TSO](#)) is located within the Oregon Department of Transportation, Driver and Motor Vehicle Services ([DMV](#)) and is responsible for administering the Federal Highway Safety Grant Program funded by the National Highway Traffic Safety Administration ([NHTSA](#)) as well as State funds. The program goal is to help Oregon eliminate death and serious injuries resulting from motor vehicle crashes by implementing proven strategies and countermeasures that address risky roadway user behaviors and prompt change. TSO provides grant funding at the state and community level for data-driven initiatives that will help the state achieve its traffic safety goals. **This Grant Procedure Manual (GPM) is intended to help grantees, or subrecipients understand the highway safety fund (grant) application and administrative processes and requirements.**

Section 1.02: Grant Program Funding Overview

TSO funding, which is awarded to the state by NHTSA, includes the State and Community Highway Safety Program (Section 402) and the National Priority Safety Program (Section 405). Both programs are included in the five-year, national transportation funding bill known as the Infrastructure Investment and Jobs Act ([IIJA](#)), also known as the Bipartisan Infrastructure Law ([BIL](#)).

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.
- Reduces crashes caused by drivers engaged in unsafe driving 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 school-based 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.

Section 405

TSO decides which Section 405 programs it will participate in. As an example, 405b means funding for the Section 405 incentive program and the “b” means subsection “Occupant Protection”. If TSO decides to apply for “Occupant Protection” funding then the criteria outlined in the 405b application must be met in order to secure the funding.

TSO must apply for this “incentive funding” or ‘priority safety programs’ on an annual basis. If awarded Section 405 funds, they may be used for the following programs:

- Occupant Protection (405b)
- Traffic Safety Information Systems (405c)
- Impaired Driving Countermeasures (405d)
- Distracted Driving (405e)
- Motorcycle Safety (405f)
- Nonmotorized Safety (405g)
- Preventing Roadside Deaths (405h)
- Driver and Officer Safety Education(405i)

Chapter 2 – Triennial Highway Safety Plan Development

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, TSO develops a Triennial (three year) Highway Safety Plan ([3HSP](#)) along with an Annual Grant Application ([AGA](#)) and submits both documents to NHTSA. These documents outline and implement a data-driven highway safety program that uses proven countermeasures to help address unsafe behaviors such as speeding, impaired and distracted driving, and not buckling up that are factors in serious injury and fatal motor vehicle crashes. For innovative countermeasures, TSO must explain the strategy and identify the source used to determine the proposed effectiveness. In year three of the current 3HSP, TSO must once again prepare and submit to NHTSA an AGA that supplements and updates the 3HSP, as well as planning for the next 3HSP.

Section 2.02: Traffic Safety Problem Identification

Identification of roadway traffic safety problems is conducted on a statewide basis for each program area. Problem identification is the process of gathering and analyzing data and information from a variety of sources and using what is learned to prioritize limited resources for the implementation of proven and innovative countermeasures that will help prevent crashes. Gathering and analyzing data and other pertinent information, along with conducting meaningful public participation and engagement, are the strategic approach TSO uses to guide the problem identification process. This approach ensures TSO understands the extent of the traffic crash problem with a focus on identifying the geographic areas where crashes are occurring and the appropriate strategies to help address them.

Numerous data resources are used to determine and prioritize the state's traffic safety problems. These include federal priorities, past evaluations, recommendations from the most recent NHTSA program assessments, and the latest edition of NHTSA's [Countermeasures That Work](#).

The problem identification process includes, but is not limited to, the analysis of data obtained from the following sources:

- Fatality Analysis Reporting System (FARS)
- Oregon Department of Transportation (ODOT) Statewide Crash System ([TDS](#) and [CAR](#))
- Law Enforcement Data System (LEDS)
- Safety Priority Index System (SPIS)
- Geographic Information System Mapping Technology (GIS)
- Driver and Motor Vehicle Services (DMV)
 - Driver Records
 - Vehicle Records
- Criminal Justice Information System

- Seat Belt Usage Observations Study
- Public Opinion Survey
- Project Evaluations
- Center for Population Research and Census, Portland State University
- Driver Education Records, Western Oregon University
- Motorcycle Safety Education Program

TSO uses statistical analysis for problem identification. Comparison data is developed, where possible, addressing crash costs, numbers of crashes and the number of deaths and injuries. Supplementary data on helmet use by motorcyclists and bicyclists, child safety restraint and seat belt use are pulled from the data source along with available violation, suspension and arrest information. Problem or focus area reduction goals and performance measures are selected based on the severity of the problem, economic costs and availability of subrecipient agencies to conduct successful programs. Upon request, data centered around highway safety is available from TSO for subrecipient usage.

Public Participation and Engagement

Highway safety problem identification not only involves data collection and analysis, but also meaningful public participation and engagement (PP&E) from communities affected by traffic crashes that result in death and serious injury. PP&E 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 PP&E 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 includes:

- **Engagement Planning:** This is the description of 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 strategies for programming grant 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 engagement efforts in the highway safety planning process that include:
 - The steps taken 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 safety programs that will be undertaken during the 3HSP cycle that include:
 - A statement of the goals for the public engagement efforts.
 - Identification of the affected and potentially affected communities, particularly those that are underserved or overrepresented.
 - The planning steps taken 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:

- Planning
- Engaging
- Evaluating and reporting
- Consideration of input pertaining to future programs

TSO staff attend meetings with federal, state and local government partners and subrecipients throughout the year to identify problems and strategic priorities for the PP&E. The staff that attend regional NHTSA meetings, the GHSA Annual Meeting and the national LifeSavers Conference, among other meetings, also gain knowledge in identifying highway safety problems.

Chapter 3 – Subrecipient Project Development and Grant Applications

Section 3.01: Project Development

Each project considered by a local agency must address an emphasis area identified in the 3HSP, be data-driven and utilize proven and/or promising countermeasures that will help TSO 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.

The federal fiscal year runs from October 1 through September 30. Projects are funded for one fiscal year and must coincide with the federal fiscal year. The state fiscal year runs from July 1 through June 20. Projects are funded for one year and must coincide with the state fiscal year. Project applications may be submitted to TSO in accordance with the timelines established by TSO.

Section 3.02: Grant Application

TSO must determine if the agency or organization applying for a federal, or state, highway safety grant is eligible and has the appropriate expertise, leadership and authority to properly implement and manage the proposed project. Eligible agencies or organizations must be able to:

- Deliver services promptly.
- Manage public funds efficiently.
- Have internal management and financial controls in place.
- Collaborate with other communities and government and/or 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.
- Provide payroll verification.

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

Proposed projects should have SMART (**S**pecific, **M**easurable, **A**ctionable, **R**ealistic, **T**imely) goals and include:

- Activities that show a logical sequence of events that will be undertaken to accomplish the project goal(s). The proposed activity must either be a best practice or proven strategy supported by research, or an approved demonstration project designed to test an innovative approach. In selecting countermeasure activities, the proposal should identify both the target area and audience. Applicants must detail how they will evaluate the effectiveness of their project toward achieving the planned goals. Evaluation is expressed in terms of what will be **measured** (numbers, attitudes, knowledge, etc.), what will be accomplished or what will change. Evaluation is essential for determining a project's effectiveness and efficiency.
- Clearly defined performance measures.
- A detailed budget that indicates how the funds will support the proposed project should have the following line items: personnel costs, personnel benefits, equipment, materials/printing, overhead/indirect costs, training/travel, office expenses, other direct costs, and consultation/contractual services, as appropriate.

Project proposals are reviewed by the Program Analyst (PA) (or Program Manager) responsible for the program area as well as other TSO PAs. The following questions help guide TSO staff as they conduct a technical analysis of each proposal:

- Has a behavioral traffic safety problem been adequately identified and appropriately described in the problem statement?
- Do the objectives, targets, and performance measures directly address the identified problem?
- Are the objectives clearly stated and achievable?
- Is sufficient time allocated to achieve each objective based on the proposed completion date?
- Will performance measures align with the project activity and objectives?
- Will any special equipment be needed and, if so, will it be available for project implementation? Is funding needed to purchase the equipment?
- Are there other considerations that might affect subrecipient performance? If so, are they adequately addressed?

TSO reviews and rates each proposal to determine the level of funding to be awarded. Successful candidates are notified of reporting and fiscal requirements. Unsuccessful candidates are informed their project was not selected and the reason why.

Application Review

All submitted applications are collected, given a unique identifier and logged into a database containing summary information and then assessed for risk. TSO staff distributes applications to Review Committee members for an initial independent review.

The Committee meets to determine which applications will be recommended or adjusted for funding and at what level. Evaluation of each application considers the following:

- Applicant's eligibility (political subdivisions and nonprofit organizations) and past performance (if applicable)
- Eligibility of the emphasis area
- Conformity to program strategy
- Extent of need, based on data, for the project or program
- Is the project utilizing proven countermeasures to combat the identified problem?
- Whether there are measurable goals and objectives
- Strategies and activities are suitable for achieving stated goals and objectives
- Participation in state highway safety campaigns or attendance at transportation safety events
- Budget and cost effectiveness
- Adequacy of agency resources and the ability of the applicant to carry out the program
- Size of community served
- TSO grant risk assessment results

If the application is incomplete, the submitter will be notified of the actions needed to complete it. Once the missing information is provided, the application is considered filed on the original date received. Notification that the application is accepted for review is made within SGMS.

Application Selection

Upon final review of each application, the TSO Review Committee will recommend one of the following actions: approve, approve with special conditions or modifications, or reject.

The Review Committee may request modifications to the application budget to meet funding targets. Requests for any changes to the application may also be made by the applicant. The revised application is then submitted to TSO for final approval.

Final approval of a grant application occurs when the grant agreement is signed by the submitting organization's (subrecipient) authorizing official and project director as well as TSO. TSO notifies the subrecipient, in writing, of their grant award and are emailed a copy of their signed grant agreement, including all contract conditions. Applicants that are rejected receive written notice from TSO.

Chapter 4 – Grant Agreement

Section 4.01: Overview

The process from grant proposal to a fully executed grant agreement can take several months. TSO PAs guide the process to ensure no project activities are conducted *prior to* the completion of a fully executed grant agreement (if so, costs for those activities cannot be reimbursed by TSO). The agreement includes terms and conditions, detailed project descriptions, the approved budget and the required Agreements and Assurances. The grant agreement must be signed by the agency or organization's authorizing official (individual with contracting authority) and submitted to TSO. The agency's authorizing official must also certify and assure that all the conditions contained in the Agreements and

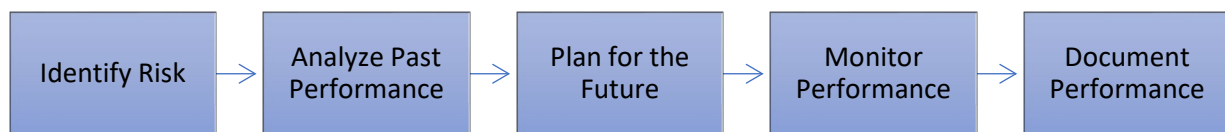
Assurances, along with reporting and invoicing requirements, including any special conditions, will be met. Once a grant agreement is signed by the agency's authorizing official and TSO, it is a legally binding document.

Section 4.02: Risk Assessment, Pre-Grant Conference and Grant Agreement

Risk assessment

TSO will 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 or required. 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.

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



Subrecipients are evaluated for risk based on the following:

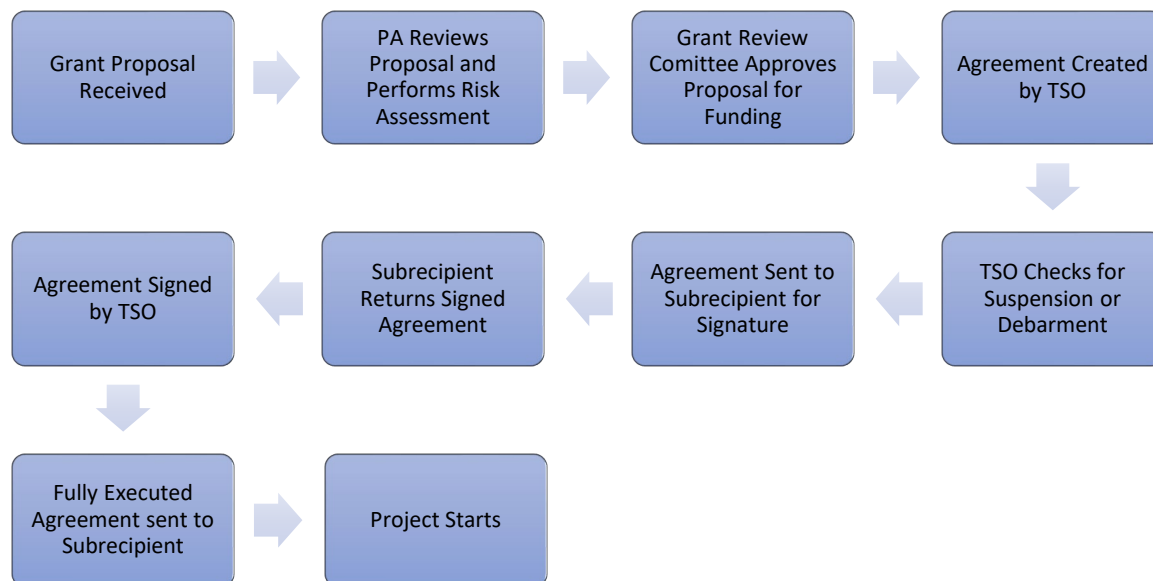
- Experience with TSO grants
- Previous monitoring results
- Single audit results
- Consistent staffing and
- Past performance

Subrecipients determined to be low risk are subject to standard TSO monitoring. Subrecipients that are assessed as high-risk are subject to the same monitoring as low risk entities but with additional monitoring activities. ***TSO must conduct a risk assessment prior to fully executing each grant agreement.***

Grant Agreement

The Project Director of the grantee agency agrees to comply with the requirements of the grant agreement. When the grant agreement is finalized, the original document is signed first by the authorizing official of the subrecipient agency and then by TSO. The signature of the authorizing official indicates the subrecipient agency will adhere to the conditions set forth in the grant agreement. **The subrecipient agency may not expend any funds until they receive a “notice to proceed” from TSO.** This notice may be by letter, email, or TSO grants management system.

The graphic below illustrates TSO grant agreement workflow.



Once the grant has been executed, TSO will reimburse the subrecipient for expenditures related to approved grant activities. The objectives outlined in the grant agreement must be accomplished during the grant period, and expenditures must align with the approved budget. **Costs incurred before the effective date or after the end date of the grant agreement period will not be eligible for reimbursement.** Reimbursement of costs claimed may not exceed the obligated federal funds. Reimbursement is contingent upon subrecipient compliance with grant requirements, **and** sufficient funds being appropriated and obligated by the federal government. TSO makes neither representation nor guarantee regarding the availability of federal highway safety funds.

Chapter 5 – Agency Responsibilities and Procedures

Section 5.01: Establish Procedures

The agency or organization receiving grant funds is responsible for establishing and maintaining procedures to ensure effective administration of the grant, including the timely completion of the grant objectives. A TSO PA is assigned to oversee each grant and conduct training for new subrecipients. The training is designed to review the controls and record keeping necessary for proper grant administration.

Section 5.02: Grant Revisions and Time Extensions

Grant Revisions

Any changes made to the executed agreement must be made in writing. All revisions to a TSO grant agreement, whether programmatic or fiscal, must be fully documented and approved by TSO prior to the performance of work outlined in the revision. TSO reserves the right to limit grant amounts at any time based on performance and/or available funding.

Any deviations from the approved grant **require** *prior* written approval from TSO including:

- Changes to the approved scope of work
- Changes to the approved work plan or activities
- Changes to the approved budget
- Changes to the project date
- Change in grantee agency staff (Authorizing Official; Project Director; or Delegate)

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

- Subrecipient submits an electronic request for a revision that includes justification for the change.
- The request is reviewed by the PA.
- The subrecipient is notified via letter or email if the revision is approved. If it is not approved, the notification includes the reason for the denial.
- If the revision requires a change in the 3HSP or AGA, TSO submits an amendment to NHTSA for review and approval. Approval from NHTSA is required before the grant agreement is modified.

Time Extension

If a project does not start on time or is delayed, a time extension may be needed. No additional funding will be provided for a time extension, nor does an extension provide additional time to submit a claim for costs already incurred. All grant costs for the prior fiscal year must be claimed by November 5 of the fiscal year in which the grant was awarded. Time extensions are exceedingly rare and must be approved by TSO and NHTSA.

Section 5.03: Travel

Reimbursement for out-of-state travel expenses by subrecipients requires prior approval from TSO and NHTSA. To request approval for out-of-state travel, a subrecipient must ensure the grant agreement includes a provision for the travel and that there are sufficient funds to cover the cost of the trip. Participants in out-of-state travel must conform to the [policy](#) established by the Oregon Department of Administrative Services (DAS).

Section 5.04: Noncompliance and Termination

TSO will impose sanctions in the event of noncompliance or violation of any grant provision by the subrecipient agency and/or its subcontractor(s). Appropriate sanctions may include, but are not limited to, withholding of payments, suspension or termination of the grant in whole or in part. In the event of termination, TSO will notify the subrecipient agency 30 calendar days in advance of the termination effective date. The subrecipient agency will be paid only for those services satisfactorily performed and allowable prior to the effective date of termination. If any equipment purchased with federal funds is not being used effectively to achieve the grant goals, the agency or organization may be required to return the equipment to TSO.

Section 5.05: Disputes and Disagreements

Any dispute, disagreement or question of fact concerning the grant will be decided by TSO. The decision will be made in writing and distributed to the concerned parties. The subrecipient agency or organization may then proceed with the performance of the grant in accordance with the decision. If the subrecipient agency or organization disagrees with the decision of TSO, it may be appealed to the DMV

Administrator. The appeal must be made in writing within 30 days of the TSO decision. The subrecipient must first appeal to TSO and then to the DMV Administrator before taking legal action.

Chapter 6 – Financial Management

Section 6.01: Overview

The subrecipient is responsible for maintaining all grant records and must ensure the agency or organization has a cost accounting system conforming to generally accepted accounting principles. The subrecipient is not required to establish a special accounting system for grant costs; however, a good policy is to establish special sub-accounts within its existing accounting system. Storing all financial records pertaining to the grant in the TSO grants management system is recommended. This will make it easier for the subrecipient to respond to questions regarding the grant. All records must be kept for a minimum of three years following grant completion.

Section 6.02: Financial Reporting

To receive reimbursement for grant expenditures, the subrecipient must accurately and completely disclose all financial activity on claims submitted to TSO. All authorized federal funds must be incurred and work performed by the subrecipient on or before September 30 of the current grant year. Only the hours worked during the current fiscal year may be claimed for reimbursement.

Payment Procedures

For an expenditure report to be paid by TSO, the subrecipient must:

- Submit a reimbursement voucher (claim) to TSO **that includes supporting documentation for expenditures claimed.**
- Submit separate claims for expenditures under each federal program funding area for which reimbursement is sought.
- Submit a project activity report at least once per quarter.
- Submit a final activity report and a fully documented final expenditure report by November 5.

Payment Rules

These payment rules apply:

- TSO will not review or process the final expenditure claim until a final activity report has been submitted and verified.
- If either the final expenditure claim or activity report is not submitted by November 5, reimbursement may not be made.
- The November 5 deadline may only be extended by the Governor's Representative for Highway Safety (ODOT-DMV Administrator, Amy Joyce)

Section 6.03: Internal Control

Effective control and accountability for all funds, property and other assets must be maintained by the subrecipient agency or organization. Additionally, the subrecipient agency or organization must adequately safeguard all assets and ensure they are used only for authorized purposes.

Section 6.04: Allowable Costs

Except where otherwise authorized by statute, costs must meet the following 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 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 TSO programs and projects.
- Be accorded consistent treatment. A cost may 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.
- 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.
- For all significant activities and major equipment to be funded with components, both related and unrelated to a highway safety grant, the federal government share will be based proportionately on the projected utilization for federal (NHTSA or FHWA) grant purposes. For example, if the subrecipient agency purchases crash reconstruction equipment that will be used for other crime scene investigations, the expenditure reimbursement will be limited to the portion used for traffic crash investigation.

Chapter 7 – Information and Reports

Section 7.01: Overview

The subrecipient must provide all information and reports required by TSO and permit access by TSO, the Comptroller General of the United States, or any of their authorized representatives, to its books, records, accounts, and other sources of information. In addition, the subrecipient is responsible for preparing and submitting a request for reimbursement (claim) and project activity reports (including a final report) to TSO either each month or quarter as determined by TSO.

Section 7.02: W-9 Taxpayer Identification Number and Certification

W-9 forms are required if the subrecipient is working contractually for TSO, such as individuals conducting the yearly seat belt survey. Otherwise, a subrecipient seeking reimbursement must provide a Unique Entity Identifier number to receive federal funds. The TSO Grants Assistant will assist the subrecipient to register as a vendor.

Section 7.03: Claims for Reimbursement and Activity Report

It is TSO's responsibility to review all claims for reimbursement submitted by subrecipients in a timely manner. The current policy is that the PA must review claims within 10 working days of original submission, unless on approved leave from the office. Once reimbursement claims and activity reports are approved, they are entered in the TSO accounting system for reimbursement. If there are any issues with the reimbursement claim or activity report, the TSO PA will contact the subrecipient.

Expenses cannot be reimbursed by TSO until related activities have actually taken place. For example, airline tickets or conference registrations cannot be reimbursed until the trip has occurred or the conference has been attended.

Section 7.04: Property Management

Federal and State Requirements and Thresholds

For equipment with a useful life of more than one year and an acquisition cost of \$5,000 or more, subrecipients must manage and dispose of equipment acquired with federal grant funds in accordance with NHTSA requirements, and state laws and procedures. TSO must obtain pre-authorization from NHTSA for the purchase of any equipment where a single item has an acquisition cost of \$10,000 or more.

Property Management Systems

Subrecipients must establish and administer a management system to procure, control, protect, preserve, use, and maintain property and equipment. This includes property and equipment furnished directly by TSO or purchased by the subrecipient through a grant, subgrant or other agreement in accordance with the subrecipient's property management procedures, provided the subrecipient procedures are not in conflict with the standards contained in federal property management procedures. 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 highway safety purposes. All equipment should be returned to TSO for disposal at the end of its useful life.

Property Records Requirements

The property management record requirements include, but are not limited to, the following:

- A description of the property
- Manufacturer's serial, model, federal or national stock or other identification number
- Inventory number
- Property funding source, including the Federal Award Identification Number (FAIN) or grant agreement number
- Location where the title is held (generally with the subrecipient)
- Acquisition date
- Percentage of federal share
- 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, including date of disposal and sales price or the method used to determine current fair market value.

Inventory Control

Subrecipients must maintain a property inventory control system to ensure adequate safeguards to prevent loss, damage or theft. Subrecipients must provide a copy of their inventory policies and procedures to TSO and establish adequate maintenance procedures to keep the property in good condition.

TSO 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 required by the applicable property management guidelines. TSO, as part of its oversight responsibility, systematically monitors 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 continues until final disposition of the equipment, including after the grant is closed.

TSO may physically verify the existence and use of each item. This verification is typically completed during onsite monitoring visits. For closed grants, once every two years TSO mails an equipment update

report form to each subrecipient that lists all previously acquired equipment that has not been disposed of. The form must be completed and returned to TSO for review and recording in the tracking system until final disposition. If a subrecipient fails to respond, TSO will contact the agency or organization to obtain the required information.

TSO may conduct an annual physical inventory and issue a report. 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. TSO receives prior written approval from the NHTSA Regional Office for the disposition of equipment with a useful life of one year and a value of \$5,000 or more unless the equipment has exceeded its useful life as determined under state law and procedures.

Upon completion or termination of a highway safety grant, or if it is determined by TSO that equipment is no longer needed for the purpose for which it was acquired, the equipment will become the property of TSO. Once the equipment has been turned over, TSO will take appropriate disposition actions including but not limited to:

- Transfer from federal inventory to state inventory.
- Obtaining a declaration, the equipment is damaged beyond repair or salvage.

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

Section 7.05: Title VI - Civil Rights Act

Nondiscrimination

The subrecipient agency or organization and its subcontractors and/or suppliers may not discriminate on the grounds of race, color, national origin, handicap, or gender in its services and/or programs. The subrecipient agency or organization must fully comply with the provisions of Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, as amended.

Section 7.06: Annual Report - Subrecipient

Subrecipients are required to prepare and submit project updates at least quarterly. In addition, a final annual report and final reimbursement claim are due no later than November 5, unless another due date is specified by TSO. A final annual report, written by the subrecipient, is required for every grant. This report recaps the entire grant year and is used by TSO when evaluating past agency performance for future grant funding.

Writing the report

The final evaluation report can be located in the online grant management system, and it contains prompts for all required information. Additional information can be submitted separately to the digital grant file or by sending it to the assigned TSO PA.

Chapter 8 – Agreements and Assurances

Section 8.01: Agreements and Assurances List

Agreements and Assurances apply to subrecipients and are part of the grant agreement. 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.

By signing the grant agreement, the subrecipient agrees to comply with the following Agreements and Assurances:

- Non-Discrimination
- 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 Helmet Usage
- Policy on Seat Belt Use
- Policy on Banning Text Messaging While Driving

Chapter 9 – Definitions, Acronyms and Frequently Asked Questions

Section 9.01: Definitions

These are the definitions for terms regularly used by TSO.

Accrued Expenditures	Subrecipient costs incurred for goods and other tangible property received and/or 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 were conducted in support of 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 TSO.
Annual Grant Application (AGA)	An annual application made to NHTSA providing project level information on the TSO highway safety program. The AGA must align with the 3HSP.
Annual Report	Describes the accomplishments and challenges TSO 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 Annual Grant Application (AGA) as well as how grant funding was expended.
Annual Report - Subrecipient	Submitted to TSO 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 TSO.
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.
Catalog 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 TSO to select effective, evidence-based countermeasures to address traffic safety problems.
Distracted Driving Program	A program to enforce a statute prohibiting distracted driving.

Equipment – Federal Guidelines	Non-expendable, tangible property having a useful life of more than one year and an acquisition cost of \$10,000 or more used only for traffic safety purposes.
Equipment – State of Oregon Guidelines	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 \$10,000 using federal funds and \$5,000 using State of Oregon funds.
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 managed by NHTSA that provides yearly traffic safety data regarding fatal injuries suffered in motor vehicle traffic crashes. Data are submitted by the states.
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)	<u>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.</u>
Grant Project	Activities proposed or implemented by TSO to address highway safety problems falling within one or more program areas.
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 Adjustment	A change to the project agreement that occurs when the budget, scope and/or activity is/are modified; including change of the subrecipient agency or staff.
Grant Tracking System (GTS)	The federal web-based system used to track grant funds and request reimbursement from NHTSA for grant expenditures made by TSO.

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 Oregon law enforcement agencies' involvement in the 3HSP through education and equitable enforcement of traffic safety laws.
Local Government / Local Political Subdivision	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.
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.
Transportation Safety Office (TSO)	The office located within the Oregon DMV 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 Analyst (PA)	The TSO staff member assigned to manage all aspects of the grant agreement including contract, monitoring, programmatic and financial activity.
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.

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 \$1,000,000 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 TSO.
Supporting Documentation	Reports, invoices, timesheets, and other documents a subrecipient submits to TSO to support a claim for reimbursement.
Triennial Highway Safety Plan (3HSP)	The three-year safety plan TSO 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.
Vulnerable Road User	A vulnerable road user is anyone who is not protected by a vehicle while on the road as defined by NHTSA.

Section 9.02: Acronym Table

Listed below is the table of acronyms.

3HSP	Triennial Highway Safety Plan
AGA	Annual Grant Application
AR	Annual Report
AASHTO	American Association of State Highway Transportation Officials
ATES	Automated Traffic Enforcement System
BIL	Bipartisan Infrastructure Law
CFR	Code of Federal Regulations
CFDA	Catalogue of Federal Domestic Assistance
CPS	Child Passenger Safety
DMV	Driver and Motor Vehicle Services
FAIN	Federal Award Identification Number
FARS	Federal Fatality Analysis Reporting System
FAC	Federal Audit Clearing House

FFATA	Federal Funding Accountability and Transparency Act
FHWA	Federal Highway Administration
FSRS	FFATA Sub-Award Reporting System
GACDUII	Governor's Appointed Committee on Driving Under the Influence
GACMS	Governor's Appointed Committee on Motorcycle Safety
GHSA	Governors Highway Safety Association
GR	Governor's Highway Safety Representative
GSA	Government Service Administration
GTS	Federal Grants Tracking System
HSIP	Highway Safety Improvement Program
HVE	High Visibility Enforcement
IIJA	Infrastructure and Investment Jobs Act
LOI	Letter of Interest
NHTSA	National Highway Traffic Safety Administration
ODOT	Oregon Department of Transportation
OMB	Federal Office of Management and Budget
OSP	Oregon State Police
OTSC	Oregon Traffic Safety Commission
PA	Program Analyst
PI&E	Public Information and Education
PP&E	Public Participation and Engagement
P&A	Planning and Administration
PPM	Policy and Procedure Manual
SAM	System for Award Management
SHSP	Strategic Highway Safety Plan
SSA	Safe Systems Approach
TASP	Transportation Safety Action Plan
TSO	Division of Motor Vehicles Transportation Safety Office
USDOT	United States Department of Transportation

Section 9.02: Frequently Asked Questions

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

Question: Can my agency/organization apply for more than one grant?

Answer: Yes.

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

Answer: Yes.

Question: 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?

Answer: Please log in to the [Oregon Department of Transportation's Crash Analysis Unit](#) to search for your community's crash data. If you need assistance, please contact the TSO Data Analyst at 971-283-5989.

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

Answer: TSO projects require subrecipients to identify the Authorizing Official or Project Director for each grant project. It is not possible to delegate to another agency or organization outside of the subrecipient's agency.

Question: Why does TSO conduct an onsite monitoring visit?

Answer: Calls, letters, and occasional meetings are generally not sufficient to adequately monitor a project, particularly those that are more complex. In some cases, a TSO Program Analyst will need to go on site to review project status, documents, and sub-recipient management and financial systems. The PA will conduct at least one onsite monitoring visit per year for subrecipients meeting any of the following criteria:

- Total cost of the grant agreement exceeds \$50,000
- Grant agreement includes reimbursement of salaries
- Sub-recipient has identified a new project director
- Sub-recipient has a past history of poor performance
- A recent ongoing monitoring identified a potential problem
- The assigned TSO PA feels an onsite visit would be helpful to effective monitoring

Question: Must my agency/organization submit a claim to TSO every month or quarter even if we haven't spent any grant funds?

Answer: Yes, these are called zero claims. These help the subrecipient and TSO Program Analyst stay current on progress being made with the project's activities.

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

Answer: Those funds go back into the TSO general funding for the next year's grant programs; they do not continue as an award to the subrecipient after the end of the grant project year.

Question: What documentation is needed for overtime reimbursement?

Answer: Agency timesheets or records that indicate payroll as well as specific overtime hours worked, and amount paid.

Question: What equipment may be purchased with grant funds?

Answer: Equipment that is applicable and necessary to conduct the activities of the grant project. From the federal perspective, equipment is defined as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds \$10,000. From the state perspective, equipment is defined as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds \$5,000.

Purchasing equipment through federal grant funds requires TSO to seek pre-approval from the National Highway Traffic Safety Administration. Supplies are defined as all tangible personal property other than those described in the definition of equipment above. A computing device is a supply item if the acquisition cost is less than \$10,000, regardless of the length of its useful life.

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

Answer: Subrecipients should maintain and track equipment purchased through grant funds for the useful life expectancy of the equipment. If the equipment is destroyed or used for any other purpose than what was intended in the grant project, even after the project expires, your agency must notify TSO immediately.

Question: I'd like to attend a conference that deals with a topic relevant to my TSO grant. What steps should I take in order to travel using grant funds?

Answer: If you know of the conference when applying for the grant, include those costs in your grant budget request (or as match toward the project). If you don't know ahead of applying for the grant, contact your TSO Program Analyst regarding a potential grant adjustment to allow these costs in your grant project.

Question: I'd like to create a flyer or video about my TSO-funded project. How do I get approval for this?

Answer: Subrecipients must provide TSO with draft copies of all outreach, media, and/or educational materials to be developed using grant funds, and prior to production (regardless of medium: print, broadcast, radio, etc.). TSO must pre-approve production of any materials developed using grant funds. All brochures, course, workshop, and conference announcements, and other materials that are developed and/or printed using grant funds should include the statement "*Funded in whole or in part by Oregon Transportation Safety – ODOT*" which credits TSO.

Question: When will my agency be notified that our application has been approved or denied (rejected)?

Answer: TSO receives many grant applications where staff review and score each individually and then finalize awarded projects based on available funding. This can take two to three months to complete the process.

Question: Are agencies allowed to submit equipment only applications?

Answer: Federal regulations state that a grant project cannot be funded for equipment only.

Question: If my agency does not participate in the High Visibility Enforcement program, may we still apply for a grant?

Answer: Yes.

Question: My application has been returned by TSO. Each time I try to edit the application the electronic grants management system will not let me make the requested changes. What do I do?

Work with your TSO Program Analyst to resolve the issue or contact the system's support desk at sgms.support@odot.oregon.gov.

Question: My first-year application has been approved. Are years two and three guaranteed?

Answer: Funding for years two and three is not guaranteed and will be based on performance in year one, continued demonstration of an identified highway safety problem, and funding availability.

Question: Are uniforms an allowable cost?

Answer: Uniforms are not an eligible cost as these are considered normal costs of doing business as a government agency.

Question: Must representatives from my agency attend the Subrecipient Orientation?

Answer: At least one of the grant's Project Director, Financial Analyst, or Authorizing Official of the subrecipient agency must attend subrecipient orientation.

Question: Are gasoline, mileage, vehicle maintenance, and car washes allowable costs?

Answer: Gasoline, maintenance, and car washes are not allowable costs. Mileage applicable to conducting grant activities are allowed and reimbursable if indicated in the approved grant budget.

Question: What training courses are allowed? Required in-service training?

Answer: Training that is applicable to conducting approved grant activities and is indicated in the grant project or budget is allowable.

Question: Must all the equipment purchases be for the personnel on the application or may I request enough for other officers?

Answer: Allowability is determined by the approved project's grant activities and budget. This is dependent on the scope of the project.

Question: Do vehicle costs include push bars, stripping/wrapping, emergency lighting, MDT's, in-car video, body cameras or radars/lidars? What if the body cameras are part of a package?

Answer: This is dependent on the approved project's scope, activities, and budget. Contact the TSO Program Analyst to discuss specific situations.

Question: What type of items should be listed in other direct costs?

Answer: Any costs applicable and necessary to achieving the project's activities, including operational needs, supplies, postage, and contracts. Disallowed items include alcohol, contributions or donations made, entertainment (including tickets and gratuities), fundraising, costs of goods or services for personal use of the governmental unit's employees, and lobbying.

Question: Is the application required to have 3 goals listed?

Answer: There is not a minimum number of goals or activities required; however, the intent and scope of the project needs to be clear and transparent and reference all desired outcomes of the project's activities.

Question: Can TSO pay for infrastructure and roadway improvements to improve safety?

Answer: Infrastructure costs are not allowable under TSO funding guidelines. There are other ODOT divisions/offices that may be able to fund these kinds of costs with [FHWA funds](#).

Question: What happens if we spent money on an expense that is determined to be unallowable?

Answer: TSO cannot reimburse unallowable expenses; the agency will be responsible for these expenses. Any reimbursed expenses that are later determined to be unallowable may be subject to repayment to TSO.