Delaware Office of Highway Safety

Grant Procedures Manual

2025

Contact Information

Delaware Office of Highway Safety

800 Bay Road, Suite 2

Dover, DE 19901

302-744-2740

www.ohs.delaware.gov

TABLE OF Contents

Chapter 1 – Introduction 4

Section 1.01: Purpose 4

Section 1.02: Mission Statement 4

Section 1.03: Grant Program Funding Overview 4

Chapter 2 – Triennial Highway Safety Plan Development 5

Section 2.01: Overview 5

Section 2.02: Traffic Safety Problem Identification 5

Chapter 3 – Subrecipient Project Development and Grant Applications 6

Section 3.01: Project Development 6

Section 3.02: Grant Application 7

Chapter 4 – Grant Agreement 9

Section 4.01: Overview 9

Section 4.02: Risk Assessment, Pre-Grant Conference and Grant Agreement 9

Chapter 5 – Agency Responsibilities and Procedures 11

Section 5.01: Establish Procedures 11

Section 5.02: Grant Revisions and Time Extensions 11

Section 5.03: Travel 12

Section 5.04: Noncompliance and Termination 12

Section 5.05: Disputes and Disagreements 12

Chapter 6 – Financial Management 13

Section 6.01: Overview 13

Section 6.02: Financial Reporting 13

Section 6.03: Internal Control 13

Section 6.04: Allowable Costs 13

Chapter 7 – Information and Reports 14

Section 7.01: Overview 14

Section 7.02: W-9 Taxpayer Identification Number and Certification 14

Section 7.03: Claims for Reimbursement and Activity Report 14

Section 7.04: Property Management 14

Section 7.05: Title VI - Civil Rights Act 16

Section 7.06: Annual Report - Subrecipient 16

Chapter 8 – Certification and Assurances.....16
Section 8.01: Certification and Assurances List.....16
Chapter 9 – Definitions and Acronyms.....17
Section 9.01: Definitions.....17
Section 9.02: Acronym Table.....21

Chapter 1 – Introduction

Section 1.01: Purpose

Located within the Delaware Department of Safety and Homeland Security (DSHS), the Delaware Office of Highway Safety (OHS) administers the Federal Highway Safety Grant Program, which is funded by formula from the National Highway Traffic Safety Administration (NHTSA). The goal of the program is to eliminate death and serious injuries resulting from motor vehicle crashes on all Delaware roadways by implementing programs designed to address and change roadway user behavior. The OHS provides grant funding at the state and community level for a highway safety initiative that addresses Delaware's own unique circumstances and particular highway safety needs. Any use of behavioral highway safety funds must support data-driven, state traffic safety goals.

Section 1.02: Mission Statement

The OHS is committed to improving safety on Delaware roadways through the administration of federal highway safety funds and the development and implementation of highway safety programs to promote safe behaviors by all roadway users to reduce and eliminate injuries and fatalities.

Section 1.03: Grant Program Funding Overview

The OHS 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 these programs, among others, are part of the five-year, national transportation funding bill, the current one being the Infrastructure Investment and Jobs Act (IIJA).

Section 402

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

- Reduce crashes caused by unsafe driving behaviors
- Reduce alcohol and drug impaired driving
- Encourage the use of occupant protection devices
- Support child passenger safety
- Eliminate speeding
- Improve motorcycle, pedestrian and bicyclist safety
- Combat distracted driving
- Support teen driver safety
- Combat aggressive driving
- Support traffic records development and management
- Increase the safety of older drivers
- Support emergency medical services
- Improve driver safety performance
- Increase awareness of commercial motor vehicles
- Eliminate school bus deaths and injuries
- Support school-based driver education programs
- Support public education for addressing the danger of leaving a child or unattended passenger in a vehicle
- Provide for equitable behavioral traffic safety programs
- Address other behavioral traffic safety programs identified through data analysis

Section 405
The OHS decides which Section 405 programs it will participate in and must apply for this funding on an annual basis. If awarded Section 405 funds, they may be used for:

- Occupant Protection (405b)
- Traffic Safety Information Systems (405c)
- Impaired Driving Countermeasures (405d)
- Alcohol Ignition Interlock (405d - subset)
- 24/7 Sobriety (405d – subset)
- 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, the OHS develops a Triennial (three year) Highway Safety Plan (3HSP). The 3HSP is updated in years two and three by the submission of an Annual Grant Application (AGA) to NHTSA. The 3HSP and the AGA outline and implement a data-driven highway safety program that uses proven countermeasures (strategies) that reduce unsafe behaviors that cause motor vehicle crashes resulting in fatalities and serious injuries. For innovative countermeasures, the OHS must explain the strategy and identify the source used to determine the proposed effectiveness.

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 information from a variety of sources and managing this information to prioritize limited resources toward reducing death and serious injury on all roadways. Gathering and analyzing data and other pertinent information, along with conducting meaningful public participation and engagement, are the strategic approach the OHS uses to guide the problem identification process. This approach ensures that the OH understands the extent of the traffic crash problem with a focus on identifying the geographic areas and types of projects needed.

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 it not limited to, the analysis of data obtained from the following sources:

- Federal Fatality Analysis Reporting System (FARS)
- Delaware Crash Analysis and Reporting System (CARS)
- Delaware State Police (DSP)
- Delaware Department of Transportation (DelDOT) data on average daily vehicle counts and vehicle miles traveled
- Observational seatbelt surveys
- Delaware Justice Information System (DELJIS)

- Delaware Department of Motor Vehicles
- U.S. Census

The OHS 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 state collision database 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.

Chapter 3 – Subrecipient Project Development and Grant Applications

Section 3.01: Project Development

Each project considered by a local agency should address an emphasis area identified in the 3HSP, be data-driven and utilize proven and/or promising countermeasures that will help the OHS 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 fiscal year and must coincide with the federal fiscal year. Project applications may be submitted to OHS throughout the federal fiscal year.

This calendar outlines the process to develop and implement the 3HSP. Flexibility is important and recognized time frames may shift to meet current resources or environment. This process is repeated annually and updates to the 3HSP are included in the AGA.

Month	Activity
January	Debrief the staff on previous year's program results and review the NHTSA Regional Office priority letter that helps set goals. Conduct problem identification processes including review of prior year state traffic crash data and other related data sources.
February	Review the response to the previous year's AR and 3HSP/AGA approval letter from NHTSA. Review program assessment recommendations made by independent assessment teams, and management review recommendations made by NHTSA.
March	Request information from partner agencies and stakeholders to identify previous year statistics and upcoming challenges. Work to identify partner priorities, program area direction, potential strategies, community and public participation strategies and overall direction of the traffic safety program. PMs review data to set priority areas, specific goals, strategies, and quantifiable statewide safety performance targets within each program area. that align with the Strategic Highway Safety Plan (SHSP). Set or revise NHTSA/GHSA performance measures. Determine which Section 405 grants to include in the AGA.

April	Establish the draft list of projects and budget. Prepare a paid media/communications plan and a law enforcement plan for inclusion in the draft 3HSP/AGA. Present the law enforcement plan to the GAC.
May	Submit the draft outline of the HSP/AGA to the GAC for review and approval.
June	Finish drafting the 3HSP/AGA and obtain DSHS Secretary signature for the certifications and assurances. Draft the Section 405 applications. Submit the HSP/AGA to NHTSA prior to June 15 for review/comment. Submit final 3HSP to NHTSA **prior to July 1**.
July	Submit final AGA to NHTSA prior to August 1. Prepare Single Point of Contact (SPOC) for review of HSP/AGA by the State Clearinghouse Committee.
August	Respond to any NHTSA requests for information referenced in the HSP/AGA. Conduct on-site monitoring visits with subrecipients.
September	Complete pre-award risk assessments. Update project agreements in SmartSimple (grants management software) for the next fiscal year. Complete internal project proposals within the approved HSP/AGA. Load the funded projects (external) and OHS projects (internal) into SmartSimple.
October	Implement the HSP/AGA.
November	Begin preparation of the AR for the previous fiscal year.
December/January	Submit the AR to NHTSA no more than 120 days after the end of the fiscal year. Perform the Grants Tracking System (GTS) federal fiscal year closeout.

Section 3.02: Grant Application

The OHS must determine if the agency or organization applying 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 in place.
- Collaborate with other communities, governmental and private organizations.
- Develop data-driven plans that solve highway safety problems.
- Adequately evaluate the success of a project addressing the problem.
- Can not be on any debarment lists.

Projects must align with the problem identification, performance targets and strategies found in the 3HSP. The planned activities funded must be identified and clearly explain in detail how they support an evidence-based countermeasure. This explanation should show a logical sequence of events that will be undertaken to help the OHS 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.

The OHS employs two separate and distinct strategies to determine which subrecipients will receive federal highway safety funds to address behavioral traffic safety.

- **Strategy 1** – The OHS identifies appropriate law enforcement agencies to conduct priority area specific overtime enforcement based on problem identification and crash location.

- **Strategy 2** – The OHS accepts project proposals from non-law enforcement partners that are designed to reduce the number of deaths and serious injuries resulting from traffic crashes.

Strategy 1 – Law enforcement agencies
Using the crash mapping tool in CARS, the OHS prepares a yearlong enforcement plan. The Program Manager (PM) identifies police agencies using the problem identification process and prepares a comprehensive enforcement plan for each agency that includes months, days of week and times of day for enforcement in each priority area. The PM then calculates the amount of funding needed to accomplish the project goals. These calculations are computed for each participating agency for each priority area and included in the 3HSP.

The PMs submit mobilization plans to the Law Enforcement Liaison (LEL) approximately one month prior to the start of the enforcement mobilization. The LEL then prepares a project agreement with a budget and enforcement details, as well as certifications and assurances, and forwards it to participating law enforcement agencies for review and signature.

Strategy 2 – Non law enforcement agencies
Project proposals must include the most current data available to identify a behavioral traffic safety problem, a workable solution linked to the identified problem, a detailed action plan and a budget that supports the planned activities. To receive consideration for funding, the proposed project must align with the OHS problem identification and address one or more of the targets outlined in the 3HSP.

The proposal project goals should state in measurable terms the ultimate outcome the applicant hopes to achieve. For example, "increase enforcement of DUI laws as measured by…" or "reduce the incidence of incorrect use of child safety seats as measured by…" Proposed projects should include SMART (**S**pecific, **M**easurable, **A**ctionable, **R**ealistic, **T**imely) goals**.**

- Activities identified in the proposal must show a logical sequence of events that will be undertaken to accomplish the 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.
- Performance measures must be clearly defined. The budget request must be detailed enough, so the reviewer can see how the funds will support the proposed project. The budget should have the following line items: personnel costs, training/travel, contractual services, equipment and capital outlay, as appropriate.
- Project proposals may be submitted at any time during the fiscal year and are reviewed within 30 days by the OHS Director, Planning Supervisor and the PM responsible for the program area. PMs.
- The following questions help guide the OHS 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 represent the project activity and accomplishment of objectives?
- Will any special equipment be needed? If so, will it be available for grant implementation, and/or does the applicant require funding to acquire the equipment?
- Are there other considerations that might affect subrecipient performance? If so, are they adequately addressed?

The OHS staff reviews and rates each proposal to determine the level of funding to be awarded. Following this review, the Planning Supervisor or PM prepares and emails an award letter to the applicant notifying them of their proposal's status. Successful candidates are notified of reporting and fiscal requirements. Unsuccessful candidates are informed their project was not selected and the reason why. This entire process is conducted through SmartSimple, the OHS electronic grants management program.

Chapter 4 – Grant Agreement

Section 4.01: Overview

The process from grant proposal to a fully executed grant agreement can take several months. The OHS PMs guide the process to ensure no project activities are conducted prior to the completion of a fully executed grant agreement. The agreement includes terms and conditions, detailed project descriptions, the approved budget and the required Certifications and Assurances. The grant agreement must be signed by the authorized official (agency person with contracting authority) and submitted to the OHS. The agency's authorizing official must also certify and assure that all the conditions contained in the Certifications and Assurances, and reporting and invoicing requirements, including any special conditions, will be met. Once a grant agreement is signed by the agency's authorized signatory and the OHS, it is a legally binding document.

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

Risk assessment

The OHS is required to assess each applicant's risk of noncompliance with federal statutes, regulations and the terms and conditions of the grant agreement. The goal of the risk assessment is to determine an organization's capacity to manage and/or receive federal grant funds and to determine the level of monitoring 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.

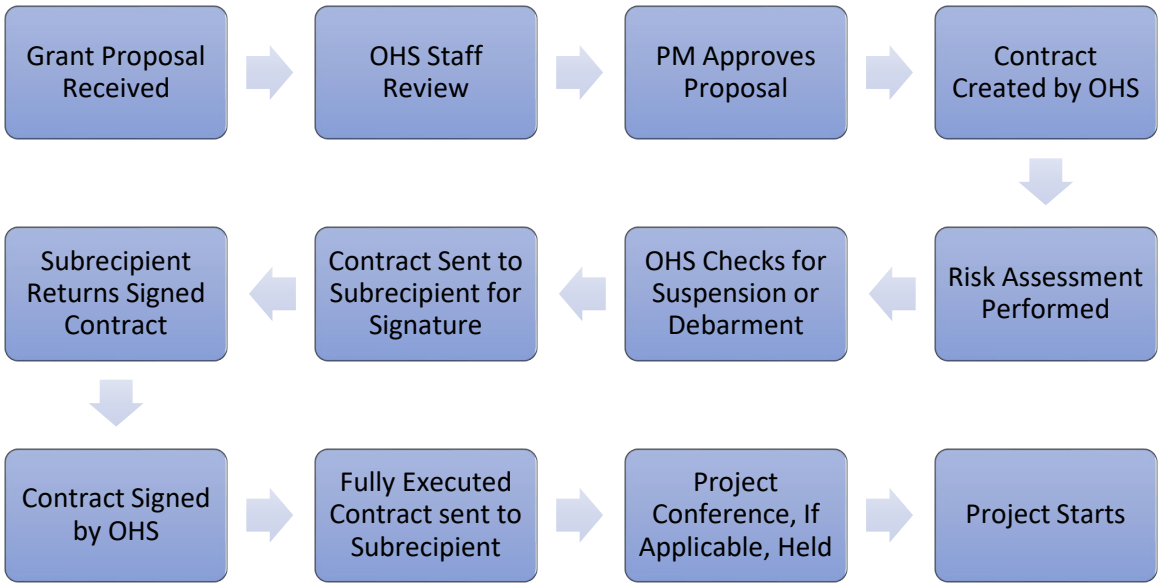
Subrecipients are evaluated for risk based on the following: experience with OHS grants, previous monitoring results, single audit results, consistent staffing, and past performance. Subrecipients determined to be low risk are subject to standard OHS monitoring. Subrecipients that are assessed as high-risk are subject to the same monitoring as low risk entities with additional monitoring activities. ***The OHS must conduct a risk assessment prior to fully executing a grant agreement.***

Pre-grant conference
Following approval to enter into a grant agreement, the OHS staff will conduct a pre-grant conference with new subrecipients or new Project Directors. Instructions for completion of the grant agreement and copies of the agreement forms are provided to the subrecipient at the conference The grant recipient is also advised of the fiscal procedures, grant fiscal controls and management practices required to be awarded to meet federal grant.

The Project Director agrees to comply with the requirements of the grant agreement. Periodic changes and additions to the Grant Procedures Manual (GPM) may be necessary to meet changing federal or state laws, or to improve program management and fiscal procedures. The OHS will notify the Project Director in writing of any changes or additions to the GPM.

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 the OHS Director. The signature of the authorizing official indicates the subrecipient agency will adhere to the conditions set forth in the grant agreement. The original copy is retained at the OHS. A copy is returned to the subrecipient Project Director and available at any time through the electronic grants management system, SmartSimple. **The subrecipient may not expend any funds until the Project Director receives a written "notice to proceed" from the OHS.** This written notice may be by letter or email.

The grant agreement workflow process is:



Once the grant has been executed, OHS 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 within the grant budget. **Costs incurred before the effective date or after the end date of the grant 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. The OHS makes neither representation nor guarantee regarding the availability of federal highway safety funds for first or subsequent year funding.

Chapter 5 – Agency Responsibilities and Procedures

Section 5.01: Establish Procedures

The subrecipient Project Director is responsible for establishing and maintaining procedures within their agency to ensure the effective administration of the grant, including the timely completion of the grant objectives. A PM from the OHS will be assigned to oversee the grant and will conduct a pre-grant conference for new subrecipients and Project Directors. This conference is designed to review the controls and record keeping necessary for proper administration of the grant.

Section 5.02: Grant Revisions and Time Extensions

Grant Revisions

All revisions to an OHS grant agreement, whether programmatic or fiscal, must be fully documented and agreed to by both the OHS and subrecipient prior to the performance of work outlined in the revision. The OHS reserves the right to limit grant amounts at any time based on performance and/or available funding.

The following deviations from the approved grant require *prior* written approval from the OHS:

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

The OHS procedure for review and approval of a grant agreement revision is as follows:

- Subrecipient submits an electronic request for a revision that includes justification for the change.
- The request is reviewed by the PM.

The subrecipient is notified via letter or email if the revision is or is not approved. If it is not approved, the notification includes the reason for the denial.

If the revision requires a change in the 3HSP, the OHS submits an amendment to the NHTSA Regional Program Manager for review and approval. Approval from the NHTSA Regional office is required before the grant agreement is modified.

Time Extension

A time extension may be needed if a project does not start on time or is delayed. 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 1 of the fiscal year in which the grant was awarded. Time extensions are not common and must be approved by the OHS PM.

Section 5.03: Travel

Reimbursement for out-of-state travel expenses by subrecipients requires prior written approval from the OHS. To request approval for out-of-state travel, a subrecipient must ensure the grant agreement includes a provision for the travel that there are sufficient funds to cover the cost of the trip. To request travel reimbursement, the subrecipient must prepare and submit a Personal Expense Reimbursement Form with the monthly report. Any mileage reimbursement is limited by the State of Delaware travel policy unless otherwise agreed upon in writing.

Section 5.04: Noncompliance and Termination

The OHS 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, the OHS will l notify the subrecipient agency 30 calendar days in advance of the effective date of termination, if possible. 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 t, the agency may be required to return the equipment to the OHS.

Section 5.05: Disputes and Disagreements

Any dispute, disagreement or question of fact concerning the grant will be decided by the OHS Director. The decision will be put in writing and distributed to the concerned parties. The subrecipient agency

may then proceed with the performance of the grant in accordance with the OHS Director's decision. If the subrecipient agency disagrees with the decision of the OHS Director, it may be appealed to the DSHS Secretary. The appeal must be made in writing within 30 days of the OHS Director's decision and served by certified mail. The subrecipient must first appeal to the OHS Director and then to the DSHS Secretary 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 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 the existing accounting system. It is recommended that copies of all financial records pertaining to the grant be stored with the grant file. This procedure will make it much easier to respond to questions regarding the grant. Grant records must be kept for no less than three years after final completion of the grant.

Section 6.02: Financial Reporting

Grant recipients must provide accurate, current and complete disclosure of the financial activity of each grant on claim forms to the OHS for reimbursement of authorized federal grant expenditures. All authorized federal funds must be incurred, and work performed by the subrecipient on or before September 30 of the grant year. Only the hours worked within the fiscal year may be claimed for reimbursement.

Grant recipients must maintain records identifying the source (federal, local or state) and application of funds for each approved budget line item. Subrecipients are responsible for tracking reimbursement by Catalog of Federal Domestic Assistance (CFDA) coding, provided by the PM, for single audit purposes.

Section 6.03: Internal Control

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

Section 6.04: Allowable Costs

Allowable grant costs are regulated by 2 CFR Part 200, also known as the *Uniform Act, and 23 CFR Part 1300, Uniform Procedures for State Highway Safety Grant Programs and are subject to state regulations and allowable costs*. 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 Act* 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 OHS 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.

- 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.

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 your 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 agency must provide all information and reports required by the OHS. The subrecipient agency must permit access by the OHS, 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 agency is responsible for preparing and submitting the request for reimbursement and project activity reports.

Section 7.02: W-9 Taxpayer Identification Number and Certification

W-9 forms are required if the subrecipient is working contractually for the OHS, 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 applicant will also need to register as a vendor with the First State Financials (FSF) system to receive payment. The OHS PM will assist the subrecipient to register as a vendor. For more information, visit;
https://esupplier.erp.delaware.gov/fn92pdesup/help_guides/Supplier_New_Registration_Guide.pdf

To sign up in the First State Financial System (FSF) as a new vendor visit:
https://accounting.delaware.gov/suppliers/

Section 7.03: Claims for Reimbursement and Activity Report

It is the OHS' responsibility to review all claims for reimbursement submitted by subrecipients in a timely manner. Once reimbursement claims and activity reports are approved, they are entered in the OHS accounting system for reimbursement. If there are any issues with the reimbursement claim or activity report, the OHS PM will contact the Project Director.

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 $10,000 or more, subrecipients must manage and dispose of equipment acquired with federal grant funds in accordance with NHTSA requirements, and state laws and procedures.

Property Management Systems

Subrecipients must establish and administer a management system to procure, control, protect, preserve, use, and maintain property and equipment. All equipment should be returned to the OHS for

disposal. This includes property and equipment furnished directly by the OHS 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.

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 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.

The OHS 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. The OHS, 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 subrecipient's grant is closed. A state inventory sticker is placed on all physical property.

The OHS 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 the OHS 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 the OHS for review and recording in the tracking system until final disposition. If a subrecipient fails to respond, the OHS will contact the agency or organization to obtain the required information.

The OHS 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. The OHS 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 $10,000 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 the OHS that equipment is no longer needed for the purpose for which it was acquired, the equipment will become the property of the OHS. Once the equipment has been turned over, the OHS will take appropriate disposition actions including but not limited to:

- Transfer from federal inventory to state inventory.
- Declaration the equipment damaged beyond repair or salvage.

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 7.05: Title VI - Civil Rights Act

Nondiscrimination
The subrecipient agency, 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 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 with their monthly reimbursement claims. In addition, a final annual report and final reimbursement claim are due no later than November 15, unless another due date is specified by the PM. A final annual report, written by the subrecipient Project Director, is required for every grant. This report recaps the entire grant year and is used by the OHS when evaluating past agency performance for future grant funding.

Writing the report
The final evaluation consists of several sections plus the title. The preferred format for submitting report information is as follows:

- Title
- Overview
- Administrative Evaluation
- Impact Evaluation
- Planned vs. Actual Cost Comparison
- Summary and Recommendations

Chapter 8 – Certification and Assurances

Section 8.01: Certification and Assurances List

Certifications 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 Certifications and Assurance:

- 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 (DE Code, Title 21, Section 4802(a) mandates seatbelt use)
- Policy on Banning Text Messaging While Driving (DE Code, Title 21, Section 4176C prohibits text messaging while driving.

Chapter 9 – Definitions and Acronyms

Section 9.01: Definitions

Accrued Expenditures	Subrecipient costs incurred for goods and other tangible property received, and services performed by employees, contractors, consultants, etc.
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	**T**he net invoice unit price of purchased equipment includes the cost of modifications, attachments, accessories 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, describing the activities that took place in support of the grant agreement.
Administrative Requirements	Functions common to all grants such as financial management, kinds and frequency of reports, and retention of records.
Annual Grant Application (AGA)	Submitted to NHTSA, it provides project level information on the OHS highway safety programs and must align with the Triennial Highway Safety Plan. It is also the application states must submit to apply for Section 405 funds.
Annual Report (AR)	Describes the accomplishments and challenges the OHS encountered in the prior federal fiscal year. Addresses progress made in achieving the

	performance measures, targets and strategies identified in the 3HSP as well as how grant funding was expended.
Annual Report - Subrecipient	Submitted to OHS 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 individual that has legislative authority to enter the subrecipient into an agreement with the OHS.
Bipartisan Infrastructure Legislation (BIL)	The funding and authorization bill governing the highway safety grant program. It is also known as the Infrastructure Investment Jobs Act (IIJA).
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 Indian tribal governments; U.S. territories and possessions; domestic public, quasi-public and private profit and non-profit 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 OHS 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 systematic record of all equipment purchases of more than $5,000.

Expenditures	Charges made to the project or program that may be reported on a cash or accrual basis.
Fatal Analysis Reporting System (FARS)	NHTSA managed national database that is the repository of state-supplied traffic safety data for fatal injuries suffered in motor vehicle crashes.
Federal Funding Accountability and Transparency Act (FFATA)	A federal database system to allow prime grant award and prime contract recipients to report sub-award activity and executive compensation.
Federal Highway Administration (FHWA)	The U.S. Department of Transportation 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.
Grant Agreement	A binding document between two or more parties detailing the conditions and terms for project scope of work and financing. May include interagency agreements.
Grant/Revision	A change to the grant agreement that occurs when the budget, scope and/or activity is/are modified.
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 OHS.
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.
Impaired Driving Program	A program to address alcohol and/or drug-impaired driving.
Law Enforcement Liaison (LEL)	The individual responsible for promoting Delaware law enforcement agency's 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 U.S. Department of Transportation 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 (OHS)	The office located within the Delaware Department of Safety and Homeland Security 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 Manager (PM)	The OHS 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 OHS to address highway safety problems falling within one or more program areas.
Project Contact	The individual designated by the subrecipient's authorizing official as the point of contact with the OHS.
Project Director	The person assigned by the subrecipient to assume direct responsibility for administering all phases of the project grant agreement.
Public Service Announcement (PSA)	A message, in the public interest, disseminated by the media at no cost to raise awareness and change public attitudes and behavior about a social issue.
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 through implementation of engineering, education, enforcement, and emergency medical services strategies.
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.
Supporting Documentation	Reports, invoices, timesheets, and other documents a subrecipient submits to the OHS to support a claim for reimbursement.

Subrecipient	The local or state government agency or entity receiving a federal highway safety grant from the OHS.
Traffic Records Program	A program to improve the timeliness, accuracy, completeness, uniformity, integration, integrity, and accessibility of the data needed to identify and address traffic safety problems.
Triennial Highway Safety Plan (3HSP)	The three-year, data-driven plan the OHS submits to NHTSA that establishes performance targets and identifies countermeasure strategies for programming funds to address the state's behavioral highway safety problems.

Section 9.02: Acronym Table

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

3HSP	Triennial Highway Safety Plan
AGA	Annual Grant Application
AR	Annual Report
BIL	Bipartisan Infrastructure Law
CARS	Delaware Crash Analysis and Reporting System
CFR	Code of Federal Regulations
CFDA	Catalogue of Federal Domestic Assistance
DelDOT	Delaware Department of Transportation
DELIS	Delaware Justice Information System
DSHS	Delaware Department of Safety and Homeland Security
DSP	Delaware State Police
DTI	Department of Technology and Information
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
FSF	First State Financial System
FSRS	FFATA Sub-Award Reporting System
GAC	Grant Advisory Committee
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
IIJA	Infrastructure and Investment Jobs Act
LEL	Law Enforcement Liaison
NHTSA	National Highway Traffic Safety Administration (move up so it's in alphabetical order)
OHS	Delaware Office of Highway Safety

OMB	Federal Office of Management and Budget
P&A	Planning and Administration
PI&E	Public Information and Education
PM	Program Manager
PPE	Public Participation and Engagement
PPM	Policy and Procedure Manual
SAM	System for Award Management
SHSP	Strategic Highway Safety Plan
SPOC	Single Point of Contact
UEI	Unique Entity Identification
USDOT	United States Department of Transportation