



Notable Rapid Response Questions from August 2021

Funding

One of our DSA financial staff asked if our grants require compliance with 2 CFR 200?

2 CFR 200 is Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly referred to as ‘Uniform Guidance’).

45 CFR 75 is Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards. In other words, the HHS agency regulations and implementation of 2 CFR part 200.

Because DD Council funding is an HHS award, Councils will use 45 CFR 75.

Does program income get deducted from the subsequent year grant award?

No. Program income generated from a Council funded project or activity must be used under the deduction alternative. This means

- Program income must be used to reduce the federal funds share of the cost of the project or activity.
- Program income should not be used as match for the project or activity.
- Program income should not be used to increase the funds committed to the project.

Please see [“Program Income and Councils on Developmental Disabilities”](#) for more information.

Federal reports

What is the difference between Federal Financial Reports and Federal Cash Transaction Reports?

Federal Financial Reports are annual required reports used to submit financial information about individual grant awards.

Federal Cash Transaction Reports are due quarterly (see Notice of Award for dates). This is an expenditure report that reflected actual expenditures against the federal award regardless of a request (draw-down) for federal funds.

For more information, please visit the Payment Management System website.

Council membership

Can we make membership recommendations to the Governor for upcoming vacancies rather than waiting until the vacancy occurs?

YES! We strongly encourage DD Council's to be proactive when recommending people for appointment to the Council. When communicating recommendations for upcoming membership vacancies, please be specific about term start and end dates.

Council operations

We develop an Annual Report of our work that is shorter and easier to read than the federal PPR, do we send it to ACL/AoD/OIDD staff and if so, when is it due to them?

The DD Act indicates that the annual report will be "widely disseminated to affected constituencies and the general public and will assure that the report will be available in accessible formats" (Section 125 (c) (7) (I)).

If your Council develops this type of annual report, there is no requirement you must submit to ACL/AoD/OIDD staff and no due date. However, they appreciate seeing your reports and messaging of the Council's accomplishments!

Is the Designated State Agency (DSA) responsible for providing the Council with legal services?

No, this would be a negotiated service with the DSA and be included as part of the Council's Memorandum of Understanding (MOU) with the DSA.