

Rural Planning Assistance Guide:

A Guide to the CDOT Rural Planning Assistance (RPA) Program

Division of Transportation Development
MPO & Regional Planning Section

Effective July 1, 2016



COLORADO
Department of Transportation
Division of Transportation Development

Introduction

The Colorado Department of Transportation (CDOT) is responsible for developing a Statewide Transportation Plan (SWP) and administering a statewide transportation planning process, including a coordinated means for the collaborative involvement of local elected officials, transportation professionals and stakeholders in Colorado's rural Transportation Planning Regions (TPRs). Counties and Municipalities within the state's TPRs who have elected to form Rural Planning Commissions (RPCs) for transportation planning, assume the responsibility for the statewide transportation planning process and for development of a Rural Transportation Plan (RTP) in their region. *Note: Although the acronym 'TPR' is commonly used in Colorado as the term to identify what is technically the RPC, we use RPC in this guidance document to specifically mean the formal planning commission referred to above, and we use TPR to mean the geographic region that the RPC represents in transportation planning.*

CDOT provides the Rural Planning Assistance (RPA) grant program, funded by the discretionary use of State Planning and Research funds (SPR), to support the eligible rural transportation planning activities of Colorado's RPCs. This guidance document provides a brief overview of the transportation planning responsibilities of an RPC and details the eligibility of rural transportation planning activities and required invoicing/billing practices of the RPC for reimbursement of related expenses. The requirements outlined in this document are effective July 1, 2016.

CDOT-DTD understands, and expects, that questions and special situations arise regarding planning activities and invoicing practices. Please direct these questions, before incurring an expense, to the appropriate Planning Liaison. For current DTD planning liaison MPO & TPR assignments, see the [DTD Planning website](#).

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1. Overview of RPC Planning Responsibilities

The following tasks describe responsibilities of an RPC for the continuation of the statewide and regional transportation planning process within its TPR. The purpose of the process and work is to implement the provisions of C.R.S. § 43-1-1101 et seq. and Rules and Regulations for the Statewide Transportation Planning Process and the Transportation Planning Regions, 2 CCR 604 –2 (The Rules). Responsibilities include:

A. Participation in the Statewide Transportation Advisory Committee (STAC)

The TPR shall have a designated representative to carry out the duties of the STAC pursuant to C.R.S. § 43-1-1104 (STAC Responsibilities) as amended, and Section V. of the Rules. The TPR shall also designate a STAC Alternate to attend regularly scheduled meetings and carry out these duties if the designated representative is unable or unavailable.

STAC representatives shall attend monthly STAC meetings, as well as other official STAC events. A STAC representative’s duties include, but are not limited to:

1. Serving as the communication liaison between the Department, the Transportation Commission, the STAC and the members of the TPR and constituents.
2. Providing advice to the Department and Transportation Commission on the needs of the transportation system.
3. Reviewing and commenting on updates and amendments to the Regional and Statewide Transportation Plans.
4. Providing assistance in resolving transportation related conflicts which arise between TPRs, or between the Department and a TPR.
5. Making recommendations to the Department and Transportation Commission concerning the integration and consolidation of Regional Transportation Plans (RTPs) into the Statewide Transportation Plan.
6. Furnishing regional perspectives on transportation problems requiring statewide solutions.
7. Providing advice and comment on TPR boundaries.

B. Provide Opportunities for Public Participation at TPR Meetings

Please reference Section VI (Public Participation Rules) of 2 CCR 604-2 (The Rules), which includes specific public participation provisions required in the transportation planning process.

The RPC is responsible for, and shall work in cooperation with CDOT, in carrying out the requirements for public participation as described in The Rules and Title 23 CFR Part 450 of the federal regulations. Public participation shall include, but not be limited to:

1. Providing a proactive process that allows the public the opportunity to participate in the transportation planning process. The process shall provide a mechanism for public perspective, ideas and needs to be incorporated into the planning process, developing the public's understanding of the problems and opportunities facing the transportation system.
2. Conducting meetings, transportation forums, open houses or other means of public meetings for the purpose of providing information about transportation issues, receiving comments, consideration and response to public input and building consensus on transportation priorities. The TPR shall record the proceedings of meetings, forums and other public meetings concerning transportation in their TPR and make those notes available to the TPR constituency, especially interested parties unable to attend the meetings.
3. Providing mailings, either electronic or regular, containing information about transportation issues. The TPR shall maintain a mailing list of all known parties interested in transportation planning in the TPR including but not limited to: elected officials, municipal and county planning staffs, affected public agencies, local state and federal agencies eligible for federal and state transportation funds, local representatives of public transportation agency employees and users, freight shippers and providers of freight transportation services, private transportation providers, representatives of alternative transportation mode users, such as pedestrian walkways and bicycle transportation facilities; representatives of the disabled, private industry, environmental and other interested groups, Indian tribal governments and the US Secretary of the Interior when tribal lands are involved, representatives of persons or groups that may be underserved by existing transportation systems such as minority, low-income and disabled populations; and members of the general public.
4. Utilizing available media opportunities to provide timely notice of planning related activities; this includes, but is not limited to, electronic mail, newspapers, social media and other means.

C. Long-Range Regional Transportation Plan (RTP)

Continue efforts to update and/or maintain the Regional Transportation Plan (RTP) and maintain up to date and relevant distribution lists, etc. The TPR shall work in conjunction with the Department and its consultants to develop new RTPs.

D. Regional Transportation Plan Amendments

Federal and State legislation altering the transportation planning factors upon which the RTP is based may change the TPR's corridor priority recommendations to the Department and require amending the RTP. The TPR shall amend the RTP as necessary to make additions or deletions on review and analysis of the RTP to insure successful implementation throughout the Statewide Transportation Plan, pursuant to Section VIII of the Rules for the Statewide Planning Process (2 CCR 604-2).

E. Development and Amendment of the Statewide Transportation Improvement Program (STIP)

The RPC will undertake activities and meetings necessary to participate in and provide input on the development and update of the Statewide Transportation Improvement Program (STIP), and to review and comment on proposed policy amendments to the STIP, as needed.

To update the STIP, RPC representatives meet with their appropriate CDOT Engineering Region(s) and Transportation Commissioner(s) to cooperate in the project prioritization process within that CDOT Engineering Region. Additional information on the STIP development process is available in the Project Priority Programming Process (4P) and STIP Development Guidelines available at: <https://www.codot.gov/business/budget/statewide-transportation-improvement-program-stip-reports-information>.

Whenever a policy amendment is proposed for the STIP, the RPC shall review and comment on the proposed amendment. The STIP amendment review process is as follows:

1. The CDOT Office of Financial Management and Budget (OFMB) will post notice of the proposed STIP amendment on the CDOT website for a 30 day review and comment period.
2. The RPC needs to determine if the policy amendment is of such significance as to establish a meeting within the 30 day comment period if a meeting is not already

- scheduled, or discuss the amendment at an already scheduled meeting within the 30 day review and comment period to provide for public input.
3. The RPC may elect to not hold a meeting or not discuss the proposed amendment if the RPC determines that the amendment is not significant enough to require such action.
 4. The RPC should post the notice of proposed STIP amendment, if it has an office and a public place for posting such notices.
 5. Comments on the proposed amendment need to be received within the 30 day review period via the CDOT website or by direct mail to the CDOT Chief Financial Officer.

F. Long-Range Statewide Transportation Plan

In conjunction with its RTP, the RPC will provide input and advice on the development of the Statewide Transportation Plan. Duties include but are not limited to:

1. Providing input on the integration and consolidation of RTPs into the Statewide Transportation Plan.
2. Reviewing and providing comment, through the STAC representative, on elements of the Statewide Transportation Plan, including drafts of the Statewide Transportation Plan, and the final Statewide Transportation Plan pursuant to C.R.S. § 43-1-1101 through 1105 and U.S.C. Section 135 Title 23.

2. General Federal Requirements

General Federal Requirements are applicable to all grants or other awards made with Federal State Planning and Research (SPR) funds. This section is not specific to the RPA Program, and is intended to provide a brief overview of Federal requirements governing this and other programs funded with Federal SPR funds.

A. Factors Affecting Allowable Costs

Pursuant to [2 CFR 225](#), for expenses to be allowable for Federal reimbursement they must meet the following general criteria:

- Be necessary and reasonable for proper and efficient performance and administration of Federal awards.
- Be allocable to Federal awards under the provisions of 2 CFR 225.
- Be authorized or not prohibited under State or local laws and regulations.
- Conform to any limitations and exclusions set forth in 2 CFR 225, Federal laws, conditions of the award or other governing regulations.
- Be consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other activities of the governmental unit.
- Be accorded consistent treatment as either a direct or indirect cost
- Be determined in accordance with generally accepted accounting principles, unless otherwise accounted for by 2 CFR 225
- Not included as a cost or match in any other Federal award, either currently or during a prior period, except as specifically provided by Federal regulation.
- Be the net of all applicable credits.
- Be accurately documented.

B. Reasonable Costs

A cost is considered reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time that the decision was made to incur the cost. This concept of reasonableness is especially important for governmental units or components that are primarily federally-funded, and in these cases consideration of the reasonableness of a given cost will be based upon:

- whether the cost is of a type generally recognized as ordinary or necessary for the operation of the governmental unit or performance of the Federal award;
- the restraints and requirements imposed by factors including sound business practices, arm's-length bargaining, the terms and conditions of the Federal award, and Federal, State, and local laws and regulations;
- the market price of comparable goods or services;

- whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the governmental unit, its employees, the public at large, and the Federal government;
- any significant deviation from the established practices of the governmental unit which may unjustifiably increase the Federal award's cost.

C. Allocable Costs

A cost is allocable to a particular transportation planning activity if the goods or services involved are chargeable or assignable to such transportation planning activity in accordance with relative benefits received.

All activities which benefit from a governmental unit's indirect cost, including unallowable activities and services donated to the governmental unit by third parties, will receive an appropriate allocation of indirect costs.

Any cost allocable to a particular Federal award or cost objective under the principles provided for in [2 CFR 225](#) may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by law or terms of the Federal awards, or for other reasons.

Where an accumulation of indirect costs will ultimately result in charges to a Federal award, a cost allocation plan will be required as described in Appendices C, D, and E of 2 CFR 225.

D. Applicable Credits

Applicable credits refer to those receipts or reduction of expenditure-type transactions that offset or reduce expense items allocable to Federal awards as direct or indirect costs. Examples of such transactions are: Purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges.

To the extent that such credits accruing to or received by the governmental unit relate to allowable costs, they shall be credited to the Federal award either as a cost reduction or cash refund, as appropriate.

E. Composition of Costs

The total cost of Federal awards is comprised of the allowable direct cost of the program, plus its allocable portion of allowable indirect costs, less applicable credits.

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances either as a direct or an indirect cost.

F. Direct Costs

Direct costs are those which can be identified specifically with a particular final cost objective. Typical direct costs include:

- The compensation of employees for time devoted to and identified specifically for the performance of Federal awards.
- The costs of materials acquired, consumed, or expended specifically for the purposes of those awards.
- The equipment or other approved capital expenses necessary for performance of the awards.
- The travel expenses incurred specifically to carry out the awards.

Any direct cost of a small amount can, for the sake of practicality, be treated as an indirect cost provided that the accounting treatment of said item is applied consistently among all cost objectives.

G. Indirect Costs

Indirect costs are those incurred for a common or joint purpose and which cannot be readily assignable to a specific cost objective without investing disproportionate effort. Indirect costs may refer to those within the grantee department as well as other departments which supply goods, services, or facilities required for the performance of Federal awards.

To facilitate equitable distribution of indirect costs to the cost objectives served it may be necessary to establish a number of indirect cost pools within a governmental unit. Requirements for the development and submission of cost allocation plans and indirect cost rate proposals are enumerated in Appendices C, D, and E of [2 CFR 225](#).

Amounts not recoverable as indirect costs under one Federal award cannot be transferred to another Federal award unless specifically authorized by a Federal law or regulation. In addition to the restrictions on indirect costs specified by 2 CFR 225, there may be other Federal laws and regulations which limit the amount of indirect costs allowed.

H. Required Certifications

Each cost allocation plan or indirect cost rate proposal must comply with the following:

- No proposal to establish a cost allocation plan or an indirect cost rate, whether submitted to a Federal cognizant agency or maintained on file by the governmental unit, shall be acceptable unless such costs have been certified by the governmental unit using the Certificate of Cost Allocation Plan or Certificate of Indirect Costs as set forth in Appendices C and E of [2 CFR 225](#).
- The certificate must be signed on behalf of the governmental unit by an individual at a level no lower than chief financial officer of the governmental unit that submits the proposal or component covered by the proposal.
- No cost allocation plan or indirect cost rate shall be approved by the Federal Government unless the plan or rate proposal has been certified. Where it is necessary to establish a cost allocation plan or an indirect cost rate and the governmental unit has not submitted a certified proposal for establishing such a plan or rate in accordance with the requirements, the Federal Government may either disallow all indirect costs or unilaterally establish such a plan or rate. Such a plan or rate may be based upon audited historical data or such other data that have been furnished to the cognizant Federal agency and for which it can be demonstrated that all unallowable costs have been excluded.
- When a cost allocation plan or indirect cost rate is unilaterally established by the Federal Government because of failure of the governmental unit to submit a certified proposal, the plan or rate established will be set to ensure that potentially unallowable costs will not be reimbursed.

I. Interagency Services

The cost of services provided by one agency to another within the governmental unit may include allowable direct costs of the service plus a pro rate share of indirect costs. A standard indirect cost allowance equal to ten percent of the direct salary and wage cost of providing the service (excluding overtime, shift premiums, and fringe benefits) may be used in lieu of determining the actual indirect costs of the service.

3. Allowable Activities

This section addresses the RPA Program specifically, outlining the major allowable activities consistent with SPR funding and the Scope of Work for the RPA contract.

In general, the following activities are allowable and can be reimbursed:

- Travel
 - Approved travel expenses (see Travel Expenses below) for travel to STAC meetings or STAC Sub-committee meetings by TPR STAC representatives or alternates only.
 - Approved travel expenses for travel to Transportation Commission meetings for the STAC Chair or STAC Vice-Chair, or their delegate.
 - Other approved travel expenses supporting the transportation planning process as authorized by CDOT. Travel for purposes other than those outlined above should receive pre-approval by CDOT-DTD via e-mail or other written means from your CDOT-DTD Planning Liaison.
- Personnel Expenses
 - Personnel Expenses (see Timesheets below) are allowable for paid staff providing support to the RPC in carrying out the duties and responsibilities of the RPC as outlined in Section 1 above. Examples include administrative staff preparing meeting materials, providing meeting setup and support, etc.
- Public Participation
 - Utilizing available media opportunities to provide timely notice of planning related activities. This includes, but is not limited to, electronic mail, newspapers and other means.
 - Providing mailings, either electronic or regular, containing information about transportation issues.
 - Conducting meetings, transportation forums, open houses or other means of public meetings for the purpose of providing information about transportation issues.
- Food and Beverage Expenses
 - In accordance with 2 CFR 225 Appendix B (27) Meetings and Conferences, meals are allowable when they are provided for a public meeting that focuses on dissemination of technical information.
 - 2 CFR 225 specifically calls out meals, and while meals are allowable when guidelines are met, more often beverages and limited food items are provided at meetings.
 - Meetings at which food and beverage will be provided must be a formally advertised public meeting that focuses on informing the general public about a project or program, and allows them an opportunity to engage and comment.

- The primary audience must be the general public and community members who are not regular participants in the transportation planning process (e.g., RPC/TPR members), nor are they transportation professionals at any level.
- Routine meetings such as a Technical Advisory Group, Technical Advisory Committee, Board of Directors, Project Steering Committee, etc., which include a regular membership and do not specifically target public participation as the primary purpose of the meeting do not qualify as meetings where food and beverage are allowable. In order to qualify, a meeting needs to contain a specific agenda item seeking to inform the general public and seeking their input on a project or program.
- Any agency or organization seeking reimbursement of food and beverage expenses must include documentation (in the invoice submitted to CDOT for reimbursement) that the meeting was advertised.
- The cost of food and beverage must be reasonable and prudent.
- The purchase of alcoholic beverages is never an allowable expense.
- Long Range Regional Transportation Plan (RTP)
 - Any tasks which involve continuing efforts to update and/or maintain the Regional Transportation Plan (RTP).
 - For specific work products that involve the use of consultants, please contact your CDOT-DTD Planning Liaison before procuring services. This is to ensure that consultant services comply with the Scope of Work, applicable state and federal regulation, and documentation requirements.

Questions about whether an activity is allowable should be directed to your CDOT-DTD Planning Liaison. It is strongly recommended that you seek pre-approval for expenses that are not explicitly permitted.

4. Expense Eligibility and Documentation Requirements

This section addresses the RPA Program specifically, providing additional details on eligibility of expenses and documentation requirements for invoicing pursuant to State and Federal requirements.

Each invoice must include the following:

- Expenditure ledger and/or copies of invoices and checks
- Personnel Expenses Summary Sheet and Timesheets
- Travel Expense Sheet, when applicable.

Details on these documents are as follows:

A. Expenditure Ledger and Invoices/Checks

The expenditure ledger is a summary report from an accounting system. If the RPC (or administrative entity) has copies of invoice(s) and check(s), the expenditure ledger is not required, but the invoices must be marked as approved for payment. All of the following are acceptable – copies of checks, check registers, approved accounting system generated expenditure ledgers showing check numbers or Electronic Funds Transfer (EFT) and date paid.

Expenditures incurred by the RPCs must have been paid by the contract vendor before CDOT is invoiced for the expense. It is against FHWA rules to invoice CDOT prior to payment by the RPC.

When using a contractor, the specific document the contractor used to invoice the RPC is required. The RPC is responsible for ensuring that the backup matches the invoice and is eligible for reimbursement. If the RPC pays the contractor a discounted amount, the full amount cannot be reimbursed to the RPC, only the discounted amount.

B. Timesheet and Personnel Expenses Summary

RPCs are required to provide timesheets with a breakdown of hours worked by day displaying all projects worked for the day, week, and month or time collection period as well as demonstration of how these work activities directly relate to the Scope of Work (See [Allowable Activities](#)). The timesheet must also be signed or approved either in ink or electronically. For full requirements by FHWA for timesheet requirements, please see [2 CFR 225](#).

Any supporting documentation from the payroll ledger indicating hours, wages, and benefits are also required. If there is sensitive information such as social security number or addresses, please block that information. If the RPC is using a temp agency, and would prefer to submit the invoice from the temp agency for reimbursement, CDOT needs the same documentation the temp agency would use for approval. This must occur before the RPC pays the temp agency.

In conjunction with the aforementioned requirements, CDOT is asking that RPCs complete and submit with each RPA invoice a ***Personnel Expenses Summary Sheet***, provided by CDOT-DTD, which provides a clear, concise summary of personnel expenses. This summary sheet includes the name of each employee that conducts work on behalf of the RPC, the hourly rate of the employee, and the numbers of hours worked on each of the six work tasks identified in the RPA Scope of Work. The Personnel Expenses Summary Sheet and other documentation forms referred to in this Guidebook are available on the [DTD-Planning website](#).

C. Travel Expenses

In conjunction with the State Travel Management Program (C.R.S. [24-30-202](#), [24-50.3](#) and [24-102-101](#)), CDOT's Policy Directive 207.1 and Procedural Directive 207.2 set the standards for all travel expenses in accordance with the [State of Colorado Fiscal Rules](#) (5-1 Travel). The applicable travel and invoicing policy is summarized below.

i. Travel Vouchers and Expense Reports

Lodging, meals, or other reimbursable travel expenses shall only be reimbursed for the period of time necessary for the traveler to accomplish the State or RPC business. If lodging, meals or transportation are included in conference fees, registration fees, or are otherwise furnished at no additional cost, no reimbursement shall be made for these items. The following table provides a helpful guideline of approved travel expenses, how they are reimbursed, and whether a receipt is required for reimbursement.

Type of Travel Expense	Reimbursement	Receipt Required?
Lodging	Actual	Yes
Meals	Per Diem Rate	No
Incidental Expenses	Per Diem Rate	No
Transportation (other than airfare)	Actual	Yes, if over \$25
Rental Vehicles	Actual	Yes
Mileage for use of Personal Vehicles	90% of current Federal mileage rate , when using a 2WD vehicle; 95% for 4WD; but not greater than the rate paid by the grantee to the traveler.	No
Airfare	Actual	Yes
Tips	Included in Per Diem Rate for Incidental Expenses	No
Registration Fees	Actual	Yes
Other Allowable Travel Expenses	Actual	Yes, if over \$25

ii. Meals

Those authorized to travel shall be reimbursed for the cost of eligible meals, including taxes and tips for those meals. If a meal is provided (such as continental breakfast at a hotel or a working lunch at a meeting/conference) the expense may not be charged unless the meal is determined to be inadequate by the traveler.

Those authorized, must claim meal expenses based on departure and arrival time as follows: Breakfast cannot be claimed unless departure is prior to 5:00 a.m. at the departing city. Lunch cannot be claimed unless departure is before 11:00 a.m. at the departing city or return is after 1:00 p.m. at the home city. Dinner cannot be claimed unless return time is after 8:00 p.m. at the home city.

NOTE: Lunch is never eligible for reimbursement when travel begins and ends in a single calendar day.

iii. Per Diem Meal Expense Rates

The applicable per diem meal expense rates are based on where each meal is taken. Per Diem rates, which vary by county and city, are determined and updated annually by the IRS and are effective October 1 through September 30. Current Meal Per Diem Rate

tables for Colorado and for the Continental US (CONUS) will be provided annually by CDOT-DTD when new rates are published by the IRS. Current rate tables may be found on the [DTD-Planning website](#).

iv. Other Allowable Travel Expenses

In addition to lodging, meals, and transportation, the following expenses incurred may be reimbursed:

- Tips: A traveler cannot claim tips as a separate item; tips paid to porters, baggage carriers, bellhops, hotel maids, and skycaps for airport check-in are included in the per diem rate for Incidental Expenses. Tips paid in conjunction with meals are included in the standard meal allowance. Tips paid in conjunction with taxi and shuttle expense should be included as part of these miscellaneous expenses.
- Other allowable travel expenses include: Commercial transportation, such as taxi and shuttle expenses; parking fees; registration fees; telephone, fax, internet access and other similar miscellaneous business expenses required for state business; toll road charges.

v. Non-reimbursable Travel Expenses

The following expenses shall not be reimbursed: Alcoholic beverages, entertainment expenses, personal expenses that are primarily for the benefit of the traveler and not directly related to state or RPC business, political expenses, travel insurance paid by the traveler, cost of traffic fines, traffic tickets, or parking tickets; or late fees for state credit cards.

vi. Exceptions to the Rule for Travel Expenses

Allowances for travel not solely for state or RPC business: If travel is for a combination of state or RPC business and personal business, the individual shall make reasonable allocation of the share of applicable expenses and provide documentation to indicate the allocation request.

Allowances for travel by privately owned automobile: Reimbursement is allowed for actual business mileage traveled when using a privately owned vehicle for business purposes.

vii. Standardized Travel Documentation Requirements

In addition to the requirements outlined under Expenditure Ledger and/or Copies of Invoices and Checks, travelers must submit the **Travel Expense Reimbursement Form** provided by CDOT-DTD and available on the [DTD-Planning website](#). This form must be fully completed and signed by the traveler requesting reimbursement to determine

eligibility for reimbursement. Alternative travel expense documentation may be provided if it provides the information required to determine the eligibility of expenses and is *pre-approved for use by your DTD Planning Liaison*.

5. Frequency of Invoicing

Pursuant to [49 CFR 18.41](#), **grantees are required to submit invoices no less frequently than on a quarterly basis and within 30 days of the close of the billing period.** The Rural

Planning Program is based on the state fiscal year (July through June) with quarters ending:

- Quarter 1: September 30 (invoice due Oct. 30)
- Quarter 2: December 31 (invoice due Jan. 30)
- Quarter 3: March 31 (invoice due Apr. 30)
- Quarter 4: June 30 (invoice July 30)

Invoices may be submitted more frequently, but should be submitted no less frequently than every three months.

6. Records Retention and Access

Pursuant to [49 CFR 18.42](#), all financial and programmatic records, supporting documents, statistical records, and other grantee or sub-grantee records which are required by the grant agreement **must be retained for a period of three years from the starting date specified below:**

- *General Documents* – Retention period begins upon submission of final expenditure report, last quarterly report of the Federal fiscal year, or annual expenditure report in the case of an annually-renewed grant.
- *Real Property or Equipment Records* – Retention period begins upon the disposition, replacement, or transfer of said property or equipment.
- *Income Transactions After the Grant Period* – If required to report income following the end of the grant period, retention period begins at the end of the grantees fiscal year in which the income was earned.
- *Indirect Cost Rate Proposals, Cost Allocation Plans, etc.* – If submitted to the Federal Government for negotiation, the retention period begins on the date of said submission; if not submitted for negotiation, the retention period begins at the end of the grantee fiscal year covered by the proposal.

Copies of original records produced with microfilm, photocopying, or other similar methods may be substituted for original records.

The Colorado Department of Transportation (CDOT) and Federal government has the right to access all grantee and sub-grantee records which are pertinent to the grant in order to make audits, examinations, excerpts, and transcripts. The right to access by CDOT and the Federal government does not expire at the end of the mandatory three year retention period, but is maintained as long as the records are retained.

Grantees and sub-grantees are not bound by the Federal Freedom of Information Act (5 U.S.C. 552) to permit public access to their records unless specifically required by Federal, State, or local law.

7. High Risk Grantees

Under special circumstances, pursuant to [49 CFR 18.12](#), a grantee or sub-grantee may be considered “high risk” if an awarding agency determines that a grantee or sub-grantee:

- Has a history of unsatisfactory performance, or
- Is not financially stable, or
- Has a management system which does not meet the management standards set forth in this part, or
- Has not conformed to terms and conditions of previous awards, or
- Is otherwise not responsible; and if the awarding agency determines that an award will be made, special conditions and/or restrictions shall correspond to the high risk condition and shall be included in the award.

As a result of high risk status, the following special conditions or restrictions may include:

- Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given funding period;
- Requiring additional, more detailed financial reports;
- Additional project monitoring;
- Requiring the grantee or sub-grantee to obtain technical or management assistance; or
- Establishing additional prior approvals.

If an awarding agency decides to impose such conditions, the awarding official will notify the grantee or sub-grantee as early as possible, in writing, of:

- The nature of the special conditions/restrictions;
- The reason(s) for imposing them;
- The corrective actions which must be taken before they will be removed and the time allowed for completing the corrective actions; and
- The method of requesting reconsideration of the conditions/restrictions imposed.