



UNITED STATES DEPARTMENT OF COMMERCE
Economic Development Administration
Washington, DC 20230

1/14/2020

Lisa Byrd
Director of Finance
Capital Area Council of Governments
200 Independence Ave
Washington, D.C. 20201

RE: Indirect Cost Rate Certificate

Lisa:

With this letter, the Economic Development Administration (EDA), a component of the Department of Commerce and your cognizant agency, acknowledges receipt of your Cost Allocation Plan Certificate for FY 2020 dated 9/24/2019. As a unit of state or local government that receives less than \$35 million in annual cumulative direct Federal funding, you are not required to submit an indirect cost rate proposal to EDA and, consequently, EDA will not review your submission at this time. For more information on this requirement, see 2 C.F.R. part 200, App. VII § D.1.b.

Your organization is required to develop an indirect cost rate proposal in accordance with 2 C.F.R. part 200 and retain it with related supporting documentation for audit. For more information on this requirement, see 2 C.F.R. part 200, App. VII § D.1.b. and 2 C.F.R. § 200.333. EDA reserves the right to review this or future indirect cost rate proposals at a later time to ensure conformity with the requirements of 2 C.F.R. part 200. Typically, EDA will exercise this right if there is a relevant audit finding, a concern is raised by another government agency concerning a particular indirect cost rate, and/or if EDA finds an anomaly in an indirect cost rate proposal. In such circumstances EDA may review such an indirect cost rate proposal itself or through another Federal agency.

Please contact my office at 202-482-2917 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Bernadette Grafton". The signature is written in a cursive style.

Bernadette Grafton
Program Analyst
Economic Development Administration

**Certificate of Indirect Costs
For State & Local Governments and Indian Tribes**

This is to certify that I have reviewed the indirect cost rate proposal submitted herewith and to the best of my knowledge and belief:

- (1) All costs included in this proposal September 23, 2019 to establish billing or final indirect cost rates for 10/1/2019 – 9/30/2020 are allowable in accordance with the requirements of the Federal award(s) to which they apply and the provisions of 2 CFR Part 200 Subpart E-Cost Principles. Unallowable costs have been adjusted for in allocating costs as indicated in the indirect cost proposal.

- (2) All costs included in this proposal are properly allocable to Federal awards on the basis of a beneficial or causal relationship between the expenses incurred and the agreements to which they are allocated in accordance with applicable requirements. Further, the same costs that have been treated as indirect costs have not been claimed as direct costs. Similar types of costs have been accounted for consistently and the Federal government will be notified of any accounting changes that would affect the predetermined rate.

I declare that the foregoing is true and correct.

Governmental Unit: Capital Area Council of Governments

Signature: Lisa Byrd Bowman

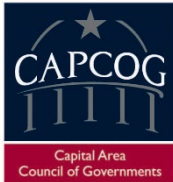
Name of Official (printed): Lisa Byrd Bowman

Title: Director of Finance

Date of Execution: 09-24-2019

This certification:

- Is a requirement per 2 CFR Part 200 Subpart E Subsection 200.415 and Appendix VII Section D.3.;
- Must be submitted as part of the annual indirect cost rate proposal; and
- Must be signed on behalf of the non-Federal entity by an individual at a level no lower than vice president or chief financial officer of the organization.



Capital Area Council of Governments FY 2020 Cost Policy Statement and Cost Allocation Plan

The Capital Area Council of Governments uses the cost allocation method prescribed in OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 C.F.R. Part 200; *Review Guide for State and Local Governments State/Local-Wide Central Service Cost Allocation Plans and Indirect Cost Rates*; *U.S. Economic Development Administration Indirect Cost Instructions (08/10/2015)*; and the Texas Uniform Grants Management Standards (UGMS) to distribute shared costs throughout the grants and programs that it administers. Six direct cost pools have been established for common services: Accounting Services, Payroll & Personnel Services, Information Technology Services, Copier, Telephone, and Office Space. Actual accumulated costs are pooled into separate cost pools and these costs are distributed directly to programs each month. The allocation method for:

- Accounting Services is number of labor hours per program.
- Payroll & Personnel Services is the number of labor hours per program.
- Information Technology Services is the number of network connections and devices per program.
- Copier is a proportional share of copies.
- Telephone is a proportional share based on number of phone lines, plus direct phone charges.
- Office Space is based on actual square footage per program.

COST POLICY STATEMENT

Basis of Accounting:

CAPCOG uses the current financial resources measurement focus and the modified accrual basis of accounting. Revenue is recognized as soon as it is both measurable and available. Revenue is considered to be available when it is collectible within the current period or soon enough thereafter to pay liabilities of the current period. For this purpose, the CAPCOG considers revenue to be available if it is collected within 60 days of the end of the current fiscal period. Expenditures generally are recorded when the liability is incurred, as under accrual accounting. However, debt service expenditures, as well as expenditures related to compensated absences and claims and judgments are recorded only when payment is due.

Expenditure-driven grants are recognized as revenue when the qualifying expenditures have been incurred and all other grant requirements have been met. Grant revenues, state financial assistance, membership dues and interest are susceptible to accrual. All other revenue items are considered to be measurable and available only when cash is received by the CAPCOG.

Indirect Cost Rate Allocation Base: Total Salaries and Wages.

Fringe Benefits: Fringe benefits are charged to each Program in direct proportion to the total salaries and wages.

Internal Control: Capital Area Council of Governments maintains adequate internal controls to insure that no cost is charged both directly and indirectly to Federal and State contracts or grants. CAPCOG uses

Abila Software's MIP Fund Accounting software which has built in internal control features such as password security, restricted access, levels of authorization, dual entry, date restriction and designated approval processes. In the Navigator mode, accounting transactions are laid out in flow chart fashion so that all steps in a process can be followed.

Accumulated Indirect Costs: CAPCOG accumulates all indirect costs and revenues in MIP fund account 100 titled, "General Fund", and program codes 110 "General Management" and 130 "General Services."

Other policies and guidelines:

CAPCOG Fixed Assets Policy
CAPCOG Fund Balance Policy
CAPCOG Investment Policy
CAPCOG Internal Controls Policy
CAPCOG Personnel Policies
CAPCOG Travel Guidelines

DESCRIPTION OF COST ALLOCATION METHODOLOGY:

Salaries and Wages:

All time is accounted for on employee time sheets, reviewed by supervisors and/or managers and submitted electronically to the Finance Department for processing. Timesheets are submitted on a bi-weekly basis. The MIP Fund Accounting software distributes the cost to the general ledger of the appropriate grant or pool. Program salaries are charged directly to the appropriate program budget. Salaries and benefits for the Executive Director's staff or other staff services that benefit all program areas are allocated to Indirect Costs. No payroll costs can be duplicated.

Fringe Benefits Allocation:

The following is a list of fringe benefits paid for all regular full time employees:

Payroll Taxes-FICA
Payroll Taxes – Medicare
Unemployment Insurance
Workman's Compensation
Retirement Contribution (401K match for those participating)
Health Insurance
Dental Insurance
Vision Insurance
Long Term Disability Insurance
Term Life Insurance
Wellness Program
Merit Pay
Vacation
Sick time
Holidays
Personal Day

Fringe benefits are tracked through the payroll module of the MIP accounting software. Charges to grants and programs are in direct proportion with compensation charges. Using the Simplified Allocation Method, the total fringe benefits costs are divided by an equitable distribution base. For CAPCOG, the distribution base is the total salaries and wages. The result of this process is a fringe benefits rate, expressed as the percentage which the total amount of benefits costs bears to the base (total salaries and wages). The rate provides a monthly charge to all programs to insure that all programs are equally charged a proportionate share directly related to the amount of labor assigned to that program.

Release Time (Annual leave, sick leave, holiday leave, and personal day) is included in the fringe benefit calculation. A wellness program contribution and a finite amount for merit, when available, are also included.

CAPCOG uses the carry forward method for fringe benefits.

Travel:

Travel is charged directly to the program or cost pool that it benefits. The purpose of the travel is documented by travel request forms, which the employee prepares and signs prior to receiving payment. Travel costs are finalized with an after-travel form that documents final expenses. Travel complies with state and federal guidelines and with CAPCOG's Travel Guidelines.

Copies:

CAPCOG uses leased copiers, each of which has been programmed with preset codes used to identify the program and grant where appropriate using the machine and the number of copies produced. Costs related to this pool are recovered monthly based on a proportional share of copies.

Postage:

Metered postage is charged directly based on actual postage cost. The cost of the leased postage meter is recovered monthly based on a proportional share of the number of items mailed.

Communications:

Telephone service and the costs are computed and allocated to the program to which the employee is assigned. The infrastructure costs are allocated in direct proportion to the number of phone lines used by a program. Long distance calls and conference call charges are directly billed. All long distance calls require the use of an access code for tracking calls by each program, as do conference calls.

Space Costs:

Office rental is allocated based on actual square foot costs of space used by each program. This rental cost includes proportionate share of conference room used for Committee meetings, etc., and ancillary areas. Average rental cost and estimated Common Area Maintenance charges are at an annual rate of \$21.47 per square foot (monthly at \$1.79 per square foot). Any overage for Common Area Maintenance charges or costs for maintenance or repairs are pooled and charged out monthly in proportion to the space used by each program.

Other Expenditures:

The remaining expenditure categories (such as consumable supplies, meeting registrations, dues, membership and publications, etc.) are costs for which each program directly pays. Documentation to

support program allocations includes items such as purchase requisitions, payment authorizations, receiving reports and vendor invoices.

Capital Equipment:

Equipment purchases are expensed directly to programs. Documentation to support program allocations includes items such as purchase requisitions, payment authorizations, receiving reports and vendor invoices. Capital purchases are made in accordance with the CAPCOG Procurement Policy and are maintained in the fixed asset inventory.

Contracts:

Contracts procured for the benefit of grants, programs or cost pools are charged directly to the grants, programs or cost pools that they benefit. Costs are supported by signed contracts, and where expending more than \$25,000, with Executive Committee approval. Audit fees are allocated to the grants or programs through the Accounting Services allocation.

Accounting Services Allocation:

These services comprise the overall financial management function for all grants and programs. These services include: recording all cash receipts, processing vendor and subcontractor disbursements, accounts receivable, invoicing, periodic reporting to funding agencies and internal management; budget support, cash management, purchasing and procurement functions, and support for all independent fiscal and operational audit teams and monitoring teams from all funding agencies. Costs are allocated monthly, based on the number of labor hours per program.

Information Technology (IT) Allocation:

Services for this function primarily relate to the Information Technology (IT) support of the local and wide-area computer network systems, which are centralized at CAPCOG's offices. IT support includes all maintenance of the network servers, all peripheral equipment used in the connectivity of the local and wide-area computer network systems, maintenance of all network and PC operating systems and all software applications, maintenance of all PC workstations at all locations, ensuring proper licensing, the maintenance of the software library, GIS technical support, and providing technical support and some software training to all employees of CAPCOG. Costs are allocated monthly based on the number of network connections and devices supported in each program or grant.

Payroll and Personnel Services Allocation:

These services comprise payroll and human resources functions for CAPCOG. These include the physical processing of a bi-weekly payroll run, disbursement and periodic payroll tax reporting, orientation for new employees, organizing required training, enrollment support for all benefits paid by CAPCOG, maintenance of a CAPCOG-sponsored defined contribution retirement plan, maintenance and control of all personnel records, and compliance with all federal and state employment laws. The allocation method for Payroll & Personnel Services is the number of labor hours per program.

Indirect Costs Allocation:

The Indirect Cost pool is used to allocate the general costs of the Capital Area Council of Governments that cannot be directly assigned to a specific department, program or grant. Indirect Cost Pools were established by OMB Circular A-87, updated in OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. Part 200, and further defined by the Uniform Grants

Management Standards (UGMS). These services comprise the overall management function for all grants and programs.

The budget for the indirect cost pool includes salary and benefits for the CAPCOG Executive Director, the Director of Administration, Member Services Coordinator, Administrative Coordinator within the Director's office, and Receptionist, employee development and training, executive travel, training, general insurance, general membership dues, Executive Committee meetings and travel, General Assembly meetings costs, postage and printing for announcements, meetings and general mailing, software maintenance and direct supplies.

Costs for any of the employees that can be readily identifiable as associated with a particular program or cost pool will be directly charged to that program. Indirect costs are allocated based on the actual accumulated expenditures in the indirect cost pool. Using the Simplified Allocation Method, the total allowable indirect costs are divided by an equitable distribution base. For CAPCOG, the distribution base is the total salaries and wages. The result of this process is an indirect cost rate, expressed as the percentage which the total amount of allowable indirect costs bears to the base (total salaries and wages). The rate provides a monthly charge to all programs to insure that all programs are equally charged a proportionate share of the Indirect Costs.

CAPCOG uses the Indirect Cost with Carry forward method.

Allocations within individual programs:

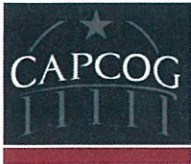
Indirect costs and other cost allocations are made at the program level. In some cases, such as in Aging Services programs, costs must be allocated between various funding streams within a program which permit the same expenditures. When this is necessary, the individual programs have developed allocations that are acceptable to their granting agencies.

Pass Through:

Pass Through is the distribution of goods and services directly for the benefit of the intended purpose of the grants or programs where the contracting entity acts merely as a conduit. Since CAPCOG exercises total administrative, managerial and financial control and oversight, very little of its funds can be considered as pass through funds.

Unallowable Costs:

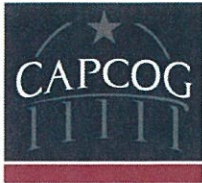
CAPCOG recognizes that unallowable costs, as defined by OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. Part 200 and UGMS, unless exempted or otherwise allowed, cannot be charged to state or federal awards and has internal controls in place to insure that this is followed.



**CAPITAL AREA COUNCIL OF GOVERNMENTS
INDIRECT COST ALLOCATION
October 1, 2019 - September 30, 2020**

| EXPENDITURES | FY 2019 Budget | FY 2019 Estimate | FY 2020 Budget |
|---|---------------------------|-----------------------------|---------------------------|
| Salaries | 306,041 | 306,041 | 312,246 |
| Temporary Services | 2,700 | 2,700 | 3,000 |
| Release Time & Benefits | 161,590 | 161,590 | 168,247 |
| TOTAL PERSONNEL COSTS | 470,331 | 470,331 | 483,493 |
| Accounting | 31,638 | 31,638 | 28,059 |
| Communications | 4,870 | 4,870 | 4,882 |
| Insurance | 10,000 | 10,000 | 10,000 |
| Legal | 2,500 | 2,500 | 2,500 |
| Postage | 7,000 | 7,000 | 7,000 |
| Printing | 2,000 | 2,200 | 2,000 |
| Photocopy Expense | 14,000 | 14,000 | 14,000 |
| Contractual Services | 0 | 0 | 0 |
| Professional Services | 2,000 | 2,000 | 0 |
| Advertising | 500 | 500 | 500 |
| Prof. Development | 1,850 | 1,850 | 1,900 |
| Meeting Expense | 0 | 0 | 0 |
| Subscriptions, Dues | 39,460 | 39,460 | 39,680 |
| Travel | 14,025 | 14,025 | 13,825 |
| Office Space | 94,754 | 94,754 | 99,665 |
| Equipment Maintenance | 0 | 0 | 0 |
| Equipment | 500 | 500 | 8,000 |
| Consumable Supplies | 6,600 | 5,600 | 10,254 |
| Furniture Maintenance | 0 | 0 | 0 |
| Personnel/Payroll Services | 12,118 | 12,118 | 13,078 |
| IT, Security, and Communications Support Services | 49,851 | 49,851 | 44,312 |
| Indirect Carryover | -1,047 | -1,047 | 1,750 |
| Cost Recovery CAECD | (254,039) | (254,039) | (234,285) |
| TOTAL EXPENDITURES | 508,911 | 508,111 | 550,613 |
| Basis for Allocation | 1,925,541 | 1,925,541 | 2,027,826 |
| INDIRECT RATE | 26.43% | 26.39% | 27.15% |

Indirect costs are not to be considered Administrative or Overhead Costs. It is an accounting method used when costs are: (a) incurred for a common joint purpose benefiting more than one cost objective; and (b) not readily assignable to the cost objective specifically benefited, without effort disproportionate to the results achieved. This method is outlined in OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (codified at 2 C.F.R. Part 200) as an allowable method of cost distribution. CAPCOG uses total direct salaries and wages as the basis for distributing indirect costs to individual program areas, resulting in each award bearing a fair share of the indirect costs in reasonable relation to the benefits received from the costs. Separate costs pools have been established for Accounting, Personnel/Payroll, and Information Technology Services, and are allocated as direct costs to program areas based on allocation methods included in the approved Cost Allocation Plan.



CAPITAL AREA COUNCIL OF GOVERNMENTS

FRINGE BENEFITS

October 1, 2019 - September 30, 2020

RELEASE TIME

| | | |
|---------------------------|----------------|---------------|
| Vacation | 171,322 | |
| Sick Leave | 116,810 | |
| Holidays | 186,896 | |
| Total Release Time | 475,028 | 13.29% |

BENEFITS

| | | |
|--------------------------------|------------------|---------------|
| FICA | 309,781 | |
| Employee Insurance | 728,082 | |
| Retirement | 275,361 | |
| Unemployment Insurance | 16,198 | |
| Workman's Compensation | 13,731 | |
| Wellness Program | 5,500 | |
| Potential Leave Payout | 20,000 | |
| Merit Pool | 42,310 | |
| Est. Adjustment - Recover 2019 | 40,000 | |
| Total Benefits | 1,450,961 | 40.59% |

TOTAL RELEASE TIME AND BENEFITS 1,925,989 53.88%

| | |
|--------------------|------------------|
| Total Salaries | 4,049,420 |
| Less: Release Time | 475,028 |
| | 3,574,392 |

BASIS FOR BENEFIT ALLOCATION:

1,925,989 / 3,574,392 53.88%