Payment Request Quick Guide

For SS4A Grant Recipients

Let's get reimbursed!

The payment request quick guide is here to help Safe Streets and Roads for All grant recipients better understand:

- What a payment request is
- How the payment request process works
- The roles involved in the payment request process, and
- The necessary documentation to successfully process payment requests

This quick guide covers:

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Payment Requests 101

"I'm a first-time Federal grant recipient. I know payment requests are important, but I have no clue what they mean within the context of my project."

First, congratulations on your SS4A award! The SS4A grant program distributes your awarded funds through a reimbursement process. In a nutshell, you submit payment requests for your costs, and FHWA reviews the requests and provides reimbursements for eligible costs incurred throughout your project's period of performance. Your period of performance is outlined in your grant agreement, so, any costs for work performed before agreement execution cannot be reimbursed using the grant funding and also may not be counted toward your matching funds.

"Great! I executed my grant agreement... how do I submit a payment request?"

To submit your payment requests, you will use the Delphi eInvoicing system, commonly referred to as iSupplier. You may hear this system referred to as Delphi, iSupplier, or Delphi/iSupplier.

Roles and Responsibilities for Payment Requests

As usual, your FHWA Point of Contact (POC) will be your main point of contact throughout the payment request process. Their goal is to help you get your payment requests processed successfully. While you work directly with your POC, you may hear the following roles mentioned during the process:

Role	Responsibilities
Division Office or OTT POC	• The SS4A contact that you usually communicate with • Answers questions • Helps get you accounts set up
Grant Recipient	• Maintains banking information associated with UEI and creates Login.gov and Delphi/iSupplier Account • Electronically submits invoice packages on Delphi/iSupplier • Works with Division Office or OTT POC to revise documentation, if needed • Received reimbursement and monitors and reports costs to ensure that the non-federal share is met
Approver	• Ensures that payments follow applicable laws, regulations, and USDOT and FHWA policies and procedures. • Verifies that the requested costs align with the information included in the approved grant agreement • Approves or rejects recipient reimbursement requests for the projects assigned to them.
Alternate Approver *Optional role/function*	• Serves the approver when the designated Approver is unavailable to perform their Approver duties.

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The Payment Request Process

One-Time Setup

Before you begin submitting payment requests, you will need to complete the following one-time, prerequisite steps:

- **Step 1: You will update your organization's banking information in the [System for Award Management](#) (SAM).**
  - o Delphi/iSupplier uses the banking information listed on your SAM account to process all payments. Ensuring your information is up to date in your SAM account will prevent delays and issues with reimbursement payments. If needed, you can update or change your banking information anytime through SAM.

- **Step 2: Request Delphi/iSupplier Access.**
  - o First, you must create or confirm your [Login.gov](#) account:
    - ▪ If you are a new grant recipient who *has not* done business with DOT/FHWA in the past and do not have a Delphi Account/ID, you will need to establish a [Login.gov](#) account. For instructions on how to create a [Login.gov](#) account, you can reference the [FHWA SS4A Recipient Resource – iSupplier Access](#) resource.
    - ▪ If you are a grant recipient that *has* done business with DOT/FHWA in the past and already have a Delphi Account/ID, make sure that your Login.gov and Delphi Account/ID are active.
  - o Then, after your award is obligated, your FHWA Division Office or Office of Tribal Transportation (OTT) point of contact (POC) will request the creation of your Delphi iSupplier account/ID on your behalf. To make the request, your POC will need the following information from you:
    - ▪ The recipient user's first and last name
    - ▪ The recipient user's email address associated with the Login.gov account
    - ▪ The recipient user's current phone number
  - o Finally, you will be notified by e-mail when your Delphi/iSupplier account has been created. The email will include detailed instructions for logging into and activating your Delphi/iSupplier account. For instructions on how access the Delphi/iSupplier web portal, you can reference the [FHWA SS4A Recipient Resource – iSupplier Access](#) resource.

Quick Tip!

The only team members who need access to iSupplier are those that will be submitting payment requests. At least one staff member of your organization must be designated as a primary contact in Delphi/iSupplier. This person must be set up as a "supplier" and any other system users must be registered.

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Payment Request Process

Once you update your organization's banking information and have access to your Login.gov and a Delphi/iSupplier accounts, the payment request process will follow the below steps.

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1. **You will use Delphi/Supplier to electronically submit your complete invoice package.**
   a. Your submission will include the applicable standard form (See Section 5 below) and supporting documentation.

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2. **A designated "Approver" in the Division Office must review your complete invoice package within 30 days.**
   a. The Approver will review your complete invoice package to ensure that the invoice package is for allowable costs that comply with the terms and conditions of the federal award. This simply means they are confirming that your spending is justified and meets all the necessary regulations and requirements.
   b. If your payment request meets the requirements, the Approver approves the payment request in Supplier. Congratulations!
   c. If the payment request does not meet the requirements, the Approver will let you know why the request cannot be approved and then rejects the payment request in Delphi/Supplier. From there, you will work with your POC to revise your documentation, so the request for payment can be approved.

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3. **You receive your reimbursement.**
   a. Once your request is approved, you can expect to see your reimbursement within five business days of the approval. If you don't see your payment posted within that time frame, contact your POC.
   b. iSupplier payments are made electronically to the bank account information associated with the recipients UEI in SAM.gov. The recipient is responsible for ensuring that this information is current before submitting payment requests.

As you receive reimbursements and work on your project, continue to monitor and report your costs to ensure that the non-Federal share is met. Requests for reimbursement cannot be submitted more frequently than monthly and no less than annually; however, it is highly encouraged that recipients bill progressively throughout the life of the project.

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Allowability Requirements for Costs to be Reimbursed

Not all project costs can be reimbursed, but there are many that can. Costs that *can* be reimbursed are called allowable costs and those that *cannot* be reimbursed are called unallowable costs. The regulations that determine whether a cost is allowable or unallowable are at 2 CFR 200 Subpart E: Cost Principles (§ 200.400 to § 200.476).

Allowable costs for reimbursement must conform to the limitations in the grant award and must meet the following general criteria, outlined in 2 CFR 200 Subpart E § 200.403. The notes provided below are intended to be a starting point for understanding 2 CFR 200 Subpart E § 200.403 and help you familiarize yourself with regulation concepts. They do not replace or supersede the need to comprehensively review the full regulatory language and its applications to your grant project.

2 CFR 200 Subpart E § 200.403 Language	Notes
(a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.	A necessary cost is needed for the performance of the grant. This cost is specifically for your project, is necessary for the overall operations of your project, and is assignable (in whole or in part) to your grant project. A cost is reasonable if it does not exceed an amount that a prudent person would incur under the circumstances prevailing when the decision was made to incur the cost. Reasonableness considerations are included in § 200.404.
(b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.	Not all costs are allowable. For example, you can't count costs towards the contributions of another award. You must follow the limitations or exclusions included in the Cost Principles and in your Federal award.
(c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.	Grant recipient costs policies should apply the same rules and logic and be consistent with other federal, state, and local program procedures.
(d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.	Treat similar costs consistently. For example, a cost shouldn't be considered a direct cost in one situation and an indirect cost in another situation.
(e) Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.	Follow GAAP unless a 2 CFR 200 requirement contradicts it.
(f) 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 period. See also § 200.306(b).	Don't double dip – for example, if you request reimbursement for a cost through the SS4A program, do not also request reimbursement for that cost through another program.

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2 CFR 200 Subpart E § 200.403 Language	Notes
(g) Be adequately documented. See also § 200.300 through 200.309 of this part.	For example, adequate documentation includes but is not limited to maintaining records that sufficiently identify the amount, source, and expenditure of Federal funds for Federal awards.
Administrative closeout costs may be incurred until the due date of the final report(s). If incurred, these costs must be liquidated prior to the due date of the final report(s) and charged to the final budget period of the award unless otherwise specified by the Federal agency. All other costs must be incurred during the approved budget period. At its discretion, the Federal agency is authorized to waive prior written approvals to carry forward unobligated balances to subsequent budget periods. See § 200.308(g)(3).	Cost must be incurred during the period of performance and budget period defined in your executed grant agreement. For phased grant agreements, only costs incurred during the currently obligated phase can be reimbursed.

2 CFR 200 Subpart E: Cost Principles (§ 200.400 to § 200.476) includes in-depth information about the specific factors that determine whether various types of costs are allowable. Consider registering for the National Highway Institute's (NHI) Understanding the Uniform Guidance Requirements (2 CFR 200) for Federal Awards course and taking the Cost Principles module for more information on what is considered allowable and unallowable. Familiarizing yourself with this section, and all of 2 CFR 200, will help you meet program requirements.

In addition to 2 CFR 200, you can also reference Article 3: Summary Project Information in your approved grant agreement and your submitted SF-424 and 424-A or 424-C for additional guidance on which costs are reasonable and necessary for your project. There are a lot of nuances in determining whether a cost is allowable or unallowable, so, when in doubt, contact your FHWA POC for questions and clarifications.

Specific CFR sections worth consulting include:

- 2 CFR § 200.305 for procedures on Federal payments, which must be documented before a reimbursement request is submitted.
- 2 CFR § 200.306 for in-kind match.
- 2 CFR § 200.307 for program income.
- 2 CFR § 200.407 for prior written approvals for certain costs, including in-kind match and program income. Be sure to work with your POC for these approvals.
- 2 CFR § 200.439 for equipment purchases of more than $5,000.

Quick Tip for 2 CFR § 200.305

Ensure that your procedures are:

- Written down and documented.
- Maintain an adequate accounting system.
- Includes language that states you will work to, at a minimum, perform billings and reconciliation on a consistent timeframe.

Documentation Requirements for Reimbursement

"Be adequately documented." -*2 CFR 200 Subpart E § 200.403(g)*

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For successful payment requests, you will need to submit adequate documentation. Every SS4A grant project is unique, so there is no singular, one-size-fits-all way of submitting documentation. However, your documentation submissions must include:

1. **The applicable standard form**
    a. For non-construction projects (Planning and Demonstration Grants, previously referred to as Action Plan Grants), submit the SF-270 Request for Advance or Reimbursement.
    b. For construction projects (Implementation Grants), submit the SF-271 Outlay Report and Request for Reimbursement for Construction Programs.

2. **Relevant supporting documents**
    a. Work with your FHWA POC to understand what documentation is required from you – it might be less than you think! Your POC can also help you identify noteworthy practices for compiling and labeling supporting documentation.
    b. Examples of documentation that supports and justifies why you're asking for a payment request. Submit documents that substantiate your payment request. Examples of these documents can include, and are not limited to:
        - Bills received from third parties such as contractors or consultants.
        - Invoices for construction materials.
        - Receipts for project-related travel.

> **Quick Tip!**
> It's hard to prioritize documentation when you are working hard to make your community safer. Connect with your POC early on to clarify what documentation is considered "adequate" for you, so you can proactively document and spend more time making your streets and roads safe for all.

Together, your forms and documents should provide a complete picture of all costs incurred, including direct labor, indirect costs, other direct costs, and travel, and should identify the Federal share and the recipient's share of those costs. Please keep in mind that in addition to the documentation you must submit to receive reimbursements, there are also many other types of documentation that you should retain in your records just in case of audits in the future.

Payment Request FAQs

Still have questions? Below are a few questions your fellow grant recipients have asked that may be helpful to you. If you have additional questions, please contact SS4A.FHWA@dot.gov or submit a request for one-on-one technical assistance.

- **Can I get started on project work before my grant agreement is executed and still be reimbursed?**
    o   NO. We love your initiative! However, any work and associated costs incurred prior to the execution of the grant agreement are <u>not</u> eligible for reimbursement and <u>cannot</u> be used toward a grant recipient's match. Per 2 CFR 200.458, grant recipients can only incur pre-award costs if you receive written approval from the Federal agency; however, this is not a standard practice for SS4A.

- **Do I need to wait for a notice to proceed (NTP) or option letter to get started?**

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- The fully executed grant agreement is the notice that the work identified in the executed grant agreement and included in the current budget period is eligible for reimbursement and can begin. Grants that involve phased grant agreements require a fully executed grant agreement amendment to move to the next phase of funding. For phased grant agreements, costs incurred for a later phase cannot be incurred before the grant agreement is amended.

- **Are there times when the Delphi/iSupplier system is not available?**
  - The system will be available for invoice submission and processing from 6:00 am ET Monday through 9:00 pm ET Saturday. System maintenance will occur between 9:00 pm ET Saturday through 6:00 am ET Monday.

- **Can grant recipients bill monthly, as a consultant bills them?**
  - Yes, the grant recipient agency can request reimbursement monthly. Recipients are encouraged to bill progressively throughout the life of the project, rather than wait until the project is completed. It is also recommended to batch requests as much as possible to reduce administrative burden.

- **Are consultant and staff wages eligible expenses for reimbursement? If so, what are the procedures for including this cost?**
  - Costs, to include direct labor and/or consultants/contractors, are eligible for reimbursement if they were included in the budget application, approved at the time of award, and are included in the executed grant agreement. If the budget changes after the grant agreement is executed, the recipient must notify FHWA of the request in accordance with 2 CFR 200.308 on revision of budget and program plans.

- **When a payment request goes through Delphi, will it be processed for the entire amount, or will it be processed only for the Federal share?**
  - It will be processed only for the Federal share. Recipients must use forms [SF-270](#) or [SF-271](#) to request the Federal share of costs only. If documentation submitted in support of the request for reimbursement includes, for example, invoices from consultants or contractors or documentation of salary costs, recipients should make it clear how much of the total invoice is being requested to be reimbursed as the Federal share.

- **Where can I find more information on payment requests?**
  - NHI Training Course: [**Understanding the Uniform Guidance Requirements (2 CFR 200) for Federal Awards**](#)
    - This course, provided by the National Highway Institute (NHI), helps grant recipients locate provisions within 2 CFR 200, understand the applicability of 2 CFR 200 to Federal awards, and know the general government-wide requirements for Federal awards. This course is free and self-paced so you can pick and choose which individual modules you want to take once you register. Take the Cost Principles module for regulations that relate to payment requests and reimbursements.

  - [**SS4A Match and Cost Share Examples**](#)

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- Recipients submitting requests for reimbursement must be submitted only for the Federal share of the costs using the SF-270 or SF-271 form. USDOT has a resource that shares general parameters regarding match and cost share as they relate to the SS4A program and offers eligible match and cost share illustrative examples. This document also provides examples of costs that are typically not eligible for match or cost share.

- **FHWA SS4A Recipient Resource – iSupplier Access**
  - This resource provides instructions on how to access Login.gov and the Delphi eInvoicing/iSupplier portal for payment requests and reimbursements.

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