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The proposed change to limit staff time for grant administration is appropriate and the limit proposed is fair. However to extend the staff limit to other aspects of reimbursable expenses is unfair to larger organizations that have internal expert staff. These organizations use internal staff instead of consultants to do a large share of the necessary work that would be otherwise reimbursable - typically at a lower cost than consultants. This change would disallow significant legitimate past costs that were incurred under the existing requirements when they would become eligible for payment requests (since past costs can go back several years by the time an already awarded grant becomes effective). It would also disallow current legitimate costs as these agencies would require time to change the structure they do business under if they wanted to recover these legitimate expenses. These agencies have hired experts to conduct this work and cannot easily change this setup. Therefore that aspect of the proposed changes are inherently unfair to these agencies through no fault of their own. In addition, that portion of these changes would actually use more limited grant funds due to higher consultant costs.

We request that while keeping the limit to staff charges to grant administration is appropriate, that a limit of internal staff for RI, FS, or construction which, are necessary expenses to complete the awarded action, should not be adopted. The current high level of documentation required under the guidance insures that the charges are legitimate.