

**ATTESTATION REPORT
OF
STATE PAYMENTS MADE TO PROJECT EXTRA MILE
JULY 1, 2015, THROUGH JUNE 30, 2016**

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Issued on September 21, 2016

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PROJECT EXTRA MILE

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PROJECT EXTRA MILE

BACKGROUND

Project Extra Mile is a 501(c)(3) non-profit organization located in Douglas and Sarpy counties, Nebraska. Project Extra Mile receives funding from both State and Federal government sources and must comply with the requirements of those funding source entities.

Project Extra Mile's website, at www.projectextramile.org (August 17, 2016), provides the following information:

Project Extra Mile is a network of community partnerships working in Nebraska to prevent and reduce alcohol-related harms. We have an active coalition in the Omaha metro area (Douglas/Sarpy counties).

Community organizing is the foundation of our efforts in preventing underage drinking, excessive alcohol consumption, and the related harms. Our work is focused on policy initiatives, enforcement collaborations, media advocacy, education and awareness, and youth leadership. This comprehensive approach is often referred to as environmental prevention.

Also according to its website, "Project Extra Mile is funded through the Nebraska Office of Highway Safety along with private donations and contributions."

On June 13, 2016, the Nebraska Auditor of Public Accounts (APA) contacted the Nebraska Office of Highway Safety (NOHS), a division of the Nebraska Department of Roads (Department), stating the APA's intent to perform an attestation examination of State payments made to Project Extra Mile during the period of July 1, 2015, through June 30, 2016.

Exhibit B provides a detail of the Project Extra Mile expenses paid with the NOHS grant.

Based on the APA's review of Project Extra Mile's 2014 Internal Revenue Service (IRS) Form 990, covering the fiscal year ended September 30, 2015, the organization received a majority of its total revenues from government grants. Approximately 98% of the funds it receives are from government grants.

The NOHS website, at www.transportation.nebraska.gov/nohs/ (August 17, 2016), states the following:

The Nebraska Office of Highway Safety (NOHS) has been the recipient of the US Department of Justice, Office of Juvenile Justice and Delinquency Program (OJJDP) Enforcing Underage Drinking Laws (EUDL) from 2000 through 2013. The NOHS utilizes these funds to support statewide evidence based community coalition and enforcement strategies targeting underage drinking problems. The NOHS also has leveraged federal highway safety funding to support, expand, and enhance these efforts. Grant funding has been provided to Project Extra Mile (PEM), a non-profit underage drinking community coalition site projects (1996 - 1999) through National Highway Traffic Safety Administration (NHTSA) and the Governor's Highway Safety Association (GHSA). PEM continues as a grantee to provide training, technical assistance, management, youth advocacy, and public policy awareness to assist community coalitions addressing underage drinking issues across Nebraska.

PROJECT EXTRA MILE

KEY OFFICIALS AND AGENCY CONTACT INFORMATION

Project Extra Mile Board Members

Name	Title	Term Ending
Kurt McBride	President	September 2018
Aron Wisneski	Vice President	September 2017
Robert Jones	Secretary	September 2018
Jerad Knott	Treasurer	September 2018
Greg Gonzalez	Board Member	September 2018
Dr. Melissa Tibbits	Board Member	September 2016
Rev. Portia Cavitt	Board Member	September 2018
Loel Schettler	Board Member	September 2016
Beverly Reicks	Board Member	September 2017
Kathryn Fuxa	Board Member	September 2016
Marty Conboy	Board Member	September 2017
Dr. David Corbin	Board Member	September 2018
Dr. Nancy Bond	Board Member	September 2018

Project Extra Mile Employees

Name	Title
Nicole Carritt	Former Director (2013 - May 2016)
Chris Wagner	Interim Executive Director/Policy and Research Coordinator
September Symens	Lead Program Coordinator
Allison Woolcott	Program Coordinator
Kayla Dagonaar	Program Assistant
Beatha Kliewer	Bookkeeper

Project Extra Mile
11620 M Circle
Omaha, NE 68137
projectextramile.org

Nebraska Office of Highway Safety

Fred Zwonechek, NOHS Administrator
Linda Kearns, Traffic Safety Specialist

Nebraska Office of Highway Safety
P.O. Box 94612
Lincoln NE 68509

PROJECT EXTRA MILE

SUMMARY OF COMMENTS

During our examination of Project Extra Mile, we noted certain deficiencies and other operational matters that are presented here. The following comments are required to be reported in accordance with *Government Auditing Standards*: Comments #1, #2, #3, and #4, which are considered to be significant deficiencies.

These comments and recommendations are intended to improve the internal control over financial reporting or result in operational efficiencies in the following areas:

1. ***Lobbying-Related Expenses:*** The Nebraska Department of Roads (Department) reimbursed Project Extra Mile for several expenditures related to what appears to have been lobbying activities.
2. ***Unallowable Expenses:*** The Department reimbursed Project Extra Mile for several expenditures that were not allowable under Federal regulations, including over \$4,600 in expenses related to a recognition dinner and approximately \$3,500 in expenses that were neither allowed nor approved in the grant agreement.
3. ***Unreasonable Expenses:*** The Department reimbursed Project Extra Mile for expenditures that did not constitute a reasonable use of Federal funds, including almost \$3,300 in conference registration fees and travel expenses for individuals who were not employees, charges for flight changes or travel insurance, other unreasonable travel expenses, payment for an outdated website, hotel rooms for individuals who were not employees, travel expenses for employee commutes from home, and other unreasonable expenses.
4. ***Time and Vacation Costs:*** The Department appears to have reimbursed all of the leave used by employees of Project Extra Mile, although not all of the employees are funded solely by the NOHS grant.
5. ***Lack of Adequate Documentation:*** The APA found over \$600 in Project Extra Mile expenses that were not supported by adequate documentation.
6. ***FICA Taxes:*** Project Extra Mile appears to have calculated FICA taxes incorrectly, resulting in an additional \$527 being charged to the NOHS grant.
7. ***Incorrect CFDA Code:*** The Department did not accurately report Federal expenditures on the Schedule of Expenditures of Federal Awards (SEFA).

More detailed information on the above items is provided hereinafter. It should be noted that this report is critical in nature, containing only our comments and recommendations on the areas noted for improvement and not our observations on any accounting strengths of Project Extra Mile.

Draft copies of this report were furnished to the Department to provide its management with an opportunity to review and to respond to the comments and recommendations contained herein. All formal responses received have been incorporated into this report. Where no response has been included, the Department declined to respond. Responses that indicate corrective action has been taken were not verified at this time, but they will be verified in the next examination.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS

1. Lobbying-Related Expenses

The APA found several expenditures reimbursed by the NOHS grant that appear to have been related to lobbying activities, which, according to Federal regulations, is not allowed.

According to its IRS Form 990 for 2014, the most recent filing for that form, Project Extra Mile has the following main sources of income:

Description	Amount
Government Grants	\$397,310
All Other Contributions, Gifts, Grants, and Smaller Amounts not Listed Above	\$6,258
Youth Training Revenue	\$495
Investment Income	\$1,198
Gain or Loss on Sales	(\$245)
Total	\$405,016

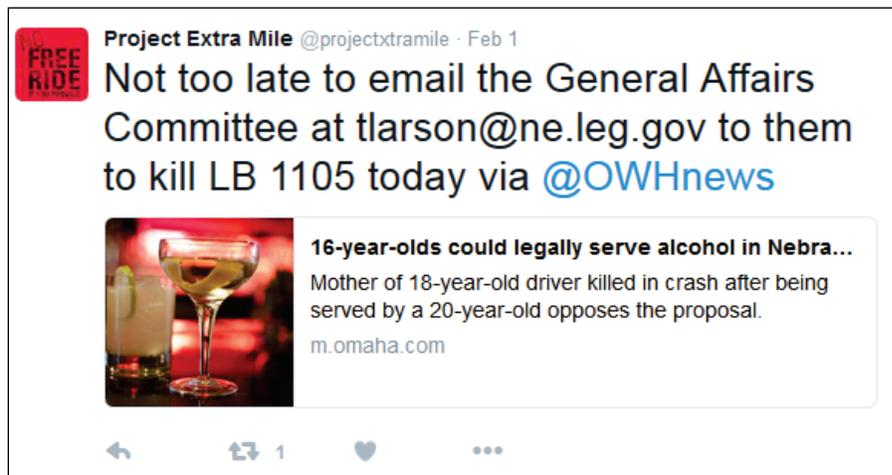
The government grants consist of the NOHS Grant and a Region 6 Behavioral Grant. Because the majority of Project Extra Mile’s funds are derived from Federal sources, they cannot be used for lobbying expenses.

The APA identified two projects that appear to have been related to lobbying and on which Project Extra Mile staff spent a significant amount of its time.

Legislative Bill (LB) 1105 (2016)

LB 1105 (2016) contained many components, including a provision for allowing 16 and 17 year olds to serve alcohol. Project Extra Mile staff charged time to the NOHS grant when working on written opponent testimony and conducting “educational meetings” in Lincoln, NE, with Senators in an effort to influence them against this bill. While educational meetings may be allowable, the classification of these activities as education is questionable, since they occurred days before Project Extra Mile provided written testimony against the bill on February 1, 2016.

Project Extra Mile also used social media accounts to request citizens to contact the chairperson of the General Affairs Committee to take action *against* LB 1105. On February 1, 2016, the following appeared on Project Extra Mile’s twitter account at <https://twitter.com/projectxtramile>:

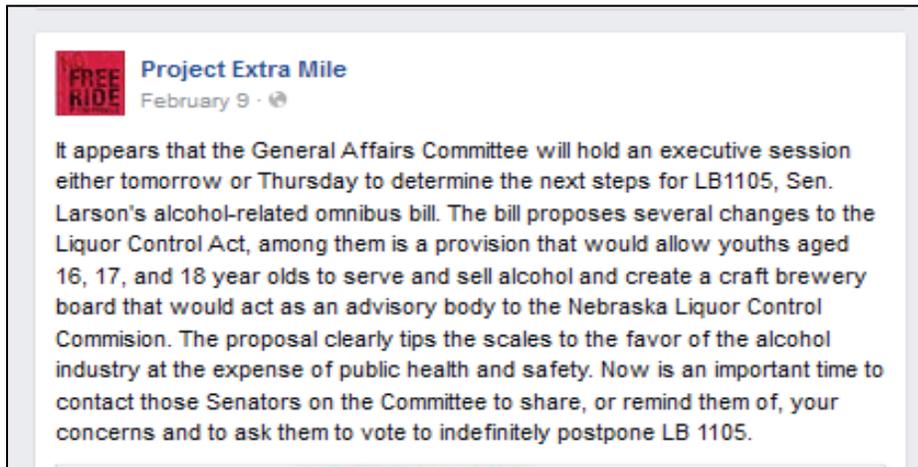
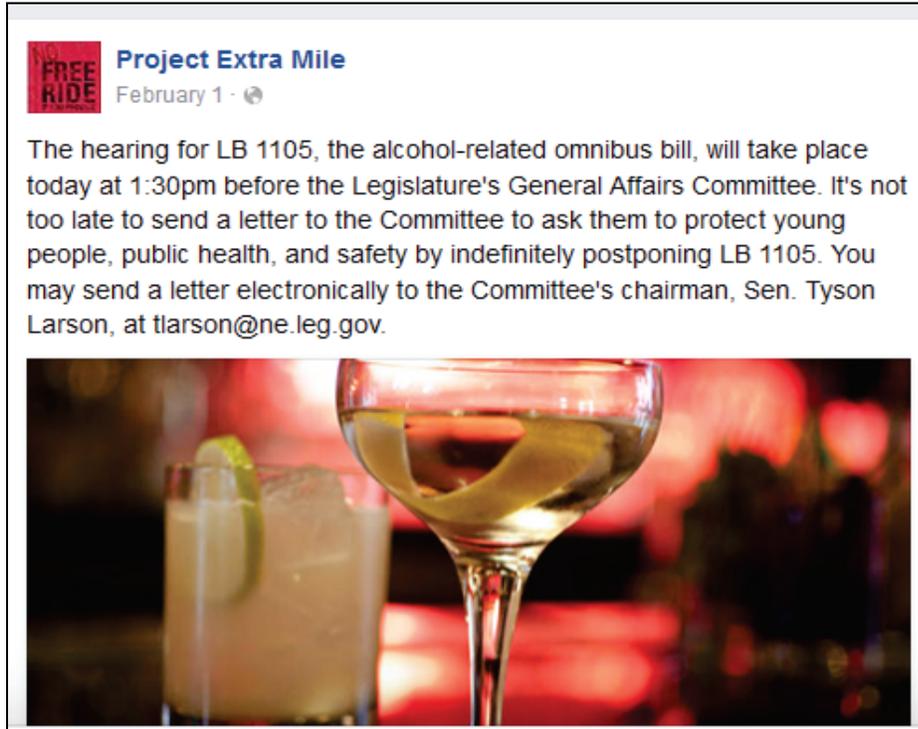


PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

1. **Lobbying-Related Expenses** (Continued)

The following posts appeared on Project Extra Mile’s Facebook page on February 1 and February 9, 2016, at <https://www.facebook.com/ProjectExtraMile>:



Based on this information, it appears that Project Extra Mile was attempting to influence the Legislature on LB 1105.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

1. **Lobbying-Related Expenses** (Continued)

Legislative Day

The second lobbying-related project for which NOHS grant funds were spent was Project Extra Mile’s Legislative Day. On March 8, 2016, Project Extra Mile and Region 5 Systems held a Legislative Day at the State Capitol, during which citizens were encouraged to meet with senators. A luncheon was also held as part of the Legislative Day. Food from the luncheon was not charged to the NOHS grant; however, other expenditures related to the Legislative Day events were charged to the NOHS grant, as follows:

Amount	Vendor	Items Purchased	Description
\$728	Elman & Company	Printing of Informational Packets	Packets included an article written by Project Extra Mile regarding LB 1105 and its dangers, which can be found in Exhibit C . Packets also included an overview of all applicable bills and whether Project Extra Mile supported them.
\$567	Hilton Garden Inn – Lincoln	Hotel Rooms	Project Extra Mile paid for four hotels rooms for participants who came to the Legislative Day from Community Connections in North Platte, NE.
Unknown		Time	Staff coded time worked when preparing for Legislative Day to the NOHS grant.

Other Lobbying

In addition to the two projects discussed above, there are other instances of Project Extra Mile employees having charged time to the NOHS grant for what appear to have been lobbying activities, including meeting with State senators, working on legislative committee hearing testimony, and attending Liquor Control Commission meetings. These activities are summarized in **Exhibit D**.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

1. Lobbying-Related Expenses (Continued)

A few examples of the employee timesheets that document these lobbying activities are included below:

Date		Duty Hours		Regular	Overtime	Holiday	Vacation	Sick Leave	Comp Leave	Other Leave	Total	Description of Activity:
Begin	End											
1/21/2016	8:30-4:30	8.00									8.00	SAMHSA Town Hall meeting registration, Board meeting preparation, General administrative duties, Meeting w/ UNMC CoPH regarding CHI Health Project, Attend coalition Rx Town Hall meeting.
1/22/2016	8:30-4:30	6.42									6.42	Prepare packet for NE Policy Alliance & send, Draft and schedule reminder for policy workgroup meeting, Prepare for BOD meeting and send out packet, Legislative tracking.
1/25/2016	8:30-4:30	4.67									4.67	Prepare for and hold Nebraska Alcohol Policy Alliance conference call, General administrative duties.
1/26/2016	8:30-4:30	8.00									8.00	Attend Madison County coalition meeting & present on Project Extra Mile's work, Prepare for and hold Board of Director's Meeting.
1/27/2016	8:30-4:30	8.00									8.00	Educational meetings in Lincoln with senators about LB 1105, Prepare for US Alcohol Policy Alliance meeting, Host Policy workgroup meeting, discuss next steps during the legislative session.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

1. Lobbying-Related Expenses (Continued)

		WEEKLY TIME REPORT		<small>NEBRASKA OFFICE OF HIGHWAY SAFETY Nebraska Department of Roads 5001 South 14th St., Lincoln, NE 68512 PO Box 84612, Lincoln Nebraska 68509-4612 (402) 471-2515 FAX (402) 471-3605</small>						
Contractor: Project Extra Mile		Contract Title: Statewide Underage Drinking Prevention		Contract Number: 405D-16-09-01						
Name: Chris Wagner		Work Phone Number:		402-963-9047						
Pay Period January 1, 2016		to		January 31, 2016						
Date	Duty Hours	Regular	Overtime	Holiday	Vacation	Sick Leave	Comp Leave	Other Leave	Total	Description of Activity:
1/27/2016	8:30-4:30	8.00							8.00	Prepared poster for CADCA Staff mtg Attended policy workgroup mtg Updated info. Materials re: LB1105 and evidence-based strategies Made additional edits to news- letter
1/28/2016	8:30-4:30	8.00							8.00	Met with Region 5 re: legislative day for coalitions and partners Met with OPD Crime Prevention
1/29/2016	8:30-4:30	8.00							8.00	Staff mtg Edited written testimony on LB1105 Edited newsletter Provided tech. Assist. To commu- nity advocates re: under. Drinking

Additionally, the NOHS grant pays for other Project Extra Mile’s costs, including rent, phone service, internet service, and a majority of other overhead costs that could be used for these lobbying-related activities.

Registered Lobbyist

Finally, the former Director of Project Extra Mile was a registered lobbyist in Nebraska. In fiscal year 2016, she submitted written testimony to legislative committees regarding LB 668 (2016), LB 669 (2016), and LB 1105 (2016). LB 668 and LB 669 pertained to motor vehicle occupant protection system enforcement requirements, and LB 1105 was introduced to “change and eliminate beverage regulations and licensure provisions and create the Nebraska Craft Brewery Board.”

In fiscal year 2015, the former Director appeared at legislative committee hearings to testify for or against six legislative bills. Her actual time spent testifying was charged to Project Extra Mile’s general fund, which is not comprised of Federal monies.

The APA also determined that the time spent by the former Director researching the legislative bills and preparing her testimony for or against them was charged to the NOHS grant. Because they are related to lobbying, the APA believes that the expenses arising from these activities are unallowable under the NOHS grant. Consequently, the former Director should not have charged time for these activities to the grant.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

1. **Lobbying-Related Expenses** (Continued)

The Federal prohibition against lobbying with grant funds is set out at 2 CFR § 200.450, which contains, in relevant part, the following:

(a) The cost of certain influencing activities associated with obtaining grants, contracts, cooperative agreements, or loans is an unallowable cost

* * * *

(c) In addition to the above, the following restrictions are applicable to nonprofit organizations . . .

(1) Costs associated with the following activities are unallowable:

(i) Attempts to influence the outcomes of any Federal, state, or local election, referendum, initiative, or similar procedure, through in-kind or cash contributions, endorsements, publicity, or similar activity;

(ii) Establishing, administering, contributing to, or paying the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcomes of elections in the United States;

(iii) Any attempt to influence:

(A) The introduction of Federal or state legislation;

(B) The enactment or modification of any pending Federal or state legislation through communication with any member or employee of the Congress or state legislature (including efforts to influence state or local officials to engage in similar lobbying activity);

(C) The enactment or modification of any pending Federal or state legislation by preparing, distributing, or using publicity or propaganda, or by urging members of the general public, or any segment thereof, to contribute to or participate in any mass demonstration, march, rally, fund raising drive, lobbying campaign or letter writing or telephone campaign; or

(D) Any government official or employee in connection with a decision to sign or veto enrolled legislation;

(iv) Legislative liaison activities, including attendance at legislative sessions or committee hearings, gathering information regarding legislation, and analyzing the effect of legislation, when such activities are carried on in support of or in knowing preparation for an effort to engage in unallowable lobbying.

Good internal controls require procedures to ensure that expenses reimbursed with NOHS grant monies are incurred in compliance with applicable Federal regulations. Without such procedures, there is an increase risk of noncompliance with Federal regulations and the possible loss of Federal funds.

We recommend the Department implement procedures, including a periodic review of Federal grant award guidelines and related staff training, to ensure that expenses reimbursed with NOHS grant monies are incurred in compliance with applicable Federal regulations.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS (Continued)

1. **Lobbying-Related Expenses** (Concluded)

Department's Response: 1) The social media outreach related to LB 1105 should not have been included in this audit report because this was done on the Executive Director's personal time and not part of grant funded activity. 2) Legislative Day is a common term for events like this and is not lobbying activity but a training and educational event. The goal is to get community members (adults and youth) to become familiar with the legislative process and to become acquainted with their own representatives in the Legislature. 3) We do not agree that the informational packets were intended to be used as lobbying information but we can see why some audit questions were raised and will recover the \$145.60 printing cost from PEM for 16 pages questioned of the total 77 pages. 4) Meeting with Senators does not constitute lobbying and monitoring the alcohol licensing and enforcement results at Liquor Control Commission hearings clearly does not meet the definition of lobbying and should be removed.

APA Response: The APA disagrees with the Department of Roads regarding the lobbying activities. As noted in the background section of this report, according to its September 30, 2015, IRS Form 990, Project Extra Mile receives 98% of its funding from government grants. Therefore, a very small amount of non-Federal funds would be available for these activities.

Regardless of whether created on work or personal time, the social media posts were made using Project Extra Mile's social media accounts. Moreover, the posts indicate clearly that Project Extra Mile was against the legislation at issue and was tacitly encouraging others to oppose it as well.

The Federal government prohibits lobbying with grant funds, as noted in 2 CFR § 200.450, which is detailed above. However, of particular interest in light of this comment is section (c)(1)(iv) of that regulation, which prohibits costs associated with the following:

Legislative liaison activities, including attendance at legislative sessions or committee hearings, gathering information regarding legislation, and analyzing the effect of legislation when such activities are carried on in support of or in knowing preparation for an effort to engage in unallowable lobbying.

The Legislative Day activities, meetings with senators, attending hearings, delivering educational materials to senators, and time spent editing and producing these materials all appear to be prohibited by the Federal provisions set out above.

2. **Unallowable Expenses**

The APA identified several expenditures that were either unallowable according to Federal regulations or were not listed in the grant agreement and, therefore, required specific approval from the NOHS Administrator.

Recognition Dinner Expenses

On May 21, 2015, Project Extra Mile held its annual Recognition Dinner, which appears to have been more of an entertainment-based event than a technical meeting, making its costs ineligible for reimbursement under Federal regulations.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

2. Unallowable Expenses (Continued)

The total expenses charged to the NOHS grant for the meeting were \$4,644.98, as summarized in the table below:

Date	Payment To	Amount	Description
5/26/2015	Kurt McBride	\$257.60	The Project Extra Mile (PEM) Board Chair's reimbursement for travel to the Omaha Champions Club from his home in Cozad, NE, for the recognition dinner.
5/28/2015	Brendan Quinn	\$5.43	Reimbursement for staff travel to the Omaha Champions Club from the PEM office for the recognition dinner.
6/4/2015	Nicole Carritt	\$19.60	The former Director's reimbursement for transporting the speaker, Jim Mosher, for a meeting with staff and travel to the recognition dinner. (Sheraton Inn to office to Sheraton Inn to office to Champions Club to Village Point to Champions Club)
6/4/2015	Beatha Kliewer	\$226.80	Reimbursement for staff travel to the Omaha Champions Club from her home in Fort Pierre, South Dakota, for recognition dinner. Ms. Kliewer was also paid for 10 hours of work on the day of the recognition dinner.
6/4/2015	Toni Monette	\$45.98	Reimbursement for recognition dinner supplies (card stock & name plates).
5/11/2015	Barnhart Press	\$1,673.48	Payment of 1,100 recognition dinner invitations, RSVPs, envelopes, and mailings.
5/13/2015	J&S Audio	\$235.40	Speaker and stand, audio mixer, wireless microphone.
6/9/2015	Sheraton Hotel	\$329.45	One hotel room for event speaker, Jim Mosher, for two nights (5/20/2015 & 5/21/2015).
6/10/2015	James Mosher	\$739.89	Reimbursement of event speaker's airline ticket, mileage, meals, and airport parking.
6/12/2015	Barnhart Press	\$88.81	Payment of 100 programs for the dinner.
6/16/2015	Center Trophy	\$997.24	Payment of 18 glass trophy awards and 1 crystal award. (However, only 17 awards were given.)
7/28/2015	Nicole Carritt	\$25.30	Reimbursement for postage expense for mailing PEM Recognition awards to Embassy Suites and John Harms.
Total		\$4,644.98	

As noted in the table above, a payment of \$997.24 was made for 19 trophies for the award recipients. According to the dinner program, however, only 17 awards were presented. Fred Zwonechek, NOHS Administrator, explained, "With regard to the extra trophies/awards, an original order for 17 trophies was placed Subsequent to the initial printing of the awards (on May 14, 2015), it was determined that the language used on two awards needed to be corrected." Therefore, due to an error that was not previously recognized, an additional \$97 was spent and charged to the NOHS grant for the needed correction.

In addition to the quantifiable expenses for the activities set out in the above table, Project Extra Mile employees incurred costs for the considerable amount of time spent preparing for the recognition dinner. Examples of employee timesheets reflecting these activities are provided below:

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

2. Unallowable Expenses (Continued)

Contractor: Project Extra Mile		Contract Title: Statewide Underage Drinking Prevention		Contract Number: 405D-15-09-02							
Name: <u>Toni Monette</u>		Work Phone Number: <u>402-963-9047</u>									
Pay Period <u>May 1, 2015</u>		to <u>May 31, 2015</u>									
Date	Duty Hours		Regular	Overtime	Holiday	Vacation	Sick Leave	Comp Leave	Other Leave	Total	Description of Activity:
	Begin	End									
5/1/2015	8:30-4:30	7.00								7.00	Developed Social Media Posts Recognition Dinner Preparation Youth Leadership Training Brochur Planning for Youth Group Retreat
5/4/2015	8:30-4:30	7.00								7.00	Constructed Social Media Posts Recognition Dinner Award Winners Youth Leadership Training Planning Recognition Dinner Planning
5/5/2015	8:30-4:30	8.00								8.00	Constructed Social Media Posts Recognition Dinner Award Winners Youth Leadership Training Planning Recognition Dinner Planning
5/6/2015	8:30-4:30	7.00								7.00	Constructed Social Media Posts Recognition Dinner Award Winners Youth Leadership Training Planning Recognition Dinner Planning
5/7/2015	8:30-4:30	6.00								6.00	Youth Group Communications Constructed Social Media Posts Youth Leadership Training Planning Recognition Dinner Preparation
5/8/2015	8:30-4:30	7.00								7.00	Media Tracking Developed Social Media Posts Youth Leadership Training Planning Recognition Dinner Preparation
5/11/2015	8:30-4:30	6.50								6.50	Recognition Dinner Preparation Constructed Social Media Posts Omaha Gives Event Preparation
Total			48.50	0.00	0.00	0.00	0.00	0.00	0.00	48.50	

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

2. Unallowable Expenses (Continued)

Project Extra Mile		Contract Title: Statewide Underage Drinking Prevention		Contract Number: 405D-15-09-02							
Name: <u>Brendan Quinn</u>		Work Phone Number: <u>402-963-9047</u>									
Pay Period <u>May 1, 2015</u>		to <u>May 31, 2015</u>									
Date	Duty Hours		Regular	Overtime	Holiday	Vacation	Sick Leave	Comp Leave	Other Leave	Total	Description of Activity:
	Begin	End									
5/12/2015	8-4:30		8.00							8.00	General office duties Media Tracking Omaha Metro Coalition prep
5/13/2015	8-4:30		8.00							8.00	General office duties Media Tracking Omaha Metro Coalition meeting Check processing
5/14/2015	8-4:30		8.00							8.00	General office duties Media Tracking Check processing
5/19/2015	8-4:30		8.00							8.00	General office duties Media Tracking Check processing <u>Recognition Dinner video</u>
5/20/2015	8-4:30		8.00							8.00	General office duties Media Tracking Check processing <u>Recognition Dinner video</u> <u>Recognition Dinner prep</u>
5/21/2015	8-9:30		13.00							13.00	General office duties Media Tracking <u>Recognition Dinner Prep</u> <u>Recognition Dinner</u>
5/22/2015	8-4:30		8.00							8.00	General office duties Bank Deposit Office supplies research
Total			61.00	0.00	0.00	0.00	0.00	0.00	0.00	61.00	
Employee Signature: _____											

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

2. Unallowable Expenses (Continued)

Contractor:		Contract Title:		Contract Number:							
Project Extra Mile		Statewide Underage Drinking Prevention		405d-15-09-02							
Name: <u>Beatha Kiewer</u>		Work Phone Number: <u>402-963-9047 / 605-224-1337</u>									
Pay Period <u>May 1, 2015</u>		to <u>May 31, 2015</u>									
Date	Duty Hours		Regular	Overtime	Holiday	Vacation	Sick Leave	Comp Leave	Other Leave	Total	Description of Activity:
	Begin	End									
5/13/2015	8:00-12:00		4.00							4.00	Dinner Program processed Invoices Printed checks Jillian Business Cards B vs A to NC Contacted P&L re: New Comp
5/14/2015	8:00-12:00		4.00							4.00	Proofed Programs w/ Barnhart Press Checks for Dinner Research items Made in USA
5/15/2015	8:00-12:00		4.00							4.00	Dinner Table Numbers Program Approval with BP Archiving
5/18/2015	8:00-11:00		3.00							3.00	Table Cards Credit card Receipts End of Month Prep Responses to NOHS re; Claim questions
5/19/2015	8:00-12:00		4.00							4.00	Contacted P&L re: New Comp Credit card Receipts Address Change with IRS Paychex call to correct Address for Federal Withholding Docs
5/20/2015	8:00-11:00		3.00							3.00	Dinner details re: check in Research items Made in USA Phone call to PL at NOHS Items for Apr NOHS Claim
5/21/2015	11:30-9:30		10.00							10.00	Travel to Omaha Recognition Dinner Event
Total			32.00	0.00	0.00	0.00	0.00	0.00	0.00	32.00	

All of the claimed expenditures associated with the annual Recognition Dinner, as reflected in both the table and employee timesheets above, could be considered entertainment costs. 2 CFR 200.438 prohibits paying for such costs with Federal grant funds, as follows:

Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

2. **Unallowable Expenses** (Continued)

2 CFR 200.432 defines a conference, for which Federal grant funds may be expended, as follows:

A conference is defined as a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award.

The annual Recognition Dinner discussed above appears to align more closely with the type of entertainment activity for which Federal grant monies are prohibited under 2 CFR 200.438 than with an allowable conference under 2 CFR 200.432.

Other Potentially Unallowable Expenses

The APA also identified the following potentially unallowable expenses, which were not expressly allowed in the grant agreement:

Claim Month	Amount	Type of Expense	Description
Sept. 2015	\$1,758.00	Directors and Officer Insurance	This expense was paid in September 2015, but the grant agreement did not include this type of expense until the grant period October 1, 2015, to January 31, 2016.
Dec. 2015	\$1,813.65	Office 365 Upgrade	This expense was not included in the grant agreement. The NOHS Administrator indicated that the expense was approved after PEM experienced significant email problems and lost several months' worth of email data; however, written documentation for the approval was not provided. It also may not have been reasonable for the NOHS grant to pay 100% of the cost.
Total	\$3,571.65		

A good internal control plan requires procedures to ensure that costs not specifically permitted in the grant agreement are supported by written approval from the NOHS. Without such procedures, there is an increased risk for misuse of Federal funds.

We recommend the Department ensure its review and documentation procedures of Project Extra Mile's claims are adequate to ensure only allowable costs are reimbursed. Additionally, if expenditures are not clearly permitted in the grant agreement, the necessary approval should be obtained from NOHS, and documentation of that approval should be properly maintained.

Department's Response: The PEM annual recognition dinner is a meeting of community members interested in the prevention of underage drinking and related issues. While providing awards to nominated individuals and organizations, this activity educates and energizes those attending to utilize effective countermeasures to meet the goals and objectives of the grant. NHTSA, the federal funding agency, has consistently supported this event and other similar ones

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

2. **Unallowable Expenses** (Concluded)

as eligible expenditures. The Highway Safety Office was fully aware that this event was included within the grant budget, even reviewing the printed items related to it for approval prior to the date of the actual event. The Director and Officers Insurance was included in all previous years and there were sufficient unexpended funds remaining in the grant to cover the eligible cost. We do agree with the recommendation that the software upgrade cost should be based upon the percentage of work under this grant and PEM has agreed and we will recover \$580.37 of the total cost from PEM.

APA Response: Despite the Highway Safety Office’s approval, the documentation provided by the Department was insufficient for the APA to conclude that the Recognition Dinner was a training event, as opposed to an entertainment activity for which Federal grant money may not be expended. The dinner appears to align more closely with the definition of an entertainment event.

As noted in the report, the Director’s and Officer’s Insurance was not paid for during the period in which it was budgeted.

3. **Unreasonable Expenses**

Certain Project Extra Mile expenses that were reimbursed with NOHS grant funds appear to have been unreasonable uses of those monies.

Travel Expenses for Non-Employees

Project Extra Mile paid for non-staff community advocates to attend the AP-17 conference in Arlington, Virginia. Those costs, shown in the table below, were reimbursed by the NOHS grant.

Individual	Conference Registration	Flight	Meals	Total Costs
Christie Abdul	\$475.00	\$308.46	\$146.01	\$929.47
Frank Lamere	\$475.00	\$300.25	\$0.00	\$775.25
Tom Mumgaard	\$475.00	\$210.20	\$60.25	\$745.45
Jayna Schaaf	\$475.00	\$233.45	\$133.96	\$842.41
Totals	\$1,900.00	\$1,052.36	\$340.22	\$3,292.58

Paying travel expenses for those who are not employed by Project Extra Mile does not appear to be a reasonable use of Federal grant funds.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

3. **Unreasonable Expenses** (Continued)

Flight Changes and Other Airline Fees

The APA identified the following airline fees that appear unreasonable.

Reimbursement Month	Vendor	Amount	Description
December 2015	Washington Co. Bank Credit Card	\$449.90	The former Director originally booked a flight for \$279.70 traveling to Washington, DC, on 2/1/2016 and returning on 2/4/2016. The former Director then charged another flight to the credit card, totaling \$449.90 to change the return trip from 8:12 AM to 2:40 PM. The cost of the second flight included the fare difference for the first flight plus a \$200 service charge for the change. NOHS stated that the former Director was invited to speak on a panel once she arrived at the conference; however, there was no documentation to support this.
March 2016	Washington Co. Bank Credit Card	\$166.00	The former Director originally booked a flight for \$644.20 traveling to Washington, DC, on 4/4/2016 and returning on 4/9/2016. The former Director then charged another flight to the credit card, totaling \$166, to change the return trip from leaving DC at 5:15 PM to leaving DC at 2:00 PM on 4/9/2016. The cost of the second flight included a fare difference and fees of negative \$34 plus a \$200 service charge for the change. An email from the former Director explained that she was invited to attend a recently scheduled meeting and needed to return on Sunday instead of Saturday. An email from the NOHS Administrator indicated that the former Director was a member of the planning committee for the conference, and the additional time was used for members of the committee to debrief and that there was no formal agenda. Additionally, the flight change did not move the flight from Saturday to Sunday, as claimed. Therefore, the former Director then purchased her own ticket at her own expense for the return ticket on Sunday.
June 2015	Washington Co. Bank Credit Card	\$32.87	The former Director charged travel insurance to the Project Extra Mile (PEM) credit card for a trip to Portland, Oregon, in July 2015. The travel insurance of \$32.87 was charged to the NOHS grant.
April 2016	Washington Co. Bank Credit Card	\$30.00	Travel insurance was charged to the PEM credit card for a speaker to come from New York in May 2016. The travel insurance of \$30 in addition to the airline flight was charged to the NOHS grant.
Total		\$678.77	

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

3. **Unreasonable Expenses** (Continued)

Unreasonable Travel Expenses

The APA identified the following travel expenses that appear to be unreasonable:

Reimbursement Month	Amount	Vendor	Description
April 2016	\$566.68	Hilton Garden Inn - Lincoln	A group from Community Connections in North Platte, NE, wanted to attend Legislative Day; however, because they had to travel a day prior, they lacked funds to cover hotel costs. NOHS gave Project Extra Mile (PEM) approval to use grant funds for those costs, as long as the costs did not exceed \$1,000.
May 2016	\$189.86	Four PEM Staff Members	Four staff members traveled to the former Director's house in Logan, Iowa, for a strategic planning meeting. The mileage costs for these four individuals were charged to the NOHS grant.
April 2016	\$16.02	Nicole Carritt or Beatha Kliewer	A \$16.02 meal for two employees was paid for twice, as both employees included the entire amount on their expense reimbursement requests.
April 2016	\$8.67	Nicole Carritt	The former Director received reimbursement for an \$8.67 breakfast on 4/4/2016. Her flight that day left at 11:28 a.m., so breakfast that day is not a reasonable expense.
February 2016	\$10.34	Nicole Carritt	The former Director received reimbursement for a \$10.34 breakfast on 2/3/2016. The conference included a continental breakfast that day, so the breakfast is not a reasonable expense.
Totals	\$791.57		

Expenses for Outdated Website

NOHS reimbursed Project Extra Mile quarterly for costs associated with web hosting services for the website www.reportunderageddrinking.com. Those reimbursements are set out below:

Date Expense Incurred	Reimbursement Month	Vendor	Amount	Description
7/22/2015	July 2015	Heartland Marketing	\$128.40	Web hosting for July - September 2015
10/20/2015	October 2015	Heartland Marketing	\$128.40	Web hosting for October - December 2015
1/31/2016	January 2016	Heartland Marketing	\$128.40	Web hosting for January - March 2016
4/15/2016	April 2016	Heartland Marketing	\$155.16	Web hosting for April - June 2016 and domain registration
Total			\$540.36	

While this activity is an allowable cost under the NOHS grant, the website appears to be outdated, which would make the expense unreasonable. The following print screens illustrate the outdated information.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

3. Unreasonable Expenses (Continued)

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Contact Us

Location:
Nebraska Office of Highway Safety
301 Centennial Mall South
Lincoln, Nebraska 68508

Mailing Address:
Nebraska Office of Highway Safety
P.O. Box 94612
Lincoln, Nebraska 68509

Telephone Number:
402/471-2515

FAX Number:
402/471-3865

Email Address:
Contact Traffic Safety Specialist [Tim Jasnoch](#) for additional information

The location of the NOHS is outdated. The current address is 5001 South 14th Street. Additionally, the employee contact information is outdated. The employee retired in May 2015, making the email address invalid.

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Must B 21

reportunderagedrinking.com/aboutus.php

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About Us

1-866-MUST-B-21 is a collaborative effort of concerned organizations, businesses, and citizens of all age groups across the state of Nebraska. The [Nebraska Office of Highway Safety](#) established the toll-free tip line in Nebraska and is promoting and coordinating its use.

Law enforcement agencies and organizations concerned about underage drinking are our key partners and allies in the effort. See "our partners" for a list of those who are helping.

1-866-MUST-B-21 is actually a phone number being utilized across state lines. A growing number of states have already instituted similar programs, all of which use the same toll-free tip line number for reporting underage drinking and associated problems.

Our objective is to spread the word about existence and use of 1-866-MUST-B-21 to as many Nebraskans as possible, thereby helping to reduce the number of underage drinkers in the state.

For more information about 1-866-MUST-B-21, contact [Fred Zwonechek](#)-Nebraska Office of Highway Safety, 402-471-2515.

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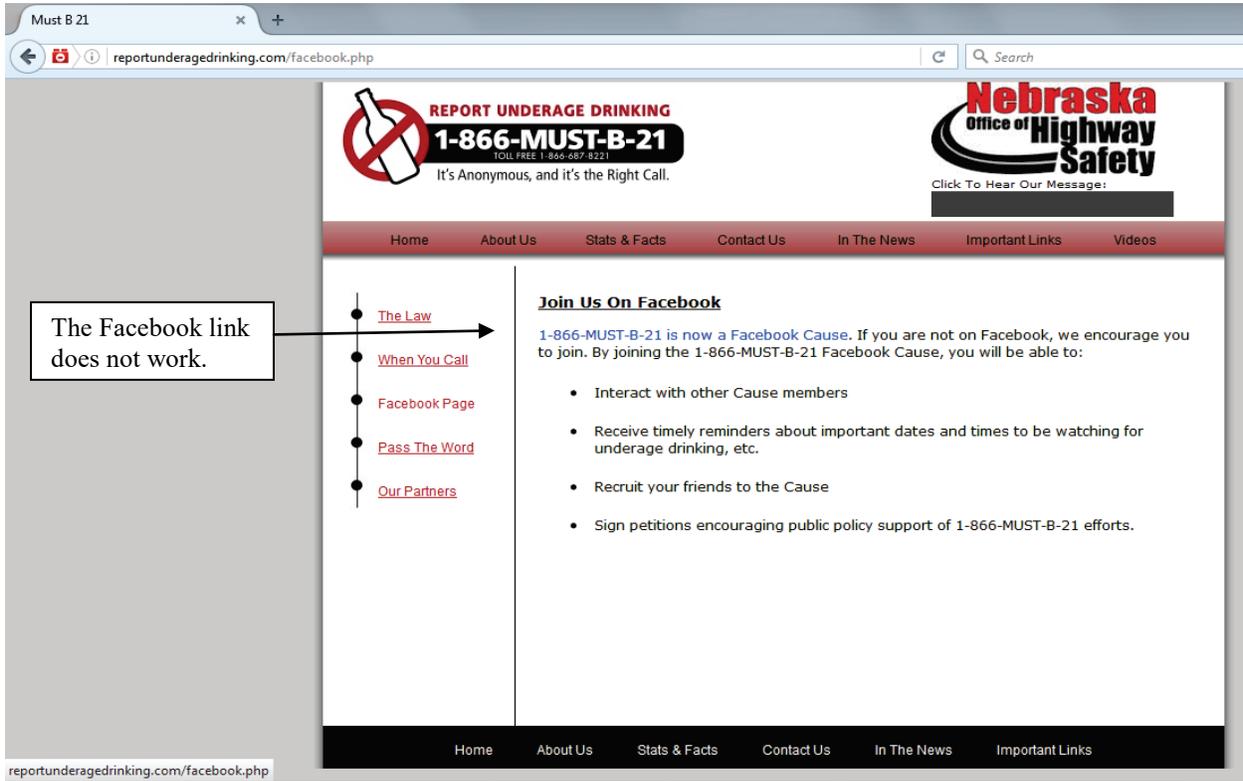
Under the "About Us" tab, the link for the Nebraska Office of Highway Safety is not a valid address and does not work.

www.dmv.state.ne.us/highwaysafety

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

3. **Unreasonable Expenses** (Continued)



Mileage Reimbursements from Home

In some instances, Project Extra Mile reimbursed employees for travel from their homes instead of from the office, per IRS guidelines. These reimbursements were charged to the NOHS grant. The following table contains examples of mileage having been reimbursed from employee homes:

Date	Name	Total Miles Reimbursed for Trip	Excess Miles	Excess Amount	APA Notes
7/12/2015	Nicole Carritt	106.0	43.8	\$25.19	Reimbursed miles from home to Omaha airport to Hilton Garden Inn West to home in order to pick up a speaker. The difference in one-way mileage from her home to the airport, compared to the miles from the office to the airport, is 21.9 miles. Thus, an extra 43.8 miles was reimbursed.
8/2/2015	Nicole Carritt	36.0	21.9	\$12.59	Reimbursed miles from home to Omaha airport. The difference in one-way mileage from her home to the airport, compared to the miles from the office to the airport, is 21.9 miles.
8/3/2015	Nicole Carritt	36.0	21.9	\$12.59	Reimbursed miles from Omaha airport to home. The difference in one-way mileage from her home to the airport, compared to the miles from the office to the airport, is 21.9 miles.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

3. **Unreasonable Expenses** (Continued)

Date	Name	Total Miles Reimbursed for Trip	Excess Miles	Excess Amount	APA Notes
11/10/2015	Allison Woolcott	28.80	5.9	\$3.39	Reimbursed miles from Gretna High School to her home, instead of to the office. Difference in mileage is 5.9 miles.
11/21/2015	Nicole Carritt	97.50	37.9	\$21.79	Reimbursed miles from home to Dodge County Sheriff's Office and back home. The difference in round trip mileage from her home, as opposed to the miles from the office, is 37.9 miles.
12/10/2015	Kayla Daganaar	11.60	3.2	\$1.84	Reimbursed miles from home to UNO. The difference in miles from her home, as opposed to miles from her office, is 3.2 miles.
1/10/2016	Nicole Carritt	43.00	37.1	\$20.03	Reimbursed miles from home to Budget Rental Car. The difference in miles from her home, as opposed to miles from her office, is 37.1 miles.
1/26/2016	Nicole Carritt	227.00	6.0	\$3.24	Reimbursed miles from home to NE District Health Department. The difference in miles from her home, as opposed to miles from her office, is 6 miles.
1/31/2016	Chris Wagner	24.80	7.8	\$4.21	Reimbursed miles from home to Omaha airport. The difference in miles from his home, as opposed to miles from his office, is 7.8 miles.
4/10/2016	Nicole Carritt	35.00	21.9	\$11.83	Reimbursed miles from Omaha airport to home. The difference in miles from her home, as opposed to miles from her office, is 21.9 miles.
Totals				\$116.70	

Other Unreasonable Expenses

The APA also identified the following unreasonable expenses:

Month Reimbursed	Vendor	Amount	Description
July 2015	Jason's Deli	\$63.36	PEM paid for 29 meals that totaled \$229.62, for an average price of \$7.92. The meals were for a youth training event. According to the sign-in sheets, only 21 individuals attended. The eight additional meals cost \$63.36.
September 2015	Washington Co. Bank Credit Card	\$93.61	PEM charged 30 meals to Jason's Deli that totaled \$255.22, for an average price of \$8.51. The meals were purchased for a law enforcement training event. According to the sign-in sheets, only 19 individuals attended. The 11 additional meals cost \$93.61.
March and April 2016	Various	N/A	PEM paid for seven board or staff and four non-staff community advocates to travel to the AP-17 Conference in Arlington, Virginia. The costs of the 11 airline tickets ranged from \$210.20 to \$810.20, depending on when the flights were booked. Federal regulations require subrecipients to look for the most cost-effective flight for travel. Had PEM made better travel arrangements for this trip, more efficient airline prices could have been obtained.
Total		\$156.97	

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS

(Continued)

3. **Unreasonable Expenses** (Continued)

In addition to being allowable, costs reimbursed with Federal dollars must also be reasonable. 2 CFR § 200.404 defines reasonable costs, as follows:

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the non-Federal entity is predominantly federally-funded. In determining reasonableness of a given cost, consideration must be given to:

- (a) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.*
- (b) The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.*
- (c) Market prices for comparable goods or services for the geographic area.*
- (d) Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal Government.*
- (e) Whether the non-Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost.*

Additionally, good internal controls require procedures to ensure that expenditures reimbursed by NOHS grant funds are reasonable and necessary. Without such procedures, there is an increased risk of loss or misuse of Federal funds.

We recommend the Department review reimbursements to ensure that all costs paid with Federal grant funds are both allowable and reasonable.

Department's Response: Provided travel expenses for grantee non-employees is an eligible (2 CFR 200.256) expenditure which routinely occurs with many grantees where grant-related participants/partners attend conferences and workshops with the approval of the Highway Safety Office. The two travel insurance items for \$62.87 are costs that should not have been reimbursed and will be recovered from PEM. A May 2014 \$189.87 of audit questioned mileage reimbursement for four PEM staff has already been returned by PEM. We agreed that a meal reimbursement on 4/5/16 for \$16.02 was claimed twice and a \$10.34 breakfast on 2/3/16 was reimbursed while a continental breakfast was provided. A total of \$26.36 will be recovered from PEM. We are in the process of reviewing whether to update the website immediately or end it. We have carefully examined the remaining mileage claims and find them to be supported by the documentation.

APA Response: To be allowable under 2 CFR 200.456, participant support costs must not only receive prior Federal approval but also be reasonable, necessary, and adequately documented. The issue is whether the costs were a reasonable use of grant funds. The approximately \$3,300 in travel costs for non-staff, community advocates does not appear to be a reasonable use of Federal funds.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

3. **Unreasonable Expenses** (Concluded)

If travel expenses from home are to be considered reasonable, the Department should ensure that Project Extra Mile has procedures in place to include all reimbursements for miles traveled to and from home as taxable income in accordance with IRS Publication 15-B.

4. **Time and Vacation Costs**

Project Extra Mile was reimbursed from NOHS grant funds for time worked that should have been charged to other Federal grants. Furthermore, Project Extra Mile did not submit time reports showing time worked on other Federal grants. Finally, vacation and sick leave appear to have been funded solely by the NOHS grant, even for employees who do not work 100% of their time on that particular grant.

Time Worked on Other Federal Grants

One Project Extra Mile employee was reimbursed from the NOHS Federal grant for time worked on other Federal grant activities. The following table describes those other activities for the time worked in September 2015:

Date	Hours	Description
9/2/2015	4	Prep for Region 6 Site Visit, USAPA Receipts/Deposits, End of Month Reports - Region 6
9/3/2015	10	Region 6 Site Visit, End of Month Reports - NOHS, Region 6 Budget vs. Actual, Vacation/Sick Emails, Travel to Omaha
9/8/2015	3	Computer Issues with P & L, End of Month Reports - NOHS, End of Month Report - Region 6, USAPA Financials

The NOHS Administrator responded to the APA's inquiries regarding the above activities with the following email message sent on August 22, 2016:

In providing grant dollars, we commonly communicate and anticipate that grantees will leverage NOHS grant funds to maximize additional grant dollars received from other sources. This allows an amplification of grant funds from multiple sources without supplanting.

In this instance, Beatha's time covers multiple pieces, including Region 6 strategies that have some coordination overlap with strategies funded through NOHS. Her time can include tasks related to Region 6 reporting and preparation activities as well as strategies identified under NOHS grant funds. As an example, Region 6 provides funding for some, but not all, enforcement activities for law enforcement agencies. Our office provides additional funds for those same operations but directed to different agencies. It is a way in which the limited resources available to a state can be leveraged to bring forward a coordinated, more robust effort.

While we did not have questions regarding these time report entries, because of our understanding of the goals/strategies of both grants (NOHS and Region 6), there have been occasions with all of our grantees where we have asked them to make adjustments, reallocating those costs to another funding source. We would have the option to address these items similarly and have the grantee make those adjustments if needed.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

4. **Time and Vacation Costs** (Continued)

Adequate Federal Time Documentation

The time records submitted by Project Extra Mile to NOHS included only time worked and coded to the NOHS grant. Because Project Extra Mile staff work on more than one Federal grant, however, the time records should have shown a more precise distribution of salaries.

2 CFR § 200.430(h)(8)(i) states, in part, the following:

Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

* * * *

(vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award

In order to ensure this subrecipient is in compliance with Federal regulations, NOHS would need to require the time records to show all time recorded to each grant.

Vacation and Sick Leave

Furthermore, the APA determined that Project Extra Mile employees charged vacation and sick time used solely to the NOHS grant, even though other grant funds pay for some of the salaries.

For example, the former Director recorded 40 hours of vacation to the grant in May 2015, but she charged only 81% of her total salary to the NOHS grant for that month. The following time report, which was submitted to the NOHS, shows how those 40 hours of vacation time were recorded:

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

4. Time and Vacation Costs (Continued)

Date		Duty Hours		Regular	Overtime	Holiday	Vacation	Sick Leave	Comp Leave	Other Leave	Total	Description of Activity:
Begin	End											
		Contractor: Project Extra Mile Contract Title: Statewide Underage Drinking Prevention Contract Number: 405D-15-09-02 Name: Nicole Carritt Work Phone Number: 402-963-9047 Pay Period: May 1, 2015 to May 31, 2015										
5/1/2015	8:30-4:30	8.00									8.00	Meeting with staff regarding program updates, meeting with Dr. Ed Truemper of Children's Media statement sent out regarding underage drinking party
												Vacation
5/4/2015	8:30-4:30						8.00				8.00	Vacation
												Vacation
5/5/2015	8:30-4:30						8.00				8.00	Vacation
												Vacation
5/6/2015	8:30-4:30						8.00				8.00	Vacation
												Vacation
5/7/2015	8:30-4:30						8.00				8.00	Vacation
												Vacation
5/8/2015	8:30-4:30						8.00				8.00	
5/11/2015	8:30-12:30	4.00									4.00	Staff meeting regarding program updates, general admin duties, Calls to partners regarding recognition dinner, review/revise May newsletter
Total		12.00	0.00	0.00	0.00	0.00	40.00	0.00	0.00	0.00	52.00	

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

4. Time and Vacation Costs (Concluded)

The following table illustrates the total vacation, sick, and holiday hours for each Project Extra Mile employee and the corresponding percent of his or her salary charged to the NOHS grant during May 2015

Employee	Total Hours Worked Per Timesheet	Vacation Hours	Holiday Hours	% of Pay Charged to Grant
Nicole Carritt	87.26	40.00	8.00	81%
Beatha Kliewer	76.00	4.00	4.00	Hourly
Toni Monette	145.00			86%
Brendan Quinn	146.50		8.00	Hourly
Jillian Waggoner	155.50		8.00	97%
Christopher Wagner	109.40		8.00	70%

It is not reasonable for an employee's benefits, including vacation, sick, and holiday leave, to be charged to the NOHS grant unless his or her salary cost is also charged to the NOHS grant in a proportional amount.

Good internal control requires procedures to ensure the following: 1) grant dollars are expended only for time spent on NOHS grant activities; 2) payroll documentation reflects the total time recorded on all Federal grant activities; and 3) vacation, sick, and holiday hours are allocated proportionately to the total amount of time charged to the NOHS grant. Without such procedures, there is an increased risk for the loss or misuse of Federal funds.

We recommend the Department implement procedures to ensure reimbursements made to Project Extra Mile for payroll costs are only for time spent on activities related to the NOHS grant and not for other Federal grant activities. Those procedures should also ensure payroll documentation reflects the total time recorded on all Federal grant activities. Finally, the procedures should ensure leave used is allocated only in proportion to the total amount of time charged to the NOHS grant.

Department's Response: As a result of the APA recommendation, we will establish a requirement to document entire salary funding source contributions, include apportioning the appropriate percentages for leave time.

5. Lack of Adequate Documentation

The APA noted several instances of Project Extra Mile expenses being reimbursed with NOHS grant funds without adequate documentation to support the cost.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

5. Lack of Adequate Documentation (Continued)

Reimbursement Month	Amount	Expense	APA Notes
August 2015	\$204.75	Hotel	No after-the-fact documentation was provided at the time of payment of the expense, only a reservation confirmation with the rate of the room.
December 2015	\$150.00	Conference Registration	Adequate documentation was not provided at the time of payment of the expense. The only support was a check request form completed by the former Director. The payment was made to the previous Director after she transferred a conference registration to the former Director; however, documentation of the original payment of this registration was not provided, until after the APA questioned the expense.
July 2015	\$145.97	Pizza	Receipt indicated "sales" for the description. Adequate receipt not provided until after the APA questioned the expense.
December 2015	\$82.65	Meeting Expense	The expense was for two combo platters from Subway for training. An itemized receipt was provided; however, a list of training attendees was not provided. Without a list of attendees, it is impossible to determine if the amount of food ordered was reasonable.
January 2016	\$33.44	Fuel Reimbursement	Receipt from Conoco was not itemized. APA could not determine what reimbursement was for.
April 2016	\$8.46	Meal Reimbursement	Receipt was not itemized.
Total	\$625.27		

2 CFR § 200.403 describes the factors affecting the allowability of costs, as follows:

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

(a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.

* * * *

(g) Be adequately documented. See also §§200.300 Statutory and national policy requirements through 200.309 Period of performance of this part.

(Emphasis added.) Good internal controls require procedures to ensure that all reimbursements paid with NOHS grant funds are adequately supported by itemized receipts that document the time, place, and nature of each expense. Without such procedures, there is an increased risk for the loss or misuse of Federal funds.

We recommend the Department ensure detailed receipts are provided to support all expenses reimbursed with NOHS grant funds. Such documentation should include a list of attendees for any meal purchases.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

5. **Lack of Adequate Documentation** (Concluded)

Department's Response: For seven of eight items it appeared that we had no supporting documentation but we were either able to locate the documentation in our project files or requested the missing documentation from PEM. One of the eight, an \$8.46 meal, lacked an itemized receipt instead a merchant copy was provided. We will recover that amount.

APA Response: The APA did remove two of the original eight exceptions from this finding for taxi costs. At the time the Department made the reimbursement to Project Extra Mile, however, adequate documentation for the remaining expenditures included in this finding was not on file.

6. **FICA Taxes**

Project Extra Mile failed to provide adequate documentation to support its calculation of the Federal Insurance Contributions Act (FICA) taxes for two of its employees, resulting in excess charges to the NOHS grant totaling \$527.

For those two employees, Project Extra Mile included the employer's contribution for retirement in the calculation.

Internal Revenue Service (IRS) Publication 15 (2016) is the Employer's Tax Guide. Section 9 of that document provides guidance for withholding from employees' wages. The Social Security and Medicare Taxes portion of Section 9 (page 23) provides the following:

Generally, you are required to withhold social security and Medicare taxes from your employees' wages and pay the employer's share of these taxes. Certain types of wages and compensation aren't subject to social security and Medicare taxes.

Section 15 of IRS Publication 15 is entitled "Special Rules for Various Types of Services and Payments." That section includes information regarding retirement and pension plans. Generally, employer contributions to a qualified plan are exempt from FICA taxes. If, however, the employer contribution to a 403(b) annuity is paid through a salary reduction agreement, the contribution is taxable.

In any event, the guidance in Publication 15 does not support different methods of calculating FICA taxes for similarly situated employees. Without further documentation, therefore, the APA believes that none of the employer retirement contributions made by Project Extra Mile should be included in the FICA tax calculations for any of its employees.

Without proper procedures to ensure that amounts calculated for taxes are properly supported, there is an increased risk for the loss or misuse of Federal funds.

We recommend the Department ensure the taxes reimbursed by the NOHS grant are calculated accurately and supported by adequate documentation.

Department's Response: The grantee will resolve the issue with the FICA tax calculation to determine what the actual amounts should be for the two employees in question.

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Continued)

7. Incorrect CFDA Code

The Department did not accurately report Federal expenditures on the Schedule of Expenditures of Federal Awards (SEFA) for fiscal year 2015. Furthermore, without inquiries made by the APA, it is likely the inaccurate reporting would have continued.

According to NOHS staff, the Code of Federal Domestic Assistance (CFDA) number for these grants changed to 20.616 in Federal fiscal year 2013. Prior to that time, the CFDA number had been 20.601, which is the number the Federal funds continued to be reported under for fiscal year 2015.

At the beginning of the audit fieldwork, the APA reviewed the fiscal year 2015 SEFA and determined that CFDA number 20.616 was not included. The NDOR central accounting office appears not to have been informed of the change in CFDA numbers in 2013.

The following information was provided by NDOR to reflect the revised 2015 SEFA amounts:

Schedule of Federal Expenditures
For Fiscal Year Ended June 30, 2015

CFDA	Program Title	Total FY-2015 Expenditures	New Total FY-2015 Expenditures	diff
20.601	Alcohol Impaired Driving Countermeasures Incentive Grants I	2,026,610.65	3,400.00	-2,023,210.65
20.602	Occupant Protection Incentive Grants	811,898.43	59,220.39	-752,678.04
20.610	State Traffic Safety Information System Improvement Grants	569,449.15	190,052.65	-379,396.50
20.611	Incentive Grant Program to Prohibit Racial Profiling			0.00
20.612	Incentive Grant Program to Increase Motorcyclist Safety	115,122.36	27,315.45	-87,806.91
20.614	National Highway Traffic Safety Administration Discretionary Safety Grants	63,018.76	63,018.76	0.00
20.616	National Priority Safety Programs		3,243,092.10	3,243,092.10
	Totals	3,586,099.35	3,586,099.35	0.00

As a result of the APA’s inquiries, NDOR was able to correct the fiscal year 2016 CFDA amounts.

2 CFR § 200.302(b)(1) requires States to utilize a financial management system that allows for the following:

Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the CFDA title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, if any.

Additionally, 2 CFR 200.508(b) includes the following among auditee responsibilities:

Prepare appropriate financial statements, including the schedule of expenditures of Federal awards in accordance with §200.510 Financial statements.

2 CFR 200.510(b) states, in relevant part, the following:

The auditee must also prepare a schedule of expenditures of Federal awards for the period covered by the auditee's financial statements which must include the total Federal awards expended as determined in accordance with §200.502 Basis for determining Federal awards expended

PROJECT EXTRA MILE

COMMENTS AND RECOMMENDATIONS
(Concluded)

7. **Incorrect CFDA Code** (Concluded)

A good internal control plan requires adequate procedures to ensure the SEFA is properly presented, and all CFDA numbers are accurately reported. Without such procedures, there is an increased risk that the Department will not be in compliance with Federal regulations, resulting in the possible loss or misuse of funds.

We recommend the Department implement procedures to ensure the SEFA is properly presented, and all CFDA numbers are accurately reported.

Department's Response: Since the APA brought this issue to our attention, the Highway Safety Office Section has been working with the Department's Controllers Office to establish a method for the Controller to more easily identify the appropriate NHSTA funding CFDA coding so that they can accurately report these federal expenditures on the Schedule of Expenditures of Federal Awards.

Overall Department's Response: The Department of Roads is appreciative of the APA's examination process, as the work was conducted in a thorough and professional manner. As a result of the examination, there were clearly instances identified that demonstrated a lack of proper documentation to support expense reimbursements, and there were processing errors relating to the calculation of expenses.

However, the Department takes serious issue with the Auditors office's subjective interpretation regarding the allowability of certain expenses, and their determination regarding the appearance of certain other expenses. These subjectively characterized expenses were clearly documented, followed consistent approval processes, and were incurred within the intent of the organization in carrying out its stated mission.

Due to this subjectivity, the Department requests that the Auditor's office revisit the documentation that was provided during the examination, and revise the Summary of Comments and Recommendations sections of the Attestation Report accordingly, to reflect the Department's position on these particular expenses.

Overall APA Response: The APA stands by the comments and recommendations contained herein, and our responses to the Department are included above. Adequate documentation was not obtained by NOHS prior to the reimbursement payments to Project Extra Mile, as noted above. Additionally, the Department confirmed duplicate payments and inadequate documentation for several items.



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PROJECT EXTRA MILE

INDEPENDENT ACCOUNTANTS' REPORT

Department of Roads
Lincoln, Nebraska

We have examined the accompanying Schedule of State Payments made to Project Extra Mile for the period July 1, 2015, through June 30, 2016. The Department's management is responsible for the Schedule of State Payments made to Project Extra Mile. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, and the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and, accordingly, included examining, on a test basis, evidence supporting the Schedule of State Payments made to Project Extra Mile and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, the schedule referred to above presents, in all material respects, the State Payments to Project Extra Mile for the period July 1, 2015, through June 30, 2016, based on the accounting system and procedures prescribed by the State of Nebraska Director of Administrative Services, as described in Note 1.

In accordance with *Government Auditing Standards*, we are required to report findings of significant deficiencies and material weaknesses in internal control; instances of fraud and noncompliance with provisions of laws or regulations that have a material effect on the subject matter or an assertion about the subject matter and any other instances that warrant the attention of those charged with governance; noncompliance with provisions of contracts or grant agreements that has a material effect on the subject matter or an assertion about the subject matter of the examination engagement; and abuse that has a material effect on the subject matter or an assertion about the subject matter of the examination engagement. We are also required to

obtain the views of management on those matters. We performed our examination to express an opinion on whether the Schedule of State Payments made to Project Extra Mile is presented in accordance with the criteria described above and not for the purpose of expressing an opinion on the internal control over the Schedule of State Payments made to Project Extra Mile or on compliance and other matters; accordingly, we express no such opinions. Our examination disclosed certain findings that are required to be reported under *Government Auditing Standards*, and those findings, along with the views of management, are described in the Comments Section of the report.

This report is intended solely for the information and use of management, the Department, others within Project Extra Mile, and the appropriate Federal and regulatory agencies, and it is not intended to be, and should not be, used by anyone other than these specified parties. However, this report is a matter of public record, and its distribution is not limited.

A handwritten signature in black ink, appearing to read "C. J. Janssen", with a long horizontal flourish extending to the right.

September 16, 2016

Charlie Janssen
Auditor of Public Accounts

PROJECT EXTRA MILE
SCHEDULE OF STATE PAYMENTS MADE TO PROJECT EXTRA MILE
For the Period July 1, 2015, through June 30, 2016

General Ledger Date	Amount
Statewide Underage Drinking Prevention Project Mini Grant for 2/1/15 to 6/30/15	
7/28/2015	\$29,436.47
8/12/2015	\$25,157.90
Subtotal	\$54,594.37
Statewide Underage Drinking Prevention Project Mini Grant for 7/1/15 to 9/30/15	
8/24/2015	\$27,135.85
9/17/2015	\$21,434.10
10/20/2015	\$27,986.30
11/13/2015	\$266.60
Subtotal	\$76,822.85
Statewide Underage Drinking Prevention Project Mini Grant for 10/1/15 to 1/31/16	
11/19/2015	\$20,961.20
12/23/2015	\$28,136.54
1/22/2016	\$26,321.67
2/22/2016	\$34,805.65
3/09/2016	\$603.10
Subtotal	\$110,828.16
Statewide Underage Drinking Prevention Project Mini Grant for 2/1/16 to 5/31/16	
3/18/2016	\$20,298.54
4/14/2016	\$30,650.18
5/19/2016	\$30,255.78
6/17/2016	\$23,891.11
Subtotal	\$105,095.61
Total Paid in FY16	\$347,340.99

The accompanying notes are an integral part of the financial statement.

PROJECT EXTRA MILE

NOTES TO THE SCHEDULE

FOR THE PERIOD JULY 1, 2015, THROUGH JUNE 30, 2016

1. **Criteria**

Pursuant to Neb. Rev. Stat. § 84-304, the APA conducted an attestation review of the financial information for the fiscal year ended June 30, 2016, in accordance with standards applicable to attestation engagements contained in Government Auditing Standards issued by the Comptroller General of the United States. The APA worked closely with NOHS staff to ensure an accurate understanding of the information regarding services provided. The APA obtained a list of payments to Project Extra Mile from EnterpriseOne for fiscal year 2016. Project Extra Mile received \$347,340.99 in payments from the State of Nebraska (State) during fiscal year 2016.

The financial information used to prepare the Schedule of State Payments Made to Project Extra Mile was obtained from EnterpriseOne.

The accounting policies of Project Extra Mile are on the basis of accounting, as prescribed by *the State of Nebraska Director of Administrative Services*.

The fund type established by the State that is used by the Department for payments from Federal funds, including payments to Project Extra Mile is:

20000 – Cash Funds – account for revenues generated by specific activities from sources outside of State government and the expenditures directly related to the generation of the revenues. Cash funds are established by State statutes and must be used in accordance with those statutes. Roads Operations Cash Fund 22700 is the Department’s primary operating fund. This fund acts as the collection point for all monies which are not directed by the Legislature to other funds. This fund also acts as the focal point for most highway expenditures; including Federal grants received by the Department which must be expended in accordance with applicable Federal requirements.

2. **Reporting Entity**

Project Extra Mile was established in 1995 after Omaha was selected by National Association of Governors’ Highway Safety Representatives (now the Governors’ Highway Safety Association) in collaboration with the National Highway Traffic Safety Administration to replicate a program out of the Washington, DC, area. The APA could not find any statutory basis for Project Extra Mile’s handling of State funds. The Articles of Incorporation were signed on September 12, 1997, as a non-profit corporation in the State of Nebraska.

The financial schedule shown was pulled from the State’s EnterpriseOne accounting system. It does not reflect the entire financial schedule for the entity, just the funds received from the State.

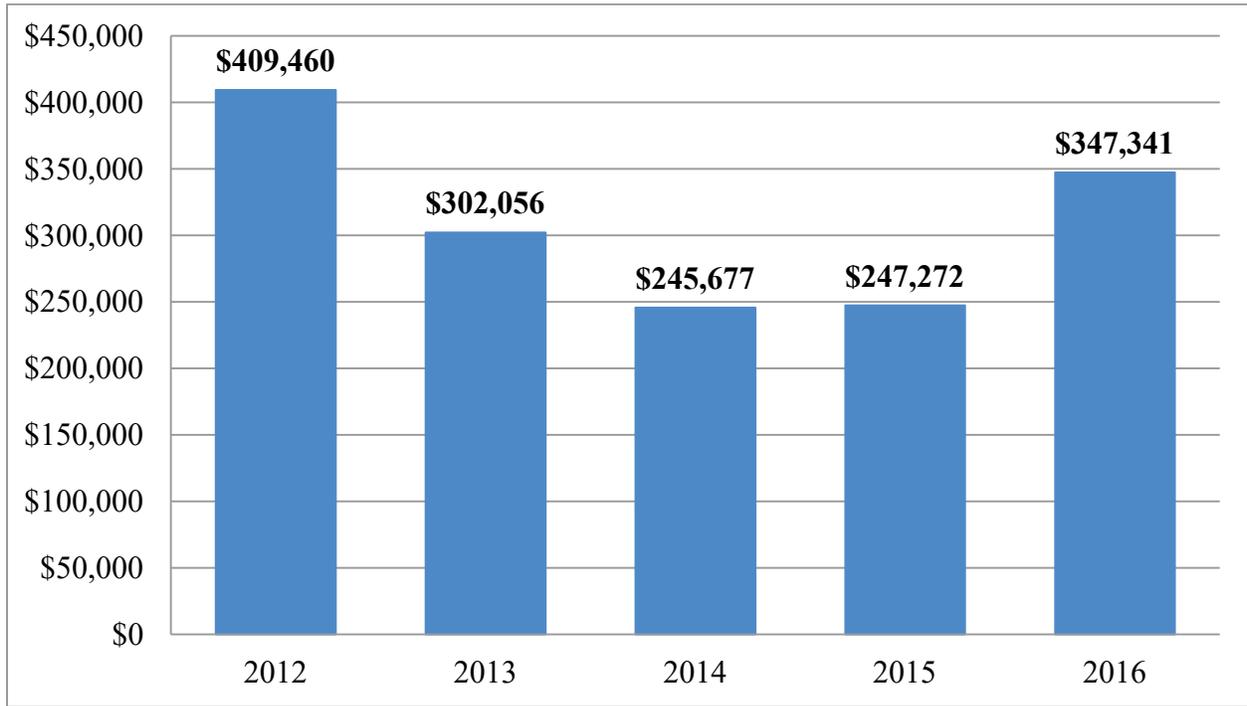
PROJECT EXTRA MILE

SUPPLEMENTARY INFORMATION

Our examination was conducted for the purpose of forming an opinion on the Schedule of State Payments Made to Project Extra Mile. Supplementary information is presented for purposes of additional analysis. Such information has not been subjected to the procedures applied in the examination of the Schedule of State Payments Made to Project Extra Mile, and, accordingly, we express no opinion on it.

PROJECT EXTRA MILE
FIVE YEAR SUMMARY OF PAYMENTS TO PROJECT EXTRA MILE
For the Fiscal Years Ended June 30, 2012, through June 30, 2016

Exhibit A



Source: EnterpriseOne

PROJECT EXTRA MILE
SUMMARY OF EXPENDITURES OF PROJECT EXTRA MILE
For the Fiscal Year Ended June 30, 2016

Exhibit B

Expense Category	Amount
Payroll Expenses	
Base Pay	\$206,031.06
FICA Taxes	\$16,288.07
Retirement	\$7,716.28
Insurance/Other	\$7,094.69
Total Personnel Expenses	\$237,130.10
Operational Expenses	
Travel	\$21,164.31
Rent	\$18,705.44
Legal & Accounting	\$10,145.15
Printing	\$8,182.59
Youth Training	\$7,229.89
Conference Registration	\$6,483.00
Insurance	\$6,281.00
Law Enforcement Training Expense	\$4,375.81
Confidential Informant Payments	\$4,350.00
Dues & Subscriptions	\$4,137.00
Office Supplies	\$3,632.53
Postage	\$3,399.53
Computer/Internet	\$3,149.60
Meeting Expense	\$2,662.77
Miscellaneous Office Copies	\$2,278.18
Telephone	\$1,115.00
Office Expense	\$977.80
Unemployment Insurance	\$755.96
Advertising	\$660.36
Recognition Dinner	\$235.40
Buy Money	\$173.28
Mail Services	\$116.30
Total Operational Expenses	\$110,210.90
Total Expenses	\$347,341.00

Note: These expenses were reimbursed by the State during fiscal year 2016.

PROJECT EXTRA MILE
LB 1105 ARTICLE
For the Fiscal Year Ended June 30, 2016

Exhibit C

LB 1105

A bill that would increase youth access to alcohol and require Nebraska taxpayers to shoulder the costs

»» LB 1105 Overview

LB 1105 is an omnibus bill that proposes numerous changes to the Nebraska Liquor Control Act. The bill, introduced by Sen. Tyson Larson of O'Neill, includes several provisions go against the available science for protecting public health and safety by preventing excessive alcohol consumption, which includes underage drinking. As introduced, the bill would make a number of troubling changes, including:

- **Allows persons 16-18 years of age to serve and sell alcoholic liquor** if they are certified as beverage servers, and allows persons aged 16 and older to complete a transaction for the sale of alcoholic liquor if they are not handling or serving the alcohol.
- **Creates the Nebraska Craft Brewery Board**, to provide a forum for beer manufacturers and producers of agricultural products used in the brewing process to discuss policies and procedures, and serves as an advisory board to the Nebraska Liquor Control Commission. Creates fund to develop and maintain programs for research and advancement of process, as well as marketing and promotion of the industry.
- **Creates a Class T¹ liquor license** for retail licensees whose annual gross revenues from alcohol sales does not exceed 20% of licensee's total annual gross revenue from all retail sales. License would allow for the off-sale of alcoholic liquor, including beer.
- **Removes the requirement that licensed establishments in annexed areas must reapply for their liquor license.** Currently, licensed establishments must reapply to the annexing local governmental body. This is particularly useful if there are licensees who have a history of liquor violations to ensure that these businesses are held accountable for their actions.

The General Affairs Committee has prioritized LB 1105, which means it will be debated soon given the short 60-day legislative session. In order to advance the bill, the Committee has proposed a number of changes in Committee Amendment AM2029, the most important of which would **eliminate the provision to allow persons 16-18 years old to sell and serve alcohol.**

POLICY Decisions using the Science

Underage drinking and excessive alcohol consumption are major public health problems. Alcohol is the most commonly used and abused drug among youth in the United States, more than tobacco and illicit drugs,ⁱ and is responsible for more than 4,300 annual deaths among underage youthⁱ. Although drinking by persons under the age of 21 is illegal, people aged 12 to 20 years drink 10% of all alcohol consumed in the United States.ⁱⁱ Furthermore, in 2010, there were approximately 189,000 emergency rooms visits by persons under age 21 for injuries and other conditions linked to alcohol.ⁱⁱ

In Nebraska, underage drinkers consumed 8% of all alcohol sold in the state in 2012, totaling \$54 million in sales (in 2013 dollars).ⁱⁱⁱ

¹ Changed to Class G in AM2029

PROJECT EXTRA MILE
LB 1105 ARTICLE
For the Fiscal Year Ended June 30, 2016

Exhibit C

According to America's Public Health Rankings data, Nebraska ranks 5th-worst in the country for our rates of excessive drinking, and CDC data indicates that 4 Nebraska communities rank in the top 15 cities (Norfolk, Lincoln, Sioux City, and Omaha) in the country. In 2012, our state's underage drinkers consumed 2.5 times more alcohol (4.3 drinks per day) than legal drinkers (1.6 drinks per day).ⁱⁱⁱ Excessive alcohol consumption, including binge drinking and underage drinking, cost taxpayers over \$1.16 billion in 2010, \$491 million of which was paid by Nebraska taxpayers.^{iv} In contrast, alcohol excise tax receipts collected by the state for 2010 were \$27.6 million, or 5.6 percent of the state's costs.^v Furthermore, research released by the CDC shows that an average of 11 people die of alcohol poisoning each year in our state.^{vi}



Bringing Public Health and Safety to the Table:

In an effort to address the alcohol-related harms and costs in Nebraska, it seems prudent that the Legislature consider creating an advisory board of public health and safety professionals, as opposed to creating a board solely for the purpose of increasing revenue for, and influence of, the beer industry in the state. Pursuant to Neb. Rev. Stat. 53-117(2), the Nebraska Liquor Control Commission (Commission) is tasked with promoting public health and welfare, not the interests of the industry. The creation of a Public Health and Safety Advisory Board would bring an important stakeholder to the table to advise the Commission about areas essential to their mission.

On the other hand, the craft brewery industry, by all accounts, is growing by leaps and bounds. Should the creation of a Nebraska Craft Brewery Board be necessary and desired within the industry, such an endeavor can and should be left to those within the industry. The creation of said Board should not require statutory language to achieve. The Commission has enough challenges related to the regulation and enforcement of the Nebraska Liquor Control Act, as evidenced by recent requests for additional funding.

Addressing the Availability of Alcohol:

In Nebraska, the current age at which a young person can legally sell alcohol is 19. As introduced, LB 1105 would move that age from 19 to 16. While this may seem a small change in a large bill, it has the potential for moving Nebraska in the wrong direction when it comes to protecting youth people's health and safety – it increases access to alcohol. It should not be the policy of Nebraska to allow kids to serve kids alcohol. Sadly, we have recently seen the consequences of what appears to have been a young server selling alcohol to a minor in Waterloo. The risk we allow in these situations has the very real potential of immediately putting the lives of young people in danger.

According to the National Institute on Alcohol Abuse and Alcoholism's Alcohol Policy Information System, only one state in the entire country currently allows 17-year-olds to serve or sell alcohol for consumption on the premises, and no state currently allows 16-year-olds to sell alcohol for that purpose. With regard to the sale of alcohol for consumption off the premises, only a handful of states allow 16- to 17-year-olds to sell alcohol.^{vii} Furthermore, adolescents' brains are rapidly developing and

PROJECT EXTRA MILE
LB 1105 ARTICLE
For the Fiscal Year Ended June 30, 2016

Exhibit C

continue through their early-20s,^{viii} meaning that they do not have the capacity to adequately weigh the potential risks and consequences when deciding whether or not to sell alcohol. They will undoubtedly also be subjected to a great deal of peer pressure to provide access to the alcohol that those 16- to 18-year-olds would have control over as a result of LB 1105.

LB 1105 also proposes to create a new Class T license² for retailers whose annual gross revenues from alcohol sales does not exceed 20 percent from all retail sales. Our state has ranked consistently among the worst in the nation with regard to excessive alcohol consumption and the consequences it has on our communities. Scientific research has shown that one important factor in preventing underage and excessive consumption and related harms is limiting the physical availability of alcohol. Instead of increasing availability in places where youth may typically gather, the state should be considering evidence-based policies that reduce and prevent excessive consumption and its related harms.

The Community Preventive Services Task Force (an independent, nonfederal, unpaid panel of public health and prevention experts) ***recommends applying regulatory authority to reduce alcoholic beverage outlet density or to limit the increase of alcoholic beverage outlet density*** as a way to reduce underage drinking, excessive alcohol consumption and related harms. A systematic review of the literature showed that when the density of on-or off-premises alcohol outlets is high or increases, excessive consumption and its diverse related harms occur.^{ix}

LB 1105 would increase the number licenses that are able to sell alcoholic liquor and may include locations that rely on business from youth – as a result, it will be easier for youth to access alcoholic beverages.

ⁱ Centers for Disease Control and Prevention (CDC). Alcohol-Related Disease Impact (ARDI). Atlanta, GA: CDC, Retrieved on January 20, 2015 from http://apps.nccd.cdc.gov/DACH_ARDI/Default/Default.aspx

ⁱⁱ Substance Abuse and Mental Health Services Administration, Center for Behavioral Health Statistics and Quality. The DAWN Report: Highlights of the 2010 Drug Abuse Warning Network (DAWN) Findings on Drug-Related Emergency Department Visits. Rockville, MD; 2012, Retrieved on January 20, 2015 from <http://archive.samhsa.gov/data/2k12/DAWN096/SR096EDHighlights2010.pdf>

ⁱⁱⁱ Pacific Institute for Research and Evaluation (PIRE) with funding from the Office of Juvenile Justice and Delinquency Prevention (OJJDP). Underage Drinking Costs: Nebraska Factsheet.

^{iv} Sacks J, Gonzales K, Bouchery E, Tomedi L, Brewer R. (2015). "State Costs of Excessive Alcohol Consumption, 2010." American Journal of Preventive Medicine 2015; 49(5):e73-79.

^v Nebraska Liquor Control Commission. (n.d.). "History of Gallonage." Last revised March 2015.

^{vi} Centers for Disease Control and Prevention (CDC). Vital Signs: Alcohol Poisoning Deaths – United States, 2010-2012, Retrieved on January 20, 2015 from http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6353a2.htm?z_cid=mm6353a2_w#tab2

^{vii} National Institute on Alcohol Abuse and Alcoholism. (n.d.). "Underage Drinking: Minimum Ages for On-Premises Servers and Bartenders." Last revised January 2015. Retrieved on January 25, 2016 from https://alcoholpolicy.niaaa.nih.gov/Minimum_Ages_for_On-Premises_Servers_and_Bartenders.html?tab=about&date=1%2f1%2f2003&dateStart=1%2f1%2f2003&dateEnd=1%2f1%2f2015&onlyChanges=True

^{viii} Johnson S, Blum R, Giedd J. (2009). Adolescent Maturity and the Brain: The Promise and Pitfalls of Neuroscience Research in Adolescent Health Policy. Journal of Adolescent Health, 2009 Sep; 45(3): 216-221. Retrieved on January 25, 2016 from <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2892678/>

^{ix} The Task Force on Community Preventive Services. (2009). "Recommendations for Reducing Excessive Alcohol Consumption and Alcohol-Related Harms by Limiting Alcohol Outlet Density." American Journal of Preventive Medicine, 2009;23(6): 570-1.

² Changed to Class G in AM2029

PROJECT EXTRA MILE
OTHER LOBBYING ACTIVITIES
For the Fiscal Year Ended June 30, 2016

Exhibit D

Potential Lobbying			
Date	Employee(s)	Activity Listed on Timesheet or Travel Reimbursement Request	Time/ travel/ both
May 2015 Reimbursement			
5/5/2015	Chris Wagner	Met with Legislature re: Underage drinking prevention evidence based research.	Time
5/6/2015	Jillian Waggoner	LCC Hearings Legislature.	Time
5/6/2015	Chris Wagner	Met with Legislature re: Underage drinking prevention evidence based research.	Time
5/7/2015	Chris Wagner	Attended and Monitored LCC Hearings.	Time
June 2015 Reimbursement			
6/10/2015	Chris Wagner	Attend Liquor Control Commission hearings.	Time
6/11/2015	Chris Wagner	Attend Liquor Control Commission hearings.	Time
5/12/2015	Nicole Carritt	Travel to State Capital for Legislative Tracking.	Travel
5/6/2015	Jillian Waggoner	Travel to State Capital for LCC Meeting + parking.	Travel
5/4/2015-5/7/2015	Chris Wagner	Met with senators/LCC Hearings.	Both
August 2015 Reimbursement			
8/19/2015	Chris Wagner	Attend Liquor Control Commission hearings.	Time
8/20/2015	Chris Wagner	Attend Liquor Control Commission hearings.	Time
September 2015 Reimbursement			
9/23/2015	Jillian Waggoner	Attend Liquor Control Commission hearings.	Time
9/23/2015	Allison Woolcott	Attend Liquor Control Commission hearings.	Time
October 2015 Reimbursement			
10/21/2015	Nicole Carritt	Attend Liquor Control Commission hearings.	Time
10/21/2015	Chris Wagner	Attended and monitored LCC hearings on PEM coordinated compliance checks.	Time
10/23/2015	Nicole Carritt	Attend and observe LR 278 hearing. Provide testimony on available research regarding alcohol availability and college-aged consumption and related harms.	Time
10/23/2015	Jillian Waggoner	Interim Study Hearings in Lincoln.	Time

PROJECT EXTRA MILE
OTHER LOBBYING ACTIVITIES
For the Fiscal Year Ended June 30, 2016

Exhibit D

Potential Lobbying			
Date	Employee(s)	Activity Listed on Timesheet or Travel Reimbursement Request	Time/ travel/ both
10/26/2015	Nicole Carritt	Travel from office to Nebraska State Capitol at 1445 K Street, Lincoln, NE and return to office. For Legislative resolution hearings.	Travel
November 2015 Reimbursement			
11/18/2015	Chris Wagner	Attended and monitored LCC hearings on PEM coordinated compliance checks.	Both
11/19/2015	Chris Wagner	Attended and monitored LCC hearings on PEM coordinated compliance checks.	Time
11/19/2015	Kayla Daganaar	Attend LCC hearings in Lincoln.	Time
December 2015 Reimbursement			
12/1/2015	Nicole Carritt	Observed hearing for LR257 related to public health.	Time
12/1/2015	Chris Wagner	Attended hearing for LR257.	Time
12/17/2015	Kayla Daganaar	Attend Nebraska Liquor Control Commission December Hearings in Lincoln.	Time
12/17/2015	Allison Woolcott	LCC Hearings in Lincoln.	Time
January 2016 Reimbursement			
1/25/2016	Chris Wagner	Edited LB1105 fact sheet; Tracking legislation related to underage drinking prevention.	Time
1/26/2016	Chris Wagner	Drafted notice to coalition to provide info on LB1105.	Time
1/27/2016	Nicole Carritt	Educational meetings in Lincoln with senators about LB 1105. Host Policy workgroup meeting, discuss next steps during the legislative session.	Time
1/27/2016	Chris Wagner	Updated info materials re: LB1105 and evidence-based strategies.	Time
1/29/2016	Chris Wagner	Edited written testimony on LB1105.	Time
February 2016 Reimbursement			
2/8/2016	Chris Wagner	Contact Senator Howard on Legislative Day and reviewed testimony.	Time
2/9/2016	Nicole Carritt	Monitor Nebraska Liquor Control Commission hearings; meet with community advocates following hearings; legislative tracking.	Time

PROJECT EXTRA MILE
OTHER LOBBYING ACTIVITIES
 For the Fiscal Year Ended June 30, 2016

Exhibit D

Potential Lobbying			
Date	Employee(s)	Activity Listed on Timesheet or Travel Reimbursement Request	Time/ travel/ both
2/18/2016	Chris Wagner	Met with senators to discuss evidence-based strategies for excessive consumption prevention.	Time
2/25/2016	Chris Wagner	Met with senators to discuss evidence-based strategies for excessive consumption prevention.	Time
March 2016 Reimbursement			
2/18/2016	Nicole Carritt	Travel to Nebraska State Capitol to deliver educational materials to senators.	Travel
3/1/2016	Chris Wagner	Met with senators to discuss evidence-based strategies for excessive consumption prevention.	Time
3/4/2016	Nicole Carritt	Prepare Legislative Day letter to senators and packets.	Time
3/8/2016	Nicole Carritt	Facilitate 2016 Legislative Day at the State Capitol, attend and monitor Nebraska Liquor Control Commission hearings.	Time
3/8/2016	Kayla Daganaar	Attend Legislative Day at Capitol.	Time
3/8/2016	Allison Woolcott	Assist in execution of Legislative Day.	Time
3/8/2016	Chris Wagner	Coordinated Legislative Day focused on preventing excessive alcohol consumption.	Time
3/9/2016	Kayla Daganaar	Print and scan letters to senators.	Time
April 2016 Reimbursement			
4/12/2016	Nicole Carritt	Attend Liquor Control Commission hearings.	Time
4/12/2016	September Symens	Attended LCC hearings in Lincoln.	Time
May 2016 Reimbursement			
5/4/2016	Nicole Carritt	Meeting with Senator McCollister (Senator McCollister is a member of the General Affairs Committee, which is in charge of liquor related bills.)	Both
5/11/2016	Chris Wagner	Compile alcohol tax research for Senator.	Time