

BARREN RIVER AREA DEVELOPMENT DISTRICT

COST ALLOCATION PLAN

FISCAL YEAR

2024

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I. INTRODUCTION

The Barren River Area Development District (BRADD) is a special district of local government established under KRS 147A. In addition to authorization by the General Assembly, the BRADD has been designated as an Economic Development District by the Economic Development Administration and Local Development District by the Appalachian Regional Commission. Funding for the activities undertaken through these designations is administered through the Joint Funding Agreement (JFA) by the Department for Local Government (DLG). The BRADD also serves as the grant recipient/administrative unit for the Area Agency on Aging and Independent Living (AAAIL).

Through contractual relationships with Federal, State and Local governments, BRADD provides services in a variety of other areas. For instance, BRADD serves as contract agent for Regional Transportation Planning, Regional Transit Planning, Water and Wastewater Planning for the Kentucky Infrastructure Authority, Hazardous Mitigation Planning for Kentucky Emergency Management and FEMA, Waiver Programs thru Department for Medicaid Services, and GIS/GPS services for various agencies. The BRADD also operates a Revolving Loan Fund program.

For the upcoming fiscal year, it is expected that the BRADD will administer about 50 individual programs/elements funded by federal, state and local sources. The number of programs/elements may change during the course of the year due to unexpected new grants and programs.

The number of programs and the variety of funding sources that are administered by the BRADD necessitates that a financial management system that is efficient and equitable has been developed to ensure that fairness in the distribution of costs is achieved. This Cost Allocation Plan has been developed to meet that need.

The Plan has been developed to comply with the relevant cost principles established in 2 CFR Part 200. In addition, App. VII of part 200, Section D.1.b of Uniform Guidance which reads: "A governmental department or agency unit that receives more than \$35 million in direct Federal funding must submit its indirect cost rate proposal to its cognizant agency for indirect costs. Other governmental department or agency must develop an indirect cost proposal in accordance with the requirement of this Part and maintain the proposal and related supporting documentation for audit. These governmental departments or agencies are not required to submit their proposal unless they are specifically requested to do so by the cognizant agency". The Economic Development Administration (EDA), who serves as BRADD's cognizant agency, confirms BRADD is not required to submit Indirect Cost Allocation Plan (CAP) due to receiving less than \$35 million in annual cumulative direct Federal funding. The plan is developed according to the Uniform Guidance and maintained for audit.

II. FISCAL MANAGEMENT SUMMARY

The Board of Directors of the Barren River Area Development District has established a goal of fiscal management which embodies complete integrity, absence of waste, overall fairness, and practicality. In support of this goal, the Board has adopted Administrative Policies and stipulated independent accountant technical assistance, as needed, in addition to the independent audit. The BRADD's Executive Committee also meets quarterly to review and approve all accounts payable and credit card expenditures. Changes in personnel are also reported to the Committee at these meetings. As a management policy, the District will utilize the JFA Administrative Handbook FY 2024 issued by the Department for Local Government as a guide to Joint Funding Agreement participation.

The basic parts of JFA Fiscal Management are:

- Written operating and accounting procedures
- Formal books of entry
- Authorized budgets
- Documentation supporting expenditures

To improve the capability of the ADD to manage its operations, the management process has been adapted for computer processing of accounting information. The BRADD utilizes Accufund, software specifically developed for grants management by local governments. These computing capabilities allow staff to charge costs to the appropriate funding source in an efficient manner.

This plan is reviewed and approved by the BRADD's Executive Council. The budget and all related computations are subject to change. Some operating expenses may change. The State budget process may be delayed. New programs may be developed. These changes are not reflective of whims of the ADD but to respond to situations such as the following: participating federal agencies can guarantee funds only after authorized and appropriated by Congress, which may not act before the end of the first quarter. The Congressional authority may be affected by Presidential rescission. Similarly, the Governor may find it necessary to alter funds appropriated by the General Assembly to meet the Constitutional mandate for a balanced budget. The Council will be advised of all changes necessitating budget revisions during the fiscal year.

As of this writing, this Cost Allocation Plan contains approximately 50 work elements. Five of the elements are in the Joint Funding Agreement subject to supervision by the Department for Local Government. Most of the remaining elements reflect agreements through other instrumentalities. However, all elements are included in this plan and subject to the same constraints to assure fairness, integrity, and practicality of management.

Essentially, the plan equitably distributes to each work element the staff necessary to accomplish

scheduled tasks. The assignment includes other direct costs, including salary, benefits, and travel costs of assigned professional staff. (Some personnel costs such as unemployment insurance, pension administration and others are treated as indirect costs for practicality.)

An employee's annual leave earned during the fiscal year will be charged to the work elements to which the employee is assigned, in the same manner as holidays are allowed. The accrued value of unused annual leave earned by employees is accounted for through annual leave payable. The funds will be accessed for the cost of paying for employee leave or to pay departing employees for any unused leave. This accrual policy has been established with guidance from Uniform Guidance.

The following four points have been adopted by the BRADD Board of Directors as the Administrative Policy for Financial Management.

1. Financial Control - The policy of the Barren River Area Development District shall be to receive, hold, and disburse all funds by means assuring the maximum security and efficiency. To the extent fiscally feasible, duties shall be separated so that no individual has complete authority over an entire financial transaction. Employees involved in financial transactions shall be bonded. The systems for fiscal control shall provide for periodic reports from auditable records. The District shall prepare annually a Cost Allocation Plan, which shall reflect work elements and methodology of the fair distribution of direct and indirect costs.
2. Receipts and Disbursements - The Executive Director or the Executive Assistant shall be responsible for opening mail, listing checks with the Records Administrator, making a copy of the checks and delivering checks to a member of Finance staff, who shall use a remote scanner to electronically send deposits to the bank for same day deposits. EFT wires shall be verified and recorded by a Finance Officer. All deposits shall be recorded as a credit to the proper elements. A Finance Officer shall review all checks for payment of appropriately documented obligations. The Finance Officer shall log all checks, which have 2 digitized approved signatures, with the Records Administrator before mailing. The Executive Director shall be responsible for the review of check registers. When funds are transferred electronically, i.e. for payroll, records of the transaction must be maintained and approved by Executive Director or designated staff.
3. Accounting System and Records - The accounting system shall provide the information required to meet all contractual reporting requirements. All entries in the accounting records with supporting documentation shall be reviewed by a Finance Officer other than the one who prepares and records those. Payments shall be cross-referenced to supporting documents. The imprest petty cash fund shall be accounted for in a ledger maintained by the Finance Officer. Bank statements shall be reconciled monthly.
4. Travel - Travel shall comply with regulations set forth in contracts agreed to by the Board of Directors, or pursuant to By-Laws and Policies approved by the Executive Council on behalf of the Board.

III. OPERATING POLICIES

The Board of Directors has adopted operating policies, which consist of the following.

Personnel Policies
Procurement Policies
Travel Policies for Staff and Board members
Credit Card Policies
Investment Policies
Open Records Policies
Fraud/Conflict of Interest Policies

IV. WORK ELEMENTS

JFA ELEMENTS

1200 Community and Economic Development
1250 Community Development Block Grants
1300 Appalachian Regional Commission
1400 Management Assistance
1500 Program Administration

NON JFA ELEMENTS

1100 Regional Support
1520 Revolving Loan Fund Management
1521 Revolving Loan Fund Management-Cares
1600 Water Management Planning
1700 Regional Transportation Planning
1710 Federal Transit Administration-Regional Planning
175X Center Lines
1996 Disaster Resiliency Coordination
1998 Building Resilience Infrastructure and Community
2xxx Local Contracts
3100 Aging General
3300 Mental Health & Aging
3400 Aging-Title IIIB- Admin
3401 Aging-Title III C1- Admin
3402 Aging-Title III C2- Admin

3403 Aging-Title IIID
 3404 Aging-Title IIIE- Admin
 3405 Aging-Title VII Elder Abuse
 3406 Aging-Title VII Ombudsman
 3407 Aging-Title IIIB-Ombudsman
 3417 Aging-Title IIIE-ARPA
 3418 Aging-Title IIIC1-ARPA
 3423 Aging-Title IIIB-ARPA
 3424 Aging-Title C2-ARPA
 3426 Aging- Title IIID-ARPA
 3413 Aging- Title VII-Ombudsman -ARPA
 3420 Aging-Title IIIB Supportive Services
 3450 Aging-Title IIIE Supportive Services
 3490 Aging-Aging & Disability Resource Center
 3500 Aging-State Health Insurance Program
 3510 Aging-State Health Insurance Program-Training
 3520 Aging-State Health Insurance Program Supportive Services
 3530 Aging-Medicare Improvement Patient and Provider Act-Ship- Sep-Jun
 3531 Aging-Medicare Improvement Patient and Provider Act-Ship- Jul-Aug
 3535 Aging-Medicare Improvement Patient and Provider Act-ADRC- Sep-Jun
 3536 Aging-Medicare Improvement Patient and Provider Act-ADRC- Jul-Aug
 3540 Aging-Medicare Improvement Patient and Provider Act- AAA- Sep-Jun
 3541 Aging-Medicare Improvement Patient and Provider Act- AAA- Jul-Aug
 3600 Aging-Homecare Program Admin
 3610 Aging-Homecare Supportive Services
 3620 Aging-Expended Senior Meal Program-Admin
 3630 Aging-Expended Senior Meal Program-Supportive Services
 3800 Aging-State Long Term Care Ombudsman
 3850 Aging-Nutrition Services Incentive Program-Jul-Sep
 3851 Aging-Nutrition Services Incentive Program- Oct-Jun
 3900 Participant Directed Services
 3950 Veterans Directed Services

V. CHART OF ACCOUNTS

1000 Cash
 1050 Petty Cash
 1202 CD-Local Edmonton State
 1205 CD-Local American Bank & Trust
 1206 CD-Local- Independence Bank
 1207 CD-Local-South Central Bank

1300	Accounts receivable
1310	Allowance for Bad Debt
1400	Prepaid
1513	Note receivable Anthurium
1518	Note receivable 5 Broke Girls LLC-Covid
1519	Note receivable Murray's Restaurant-Covid
1520	Note receivable New Attitudes Salon-Covid
1521	Note receivable Laxmi Hotels- Covid
1522	Note receivable Cave City Hospitality-Covid
1523	Note receivable Petite Olive-Covid
1524	Note receivable Sims Studio & Shop-Covid
1525	Note receivable Meltdown Ice-cream-Covid
1601	Note receivable The Flip N Axe
1602	Note receivable DHRUV Management Inc.
1603	Note receivable TKAC Hotels-Super 8
1605	Note receivable The Painted Parlor Hair Lab
1611	Note receivable Shiv-Darsh Investments LLC dba America's Best Value Inn
1612	Note receivable Legin's Seafood
1613	Note receivable CGS Machine & Tools
1614	Note receivable Lewis Memorial
1700	Fixed Assets
1705	Fixed Asset-Local
1706	Fixed Asset - Ford Escape
1708	BRDC Building
1709	BRDC Comp Equip
1710	BRDC Office Equip
1711	BRDC Land
1712	Fixed Asset – 2018 Honda CRV
1713	Fixed Asset – 2016 Honda CRV
1800	Accumulated Depreciation
1806	Accumulated Depreciation-Ford Escape
1808	Accumulated Depreciation-BRDC Bldg.
1809	Accumulated Depreciation-BRDC Comp Equip
1810	Accumulated Depreciation-BRDC Office Equip
1812	Accumulated Depreciation-2018 Honda CRV
1813	Accumulated Depreciation-2016 Honda CRV
1999	Due To/From
2000	Accounts Payable
2150	Annual Leave Payable
2300	Fed Tax Payable
2310	Medicare Tax Payable
2320	FICA Payable
2330	State Tax Payable
2340	City Tax Payable
2350	County Tax Payable
2355	Occupational Tax payable
2360	Suta Tax Payable
2370	Local Tax Payable

2380	Garnishments
2400	Health Insurance Payable
2410	HRA Payable
2411	HSA Payable
2415	HRA Admin Payable
2420	Dental Ins Payable
2430	Vision Ins Payable
2440	Aflac Payable
2441	United Way Payable
2442	MASA Payable
2460	Life Insurance Payable
2461	Life Insurance Voluntary Payable
2480	CERS Payable
2481	Employee Health Contribution Payable
2490	401k Payable
2495	Roth 401k Payable
2500	Unearned Revenue
2999	Accrued Payroll
3000	Fund Balance
3500	Investment in Fixed Assets
4000	Revenue-Federal
4100	Revenue-State
4110	Revenue -Goods & Services
4120	Revenue-Support Broker
4150	Revenue-State-Unmatched
4200	Revenue-Local
4300	Revenue-Other
4305	Vehicle Revenue-Local
4310	Background Check Revenue
4400	Revenue-Program Income
4413	Interest Revenue-Anthurium
4418	Interest Revenue-5 Broke Girls
4419	Interest Revenue-Murray's Restaurant
4420	Interest Revenue-New Attitudes
4421	Interest Revenue-Laxmi Hotels
4422	Interest Revenue-Cave City Hospitality
4423	Interest Revenue-Petite Olive
4424	Interest Revenue-Sims Studios & Art Shop
4425	Interest Revenue-Meltdown Ice Cream
4500	Interest Revenue
4501	Interest Revenue-The Flip N Axe
4502	Interest Revenue-DHRUV Management Inc.
4503	Interest Revenue-TKAC Hotels-Super 8
4505	Interest Revenue-The Painted Parlor Hair Lab
4510	Interest Revenue-Express Hospitality- Home 2 Suites
4511	Interest Revenue-Shiv-Darsh Investment LLC
4512	Interest Revenue-Legin's Seafood
4513	Interest Revenue-CGS Machine & Tools

4514	Interest Revenue-Lewis Memorial
4600	Revenue-Investment Income
4700	Revenue-In-Kind
5000	Transfer In
6000	Direct Salary
6100	Direct Burden
6150	Direct Annual Leave
7000	Transfer Out
7100	Direct Professional Exp.
7200	Direct Travel
7210	Direct Vehicle
7230	Direct Board Travel
7300	Direct Staff Training
7405	Direct Advertising
7415	Direct Dues/Subscription
7420	Direct Insurance
7425	Direct Marketing Expense
7430	Direct Meeting Expense
7432	Direct Annual Meeting Exp.
7435	Direct Phone/Fax
7440	Direct Postage
7445	Direct Printing/Copying
7450	Direct Supplies
7455	Direct Miscellaneous
7460	Direct Data Technology
7600	Direct Contractual Services
7620	Direct Service Mains'l
7640	Direct Audit Fee
7650	Direct Legal
7700	Direct Equipment Rent
7770	Depreciation Expense
7705	Vehicle Expense-Local
7706	Vehicle Maintenance
7900	Dir Bad Debt Expense/Recovery/Uncollectible
8000	Indirect Salary
8100	Indirect Burden
8150	Indirect Annual Leave
8200	Indirect Travel
8210	Indirect Vehicle
8300	Indirect Staff Training
8405	Indirect Advertising
8415	Indirect Dues/Subscription
8420	Indirect Insurance
8430	Indirect Meeting Expenses
8435	Indirect Phone/Fax
8440	Indirect Postage
8445	Indirect Printing/Copying
8450	Indirect Supplies

8455	Indirect Miscellaneous
8460	Indirect Financial Data Technology
8465	Indirect Pension Management
8510	Indirect Bldg. Depreciation Exp.
8640	Indirect Audit Fee
8650	Indirect Legal
8700	Indirect Utilities
8710	Indirect Janitorial Service
8720	Indirect Bldg. Supplies
8730	Indirect Bldg. Maintenance
8740	Indirect Auto Exp.
8770	Indirect Building Rent
8900	Indirect Cost
9000	Program Services
9100	Payroll Services
9110	Goods & Services
9300	Background Check Exp.
9310	KARES Exp.

VI. BOOKS OF ENTRY

The BRADD maintains computing software to record and calculate information for BRADD financial management. The accounting software package -- Accufund, developed for the computer, includes the following modules:

- (1) Accufund Accounting Suite
- (2) Automation Workbench
- (3) Payroll
- (4) Human Resources
- (5) Employee Portal

VII. COST ALLOCATION POLICY

Essentially, those personnel and other costs incurred only because of the work element, and which may be readily and accurately ascribed to that element, are charged as direct costs. All other costs are charged indirectly when it is impractical to charge them directly to a cost objective without a disproportionate amount of effort or the cost is incurred for a common or joint purpose benefiting more than one cost objective. The indirect costs are distributed proportionately based upon an established methodology.

1. Salary - Work time of regular full-time, part-time, temporary, or seasonal staff is charged as a Direct Cost to the program element(s) in which they have assigned responsibilities or to which their work is deemed beneficial. Work time of employees that benefits more than one work element and the allocation of time to direct charge would require an inordinate amount of effort are charged to indirect costs.
2. Personnel Burden - All employees' benefit costs specifically related to an employee are charged in the same manner as that employee's salary, either direct or indirect. Some burden costs are general and cannot be specifically related and are charged as indirect.
3. Staff Travel/Training - The regular full-time, part-time, temporary, or seasonal staff charged directly to work element(s) will have their travel costs charged accordingly. Travel costs for indirect staff time will be charged to the indirect cost pool. Mileage and per diem follow 200 KAR 2:006.
4. Board Training - Training recommended for BRADD Board to increase the knowledge of officials to further the goals of the BRADD will be charged to the general fund. Mileage and per diem will be reimbursed following 200 KAR 2:006.
5. Other Travel - Costs or required reimbursements for other travel such as council members/other board members will be charged as a direct cost to the work element to which the activity is assigned.
6. Other - Other costs, including but not limited to: payroll services, communications, printing, postage, equipment and supplies, will be charged as direct costs when possible. Other costs that cannot be readily identified to an individual program will be charged as indirect.
7. Building Cost/Rent - Office space, equipment and furniture depreciation, building insurance, utilities and routine operational costs such as janitorial and general maintenance of the main office building will be charged as indirect.
8. Insurance - General and public officials' liabilities, workers compensation, bonding, and other exposures are considered indirect costs.
9. Services and Fees - General services of benefit to all ADD programs, such as indirect audit costs, general legal advice, office supplies, pension management fee, and staff development programs, are costs that are shared as an economical and rational management methodology. It will be in the scope of the Independent Auditor to determine that such costs are allowable, appropriate, and shared properly.
10. Other In-Kind - In-kind contributions of services from outside agencies or personnel may be utilized as a match for certain programs provided that the value of the services is substantiated in an appropriate manner.

All additional costs, which are not identified above, may be charged as indirect costs, unless prohibited by federal regulations.

Determination of Indirect Cost Methodology

The determination of BRADD's indirect costs is based upon the State, Local, and Indian Tribe Indirect Cost Proposals (Uniform Guidance). The specific indirect cost methodology used is set forth in Appendix VII, Part 200, and Section F3 which reads:

“Indirect Cost Allocations Not Using Rates: In certain situations, governmental departments or agencies (components of the governmental unit), because of the nature of their Federal awards, may be required to develop a cost allocation plan that distributes indirect (and, in some cases, direct) costs to the specific funding sources. In these cases, a narrative cost allocation methodology should be developed, documented, maintained for audit, or submitted, as appropriate, to the cognizant agency for indirect costs for review, negotiation, and approval.”

BRADD programs and funding awards sometimes begin or end in the middle of the basis period, the time during which costs are incurred and accumulated for allocation. Due to the nature of these awards, the BRADD chose this methodology since it is the appropriate, most equitable, and most accurate manner to allocate our indirect costs. By using this methodology, actual indirect costs are charged throughout the year to the funding sources instead of using an amount established through a predetermined rate. Cumulative indirect costs are therefore allocated on a monthly basis, eliminating the need to reallocate adjustments in another basis period. A Summary Schedule of Programs and Indirect Cost Calculation sheet for the most recent audited year are included to illustrate the indirect cost methodology.

Process for Indirect Cost Allocation

Indirect cost pools are established containing all identified costs to be allocated. The basis for indirect cost allocation is the cumulative year to date direct salary and burden (excluding annual leave). The cumulative year to date indirect cost pools are allocated to each element based on percentage of year-to-date salary and benefits of that element to the total year to date direct salaries and benefits of all active participating elements. If an element is closed during the fiscal year, it becomes inactive, and its salary and benefits are not counted toward the basis for indirect cost allocation. The indirect cost that has been allocated to it is also excluded from the indirect cost pool for allocation from the point it became inactive.

BRADD is currently utilizing one indirect cost pool. The cost pool represents indirect costs that benefit all programs/elements and would be impractical to charge them directly. Those costs are, but not limited to, indirect salaries and benefits, travel, audit and legal, telephone, supplies, insurance, postage, printing, accounting software, computer support and maintenance, dues, depreciation charges (if any) for the building, utilities, janitor, building supplies and maintenance and any other costs that benefit more than one program/element.

The indirect cost pools are monitored to ensure that those expenses that can be direct charged are not included.

VIII. SUPPORTING DOCUMENTATION

All expenditures are supported by required authorizations and documentation prior to payment. Procedures and policies, with required forms, have been adopted and are available in the BRADD Administrative Policies Handbook and the financial internal control policies. The following is a summary of the required forms and processes used to support payment.

Employee Timesheet- Time sheets are prepared on paper and signed by each employee for each semi-monthly pay period to denote their work in that period for the various elements. The form is then submitted to the employee's immediate supervisor or designee for review, approval and/or signature and forwarded to those who are responsible for processing payroll to check for possible errors or omissions.

Travel Form - A travel form is prepared and submitted semi-monthly by employees or Board members claiming reimbursement for incurred travel expenses. The form is certified by the claimant, reviewed and signed by the employee's immediate supervisor or designee and reviewed by a Finance Officer for compliance with policies, errors and/or omissions.

Travel log - When staff use BRADD's vehicles to travel, there is a logbook in each vehicle for staff to record the date, beginning and ending mileage, and grant number. At the end of each month, the Finance Office records travel costs based on the logbook.

Credit Card Form - Credit cards are issued to staff that travel on a regular basis. For those employees that do not travel as often, a card is available for checkout on an as needed basis. Policies have been established for eligible uses of credit cards. Credit card forms, with original receipts, must be submitted to the Finance Officer for review of the eligibility of the costs and for errors and/or omissions on a monthly basis. Any purchases in excess of \$500 are required to follow BRADD's procurement policies. The Executive Director reviews and approves credit card statements on a monthly basis.

Other documents- Other supporting documents including, but not limited to, invoices, payment request, contracts, packing slips etc. are reviewed by Finance Officer before payments can be made.

IX. BARREN RIVER AREA DEVELOPMENT DISTRICT
Summary Schedule of Programs
For the year ended June 30, 2022

<u>Description</u>	<u>General Fund</u>	<u>JFA and Non-JFA</u>	<u>Aging</u>	<u>PDS</u>	<u>VDS</u>	<u>Revolving Loan Prog</u>	<u>Total</u>
Salaries	10,619	396,416	498,554	664,611	5,670	5,642	1,581,513
Benefits	4,699	184,675	257,754	326,333	2,786	2,474	778,720
Annual leave	860	23,590	30,970	38,581	570	366	94,937
Travel & Training	8,816	40,755	10,325	12,106	119.09	1,567	73,688
Other Costs	48,774	57,792	58,703	42,370	175	8,958	216,772
Contractual Services	-	-	-	-	-	-	-
Program Services	32,151	112,241	3,039,841	6,069,921	63,717	-	9,317,871
Indirect costs	3,857	146,403	191,393	249,537	2,130	2,044	595,364
Total expenditures	<u>109,777</u>	<u>961,872</u>	<u>4,087,540</u>	<u>7,403,458</u>	<u>75,166</u>	<u>21,051</u>	<u>12,658,864</u>

X. Barren River Area Development District
JFA and Non-JFA
Statement of Indirect Costs
For the Year Ended June 30, 2022

	<u>Indirect Cost</u>	
Salaries and benefits	355,664	
Travel	4,940	
Audit and Legal	41,806	
Pension Management	2,800	
Telephone	20,304	
Supplies	10,603	
Insurance	32,930	
Postage	2,483	
Printing	1,331	
Dues and Subscription	996	
Computer support and Maintenance	34,834	
Other	7,625	
Rent	10,756	
Utilities	25,945	
Building Maintenance and Janitorial	<u>42,346</u>	
Total	<u>595,364</u>	
Allocation basis: Total direct salary and benefits	2,360,232	25%

Certificate of Cost Allocation Plan (State/Local Government)

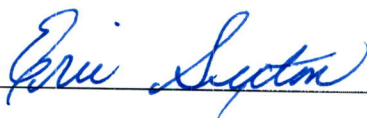
This is to certify that I have reviewed the cost allocation plan submitted herewith and to the best of my knowledge and belief:

- (1) All costs included in this proposal dated 04/26/2023 to establish cost allocations or billings for the period of fiscal year 2024 (July 1 2023 through June 30 2024) are allowable in accordance with the requirements of Appendix V to 2 CFR Part 200 and the Federal award(s) to which they apply. Unallowable costs have been adjusted for in allocating costs as indicated in the cost allocation plan.
- (2) All costs included in this proposal are properly allocable to Federal awards on the basis of a beneficial or causal relationship between the expenses incurred and the Federal awards to which they are allocated in accordance with applicable requirements. Further, the same costs that have been treated as indirect costs have not been claimed as direct costs. Similar types of costs have been accounted for consistently.

I declare that the foregoing is true and correct.

Governmental Unit: Barren River Area Development District

Signature:



Name of Official (printed): Eric Sexton

Title: Executive Director

Date of Execution: 04/26/2023

This certification:

- Is a requirement per 2 CFR Part 200 Appendix V Section E.4.;
- Must be submitted as part of each cost allocation plan; and
- Must be signed on behalf of the non-Federal entity by an individual at a level no lower than vice president or chief financial officer of the organization.

