



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

March 25, 2021

Randy Heiss, Executive Director
SouthEastern Arizona Governments Organization
1403 W. Highway 92
Bisbee, AZ 85603

Re: Indirect Cost Rate Certificate

Randy Heiss:

With this letter, the Interior Business Center (IBC), on behalf of the Economic Development Administration (EDA), a component of the Department of Commerce and your cognizant agency, acknowledges receipt of your Certificate of Indirect Costs for FY 2022 dated March 8, 2021. As a unit of state or local government that receives less than \$35 million in annual cumulative direct Federal funding, you are not required to submit an indirect cost rate proposal to EDA and, consequently, EDA will not review your submission at this time. For more information on this requirement, see 2 C.F.R. part 200, App. VII § D.1.b.

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

IBC is a shared service provider operating under the Department of the Interior. EDA has entered into an agreement with IBC to review and process Certificates of Indirect Costs on their behalf. EDA remains your cognizant agency and this letter, although issued from IBC, is EDA's acknowledgement of receipt.

Please contact IBC if you have any questions or concerns.

Sincerely,

Craig A. Wills
Indirect Cost Services Division Chief

Enclosure: Certificate of Indirect Costs

U.S. Department of Commerce, Economic Development Administration
1401 Constitution Avenue, NW
Washington, DC 20230

CERTIFICATE OF INDIRECT COSTS

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

(1) All costs included in this proposal dated December 15, 2020 to establish an indirect cost methodology for the period July 1, 2021 through June 30, 2022 are allowable in accordance with the requirements of the Federal award(s) to which they apply and OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (codified at 2 C.F.R. Part 200). 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 agreements to which they are allocated in accordance with applicable requirements. Further, the same costs that have been treated as indirect costs have not been claimed as direct costs. Similar types of costs have been accounted for consistently and the Federal Government will be notified of any accounting changes that would affect the methodology.

(3) This proposal establishes an indirect cost billing methodology for Fiscal Year 2022. The proposal's methodology is to use allowable actual indirect costs to bill for reimbursement of indirect costs, rather than an estimated annual fixed rate with carry-forward adjustment. These actual indirect costs are allocated to each program using total direct costs (excluding capital expenditures and other distorting items) as the direct cost base. These actual indirect costs will be allocated to each program proportionate to each program's share of the total direct cost base. The formula used for the allocation is as follows: The number of hours worked in the program, divided by the total hours worked in all programs, equals the program allocation percentage for the month being allocated.

(4) All documentation supporting the indirect cost methodology identified above must and shall be retained by the Recipient for audit purposes. This methodology should be reviewed and validated as part of the Recipient's annual financial audit.

Subject to the provisions of the Program Fraud Civil Remedies Act of 1986, (31 USC 3801 et seq.), the False Claims Act (18 USC 287 and 31 USC 3729); and the False Statement Act (18 USC 1001), I declare to the best of my knowledge that the foregoing is true and correct.

Organization Name: SouthEastern Arizona Governments Organization

Signature: _____

Name of Authorized Official: Randy Heiss

Title: Executive Director

Email Address and Phone: rheiss@seago.org (520) 432-5301 Extension 202

Date of Execution: March 8, 2021

**SOUTHEASTERN ARIZONA GOVERNMENTS ORGANIZATION
INDIRECT COST ALLOCATION PROPOSAL**



INTRODUCTION

SouthEastern Arizona Governments Organization (SEAGO), as an Arizona Council of Governments, is considered a local government pursuant to [OMB 2 CFR 200.64](#) and is located in Bisbee, Arizona. SEAGO administers a variety of programs funded by federal, state, and local governments.

As an agency receiving less than \$35 million in direct Federal funding, SEAGO must develop an indirect cost proposal in accordance with [OMB 2 CFR 200 Appendix VII](#) and maintain the plan and related supporting documentation for audit. SEAGO is not required to submit this proposal unless specifically requested to do so by our [cognizant agency for indirect costs](#). This proposal will be made available to funding agencies when specifically requested to do so.

COST ALLOCATION METHODOLOGY

This indirect cost allocation plan is for the fiscal year beginning July 1, 2021 and ending June 30, 2022. This plan addresses all elements of cost incurred by SEAGO and identifies shared costs that require allocation. SEAGO treats all costs as direct costs except general administration and general expenses. Joint costs are prorated individually as direct costs to each program using the base most appropriate to the particular cost being prorated. Therefore, the direct allocation method has been used in allocating indirect costs. Only costs that are allowable, in accordance with the cost principles in [OMB 2 CFR 200 Subpart E](#), will be allocated to benefiting programs or included in the indirect costs pool.

The following is a brief description of each cost category used by SEAGO. These costs may be direct or indirect depending on exact nature of the expenditure in relation to the particular final cost objective.

Salary/Wages – employee compensation for personal services and paid leave.

Employee Related Expenses – includes but is not limited to payroll taxes, pension contributions and employee health benefits.

Audit – charges related to the annual audit.

Contract Services – includes but is not limited to professional services rendered under a formal agreement.

Outside Services – includes but is not limited to computer support services, pest control, meeting room rentals and interpretation services.

Depreciation – cost of fixed assets equally allocated over the estimated useful life of the asset.

Supplies – includes but is not limited to various office, janitorial and maintenance items.

Postage – charges for mailing and mailing supplies.

Copy – charges for copies, copy machine maintenance, supplies and paper.

Travel – includes but is not limited to mileage, lodging and meals.

Phone – charges for telephone and cell phone services.

Internet Charges – includes but is not limited to internet connectivity and related costs.

Utilities – includes but is not limited to water, electricity and natural gas.

Equipment Maintenance – includes but is not limited to telephone equipment maintenance.

Equipment Purchase – includes but is not limited to non-consumable supplies and fixed assets.

Advertising – includes but is not limited to legal notices and employment ads.

Dues/Subscriptions – charges for business, technical or professional organization membership or publications.

Miscellaneous – charges not falling into any other category.

Insurance – includes but is not limited to property and general liability insurance.

Bank Service Charges – fees charged by banks.

Conferences/Workshops/Training – registration fees.

DIRECT COSTS

Direct costs are those that can be identified specifically with a particular final cost objective and therefore are charged to that particular final cost objective. The accounting system records these costs as they are incurred within the series of accounts assigned for that purpose. Further distribution is not required.

INDIRECT COSTS

Indirect costs are those incurred for common or joint objectives and therefore cannot be readily and specifically identified with a particular final cost objective. These costs are grouped into a common pool and distributed to benefiting final cost objectives by an indirect cost allocation process.

COST POOL AND BASE FOR DISTRIBUTION

SEAGO has created a Central Administration Pool consisting of salaries, wages, employee related expenses and non-payroll costs. The Central Administration Pool is charged with all the

indirect costs as defined above. Only indirect costs actually incurred are included in the indirect cost allocation pool. Direct costs are not to be included in the indirect cost allocation pool.

Each accounting transaction is assigned to the appropriate cost category and the benefiting program(s) or the indirect cost pool. The indirect cost pool is allocated on a monthly basis to each program based on direct labor hours worked in each program. The formula used for the allocation is as follows: The number of hours worked in the program, divided by the total hours worked in all programs, equals the program allocation percentage for the month being allocated. The program allocation percentage is applied to the indirect cost pool balance at the end of the month to determine the indirect costs to be allocated to the program (see attached Allocation Calculation sheets).

AUDIT ADJUSTMENTS

Material audit adjustments will require reimbursement to the granting agency.

DOCUMENTATION

The following will accompany the indirect cost allocation plan:

1. A copy of SEAGO's current fiscal year adopted budget.
2. A chart showing the organizational structure of SEAGO during the period for which the plan applies, along with a functional statement(s) noting the duties and/or responsibilities of all units that comprise SEAGO.

CERTIFICATE OF INDIRECT COSTS

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

(1) All costs included in this proposal dated December 15, 2020 to establish billing or final indirect costs for the period July 1, 2021 through June 30, 2022 are allowable in accordance with the requirements of the Federal award(s) to which they apply and the provisions of OMB 2 CFR 200 Subpart E. Unallowable costs have been adjusted for in allocating costs as indicated in the indirect cost allocation proposal.

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

I declare that the foregoing is true and correct.

Governmental Unit: SouthEastern Arizona Governments Organization

Signature: _____

Name of Official: Randy Heiss

Title: Executive Director

Date of Execution: _____

12/15/2020

Governmental Unit Contact Information:

SouthEastern Arizona Governments Organization
1403 W. Highway 92
Bisbee, Arizona 85603

EIN: 86-0264390

Point of Contact: Randy Heiss, Executive Director
Phone - (520) 432-5301 Extension 202
Fax - (520) 432-5858
Email – rheiss@seago.org
Website – www.seago.org

**SEAGO
Allocation Calculation**

Calculation ID:	Indirect 12 2020	Updated:	1/29/2021 1:05:55 PM		
Session ID:	Indirect 12 2020	Session Date:	12/31/2020	Session Desc:	allocate indiret expenses
First Doc Number:	Indirect 12 2020	Effective Date:	12/31/2020	Doc Desc:	allocate indirect expenses
Allocation Code:	Indirect by Hours	Amounts From:	7/1/2020	Amounts To:	12/31/2020
Basis:	Actual	Balances From:	12/1/2020	Balances To:	12/31/2020
Alloc Segments:	Program, Service, Project				
ICR Segment:					

Calculation Options:

Calculation Method: Labor Hours
 Use indirect cost limit cap: No
 Continue calculation if a selected code yields no entries: Yes
 Pool Filter Applied: No
 Method Filter Applied: No

Handwritten signature and date: 2/1/2021

Pool Information:

<u>Program</u>	<u>Service</u>	<u>Project</u>	<u>Amount</u>
201	000	000	12,858.93
Total			12,858.93

<u>Program</u>	<u>Service</u>	<u>Project</u>	<u>Hours</u>	<u>Percentage</u>
301	000	000	41.73	1.6124%
302	000	000	182.75	7.0609%
303	000	000	144.96	5.6008%
306	000	000	6.06	0.2341%
307	000	000	8.34	0.3222%
308	000	000	14.41	0.5567%
309	104	000	19.75	0.7630%
309	105	000	19.78	0.7643%
309	106	000	5.00	0.1931%
309	107	000	41.00	1.5841%
309	108	000	63.55	2.4555%
310	101	000	382.10	14.7634%
310	205	000	35.32	1.3648%
310	214	000	120.82	4.6680%
310	216	000	137.43	5.3098%
310	217	000	59.20	2.2873%
310	219	000	133.50	5.1580%
310	228	000	33.57	1.2971%
310	255	000	96.64	3.7338%
310	260	000	45.65	1.7637%
310	261	000	9.13	0.3526%
310	262	000	0.00	
310	271	000	8.16	0.3154%
310	275	000	5.27	0.2034%
310	276	000	80.00	3.0909%
310	284	000	0.00	
310	286	000	78.00	3.0137%
310	287	000	0.00	
310	288	000	8.20	0.3168%
310	289	000	3.20	0.1254%
314	000	000	26.43	1.0211%

SEAGO
Allocation Calculation

Calculation ID:	Indirect 12 2020	Updated:	1/29/2021 1:05:55 PM	
Session ID:	Indirect 12 2020	Session Date:	12/31/2020	Session Desc: allocate indiret expenses
First Doc Number:	Indirect 12 2020	Effective Date:	12/31/2020	Doc Desc: allocate indirect expenses
Allocation Code:	Indirect by Hours	Amounts From:	7/1/2020	Amounts To: 12/31/2020
Basis:	Actual	Balances From:	12/1/2020	Balances To: 12/31/2020
Alloc Segments:	Program, Service, Project			
ICR Segment:				

317	000	000	0.00	
319	000	000	0.00	
323	000	000	6.65	0.2569%
327	000	000	15.16	0.5858%
328	000	000	130.67	5.0486%
329	000	000	18.13	0.7006%
338	000	000	376.27	14.5381%
340	000	000	199.79	7.7194%
341	000	000	31.53	1.2183%
			2,588.16	100.0000%
Total				

SEAGO
Allocation Calculation

Calculation ID:	Indirect 12 2020	Updated:	1/29/2021 1:05:55 PM		
Session ID:	Indirect 12 2020	Session Date:	12/31/2020	Session Desc:	allocate indiret expenses
First Doc Number:	Indirect 12 2020	Effective Date:	12/31/2020	Doc Desc:	allocate indirect expenses
Allocation Code:	Indirect by Hours	Amounts From:	7/1/2020	Amounts To:	12/31/2020
Basis:	Actual	Balances From:	12/1/2020	Balances To:	12/31/2020
Alloc Segments:	Program, Service, Project				
ICR Segment:					

Legend (* Indicates Error):

ECA - Entry Codes Assigned, P - Pool Entry Shown For Error Resolution, RAA - Required Accounts Assigned, SYS - System Generated Rounding Adjustment

XCAP - Cap Already Exceeded, *A - Account Combination, *D - Discontinued Code, *E - Effective Date,

*M - Missing Segments, *O - Open Balance Adjustment, *R - Required Account Assignment Missing

Recipient Information:

Codes	Program	Service	Project	Percentage
	301	000	000	1.6124%
	302	000	000	7.0609%
	303	000	000	5.6008%
	306	000	000	0.2341%
	307	000	000	0.3222%
	308	000	000	0.5567%
	309	104	000	0.7630%
	309	105	000	0.7643%
	309	106	000	0.1931%
	309	107	000	1.5841%
	309	108	000	2.4555%
	310	101	000	14.7634%
	310	205	000	1.3648%
	310	214	000	4.6680%
	310	216	000	5.3098%
	310	217	000	2.2873%
	310	219	000	5.1580%
	310	228	000	1.2971%
	310	255	000	3.7338%
	310	260	000	1.7637%
	310	261	000	0.3526%
	310	271	000	0.3154%
	310	275	000	0.2034%
	310	276	000	3.0909%
	310	286	000	3.0137%
	310	288	000	0.3168%
	310	289	000	0.1254%
	314	000	000	1.0211%
	323	000	000	0.2569%
	327	000	000	0.5858%
	328	000	000	5.0486%
	329	000	000	0.7006%
	338	000	000	14.5381%
	340	000	000	7.7194%
	341	000	000	1.2183%

Total	100.0000%
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SEAGO
Allocation Calculation

Units	Dollar	% Amount	Allocated Amount
0.0000	0.00	207.33	207.33
0.0000	0.00	907.95	907.95
0.0000	0.00	720.21	720.21
0.0000	0.00	30.14	30.14
0.0000	0.00	41.45	41.45
0.0000	0.00	71.59	71.59
0.0000	0.00	98.10	98.10
0.0000	0.00	98.29	98.29
0.0000	0.00	24.83	24.83
0.0000	0.00	203.71	203.71
0.0000	0.00	315.77	315.77
0.0000	0.00	1,898.33	1,898.33
0.0000	0.00	175.51	175.51
0.0000	0.00	600.23	600.23
0.0000	0.00	682.78	682.78
0.0000	0.00	294.10	294.10
0.0000	0.00	663.29	663.29
0.0000	0.00	166.78	166.78
0.0000	0.00	480.14	480.14
0.0000	0.00	226.80	226.80
0.0000	0.00	45.36	45.36
0.0000	0.00	40.55	40.55
0.0000	0.00	26.14	26.14
0.0000	0.00	397.47	397.47
0.0000	0.00	387.50	387.50
0.0000	0.00	40.73	40.73
0.0000	0.00	16.13	16.13
0.0000	0.00	131.27	131.27
0.0000	0.00	33.03	33.03
0.0000	0.00	75.34	75.34
0.0000	0.00	649.19	649.19
0.0000	0.00	90.10	90.10
0.0000	0.00	1,869.47	1,869.47
0.0000	0.00	992.65	992.65
0.0000	0.00	156.67	156.67
0.0000	0.00	12,858.93	12,858.93

SEAGO

Statement of Revenues and Expenditures - Unposted Transactions Included In Report

201 - Central Administration

000 - Not Applicable

From 12/1/2020 Through 12/31/2020

		Current Period Actual	Current Year Actual	Total Budget - Original	Percentage of Budget Used
Expenses					
Salary/Wages		7,227.03	41,991.32	76,122.00	55.16%
ERE		2,735.71	15,738.36	31,216.00	50.41%
Operating Expenditures					
Audit	63000	0.00	0.00	25,000.00	0.00%
Outside Services	64000	321.13	2,956.39	4,985.00	59.30%
Depreciation	64100	783.55	4,666.80	8,637.00	54.03%
Supplies	65000	446.22	2,181.08	5,000.00	43.62%
Postage	65200	49.24	947.17	1,025.00	92.40%
Copy	65500	21.28	204.24	175.00	116.70%
Travel	66000	25.00	154.10	5,600.00	2.75%
Phone	67500	249.03	1,383.03	2,494.00	55.45%
Internet	67600	76.82	2,718.64	2,303.00	118.04%
Utilities	67700	211.43	1,123.66	3,032.00	37.06%
Equipment Maintenance	68000	59.79	418.53	1,617.00	25.88%
Equipment Lease	68400	258.65	1,209.94	2,078.00	58.22%
Equipment Purchase	68500	44.70	67.07	500.00	13.41%
Advertising	69000	0.00	0.00	100.00	0.00%
Insurance	69600	349.35	1,617.05	6,750.00	23.95%
Bank Service Charge	69700	0.00	20.00	0.00	0.00%
Conferences/Workshops/S...	69800	0.00	0.00	1,100.00	0.00%
Total Operating Expenditures		2,896.19	19,667.70	70,396.00	27.94%
Other					
Indirect Costs Control	59700	(12,858.93)	(77,397.38)	(177,734.00)	43.54%
Total Other		(12,858.93)	(77,397.38)	(177,734.00)	43.55%
Total Expenses		0.00	0.00	0.00	0.00%
Balance		0.00	0.00	0.00	0.00%



SouthEastern Arizona
Governments Organization

