



FINANCIAL GUIDELINES

FOR TOBACCO PREVENTION AND CESSATION PROGRAM



Arkansas Department of Health



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Section I – General Guidance

Use of the Guide

This guide should be reviewed by everyone in the organization who is responsible for grant management, including those who prepared the grant application and those who record and report on grant project activities. This guide is not offered as a complete manual of procedures on grant administration; it is intended only to provide practical information on what is expected from grantee organizations in terms of fiscal accountability.

Accountability Requirements

Acceptance of a grant from the Tobacco Prevention and Cessation Program (TPCP) creates a legal obligation on the part of the grantee to use the funds in accordance with the terms of the grant and to comply with the grant's provisions and conditions. The grantee thus assumes full responsibility for the conduct of the project activities and becomes accountable for meeting required standards in the areas of financial management, internal control, monitoring/audit, and reporting to the TPCP.

Financial Management Standards

Many alternative methods exist for implementing financial management systems, and the organization should choose methods appropriate for its particular scale of operations. If the grantee organization is unable to meet the standards that are covered here, TPCP funding may be terminated and the organization may be deemed ineligible to receive subsequent financial assistance.

- ▶ Recipients must have accounting structures that provide accurate and complete information about all financial transactions related to each source of funds.
- ▶ Recipients must have an accounting system that can provide accurate, current, and complete financial reports that can be duplicated and supported with back-up documentation.
- ▶ Recipients must have an accounting system that can track expenses and revenue by its funding source.
- ▶ Expenditure records must be at least as detailed as the cost categories indicated in the approved budget (including administrative/indirect costs that are charged to the project).
- ▶ Actual expenditures are to be compared with budgeted amounts.
- ▶ Costs may be incurred only during the award period and all obligations must be paid no later than 45 days after the end of the award period.
- ▶ Records must be supported by source/back-up documentation such as cancelled checks, invoices, contracts, travel reports, personnel etc.
- ▶ Records must be preserved for a period of five (5) years after the agreement expires, or if any audit is pending at the end of the five- year period, until resolution of the audit.

Organizations will grant access to their records upon request by TPCP personnel. Access will be given to any books, documents, papers or records of the sub-grantee which are related to any services performed under the TPCP award agreement.

Organizations must provide safeguards for all grant property, whether cash or other assets, and assure that it is used solely for authorized purposes. Control will be enhanced if the duties of the

members of the organization are divided so that no one person handles all aspects of a transaction from beginning to end. Although a complete separation of functions may not be feasible for the small organizations, some measure of effective control may be obtained by planning the assignment of duties carefully.

Many of the most effective techniques for providing internal control are very simple. Some examples are:

- ▶ Bank accounts should be reconciled monthly by someone other than the person who signs the checks.
- ▶ Checks to vendors should be issued only in payment of approved invoices.
- ▶ The person who is responsible for the physical custody of any asset should not also have responsibility for keeping the records related to that asset.
- ▶ The person who has authority for placing employees on the payroll and establishing wage rates should not be the same person who signs the checks.
- ▶ The individual signing the checks for payment should not be the individual setting up the payment requests. An individual cannot sign a check made payable to themselves.
- ▶ Signature stamps or pre-signed checks cannot be used.
- ▶ Two signatures should be required on checks. Checks must state that two signatures are required. Checks with two signature lines do not constitute the requirement for two signatures and will not be challenged by the bank or vendor cashing the check.
- ▶ Cash transactions are not acceptable. All transactions paid with TPCP funds must be made with a check or credit/debit card with the exception of small cash purchases (under \$100) made through a petty cash fund or personal reimbursements with proper documentation.

Monitoring/Audit Standards

Organizations must assure that TPCP's Quality Assurance Specialist will be able to review the organization's expenses, tie them specifically to TPCP funding, and determine if the expenses are reasonable and supported with appropriate back-up documentation, e.g. invoices, cancelled checks, time/activity sheets, travel logs. Organizations must provide the Quality Assurance Specialist with a copy of the organization's general ledger (in Excel) of all expenses charged to the TPCP sub-grant for the specific period that is being reviewed. In the event that the general ledger total expenses related to the TPCP grant exceed or are less than the amounts reimbursed by TPCP, organizations should provide an explanation on discrepancies. (See Section V – Monitoring for additional information)

TPCP's Quality Assurance Specialist will conduct a review of financial transactions annually. The monitoring reviews will be accomplished through either an on-site visit or a desk review.

For audit requirements see Section F of the Sub Grant Agreement form (FIN-9600).

Reporting Requirements

Organizations must submit a monthly invoice in GEMS and mail the original signed invoice with back-up documents to TPCP no later than 30 days after the end of the reporting month.

Tax Reporting

It is the organization's responsibility to ensure their organization follows Internal Revenue Service (IRS) and State tax laws.

The IRS Miscellaneous Income form (1099-Misc) is required for some services when you pay a vendor more than \$600 in a calendar year. Refer to the following website for additional information. <http://www.irs.gov/pub/irs-pdf/i1099misc.pdf>

The IRS Return of Organization Exempt from Income Tax (Form 990) is an annual reporting return that all 501(c)(3) private foundations, regardless of income must file with the IRS. It provides information on the filing organization's mission, programs, and finances. Refer to the following website for additional information. <http://www.irs.gov/pub/irs-pdf/f990.pdf>



Organizations that have a tax-exempt status that has been revoked cannot be funded by TPCP.

Section II – Grant Management Guidelines

TPCP requires prior approval on some items/transactions before the purchase of an item or engaging in an obligation to expend funding. To assist sub grantees in determining the types of items requiring prior approval; requirements for the purchase; person(s) responsible for the approval; and the method to use to get approval see Appendix I of the Financial Guidelines.

The following sections provide additional guidelines to assist organizations with managing TPCP funding according to established requirements.

NOTE: The financial guidelines in this document must be followed if they are more stringent than those of the funded organization. Otherwise the funded organization's guidelines must be followed.

Use of Funds

Activities conducted under a sub-grantee agreement are an extension of the program. Funds must be used to meet sub-grantee objectives such as for evidence-based tobacco control interventions, reasonable program purposes, activities. **Sub-grantee may not use funds for any items that were not identified in the approved budget without a budget adjustment request and/or prior approval.**

Allowable Costs

Allowable costs are defined as being *reasonable, allocable, necessary, authorized, treated consistently, and documented*.

Recipients should use the following test to determine the allowability of a purchase:

Reasonable: Costs are considered reasonable when the cost does not exceed the market prices for comparable goods or services.

Allocable: Costs are allocable when they are assigned to a specific function where costs are needed and incurred.

Necessary: Costs are considered necessary when they are recognized as ordinary and necessary to support the operation and/or performance of the program.

Authorized: Costs must be authorized in the approved budget and not prohibited under state or local laws or regulations.

Consistent: Costs must be treated consistently regardless of the source of funds.

Documented: Costs must be adequately documented.

The following scenarios are provided to assist with testing for allowability of a cost.

Scenario 1

The approved budget includes the purchase of a computer to replace an obsolete computer that the TPCP Coordinator has been using. However, when the computer is received it is assigned to a staff person that does not perform grant-related tasks. **Does this pass the test for allowable cost?**

No. Why not? The purchase of the computer was authorized for the TPCP Coordinator. By assigning the computer to a staff person not performing grant-related tasks, the cost cannot be allocated to this funding.

Scenario 2

The TPCP Coordinator purchases an item for a TPCP event using his/her personal funds. The event is included in the work plan and budget. An itemized receipt along with the organization's reimbursement/reconciliation form documents the purchase. **Does this pass the test for allowable cost?**

Yes. Why? It was approved in the budget and work plan and the expense was documented (itemized receipt and proof of reimbursement).

Scenario 3

Your work plan includes working with a population that does not speak English and the services of an interpreter are required. You contact someone you know that can provide the service and offer to pay them \$150 per hour. **Does this pass the test for allowable cost?**

No. Why not? The work is necessary; you can allocate it, but is the cost reasonable? When hiring a contractor, you cannot pay more than the market rate for their services. The current market rate for a Spanish interpreter is between \$40 and \$60 per hour with a minimum of one

hour; therefore, the cost is not **reasonable**. Amounts paid over the market rate can be disallowed. Market rates for interpreter services can be found quickly by doing online searches.

Scenario 4

The local coalition for alcohol and other drugs has a meeting that includes a tobacco prevention topic on the agenda and you are asked to provide lunch and snacks (catering) for the meeting. Since the TPCP approved budget does include catering you agree even though only a portion of the meeting will be devoted to tobacco prevention. **Does this pass the test for allowable cost?**

No. Why? The cost is **authorized**, however, the total cost cannot be **allocated** to TPCP funding since the event is for other programs as well as TPCP. TPCP funding can only be used for a portion of the costs and must be based on a methodology equally dividing the costs with the other programs involved in the meeting, i.e. percent of meeting time or portion of the agenda devoted to tobacco prevention.

Scenario 5

Your organization's policy authorizes an up to 4% annual salary increase based on performance reviews. The TPCP funding your organization receives is projected to have a surplus in salary and fringe. Your performance has been outstanding this year so you ask your supervisor for a 5% salary increase which is approved. **Does this pass the test for allowable cost?**

No. Why not? TPCP funds must be treated **consistently** throughout the organization. If the organization's policy sets a limit of 4% annually for salary increases, then all employees must be treated consistently despite having surplus funds.

Scenario 6

An opportunity arises to partner with another organization on a project but the activity was not included in the approved work plan and there will be costs associated with the project that was not included in the budget. **Does it pass the test for allowable cost?**

Maybe. Sub-grantee must seek advice from TPCP prior to commitment. If TPCP, agrees the sub-grantee must submit a Change Action Form following the guidelines in the Revisions to Sub-Grant Agreements section of this manual.

Scenario 7

Approved budget has \$1,200 in office supplies. Your organization has not purchased any office supplies until June. On June 10, you purchased \$1,000 of toners and \$200 of promotional supplies. **Does it pass the test for allowable cost?**

Maybe: The purchase of \$1,200 was authorized; however, it does not seem **necessary** to purchase \$1,000 worth of toner and \$200 of promotional supplies when the grant will expire in 20 days. The sub-grantee must provide justification for this purchase.

Explicitly Unallowable Costs

Below is a list of explicitly unallowable costs that TPCP will not reimburse to recipients. This list is not all-inclusive but provides guidance on those costs that are strictly disallowed.

- | | |
|---|---|
| <ul style="list-style-type: none"> • <i>Alcoholic Beverages</i> • <i>Bonuses</i> • <i>Cash Advance to Employees</i> • <i>Construction Costs</i> • <i>Contingency Provision</i> • <i>Costs Incurred Outside the Sub-Grant Period</i> • <i>Credit Card Fees</i> • <i>Dependent Care Costs (Insurance)</i> • <i>Donations or Contributions</i> • <i>Dual Compensation</i> • <i>Earned sick leave paid upon employees' departure</i> • <i>Fines and penalties</i> • <i>Flowers/Plants</i> • <i>Fundraising</i> • <i>First class and non-coach travel</i> • <i>Gift Cards</i> • <i>Goods and Services for Personal Use</i> • <i>Housing and Personal Living Expense</i> • <i>Idle Facility</i> • <i>Interest Expense</i> • <i>Investment Management</i> | <ul style="list-style-type: none"> • <i>Late Payment Fees</i> • <i>Lobbying</i> • <i>Losses on sponsored projects or contracts</i> • <i>Memberships, subscriptions and professional activity costs /subject to conditions (memberships must be in the name of the organization not an individual and meet the allowability test)</i> • <i>Overtime Cost, Extra Pay or Shift Pay</i> • <i>Organizational or Reorganization Costs</i> • <i>Personal entertainment</i> • <i>Pre-Agreement Costs</i> • <i>Property Acquisition (Land and/or Building)</i> • <i>Relocation Cost</i> • <i>Selling Products Purchased with TPCP Funds</i> • <i>Severance Pay</i> • <i>Valet Service</i> |
|---|---|

Unacceptable Accounting Practices

Organizations must avoid the following practices:

- ▶ Charging costs to spend remaining balances.
- ▶ Assigning charges to the grant with the largest remaining balance.
- ▶ Billing costs to the grant prior to the expense being incurred.
- ▶ Charging the budgeted amount rather than the actual amount.
- ▶ Identifying a cost as something other than what it actually is, i.e. contractor cost rather than personnel cost.
- ▶ "Rainy Day Purchases" where a cost may be beneficial to other projects after the project end date.

Obligation of Funds

An obligation is orders placed, contracts awarded for services to be received and similar transactions during the award period that require payment by the sub-grantee. An obligation occurs when funds are committed, such as a valid purchase order or requisition to cover the costs of purchasing an authorized item on or after the begin date and up to the last day of the project period. Obligations must occur during the project period stated in the award agreement. Any funds not obligated by the end of the award period will expire and will not be available to spend by the sub-grantee.

Contracted services must be performed during the award period. However, invoices for services performed during the award period can be paid after the end date of the award. Entering into a contract for services to be performed after the end date of the award is not acceptable and would be a disallowed cost.

The following scenarios are provided to assist with testing for obligation of funds.

The following scenarios are provided to assist with testing for obligation of funds.

Scenario 1: The advertisement was purchased in May; however, the advertisement ran in June. Can this cost be reimbursed in May?

No: This is a reimbursable grant. The services must be received before the processing of the payment. Therefore payment request should be processed in June.

Scenario 2: The sub-grantee agreed with the vendor that advertising would be purchased in June. The artwork was completed in June but the advertisement will be placed in July. Will this cost be reimbursed?

Yes, but not all costs: The only the cost of artwork can be reimbursed. The services must be performed during the award period.

Scenario 3: The sub-grantee purchased and received services in May. The sub-grantee received the invoice from the vendor in July. Will this cost be reimbursed?

Yes: The sub-grantee can invoice TPCP within 45 days after the grant expired.

Note: TPCP recommends the sub-grantee submit invoices by June 15.

Scenario 4: The sub-grantee purchased a newspaper advertisement in May. This advertisement is for May, June and July services. Sub grantee submits an invoice in May for all three months services. Will this cost be reimbursed?

Yes, but not all costs: The sub-grantee will not be reimbursed for the payment that crosses grant years and/or in advance. The sub-grantee submitted the invoice in May; therefore, the cost for the May services can be reimbursed. The cost for June services can be requested and reimbursed after the services are performed. The cost for July services cannot be reimbursed in this grant period. The sub-grantee must submit a copy of advertisement (tear-sheets) along with each invoice.

Program Income

Program income is defined as gross income received by the organization that was directly generated by a grant supported activity or earned only as the result of the grant agreement. Some examples include:

- ▶ Charging a registration fee for workshops and conferences.
- ▶ Revenue received in return for providing services to a third party.
- ▶ Membership fees.
- ▶ The sale of commodities, data and information records, services or books and publications, software, childcare, tutoring, etc.
- ▶ Rental or usage fees charged for use of supplies or equipment purchased with TPCP grant funds.
- ▶ The sale of products made/purchased using TPCP grant funds.

Organizations must report program income as soon it is earned. TPCP will determine if the program income can be used to advance the TPCP program objectives, or if a refund to TPCP is required. Program income can only be used for allowable TPCP program costs and must be reflected in the work plan.

Personnel Cost

Organizations must ensure that staffing requirements are in compliance with the applicable Request for Applications (RFA). TPCP requires one (1) full time coordinator who must dedicate 100% of his or her time to perform TPCP related activities specified in the work plan. TPCP funded coordinators must be available to work during normal business hours (8:00 a.m. to 5:00 p.m.) with occasional work beyond normal business hours, i.e. evening and weekends. Overtime compensation is an unallowable cost. TPCP will not reimburse overtime compensation to the sub-grantee.

The coordinator must maintain weekly timesheets showing hours worked and days off that are submitted monthly as part of the back-up documentation with the invoice.

In no case is dual compensation allowable. An employee may not receive compensation for the same work from two different funding sources for a single period of time, even though such work may benefit both activities/grants.

If staff funded wholly or in part by TPCP (does not include the required full time coordinator) work on multiple grant programs or cost activities, a reasonable allocation of costs to each activity must be made based on time and/or effort reports (e.g., timesheets with award and activity designation). These reports must:

- ▶ Reflect an after-the-fact distribution of the actual activity of each employee.
- ▶ Account for the total activity for which each employee is compensated.
- ▶ Be prepared at least monthly and coincide with one or more pay periods.
- ▶ Account for the total activities for which employees are compensated and;
- ▶ Be signed by the employee and approved by a supervisory official having firsthand knowledge of the work performed.
- ▶ Be allocated based on a 40 hour work week.

Note: Allocations for fringe benefits must follow the same allocation percentage as salary. The same is true for budgeting salary.



For program continuity, all changes in personnel must follow qualifications as outlined in the current RFA. TPCP recommends written notification of salary and fringe benefits prior to work beginning. This includes submission of resumes and budget adjustments. Nepotism is highly discouraged and as a result related employees should not be placed within the same line of supervision.

Other Costs

Cell Phone and Internet Monthly Services

Cell phone and internet monthly services costs are allowable costs but must be set up in the name of the organization unless the organization requests a waiver that includes a justification and the costs are reasonable. TPCP will reimburse up to \$50 per month for personal cell phone monthly services and \$25 per month for personal internet service. To receive reimbursement a copy of the individual's personal cell phone bill and internet bill must be provided as backup documentation with the monthly invoice.

Desk Phone

Desk phone costs are allowable costs but must be purchased in the name of the organization.

Catering/Food Costs

Catering costs for food and beverages at a TPCP sponsored event are allowable. However, organizations must utilize the National Alliance for Nutrition and Activity meeting guidance as a reference when providing food at meetings. See links below for additional information:

<http://cspinet.org/nutritionpolicy/Healthy-Meeting-Guidelines.pdf>

<http://cspinet.org/nutritionpolicy/Healthy-Meeting-Toolkit.pdf>

<https://www.cspinet.org/nutritionpolicy/healthy-meeting.html>

In addition, the organization must assure that:

- ▶ The meal is provided to participants of a TPCP sponsored event i.e. workshop, meeting, conference, etc. If the event is in conjunction with other programs, such as drug and alcohol awareness programs, the catering cost must be prorated based on attendance or agenda topics. TPCP will not reimburse 100% of the costs if the event is shared with other programs.
- ▶ A timed agenda and justification should be submitted with the invoice.
- ▶ An itemized invoice for food/beverage costs must be provided. Note: A credit card receipt is not adequate backup documentation for the expense.
- ▶ A detailed sign-in sheet that includes contact information for the participants must be submitted to TPCP (see Appendix III)
- ▶ Cost per person does not exceed the state per diem rate and the majority of the attendees are not staff of the sub-grantee organization or state employees. (see per diem rates- <http://www.gsa.gov/portal/content/104877>)
- ▶ Snacks and breakfasts costs are unallowable without special justification and prior approval.
- ▶ Boxed healthy lunches are preferred.

Unallowable Food and Beverage Costs

Following are examples of events where food and beverage costs would not be appropriate and would not be reimbursed by TPCP:

Food for normal daily business, i.e. coffee, water, cups, etc.

- ▶ Staff meetings/working lunches
- ▶ Organizational parties
- ▶ Any non-TPCP related activity

Speaker Fees

Use of a speaker must be centered around changing social norms with the launching of a tobacco control policy or to engage youth resulting in multiple activities such as interviewing the speaker and using the interview after the event to promote tobacco control.

Speaker fees are budgeted in the Contractor/Consultant Services section of the budget. If the speaker was identified in the approved budget and/or selected from the list of recommended speakers in the GEMS Resource Library, no further approval from TPCP is necessary.

The following information must be submitted to TPCP prior to contracting with the speaker if the speaker was not identified in the approved budget:

- ▶ Résumé/credentials
- ▶ Itemized costs (fees and reimbursable expenses, i.e. travel, meal, lodging, and materials for the presentation)

Individuals who receive a salary from any of the Master Settlement Agreement (MSA) funded programs cannot be a paid speaker at sub-grantee events.

Travel Costs

Travel expenses are allowable costs for employees who are on official business travel related to TPCP activities. Travel costs must be in accordance with travel limits listed in the table below or your organizations travel policy, whichever has the more stringent policy. Some travel limits might be applied to in state travel and/or out of state travel.

Note: *Out of state travel is allowed for statewide sub-grantee only.

- ▶ Per Diem rates must be at the government rates. See <http://www.gsa.gov/portal/content/104877>

Detail	In State Travel	Out of State Travel*
Travel expenses will be reimbursed at actual expenses but not exceed per diem rate. Itemized receipt is required.	X	X
Travel expenses for volunteers are allowable.	X	X
Meals	In State Travel	Out of State Travel*
To receive meal reimbursement, the traveler must have an overnight lodging and must travel over 50 miles from work location to destination and submit itemized receipts.	X	X
If the lodging cost includes breakfast, TPCP will not reimburse for breakfast. An exception might be applied to those who have a dietary restriction.	X	X
If the conference cost includes breakfast and/or lunch, TPCP will not reimburse for these meals. An exception might be applied to those who have a dietary restriction.	X	X
Tips on meals may be reimbursed up to 15% but not to exceed per diem.	X	X
Alcohol purchases are not allowable.	X	X
Lodging	In State Travel	Out of State Travel*
Hotel rates should follow the government rate. If the organization cannot claim government rates then a reasonable rate should be sought. Reasonable rate will be determined at the discretion of TPCP.	X	X
Costs for room service, movie rental, alcoholic beverages, etc., are not allowable costs and will not be reimbursed by TPCP.	X	X
If the traveler shares the lodging space with others, the cost should be divided among others equally.	X	X
Valet parking is not a reimbursable expense.	X	X

Mileage	In State Travel	Out of State Travel*
<p>Mileage reimbursement is in accordance with the state rate of \$.42 per mile. To receive reimbursement for mileage the traveler must maintain mileage logs documenting each trip. The mileage log must include the following information:</p> <ul style="list-style-type: none"> • Date of the trip • Starting location including street address and city • Destination location including street address and city • Purpose of the trip • Total miles traveled based on Rand McNally.com • Amount reimbursed for the trip 	X	X
<p>Rental car purchases require prior written approval from TPCP granting permission to proceed. The justification must include cost savings for car rental versus public/private vehicle. The estimated total cost must include all charges, such as gasoline, mileage, insurance, etc. (Full coverage insurance must be obtained from the rental car company when renting a vehicle.) NOTE: Rental cars are for official business use, and cannot be used for trips to restaurants, shopping, entertainment, etc.</p>	X	
Airfare	In State Travel	Out of State Travel*
<p>First class airfare is not reimbursable.</p>		X
<p>Reimbursement may be made for one (1) checked bag per person.</p>		X
<p>Transportation to and from hotel to airport is reimbursable.</p>		X
<p>Transportation to restaurants is not an allowable cost.</p>		X
<p>For out of state travel, statewide sub-grantee can choose an option to travel either by driving or flying. Sub-grantee must submit the justification letter for prior approval. The letter should provide cost savings for driving versus flying. The estimated total cost must include all charges, such as gasoline, mileage, insurance, lodging, meals, etc.</p>		X

Media and Health Communication

Organizations must allocate a portion (percent specified in the RFA) of the total direct budget to media and advertising efforts, e.g. television, radio, print ads, digital media, and bill boards. All media and health communication efforts must be approved by TPCP prior to purchase and must include all required logos (Master Settlement Agreement logo, StampOutSmoking logo, and Arkansas Department of Health logo). Request for approvals must be submitted on the TPCP Health Communication Approval Form allowing ten (10) days for the approval process. This form can also be used to identify items that require prior approval.



Approval is required anytime logos are used and must be submitted on the TPCP Health Communication Approval Form.

Educational Items

Educational items are included as a part of the Media and Health Communication section and are items distributed to the public that include an educational message. A list of educational items that can be purchased is located in Appendix II and can also be found in the GEMS Resource Library. Examples include Cost of Smoking Calculator Slide Guide, etc. Prior to purchase, submit a Health Communication Approval Form for approval of the logo placement. The item, quantity, and message must be in line with and support specific activities in the work plan.

Educational Supplies

Educational supplies are budgeted in the M and O section of the budget and are items used as educational tools such as Mr. Gross Mouth, tarred lung model, etc. If the educational supply item was included in the approved budget, no further approval from TPCP is required.

Sponsorship

Sponsorships are budgeted in the Contractor/Consultant Services section of the budget. If the sponsorship was specified in the approved budget no further approval from TPCP is required, with the exception of logo placements and messaging. Submit requests for logo placement and messaging on the Health Communication Approval Form to the Section Chief for Media and Health Communications.

Direct and Indirect/Administrative Costs

Direct costs are costs that can be tracked directly to TPCP events or activities in the work plan. Examples of allowable direct costs include:

- ▶ Salary and fringe benefits for the coordinator
- ▶ Supplies used by the coordinator to carry out the activities of the work plan
- ▶ Equipment for the coordinator that is deemed necessary
- ▶ Media and promotional/educational materials
- ▶ Cell phone and internet service for the coordinator
- ▶ Sub-contractor services for the purpose of carrying out TPCP workplan activities

- ▶ Coordinator travel costs
- ▶ Meeting and event cost, e.g. facility rental, catering
- ▶ Duplication/copying of program- related materials

Indirect/Administrative Costs are costs that associated with activities or services that benefit more than one project to include TPCP. Organizations are allowed to charge an indirect/administrative cost of up to 10% of the total expensed direct costs. Examples of indirect/administrative costs include:

- ▶ Utilities
- ▶ Rent/Lease
- ▶ Bookkeeping/Accounting
- ▶ Audit
- ▶ General Administrative Fees
- ▶ Equipment Maintenance

Organizations cannot charge more indirect/administrative costs than are documented in the general ledger and the amount cannot exceed 10% of the total expensed direct costs. Example: The indirect cost amount approved in the budget is \$5,000 but only \$4,000 is documented in the general ledger, therefore, the organization can only be reimbursed \$4,000.

Property Management

Equipment purchases of \$500 or greater must be approved by TPCP prior to purchase. If new equipment is purchased when suitable equipment is already available within the organization, the purchase will be considered an unnecessary cost and will not be reimbursed.

Organizations must establish/maintain an effective property management system. Subgrantees are required to track items with an acquisition cost of \$500 or greater. The procedure used for maintaining equipment acquired, in whole or in part, with TPCP funds (including replacements) should, at a minimum, meet the following requirements:

- ▶ Description of the property
- ▶ Serial number or other identification number
- ▶ Identification of the title holder
- ▶ Acquisition date
- ▶ Cost of the property
- ▶ Percentage of TPCP participation in the cost of the property along with other funds used to purchase property if applicable
- ▶ Location of the property and individual name or title of position using property
- ▶ Use and condition of the property
- ▶ Disposition data, including the date of disposal and sale price or disposal method
- ▶ A physical inventory of the property and reconciliation of the results must be completed at least once every 2 years.

Organizations are responsible for replacing or repairing property that lost, stolen, damaged, or destroyed. Sub-grantees must investigate and fully document any loss, damage, or theft of the property and make the documentation part of the official project records. Organizations must:

- ▶ have a control system in place with adequate safeguards to prevent the loss, theft or damage of equipment.
- ▶ promptly and properly investigate any loss, damage, or theft.
- ▶ establish and use adequate maintenance procedures to keep the property in good condition.

Organizations no longer funded by TPCP should contact TPCP to determine the disposition of all equipment purchased. A written response will be sent to the sub-grantee with instructions on the disposition of each item.

Procurement

There are times when it may be necessary to procure goods and/or services to accomplish the activities approved in the work plan. For example, it may be necessary to purchase equipment or contract for services that the recipient does not have in-house.

Recipients must adhere to the following procurement standards when procuring goods and services:

General – At a minimum, TPCP expects all contracted services to be competitively bid using at least three quotes. Examples include, catering costs, professional and technical services, etc.

Adequate Competition – All procurement transactions, whether negotiated or competitively bid and without regard to dollar value, must be conducted in a manner so as to provide maximum open and free competition.

Non-competitive Practices – Sub-grantees must be alert to organizational conflicts of interest or non-competitive practices among contractors that may restrict or eliminate competition or otherwise restrain trade.

Conflict of Interest

To avoid any perception of a conflict of interest, TPCP will not reimburse any organization or individual that is funded by TPCP for services or products, if those services or products are being provided by that individual or organization, or if the individual or organization has a vested financial interest in the company that provides the products or services. Also, TPCP will not pay for services/products if the TPCP funded person/organization will personally gain from the transaction whether direct or indirect, such as receiving discounts or gifts as a result of the transaction.

Definition: *A conflict of interest is a set of circumstances that creates a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest. The conflict in a conflict of interest exists, whether or not a particular individual is actually influenced by the secondary*

interest. It exists if the circumstances are reasonably believed (on the basis of past experience and objective evidence) to create a risk that decisions may be unduly influenced by secondary interests.

Contractor/Consultant Services

This category must be used when sponsoring an event, contracting for a service, hiring an individual as an event speaker, or to give professional advice or services (e.g., training, expert consultant, etc.), but not as an employee of the grantee organization. Contractors, consultants, speakers, and sponsorships included in the approved budget do not require further approval from TPCP with the exception of logo placement and educational messages. Approval of logo placement and educational messages must be submitted to the Section Chief for Media and Health Communications using the Health Communication Approval Form.

The following information is required by TPCP for contracting and consulting services:

1. **Name of Contractor/Consultant:** Provide the name of the proposed contractor/consultant.
NOTE: Contracting with a person who occupies a position with a state agency is prohibited.
2. **Method of Selection:** Describe how the contractor/consultant was selected.
3. **Period of Performance:** Specify the beginning and ending dates of the contract.
4. **Scope of Work:** Describe in outcome terms the specific services/tasks to be performed by the contractor or consultant as it relates to the accomplishment of program objectives.
5. **Method of Accountability:** Describe how the progress and performance of the contractor/consultant will be monitored during and on close-out of the contract period. Identify who will be responsible for supervising the contract. In addition, for continuation contracts, describe the contractor/consultant's previous performance.
6. **Itemized Budget and Justification:** Provide an itemized budget with appropriate justification.
7. **Contract and Grant Disclosure and Certification Form:** Provide a completed and signed copy of the form.
8. **Request for Tax Payer Identification Number and Certification (W-9) Form:**
Provide a completed and signed copy of the W-9 form to TPCP prior to awarding a contract. Sub-grantee should submit the final contract signed by all parties to TPCP when requesting payments.

Printing

Arkansas law ACA19-11*201(30)(a)and(b) requires all government agencies **as well as sub-grantees funded by the state** to competitively bid printing jobs.

Printing is defined as transferring images, by the use of standard industrial type printer ink, upon documents such as letterhead, envelope, pamphlets, booklets, and forms.

Section III – Reimbursement Guidelines

Financial reports are due to TPCP monthly no later than 30 days past month end. Sub-grantees must enter expenditures into GEMS each month and print, sign, and mail the Sub-Grantee Payment Request Form that is generated by GEMS to TPCP, along with the back-up documentation supporting the expenditures billed.

Final bills requiring reimbursement prior to the end of the fiscal year (June 30th) must be submitted no later than June 15th. Expenditures between June 15th and June 30th can be billed after July 1st or no later than August 15th. However, salary and fringe for the month of June can be prorated and billed with the June 15th invoice.

Documentation of Expenses

TPCP requires back-up documentation (source documents) for all expenses that are submitted on the monthly invoice. A source document is a written document that provides details of a transaction and the evidence that the transaction took place. A statement of account from a vendor is not an acceptable source document for an expense. Source documents must be legible and relate to the proper time period and event.

Below are examples of the source documents that should be maintained and submitted with the monthly invoice to document expenses:

- ▶ Personal Travel Expense Reimbursements
- ▶ Mileage Logs
- ▶ Vendor Invoices
- ▶ Store Receipts
- ▶ Purchase Orders
- ▶ Contract Agreements
- ▶ Credit Memos
- ▶ Petty Cash Records
- ▶ Deposit Records
- ▶ Bank Statements
- ▶ Time and Attendance Records
- ▶ Leave Records
- ▶ Hire and Pay Records
- ▶ All Accounting Records and General Ledgers
- ▶ Tax Documents
- ▶ Travel Documents
- ▶ Board Meeting Minutes
- ▶ Canceled Checks
- ▶ Cost Allocation Plans
- ▶ Agendas
- ▶ Sign- in Sheets
- ▶ Asset Records (purchase, inventory and disposal)
- ▶ TPCP Sub-Grant Award

- ▶ Cash Register Receipt

NOTE: Expenses not supported with backup documentation will not be reimbursed until appropriate documentation is provided.

Source documents should show who, what, when, where and quantity and cost of the goods or services purchased. Source documents must be legible.

An invoice provided as backup documentation should include the following information:

- ▶ Name and address of the company
- ▶ Invoice date and invoice number
- ▶ Contract number or other authorization for supplies delivered or services performed (including order number and contract line item number)
- ▶ Description, quantity, unit of measure, unit price, and extended price of supplies delivered or services performed
- ▶ Shipping and payment terms (*e.g.*, shipment number and date of shipment, discount for prompt payment terms)
- ▶ Date of services
- ▶ Total of invoice including taxes
- ▶ Taxpayer Identification Number

Statements from a vendor and credit card receipts are not acceptable documentation of an expense as they lack the necessary details about the transaction.

Although a general ledger (GL) listing payments is used for audit purposes, it cannot be used, solely, to document an expense.



Sub-grantees must pay vendors from itemized invoices from the vendor. Sub-grantees are never to “make up” invoices for their vendors.

Personnel Costs

Personnel costs (salaries/wages and fringe benefits) must be based on payroll records approved by a responsible official(s). Organizations invoicing TPCP for personnel costs must include the following information:

- Copy of weekly timesheet signed by employee and the employee’s supervisor.
- Copy of employee reconciliation or pay stub detailing salary and fringe breakdown.

Meeting Costs

Organizations invoicing TPCP for meeting expenses, i.e. room rental, catering, etc. must include the following information:

- Sign-in sheets
- Meeting agenda
- Copy of invoices for expenses such as catering and supplies
- Copy of the notice of meeting, if advertised
- Copy of meeting minutes, if applicable

Minor Purchase Expense Reimbursements

Organizations invoicing TPCP for minor purchase expenses incurred by a staff member who made a purchase with personal funds must include the following information:

- Legible itemized receipt showing items purchased.
- Organization's reimbursement/reconciliation form signed by the staff member making the purchase and his/her supervisor or the organization's authorized agent.

Travel Cost

Organizations invoicing TPCP for official TPCP related travel expenses incurred by a staff member must include the following information:

- Copy of mileage log signed by traveler and the traveler's supervisor
- Meal receipts showing details of food purchased (a credit card receipt is not acceptable)
- Original itemized hotel receipt in the traveler's name (entertainment charges are not allowed)
- Airline ticket and baggage receipt
- Taxi or shuttle receipt
- Parking receipt
- Other miscellaneous travel expenses

NOTE: Travel related to non-mandatory professional development trainings and workshops must have prior approval from the State and Community Intervention Section Chief on the Professional Development Approval Form.

Contractor/Consultant Cost

Organizations invoicing TPCP for contractor or consultant costs must include the following information:

- Time accounting for contractor/consultant services.
- Evidence of deliverables being requested/paid.
- Copy of itemized invoice from contractor/consultant that describes the services provided and date of services.

Media/Health Communication Costs

Organizations invoicing TPCP for media/health communication costs, e.g. television, radio, print ads, digital media, and bill boards must include the following information:

- Copy of an itemized invoice from the vendor that provided the service.
- Copy of radio or TV script, picture of billboard, tear-sheets or promotion items showing messaging/logos.
- Copy of TPCP Health Communication Approval Form.

Section IV – Budgets and Work Plan Adjustments

The budget, as approved during the award process, is the sub-grantee's financial plan. The work plan, as approved during the award process, is the sub-grantee's action plan to accomplish objectives. Any changes to either the budget or work plan must have prior approval from TPCP. There must be a compelling programmatic justification and rationale for changes and the changes must be in keeping with the intended goals and objectives of the sub-grant agreement. Failure to obtain prior approval could result in disallowed costs. Budget and work plan adjustments should be submitted to TPCP on or before April 15th.

Prior approval must be received from TPCP for the following:

- ▶ Alternative use of salary support due to receipt of other funding. (Caution: A full-time TPCP coordinator is required.)
- ▶ Transferring from one budget category to another.
- ▶ Changes to the work plan.
- ▶ Transferring substantial programmatic work to a third party.
- ▶ Earning program income.
- ▶ Changes in personnel or FTE status changes.

NOTE: This is not an all-inclusive list, but provides examples of situations that require prior approval from TPCP.



Line item budget categories and/or line items within budget categories must never be exceeded (no negative balances).

Budget Adjustment

A budget adjustment occurs when the sub-grantee determines that a project can be improved if approved funds are moved from one budget category to another within the current budget period. Budget adjustments require prior approval.

- ▶ To request a budget adjustment, organizations must submit a request to the State and Community Section Chief and the Administration and Management Section Chief.
- ▶ The requested budget adjustment must be in a Budget Revision Worksheet along with letter of justification describing the impact of the change on the delivery of the work plan activities signed by the agency's authorized person or tobacco control coordinator supervisor.
- ▶ ***If the total redirect amount in the fiscal year is less than 10% of the approved budget line item and the fund is redirected within the same budget category, prior approval is not required.*** Only a justification notation in the GEMS is required. Failure to notate changes might result in the disallowed costs.

Work Plan Adjustment

To request a change to the approved work plan, organizations must submit a request to the State and Community Section Chief and the Administration and Management Section Chief following the guidelines listed below:

- ▶ Submit the request on the organization's letterhead signed by both the coordinator and the organization's authorized representative.
- ▶ Reference the objective/activity in the workplan that is affected, if applicable. Provide a detailed explanation of the change, including a brief synopsis of the impact of the change on the program.

Note: Request to make a change to the work plan or budget can be scanned and emailed to the State and Community Section Chief and the Administrative and Management Section Chief.

IMPORTANT NOTE: Sub-grantees may not implement any changes until official written notification of approval is received from TPCP. Any changes enacted prior to notification of approval may be disallowed or may become the object of a monitoring finding, and are done so at the sub-grantee's own risk. Receipt and review of a change request does not imply or indicate pending approval. Approval of a sub-grant agreement modification is dependent upon a justifiable programmatic and/or fiscal need that will be of direct benefit to the project and is permissible under the established sub-grant parameters. Be sure to review the approved modification. In some cases, partial approval may be granted or TPCP may have changed some budget information during the review/approval process. **Requests for changes will only be considered if both financial and program-reporting requirements are current and terms and conditions of the agreement have been met at the time the request for change is made.**

TPCP will review the change requests and, if approved, initiate a Change Action Form that will be sent to the sub-grantee for review and signature. Once the Change Action Form is signed by both the sub-grantee and TPCP, the sub-grantee will be provided a copy with an effective date for the change. Once the sub-grantee receives the approved Change Action Form, the change can then be made in GEMS.

Note: Sub-grantees will make the approved changes in GEMS and notify the TPCP Administration and Management Section's Grants Analyst that the changes have been made in GEMS. The Grants Analyst will review and accept the change in GEMS and then notify the sub grantee that the change has been accepted.

Section V- Cancellation

Cancellation

TPCP and the sub-grantee agree that either party may cancel this agreement unilaterally at any time by giving the other party thirty (30) calendar days written notice, and delivering notice of cancellation either in person or by certified mail, return receipt requested, restricted delivery. Cancellation notices to the Arkansas Department of Health must be sent to the ADH Director or the authorized representative designated herein.

Section V – Monitoring

Monitoring involves the review of accounting information through the use of a paper trail to prove transactions are accurate and correct and can be allocated back to the TPCP sub-grant. A paper trail provides a complete history of any given financial transaction by identifying each step in the process from the initiation of the transaction all the way through to the completion of the transaction.

TPCP conducts an annual monitoring review on each organization that is funded and may conduct an on-site visit as part of the monitoring and reporting process.

In preparation for a monitoring review, the TPCP monitor will review the sub-grantee's budget, reimbursement files, workplan, and program evaluations to gather background information on the program and how the funding is being used. The monitor will also request a copy of the organization's general ledger (in Excel) of all expenses charged to the TPCP sub-grant for the specific period that is being reviewed – usually the last completed grant cycle but may include a review of current year transactions. Other documents that may be requested include payroll verification, leave ledgers, employee leave requests and timesheets, bank statements, quarterly tax reports, etc.

Examples of tests that will be performed include:

- ▶ A comparison of expenses reported to TPCP (monthly payment requests) and those recorded in the general ledger.
- ▶ A comparison of total expenses to total funds requested.
- ▶ Tracing selected expenses through the organization's accounting system.

- ▶ Reviewing selected expenses and applying the allowability test to determine if the costs are allowable.
- ▶ A comparison of wages requested versus wages paid.
- ▶ A comparison of timesheet hours records versus payroll records.
- ▶ A comparison of leave earned and leave taken.
- ▶ Tracing payroll through the bank account.
- ▶ Ensuring that the required taxes are paid and filed on time.

Examples of some common findings include:

- ▶ Charging budgeted amount rather than actual amount.
- ▶ Insufficient time and leave records.
- ▶ No documentation to support a transaction.
- ▶ Using cash to pay a vendor.
- ▶ Charging prior year costs to current year award.
- ▶ Not providing a full-time coordinator as required by the RFA
- ▶ Documentation does not support expenses.
- ▶ Purchasing unallowable items.
- ▶ Required logos are not being used.
- ▶ Dual billing – billing two different grants for the same costs.
- ▶ Excessive mileage claims – not using Rand McNally mileage.
- ▶ Tax documents not filed.
- ▶ Amount requested does not equal amount expended.
- ▶ Charging for salary with no payroll ledger to support the costs.
- ▶ Improper or lack of documentation for leave time.
- ▶ Not maintaining accounting records or source documents.

Appendix I

Items/Transactions Requiring Prior Approval from TPCP

Prior approval means that you must obtain approval from TPCP before you purchase an item or engage in any obligation to expend TPCP funds. If item costs are not in the approved budget, you must request a Budget Revision before you obligate funds.

Type Item	Requirements	Responsible for Approval	Method of Approval
I. Event Items			
Educational Items (EI) Ex: Silicone Wrist Bands, Youth Team Uniforms (other items on approved list)	EI in the approved budget require no further approval other than logos and educational message. If not specified in the approved budget preapproval is required.	GA approves request for logo and message, if the EI is in the approved budget and sends to TPCP Health Communications	Form-Health Communication Approval
Educational Supplies (ES) Ex: DVDs, Canopy/Table Cloth, Booth Displays-Lungs, Tar Jar, etc.	ES in the approved budget require no further approval other than logos. If not in the approved preapproval is required. NOTE: Items that need logo added such as table cloth will need GA approval.	GA approves request for logo placement if ES is in the approved budget. If not in the approved budget, must be approved by both GA and TPCP Health Communication Section Chief	Form-Health Communication Approval
Media – Print ads, Billboards, Radio, Newsletters, E-blast, Social Media ads, TV/Cable, Letter to Editor, Press Release, etc.	All media must be pre-approved.	First review by GA. Final review and approval by TPCP Health Communication Section.	Form-Health Communication Approval
Infographics	Preapproved infographics do not need further approval unless content has been changed.	GA can approve if there are no changes to the infographic. If changes are made, both GA and TPCP Health Communication Section Chief must approve.	Form-Health Communication Approval
Sponsorships	Must provide appropriate visibility and value-added opportunities for TPCP such as logo placement, banners, public service announcements, advertisements, speaker opportunities, etc. If sponsorship was included in the approved budget, logo approval is required.	If the sponsorship is preapproved, the GA approves initials and sends to TPCP Health Communication Section for approval of logos and message.	Form-Health Communication Approval

II. Services			
Contractors/Consultants	Written approval from TPCP. For details on items that must be provided to TPCP see page 16 of the TPCP Financial Guide.	Submit request to Administration and Management Section Chief and State and Community Section Chief for approval.	Letter/email: submit request with appropriate information
Speakers	Speakers included and identified in the approved budget require no further approval. NOTE: Speakers must be high impact, centered on achieving a school policy or a youth event with multiple interventions.	Speakers not included or identified in the approved budget require prior approval from the GA and TPCP Health Communication Section Chief.	Form-Health Communication Approval
III. Travel			
Travel Reimbursement for Non-TPCP Paid Coordinator	Identify the role of the person and provide justification for travel reimbursement (e.g. coalition member).	Submit request to Administration and Management Section Chief and State and Community Section Chief for approval.	Letter/email
Non-TPCP Sponsored Conference/Trainings (1 per award cycle)	If conference was identified and included in the approved budget no further approval required. If not in the approved budget, a budget revision may be necessary. If budget revision is necessary, justification describing how the training supports the work plan and meets criteria previously outlined.	Submit request to GA, State and Community Intervention Section Chief and Administration and Management Section Chief for approval (based on the need for a budget revision)	Letter/email: submit request with appropriate information)
IV. Equipment			
CO₂ Monitors, Laptops, PC's, etc.	If items are in the approved budget no further approval is required. If not, the model type and cost must be approved by TPCP. A budget revision may also be necessary.	If not included in the approved budget, prior approval is required by GA and Administration and Management Section Chief.	Letter/email: submit request with appropriate information
Cell Phone Waiver- Personal	Submit a request to reimburse for personal cell phone cost verses an organizational issued cell.	Submit request to Administration and Management Section Chief for	Letter/email: requesting a waiver

	See page 11 of the TPCP Financial Guide.	approval.	
V. Budget/work plan Revisions – all changes to budgets and work plans require approval			
Change in Budget Line Amount	Justification for changes and how it affects work plan.	Submit request to GA, Administration and Management Section Chief and State and Community Intervention Section Chief for approval.	Letter/email
Change in Work Plan Deliverables	Justification for changes and how it affects work plan and budget.	Submit request to GA, State and Community Intervention Section Chief and Administration and Management Section Chief for approval.	Letter/email
Change in Personnel Status	Explanation on why change is being made and how it will affect deliverables - to include the status of deliverables. NOTE: Based on the information provided, TPCP will determine whether to continue the contract.	Submit new coordinator's resume to GA, Administration and Management Section Chief and State and Community Intervention Section Chief for approval.	Letter/email

Educational Items

Item Name:	Target Audience:	Logo Required	Purpose:
2 A's and R Mousepads	Healthcare Providers and Those Individuals Who Quit Tobacco Use	SOS	Given to providers who adopt BTI policy. This will work as a reminder to providers while they are providing services to patients and entering data in their EMR.
Backpacks/Draw string backpacks/drawstring totes	Youth and Young Adults	Project Prevent	Given to youth during Project Prevent activities and youth-related community events/activities. Item will have continued use through the award period while youth participate in multiple interventions.
Church Fans/Bible Bookmarks	Faith Based Organizations	SOS	Given to faith-based organizations to educate the congregation on tobacco free campus policies and increase referral to the ATQ.
Pencils	Youth	Project Prevent	Given to youth at assemblies to provide students with reminders to participate in Project Prevent activities or used when students participate in surveys (APNA, YRBS).
Pens	General Population	SOS	Given out at health support group sessions, as well as adult/college age health classes and CNA classes; surveillance and evaluation activities; and community events. This is a low cost material which we can use to increase cessation among Arkansans.
Silicone Bracelets	Youth	Project Prevent	Given to youth as reminders to stay committed to living a tobacco and nicotine free lifestyle during nationally recognized tobacco events within the state. In addition, they provide educational messaging about tobacco prevention and cessation awareness.
Stress Balls in the shape of lungs	Tobacco Users/Cigarette Users to Include ESDs	SOS	Given to individuals referred to ATQ through worksite wellness, when employers implement tobacco-free policies and offer cessation resources. Provide an avenue to keep hands busy when attempting to quit tobacco and have the ATQ number available.
T-shirt Uniforms	Youth	Project Prevent	Given to youth to be strictly used as uniforms and worn when participating in Project Prevent events and local community activities. Provide an avenue to promote PPYC and assist in recruiting youth coalition members. Item will have continued use through the award period while youth participate in multiple interventions.
Water Bottles	General Population	SOS	Given at health/nutrition related events to enhance awareness of tobacco use and its impact on one's ability to exercise. Used by all ages and with tobacco prevention and cessation educational messages.

