MONTANA SECRETARY OF STATE

Brad Johnson

Elections Bureau
(406) 444-5376
egraveley@mt.gov

Montana State Capitol
2nd Floor, Room 260
P.O. Box 202801
Helena, MT 59620-2801

April 3, 2007

Thomas R. Wilkey
Election Assistance Commission
Amended 101 and 251 Reports
1225 New York Ave. NW, Suite 1100
Washington, DC 20005

Dear ~~Thomas~~: Tom

As you know, we have received your letters regarding Montana's Amended SF 269 reports. On January 24, 2007, your office granted us an extension for these amended reports.

Below is a summary of the information required, in addition to our office's response to each item.

Title I, Section 101

- *Report interest earned on deposits of these funds into your State HAVA account. It must be added to your total federal share and shown on Line 10 o as a combined total, and the amount footnoted on Line 12.*

Response:

- This office did not initially allocate interest funds to separate account numbers for Title I and Title II funds, so all funds were pooled instead of being placed in Title I and Title II accounts. However, based on our HAVA spending, for the purposes of the Title I amended report attached we have reviewed our Title I expenses during the applicable period and accordingly have apportioned percentages of the total interest earned to Title I. We trust that this method will be acceptable and meets the applicable requirements for reporting.

Title II, Section 251

- *Report interest earned on deposits of these funds into your State HAVA account. It must be added to your total federal share and shown on Line 10 o as a combined total, and the amount footnoted on Line 12.*

- *Interest is also earned on your State's match. This interest must also be reported, separately, totaled with the match and footnoted on Line 12.*

- *Please add a separate entry on Line 12, to note the maintenance of effort (MOE) for the State fiscal years covered by the report. For example, if your State fiscal year runs from July 1 to June 30, then the report covering Title II requirements payments activities from October 1, 2004 to September 30, 2005 should disclose on Line 12 the amount expended in MOE funds from July 1, 2004 to June 30, 2005 and the amount budgeted for the MOE for the period from July 1, 2005 to June 30, 2006.*

Response:

- As noted above, this office did not initially allocate interest funds to separate account numbers for Title I and Title II funds, so all funds were pooled instead of being placed in Title I and Title II accounts. However, based on our HAVA spending, for the purposes of the attached Title II amended report we have reviewed our Title II expenses during the applicable period and accordingly have apportioned percentages of the total interest earned to Title II. Again, we trust that this method will be acceptable and meets the applicable requirements for reporting.

- For the purposes of the state match, our office has asked the county election administrators to provide funds for the match. The election administrators did so through their own funds and did not accrue interest on those funds. Therefore, there is no interest to be reported for the match, and this is noted on the attached amended report.

- In regard to the maintenance of effort, we have added separate information on Line 12 to report the state's maintenance of effort. We understand that this is meant to reflect how Montana, in using the requirements payment, maintained the expenditures of the state for activities funded by the payment at a level that was not less than the level of such expenditures maintained by the state for the fiscal year ending prior to November 2000.

As noted above, we have attached the amended 2004 and 2005 Title I and Title II reports for your review. If there are any errors or omissions on the attached, please let me know as soon as possible and we will make any necessary corrections or additions.

Sincerely,

Elaine Graveley

Elaine Graveley
Elections Deputy

Amended Standard Form 269 Section 251 FY 2004

REVISED

FINANCIAL STATUS REPORT
(Long Form)
(Follow instructions on the back)

1. Federal Agency and Organizational Element to Which Report is Submitted	2. Federal Grant or Other Identifying Number Assigned By Federal Agency	OMB Approval No. 0348-0039	Page 1 of 3 Pages
Election Assistance Commission	39.011 Section 251		

3. Recipient Organization (Name and complete address, including ZIP code)

Montana Secretary of State/ PO Box 202801/ Helena, MT 59620-2801

4. Employer Identification Number	5. Recipient Account Number or Identifying Number	6. Final Report	7. Basis
81-0302402	03715	☐ Yes x☐ No	☐ Cash x☐ Accrual

8. Funding/Grant Period *(See instructions)* From: (Month, Day, Year)	To: (Month, Day, Year)	9. Period Covered by this Report From: (Month, Day, Year)	To: (Month, Day, Year)
June 17, 2004	Open	June 17, 2004	September 30, 2004

10. Transactions:	I Previously Reported	II This Period	III Cumulative
a. Total outlays		593,385.85	593,385.85
b. Refunds, rebates, etc.			0.00
c. Program income used in accordance with the deduction alternative			0.00
d. Net outlays *(Line a, less the sum of lines b and c)*		593,385.85	593,385.85
Recipient's share of net outlays, consisting of: e. Third party (in-kind) contributions			0.00
f. Other Federal awards authorized to be used to match this award			0.00
g. Program income used in accordance with the matching or cost sharing alternative			0.00
h. All other recipient outlays not shown on lines e, f or g		216,480.00	216,480.00
i. Total recipient share of net outlays *(Sum of lines, e, f, g and h)*		216,480.00	216,480.00
j. Federal share of net outlays (line d less line i)			376,905.85
k. Total unliquidated obligations			
l. Recipient's share of unliquidated obligations			
m. Federal share of unliquidated obligations			
n. Total federal share (sum of lines j and m)			376,905.85
o. Total federal funds authorized for this funding period			**4,158,102.82**
p. Unobligated balance of federal funds *(Line o minus line n)*			**3,781,196.97**
Program income, consisting of: q. Disbursed program income shown on lines c and/or g above			
r. Disbursed program income using the addition alternative			
s. Undisbursed program income			
t. Total program income realized *(Sum of lines q, r and s)*			

11. Indirect Expense	a. Type of Rate *(Place "X" in appropriate box)* ☐ Provisional ☐ Predetermined ☐ Final ☐ Fixed			
	b. Rate	c. Base	d. Total Amount	e. Federal Share

12. *Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:* **The 5% match was paid by Missoula County on February 23, 2004 for precinct counters that cost $432,960.00. Our office reimbursed the county for $216,480.00, leaving an amount of $216,480.00 paid by the county for matching. This amount was more than the federal match requirement of $207,500 (5%) for the $4,150,000.00 outlay. This match is included as part of the total outlay on Line 10d. and Line 10h. All of the match was expended before the requirements payment was received. There was no interest on this match since it came from the county. All interest from HAVA funds was pooled and not originally allocated separately to Title I and II, but it was estimated based on spending and included on Line 10o in the amount of $8,102.82. In FY 2000, our elections expenses totaled $160,288.17. For the state fiscal year July 1, 2003-June 30, 2004, non-HAVA MOE totaled $301,890.40. For the state fiscal year July 1, 2004-June 30, 2005, non-HAVA MOE totaled $345,425.41.**

13. Certification: I certify to the best of my knowledge and belief that this report is correct and complete and that all outlays and unliquidated obligations are for the purpose set forth in the award documents.

Typed or Printed Name and Title	Telephone (Area code, number and extension)
Elaine Graveley, Elections Deputy	(406) 444-5376
Signature of Authorized Certifying Official: Elaine Graveley	Date Report Submitted: 4-3-07

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269-104

Standard Form 269 (REV 7-97)
Prescribed by OMB Circulars A-102 and A-110

200-498 P.O. 139 (Face)