



## **ALLOWABLE COSTS: ADVERTISING, PUBLIC RELATIONS, AND PROMOTIONAL MATERIALS**

The following general guidance is meant to assist a State Library Administrative Agency (SLAA) in determining allowable and unallowable costs related to advertising, public relations, and promotional materials for Library Service and Technology Act (LSTA) grant awards and subawards.

SLAAs also must review the applicable Code of Federal Regulation (CFR) Cost Principles for more complete information on allowable and unallowable costs (2 CFR 200 Subpart E: Cost Principles). Please be advised that the CFR takes precedence over IMLS Grants to States Guidance. Additionally, please consult with your Program Officer with any questions or for further guidance on allowable costs for LSTA grant awards.

SLAAs must be familiar with the eight priorities of the LSTA program since no LSTA funds may be expended for any program that does not meet at least one of these priorities. The eight priorities are:

- (1)** expanding services for learning and access to information and educational resources in a variety of formats, in all types of libraries, for individuals of all ages in order to support such individuals' needs for education, life-long learning, workforce development, and digital literacy skills;
- (2)** establishing or enhancing electronic and other linkages and improved coordination among and between libraries and entities, as described in 9134(b)(6), for the purpose of improving the quality of and access to library and information services;
- (3)(A)** providing training and professional development, including continuing education, to enhance the skills of the current library workforce and leadership, and advance the delivery of library and information services; and
  - (B)** enhancing efforts to recruit future professionals to the field of library and information services;
- (4)** developing public and private partnerships with other agencies and community-based organizations;
- (5)** targeting library services to individuals of diverse geographic, cultural, and socioeconomic backgrounds, to individuals with disabilities, and to individuals with limited functional literacy or information skills;

(6) targeting library and information services to persons having difficulty using a library and to underserved urban and rural communities, including children (from birth through age 17) from families with incomes below the poverty line (as defined by the Office of Management and Budget and revised annually in accordance with section 9902(2) of title 42) applicable to a family of the size involved;

(7) developing library services that provide all users access to information through local, State, regional, national, and international collaborations and networks; and

(8) carrying out other activities consistent with the purposes set forth in section 9121, as described in the State Library Administrative Agency's plan.

*(20 USC Chapter 72, Sec. 9141).*

## **I. Allowable Costs Overview**

As Federal grant recipients, SLAAs are required to comply with the terms and conditions of their grant awards, as well as with applicable federal laws, regulations, and applicable state and local laws and regulations. SLAAs are encouraged to review and become familiar with the [Cost Principles](#) located in 2 CFR Part 200, Subpart E.

All costs charged to grants awarded by IMLS under LSTA must be "allowable costs." Generally, for a cost to be allowable for an LSTA grant award, the cost must be **directly related to and necessary to carry out one or more of the approved LSTA priorities** (20 USC Chapter 72, Sec. 9141). **In addition, it must be (1) reasonable, (2) allocable, and (3) not specifically disallowed by the State or local laws or regulations** (2 CFR 200.404-405). Examples of allowable costs for LSTA awards include, but are not limited to: salaries and wages, fringe benefits, consultant fees, travel costs, equipment, supplies and materials, and indirect costs.

In general, no IMLS State Program funds may be used for **lobbying** activities. The term "lobbying" is generally considered to cover any attempt to influence government decision-making. Note that lobbying also includes activities or the publication or distribution of literature that in any way tends to promote public support or opposition to a pending legislative proposal.

## **II. Advertising, Public Relations, and Promotional Materials Costs**

### **A. Advertising Costs**

2 CFR 200 defines advertising costs as "the costs of advertising media and corollary administrative costs. Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like."

Generally applying the CFR to LSTA projects, the only allowable advertising costs are:

- recruitment of personnel for the LSTA grant projects;
- procuring goods or services for the performance of LSTA grant projects;
- disposal of scrap or surplus materials acquired in the performance of LSTA grant projects (except where SLAAs are reimbursed for disposal costs at a predetermined amount); and
- program outreach and other specific purposes necessary to fulfill the requirements of the LSTA grant.

With respect to LSTA, an SLAA can advertise for staff to assist in the implementation of statewide databases, for equipment and software necessary to implement the databases, and for training of library staff in the use of the databases.

#### B. Public Relations Costs

2 CFR 200 establishes that the definition of public relations “includes community relations and means those activities dedicated to maintaining the image of the non-Federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.”

The cost principles establish, with respect to LSTA grant projects, that allowable public relations costs include:

- costs specifically required by the grant award for a specific LSTA grant project;
- costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the Federal award; and
- costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.

Typically, allowable public relations costs are specific expenses involved in a project to inform the public or the press about specific LSTA grant projects. Public relations costs, such as brochures and bookmarks, charged to an LSTA project to carry out that specific project would be allowable. However, a general message such as “libraries are good places and deserve to exist” would be considered unallowable. As a further example, it would not be an allowable cost on an LSTA project for an SLAA to hire a photographer to take photographs of library patrons for a press release highlighting the importance of libraries. However, using a photographer to take photographs to let users know about the availability of an LSTA-funded service in furtherance of a specific LSTA-funded project would likely be allowable.

#### C. Unallowable Advertising and Public Relations Costs

2 CFR 200 also provides direct examples of unallowable advertising and public relations materials. With respect to these cost principles, SLAAs **may not** use LSTA grant funds to cover:

- any advertising or public relations costs other than specified as allowable by the CFR;
- costs of meetings, conventions, convocations, or other events related to other non-LSTA grant activities of the non-Federal entity (including the costs of displays, demonstrations, exhibits, meeting rooms, hospitality suites, other special facilities used in conjunction with shows and special events, and salaries and wages of employees engaged in setting up exhibits, making demonstrations, and providing briefings);
- costs of promotional items and memorabilia including models, gifts, and souvenirs; and
- costs of advertising and public relations designed solely to promote the SLAA or a library in general.

SLAAs should both be very cautious in approving any item which may fall into the prohibited cost categories set out above and consult with the appropriate Program Officer for guidance.

#### D. Promotional Materials

As set forth above, 2 CFR 200 does not allow costs of promotional items and memorabilia including models, gifts, and souvenirs to be applied as allowable costs to LSTA grant awards. However, based on questions received by the Grants to States Program, questions about the purchase of items that may have a promotional nature arise frequently for both SLAAs and their sub-grant recipients.

Following is a listing of promotional items that SLAAs have asked about that should be carefully reviewed by SLAAs on a case-by-case basis before their cost is approved out of LSTA award funds: bookmarks, postcards, T-shirts, mugs, books, bags, CDs, calculators, banks, jump ropes, ties, scarves, bibs, safety plugs, hats, rubber stamps, sidewalk chalk, jigsaw puzzles, patches, flying disks, paint sheets, plastic bags, trading cards, stretch band watches, gel bracelets, posters, door hangers, magnetic bookmarks, pennants, megaphones, figurines, banners, book packs, mini-pad holders, and message magnets. Please note that the foregoing list is illustrative; its inclusion in this guidance does not imply that these items are per se allowable. Each item should be carefully scrutinized in the context of its specific corresponding project.

As stated above, the CFR prohibits these items from being used as gifts, models, or souvenirs. The purchase of these items with LSTA funds is rarely an allowable cost unless SLAAs and subrecipients have a clearly demonstrable and legitimate purpose for the purchase and distribution of these items that is directly related to the LSTA grant project. A general guiding question is whether a prudent person would determine that the items are directly related to the LSTA grant project, and a factor may be whether the

items are more educational and informational in nature than promotional. Since often these items are more promotional in nature, and therefore are an unallowable cost, many libraries partner with businesses and other organizations to cover the costs of promotional materials.

Each SLAA should ensure that their subrecipients understand the CFR restrictions regarding promotional items such as those listed above. The Grants to States Program encourages SLAAs to provide written instructions to their subrecipients on the use of LSTA grant awards for promotional items as this is a common area of confusion for LSTA subrecipients.

### **III. LSTA Public Relations/Advertising Activities, Workshops, & Projects**

#### **A. LSTA Funded Public Relations/Advertising Activities**

Subject to the restraints of 2 CFR 200, public relations/advertising activities in support of a specific LSTA-funded project are allowable. This means that there can be a public relations/advertising component to a project that provides a service or program that meets any of the eight LSTA priorities. For instance, the SLAA could develop brochures or announcements that inform potential participants or users about the availability of an LSTA-funded summer reading program or state database.

#### **B. Workshops/Continuing Education Activities on Public Relations/Advertising**

Again, subject to the restraints of the CFR, LSTA funds may be used to conduct workshops that teach librarians how to engage the public in specific library services and programs. The workshops would be instructional, rather than promotional. There should not be a component of the workshop that would fund the actual production of public relations materials, etc., unless the materials were designed to carry out a specific LSTA-funded project.

#### **C. Public Relations/Advertising Projects**

Public relations/advertising projects per se are not allowable uses of LSTA funds EXCEPT in furtherance of addressing priorities 5 and 6 of the LSTA legislation (see page 1). This means that a project whose purpose is to promote or market libraries or their services may not be funded with LSTA dollars unless they are used to address those groups identified in priorities 5 and 6.

### **IV. Conclusion**

The intent of the IMLS LSTA program is to support specific projects (that meet the eight statutory priorities) and their related costs. The CFR provides further guidance on allowable and unallowable costs. SLAAs need to familiarize themselves with the limits on allowable costs for LSTA grant funds for advertising and public relations costs and must be aware of the explicit restrictions set out in 2 CFR Part 200. SLAAs should also

make subrecipients aware of the limitations on allowable costs for LSTA grant funds for advertising and public relations costs and provide written guidance where appropriate on this issue. **Please contact your State Program Officer for further guidance on advertising, public relations, and promotional materials costs as well as with general questions on allowable costs.**

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