OFAM Recipient Technical Assistance
April 27, 2023

Office of Federal Assistance Management (OFAM)
Health Resources and Services Administration (HRSA)
Reminders

• Listen-only Mode

• Time allocated is estimated

• Questions will be taken at the end of the session
Agenda

• Helpful Resources
• Suspension and Debarment
• Multi-Factor Authentication
• Questions & Answers
Visit our Training page — https://www.hrsa.gov/grants/manage-your-grant/training
HRSA Grants Training Webinars

• Register Today
• Workshop Schedule Available
• First Session in May; new sessions in June, July, and August
  • No cost
HRSA Grants Training Webinars #2

Register Today!
https://www.hrsa.gov/grants/Healthy Grants Workshop
Contact and Technical Assistance Information

• HRSA Electronic Handbooks (EHB) (877) 464-4772 8:00am – 8:00pm EST

• EHBs Help and Ticketing System:  
  http://www.hrsa.gov/about/contact/ehbhelp.aspx

• Grants Management Specialist or Program Officer listed on your Notice of Award (NOA)

• Bureau of Primary Health Care: 1-877-974-2742. or  
  http://www.hrsa.gov/about/contact/bphc.aspx

• Payment Management Services (PMS):  
  877-614-5533 or https://pms.psc.gov
Resources, EHB Help and Knowledge Base

• **Visit Manage Your Grant**
  http://www.hrsa.gov/grants/manage/index.html

• **Visit interactive EHB videos**
  https://help.hrsa.gov/display/public/EHBSKBFG/Interactive+Videos
Updating and Managing EHB Users

Manage your EHB profile
https://help.hrsa.gov/display/public/EHB
SKBFG/User+Profile+Management+FAQs

See interactive EHB videos
https://help.hrsa.gov/display/public/EHB
SKBFG/Interactive+Videos
3 Roles:

- Authorizing Official
- Project Director
- Financial Report Administrator

Managing recipient information and EHB User Roles is a Critical Recipient Responsibility
Federal Systems SAM.gov and Grants.gov

- Update your SAM.gov and Grants.gov registrations
- Active registration is required to receive HRSA funding
- Registration in both systems is free
Suspension and Debarment
Suspension and Debarment Overview

2 CFR 180 and HHS 2 CFR Part 376

Safeguard federal funds, prevent poor performance, fraud, waste and abuse

Ensures federal government does business with responsible entities and individuals

An organization and/or an individual designated as a principal may be excluded from receiving or participating in federal government transactions

Government Transaction: Grants, cooperative agreements, scholarships, fellowships, loans, insurance programs and contracts.
Comparison Suspension and Debarment

Suspension
- Action taken to temporarily disqualify from government transactions.
- Imposed without prior notification to allow for quick response.
- Suspended – temporarily ineligible.

Debarment
- Action taken to exclude from government transactions for a reasonable period of time.
- Debarment requires written notice.
- Debarred = excluded.
Important Terms

Principal 2 CFR § 180.995
• A person with management or supervisory responsibilities; or
• A consultant or other person, who is in a position to:
  1. handle federal funds;
  2. influence or control the use of those funds; or
  3. occupies a technical or professional position capable of substantially influencing the development or outcome of an activity required to perform the covered transaction

2 CFR § 376.995
Individuals who participate in HHS covered transactions including:
• Providers of federally required audit services; and
• Researchers
Important Terms #2

Key personnel

The Principal Investigator/Project Director (PI/PD) and other individuals who contribute to the programmatic development or execution of a project or program in a substantive, measurable way, whether or not they receive salaries or compensation under the award.

Additional personnel considered critical to the project, their removal or absence from the project would have a significant impact

Identified by HRSA as listed in the Notice of Award
Applicant Responsibilities

- Understand Code of Federal Regulations (CFR) and HHS Grant Policies.
- Develop applicant policies compliant with Federal.
- Review Notice of Funding Opportunity (NOFO) for HRSA program requirements.
- Fully complete all required forms.
Everify.gov

- **Everify.gov** – Web-based system.

- Employers electronically confirm the employment eligibility of employees.

- Webinars provided.
Key Contact Form Required
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:
Example Case Study

- John Lee
- 26 John Lee’s registered in SAM.gov as either suspended or debarred

**Budget Justification Narrative – Budget period: Year 1, 4/1/2018-3/31/2019**

Program Manager (John Lee, MPA, BS) is a XXX manager who has day-to-day operational responsibilities; including leading the XXX team, budget review, and close collaboration with the {grant title} Program Director. This position is responsible for overseeing the xxx subcontract to ensure compliance with all grant regulations and a robust quality management program. He will conduct annual monitoring visits.
Outcomes

Best Practices

• Ensure all personnel included in the application are not recorded in SAM.gov as excluded

• Enter as much information as possible on Key Contact form including middle name if applicable

• Respond timely to HRSA’s requests for verification of information

Outcome:

• John J. (Jason) Lee is not suspended or debarred

• Delayed issuance of the award; pending recipients response
Recipient Responsibilities

- Develop and implement policies compliant with Federal
- Ensure organizational policies are updated, employee training and knowledge of Federal and organizational policies, identify best practices
- Use resources (SAM.gov)
- Provide complete information and respond timely to HRSA requests for information
- Assign and monitor correct User Roles in EHB
- Read and understand Notice of Award
- Communicate with Grants Management Specialist/Program Officer
Notice of Award

Standard Terms of Award # 14 §75.113 Mandatory disclosures

• Applicants and non-federal entities must disclose all information related to violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award. Subrecipients must disclose all information related to violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award.

• Failure to make required disclosures can result in any of the remedies described in 45 CFR § 75.371, including suspension or debarment (See 2 CFR parts 180 and 376 and 31 U.S.C. § 3321). You must include this mandatory disclosure requirement in all subawards and contracts under this award. Non-federal entities that have received a federal award must report certain civil, criminal, or administrative proceedings as set forth in 45 CFR part 75 Appendix XII to www.SAM.gov. Recipient integrity and performance matters.
Upcoming EHB Changes for Non-Competing Continuation Progress Reports

**Background:**
Currently, principals are not captured in a structured format within the Non-competing Continuation (NCC) progress reports

**Goal:**
Reduce burden, increase efficiency, improve customer satisfaction

**Enhancement:**
Include new key contact form to capture principal information in NCC progress reports

**Current Status:**
Finalizing design developments

**Release Date:**
Full Implementation Fall 2023 for Fiscal Year 24 (Oct 1, 2023) and future NCCs

**Key Point:** More information to follow
HRSA Responsibilities

- Implement and execute all CFR Requirements, HHS Policies and HRSA program requirements
- Provide technical assistance and resources
- Identify best practices
- Verify organizations/individuals are not suspended or debarred
- Report non-compliance to authorities
- Render appropriate actions for non-compliance
Scenario

- A co-worker describes financial difficulties; including delinquency on their student loan
- You both hold similar positions; are working on a HRSA grant together and know your salaries are being charged to the grant
- Concern: This information may negatively impact your organization; your position and the patient services delivered under the grant
- What are the appropriate next steps?
Poll
Scenario Outcome

Report your concerns to your Authorized Representative (AR) who has the responsibility for federal grant awards and to report to HRSA as the awarding agency.

Regulation:

- Individuals who are delinquent on student loans = federal debt are ineligible to participate on and receive federal grant funds.
- The AR is responsible for immediately reporting to the awarding agency situations that meet reporting criteria.

Potential Outcome:

- Probable Technical assistance with the organization to increase knowledge and compliance with regulations.
- Possible Suspension or Debarment of the Co-worker.
- Recovery of Co-worker salary funds paid from the grant.
Multi-Factor Authentication (MFA)
Applicant/Grantee/Service Provider

Office of Information Technology (OIT)
New EHBs Login Process

• Starting May 26, 2023, Applicants/Grantees and Service Providers will begin using Login.gov and 2 Factor Authentication to login to the EHBs.

• You must establish your credentials in Login.gov by May 25, 2023
  ▪ Login.gov account must be created with the same email address used to log into the EHBs
  ▪ If you already have a Login.gov account, you must ensure it is active and the same email address used to log into the EHBs
New EHBs Login Transition Timeline

• January 27, 2023, Wiki Help page made available.
• Emails sent to Applicants/Grantees/Service Providers – More to follow.
• Banner posted in EHBs – Will be updated with additional information.
• New EHBs login process goes live on May 26, 2023 – All Applicants/Grantees and Service Providers must have a Login.gov account.
• Keep an eye out for more notifications.
Resources

• **Access Login.gov**
  https://login.gov/

• **Visit Login.gov Help Center**
  https://login.gov/help/

• **Visit Wiki Help page**
  https://help.hrsa.gov/x/8gESCw

• Additional information and details will be provided as the transition date approaches.
Questions and Answers

If your question cannot be answered during this session, your contact information will be gathered for follow-up response after the session.
Survey
Topic Ideas

• Do you have a topic you would like to see presented during an upcoming TA call?

• Email us your ideas
  HRSAPostAwards@hrsa.gov
Connect with HRSA

Learn more about our agency at:

www.HRSA.gov

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