OFAM Recipient Technical Assistance Conference Call

September 2021

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

• Listen-only mode
• HRSA personnel present information
• Questions and Answers
Agenda

• Welcome
• Reminders
• Division of Grants Policy
• Civil Rights and Accessibility
• Budgeting
• Division of Financial Integrity
Presentation Location
Contact and Technical Assistance Information

• HRSA Contact Center number: (877) 464-4772

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

• Payment Management Services (PMS): 877-614-5533 or https://pms.psc.gov/

• Bureau of Primary Health Care: 1-877-974-2742. or http://www.hrsa.gov/about/contact/bphc.aspx
Electronic Handbook Help and Knowledge Base


• HRSA Grants TA webpage: http://www.hrsa.gov/grants/apply/
Updating and Managing EHBs Contact Information

• Managing Profile Information:
  ▪ https://help.hrsa.gov/display/public/EHBSKBFG/User+Profile+Management+FAQs

• Interactive Videos:
  ▪ https://help.hrsa.gov/display/public/EHBSKBFG/Interactive+Videos
SAM.gov and Grants.gov

• Update your SAM.gov and Grants.gov registrations.
• SAM.gov and Grants.gov are free
• Expired registrations will not receive HRSA funding
Become a HRSA Grant Reviewer

HRSA has specific interest in the following areas:

• Health Professions training
• HIV/AIDS
• Maternal and child health
• Organ transplantation
• Primary care for underserved people
• Rural health
• Register in the HRSA Reviewer Recruitment Module (RRM)

• [https://rrm.grantsolutions.gov/](https://rrm.grantsolutions.gov/)

Division of Independent Review
Division of Grants Policy (DGP)

Ericka Williams
Division of Grants Policy
Office of Federal Assistance Management

Vision: Healthy Communities, Healthy People
Division of Grants Policy (DGP) Update

• The HHS Grants Policy Statement is currently being rewritten and updated.

• In the fall of 2020, OMB updated the regulations 2 CFR 200.
  
  ❖ HRSA is adhering to 45 CFR 75 for all current awards.
  ❖ HHS will be moving to the updated 2 CFR 200 but award recipients are to adhere to 45 CFR 75 until further notice.
Division of Grants Policy (DGP) Reminder

• Grants.gov website under Search Grants

❖ Forecast for planned NOFOs and proposed dates are posted.

❖ Sign up for notifications from Grants.gov
Grant Budgeting

Rachel Holmes, MPA
Division of Grants Management Operations
Office of Federal Assistance Management (OFAM)

Vision: Healthy Communities, Healthy People
Welcome and Overview

Grant Budgeting Overview

• Become a master at determining whether budget costs meet the Allowable, Reasonable and Allocable “test”
• Gain a better understanding of what HRSA reviewers are looking for when they review your budget
• Review example of costs to understand the level of detail HRSA reviewers are seeking
• Understand the issues with improper budgeting and the dangers that accompany errors
Allowable, Reasonable & Allocable

Allowable – Code of Federal Regulations (CFR) §75.403
Program legislation, grant or other regulations, and the specific terms and conditions of the award determine whether federal funds can be used to cover a particular cost

✓ Based on the items noted, can federal funds be used to cover a particular cost?

Reasonable – CFR §75.404
A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

✓ Would you, as a reasonable person, be willing to spend the amount of money requested on the item requested?

Allocable – CFR §75.405
A cost is allocable to Federal award if the goods or services are chargeable or assignable to that Federal award.

✓ Is this cost necessary and directly connected to carrying out the goals and objectives of the grant?
Budget Categories: A Closer Look

**SF-424 A**
- Personnel
- Fringe
- Travel
- Equipment
- Supplies
- Construction/Renovation
- Contractual
- Other
  - ✓ Facility Rental/User Fees
  - ✓ ADP/Computer Services
- Indirect Costs

**SF-424 R&R Additional Categories**
- Participant/Trainee Support Costs:
  - ✓ Tuition/Fees/Health Insurance
  - ✓ Stipends
  - ✓ Subsistence
- Senior Key Personnel (other than PD/PI)
- Other More Detailed Personnel Costs
- Incentive Costs as Supported by Program Require

**SF-424 C Additional Categories**
- Land, Structural, Right-of-way, Appraisal
- Relocation Expenses
- Architectural and Engineering Fees
- Project Inspection Fees
- Site Work
- Demolition and Removal
- Construction
- Equipment
- Contingencies
## Budget Documents

**Budget Narrative/Justification**
Details each item of cost under each budget category

### Budget Justification

<table>
<thead>
<tr>
<th>Item</th>
<th>FY 20XX Budget Period</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Federal Grant - Base Grant</td>
</tr>
<tr>
<td><strong>SUPPLIES</strong></td>
<td></td>
</tr>
<tr>
<td>Laptop computers @ $X each</td>
<td></td>
</tr>
<tr>
<td>Office Supplies ($X per month x 12 months)</td>
<td></td>
</tr>
<tr>
<td>Printing Costs ($X.XX per brochure x 4 brochures x X,000 copies)</td>
<td></td>
</tr>
<tr>
<td>Medical Supplies ($X.XX per visit x X,XXX visits)</td>
<td></td>
</tr>
<tr>
<td>Dental Supplies ($X.XX per visit x X,XXX visits)</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL SUPPLIES</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Contractual</strong></td>
<td></td>
</tr>
<tr>
<td>Pharmacy Services ($X per contract)</td>
<td></td>
</tr>
<tr>
<td>Laboratory Services ($X per sample x X,XXX samples)</td>
<td></td>
</tr>
<tr>
<td>Housekeeping Services ($X per month x 12 months)</td>
<td></td>
</tr>
<tr>
<td>Ophthalmology Services ($X per patient x XXX patients)</td>
<td></td>
</tr>
<tr>
<td>Waste Removal ($X per month x 12 months)</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL CONTRACTUAL</strong></td>
<td></td>
</tr>
</tbody>
</table>

### Additional Documents – if applicable:
- Personnel Justification Table
- Equipment List
Local Travel:
Example:
Community Health Worker visits school based clinic: $.56/mile x 10 miles (per trip) x 25 trips
Total: $140.00

Long Distance Travel:
Example:
Four staff to attend the _______ Conference in Denver:
4 flights x $350/flight = $1,400; 3 nights in a hotel $125/night for four staff = $1,500; Per diem ($65/day) for four staff x 4 days = $1,040,
Car rental $100/day x 4 days = $400.
Total = $4,340
### Examples of Unallowable Costs: Faux Budget

#### Travel

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost 1</th>
<th>Cost 2</th>
<th>Cost 3</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travel to DC to meet with Senators: $200/flight x 2 people, $180/night hotel x 2 people for 2 nights, per diem $40/per day for 2 people for 2 days</td>
<td>$1,304</td>
<td>$</td>
<td>$</td>
<td>$1,304</td>
</tr>
<tr>
<td>Staff Training: 2 trainings in QI/QA @ $20,000 per person x 2 FTEs; 5 hotel nights @ $800 per night x 2 FTEs x 2 trainings</td>
<td>$43,200</td>
<td>$</td>
<td>$</td>
<td>$43,200</td>
</tr>
<tr>
<td>Staff trip to waterpark: $20/staff x 100</td>
<td>$</td>
<td>$2,000</td>
<td>$</td>
<td>$2,000</td>
</tr>
<tr>
<td>Travel tokens for patients or participants: $100/token x 50 tokens</td>
<td>$5,000</td>
<td>$</td>
<td>$</td>
<td>$5,000</td>
</tr>
<tr>
<td><strong>TOTAL TRAVEL</strong></td>
<td>$49,504</td>
<td>$2,000</td>
<td>$</td>
<td>$51,504</td>
</tr>
</tbody>
</table>

While the costs are broken down clearly here, a trip to meet with a senator is considered lobbying and therefore an unallowable cost.

A $20,000 conference fee and $800/night hotel rooms are considered unreasonable.

This cost would be unallowable if paid out of federal funds. It is fine to be paid out of non-federal resources.

$100/token is unreasonable.
Unallowable Costs and Improper Budgeting

Examples of Unallowable Costs
- Bad debt
- Cash reserves/Miscellaneous funds
- Donations and Contributions
- Entertainment
- Fundraising costs
- Fines, Penalties
- Lobbying
- Meals (“generally” unallowable)
- Honoraria (except as a payment for services rendered, such as a speaker’s fee under a conference grant)

Improper Budgeting: Potential Issues
- Lower application score
- Additional terms and/or conditions of award
- Delayed award of funding
- Disallowed costs
- Audit findings
Watch the full Grant Budgeting Presentation from the 2021 Healthy Grants Workshop

(Grant Budgeting Presentation starts about half way through at the 1hour and 4minute marker.)

HRSA’s Healthy Grants Workshop 2021
Civil Rights & Accessibility for HRSA Recipients

Sarah Williams
Section Chief, Civil Rights Coordination & Compliance
Office of Civil Rights, Diversity, & Inclusion

Vision: Healthy Communities, Healthy People
## Civil Rights Coordination & Compliance (CRCC)

**Mission:** CRCC promotes compliance with federal civil rights law through research, partnerships, and technical assistance to improve care for underserved populations.

**Goals:**
- To establish HRSA as a federal leader and innovator in the provision and promotion of accessible services.
- To ensure HRSA conducted programs and services are accessible to individuals who experience barriers to participation.
- To support HRSA recipients in achieving compliance with relevant civil rights laws to reduce barriers to obtaining health services.
Enforcement v. Proactive Compliance

HHS Office for Civil Rights (OCR)
- Enforcement Agency
- Investigation and Resolution

HRSA
- Funding Agency
- Proactive Compliance
Federal civil rights laws have **two** levels of application. They mandate that federal agencies (HRSA) **and** their funding recipients (grantees):

| Do not discriminate against individuals due to race, disability, national origin, sex, and other protected bases. | Ensure that their **programs and activities are accessible** to people with disabilities, non-English speakers, and other populations. |
Civil Rights Protections & Requirements

- Language Access (Title VI)
- Accessibility & Disability Discrimination (Section 504)
- Sexual Harassment & Discrimination (Title IX)
- Conscience Protections (Church Amendments)
- Age Discrimination (Age Discrimination Act)
Fiscal Policies and Procedures

Wayne Bulls
Division of Financial Integrity
Office of Federal Assistance Management

Vision: Healthy Communities, Healthy People
Discussion Topics

• Federal Suspension and Debarment Requirements

• SAM.gov Checks
Federal Suspension and Debarment Requirements

2 CFR Part 180

- Recipients are prohibited from contracting with or making subawards for goods and services with parties that are suspended or debarred by the Federal Government.

- Prior to hiring employee or contracting with or making subawards to an entity, recipients must verify that the individual or entity is not suspended or debarred or otherwise excluded from receiving federal funds.
Federal System for Award Management (SAM.gov)

- Prior to hiring new employees, consultants or contractors, the System for Award Management (SAM) at https://www.sam.gov/portal/public/SAM/ should be checked to ensure they are not prohibited from receiving federal funds.
- Rechecks should conducted at least annually.
- Documentation of these checks should be saved in personnel/vendor file.

45 CFR §75.327 and 45 CFR §75.335
Questions and Answers

• Please have your grant number ready

• If we cannot answer your question, we will take your contact information and get back to you
Survey
DFI Contact Information

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Topic Ideas

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

• Email your ideas to HRSAPostAwards@hrsa.gov
To learn more about our agency, visit

www.HRSA.gov

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