

Questions and Answers from June 15 Recipient Orientation Meeting

OT21-2103: National Initiative to Address COVID-19 Health Disparities Among Populations at High-Risk and Underserved, Including Racial and Ethnic Minority Populations and Rural Communities

Program/Project Officer

1. When will our project officer be assigned?

You have an interim assigned project officer as of June 1. You can find contact information for that individual in your Notice of Award. Please note that we are in the process of onboarding additional staff to support administrative oversight of the grant. We will notify you once a permanent project officer is assigned.

2. County organizations face a process in which projects offered are required to include a Request for Proposal (RFP). This process is long and will delay implementation. Can we get a declaration that these are emergency funds to allow us to avoid the RFP process?

Per the current iteration of [45 CFR §75.329](#), procurement by noncompetitive proposals may be used when the “public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.” This qualifier allows for an exception to the competitive bidding process if the emergency circumstances are not amenable to the typical RFP process and timeline. Beyond this overarching guideline, CDC defers to recipients’ own internal procurement policies and guidelines.

3. When will site visits occur?

Your assigned project officer and grants management specialist will conduct a virtual compliance visit after six months post-award, but no later than June 1, 2022. The virtual compliance visit will be a telephone call or video conference to ensure the recipient is using funds for the approved activities and to identify technical assistance needs. CDC may conduct additional in-person site visits or virtual visits as needed for grants management and oversight duties. Project officers will work with you to schedule these visits.

Funding

1. Can subawardees spend funds past the end date of the award if we, the recipients, give them the funds before that end date?

No, a subawardee or subrecipient of a recipient cannot continue to incur costs or spend funds after the end of the period of performance. At the end of that period, there should be no further activity and no costs incurred on this award. There is a 90-day period at the end of the period of performance where you can submit final invoices for costs accrued during the period of performance. Those are the requirements in place for recipients and subrecipients. Whatever stipulations have been placed on you (the recipient), you must place those same stipulations on the subawardee or subrecipient.



You are held accountable for the activities and adherence to the regulations of your subrecipient.

2. *Do we need to track rural carve-out dollars for reporting purposes?*

Yes, CDC requests that state recipients identify and track their rural carve-out funding separately from their base, or US COVID-19 Community Vulnerability Index (CCVI), funding to facilitate tracking and reporting of rural carveout dollars to the Department of Health and Human Services. CDC will ask recipients to provide this information in REDCap by August 16, 2021.

3. *Regarding fiscal reporting via REDCap or otherwise, do we need to make sure we track expenses by strategy and/or activity?*

At this time, CDC is not requiring recipients to track their spending by strategy or activity given the potential challenges and burden for recipients. However, state recipients will be asked to track and report on rural carve-out dollars in REDCap. For reporting in CDC's Payment Management System for general cash reporting and the annual Federal Financial Report (SF425), recipients are required to report only on total funds expended.

4. *Regarding the lease-versus-purchase options for vehicles, can we justify purchase as a way to sustain this program when funds run out?*

Program sustainability could provide support for the purchase option, but it should not be the primary justification. We understand circumstances (e.g., location/locality, transport of vehicle) might make leasing more challenging. All supporting justifications will be considered.

5. *Does this grant have expanded authority? Are we using the traditional rules regarding budget revisions?*

CDC's expanded authority is associated only with carry-over, which is not applicable at this time to this grant given the 24-month budget and project period. Regarding budget revision prior approval requests, a budget revision amendment is required if a recipient is directing 25% or more of the total budget, or if the changes require another type of prior approval. For example, you will not need to get CDC approval if you are moving \$500,000 from "personnel" to "contractual" to cover an unanticipated cost in an *existing* contract, and you are below the 25% threshold. However, if you are transferring that same \$500,000 from "personnel" to "contractual" to initiate a *new* contract, you would need to submit a request for prior approval because new contracts require CDC approval.

6. *There was discussion earlier about the requirement for prior approval of the purchase of vans and associated equipment. If we include the purchase of a van as part of a contract where the contractor is "to be determined," would you require us to report additional information when we select the contractor?*

Yes, we would need additional information regarding the contractor you select, including the name of the contractor, method of selection, period of performance,

scope of work, method of accountability, and itemized budget and justification. In addition, you would be required to submit a justification for the purchase-versus-lease of the vehicle. Anything outlined in the [OT21-2103 Recipient Orientation webinar slide deck](#) related to vehicle purchases does require an additional level of approval.

7. *Is there is an incentive for spending more than the specified rural carve-out amount?*

The rural carve-out amount provided to recipients is the minimum that must be spent on activities that serve rural communities; however, recipients can use more than the specified rural carve-out amount as needed or desired.

8. *Is there a percentage associated with the rural carve-out dollars (% of total award)? So far, we are familiar only with the specified dollar amount for rural carve-outs.*

There is no specific percentage of the dollars awarded each state that must be used on rural health. Each state's award is unique and was determined based on the number of rural residents.

9. *Are there any limitations to the use of funds for food, music, gift cards, or promotional items that our network of 170 community-based organizations may use to provide culturally and linguistically responsive community engagement and COVID-19 education?*

The CFR requires incentives to be reasonable; however, entertainment-related expenses and promotional items are not allowable costs. If you have questions about proposed incentives, please reach out to your project officer to discuss. More detailed guidance regarding incentives will be provided later.

10. *Are there any limits on monetary amounts for vaccine incentives? What if a state has a lesser limit amount?*

Incentives should be monetarily reasonable, and recipients should follow their respective guidance and limitations.

11. *Is there a place that outlines the transfer allowances of dollars from one category to another?*

Information regarding actions that require prior approval can be found on page 8 of 17 in [CDC's General Terms and Conditions for Non-Research Grant and Cooperative Agreements](#). [CDC's Guidance for Non-Research Prior Approvals](#) provides more detailed guidance regarding the required documentation for each type of prior approval request.

12. *What if you have multiple pieces of equipment that don't cost \$5,000 individually, but total a large amount?*

Equipment is defined as a per unit cost.

13. *If we spend in a strategy that's not selected but is an allowable expense, what is the approval process?*

Recipients should contact their assigned CDC project officer to discuss specific changes

to OT21-2103–funded strategies or activities, to determine whether those changes are allowed and to determine if prior approval is required.

14. *Can we go ahead and award subcontracts that were in our original application before the revised work plan is submitted?*

Yes, unless the funds were restricted in your Notice of Award.

15. *Do you need a copy of the subcontract contracts?*

No, the recipient is responsible for maintaining all records. You will make them available only upon request.

16. *Regarding personnel, is it allowable to use a third-party contractor to hire staff?*

Yes, it is allowable to use a third party to assist with locating and hiring staff.

17. *Is there a suggested format or template available for providing the purchase-versus-lease analysis for a vehicle?*

Please reach out to your respective grants' management specialist for additional guidance and resources regarding the vehicle purchase-versus-lease analysis.

There is no required format, but your analysis must include the following:

1. Justification for the purchase of the vehicle, including why the vehicle cannot be leased
2. Cost analysis of purchasing versus leasing a vehicle
3. Quotes for, or basis of, pricing
4. Purpose of the vehicle
5. Disposition plans for the vehicle at the end of the project

18. *Do you anticipate a no-cost extension?*

CDC may consider the need for a no-cost extension (NCE) beyond the initial 24-month period of performance approximately 6 months prior to the end of the award. Consideration of an NCE will be based on the need to complete approved activities but not merely to expend unused funds.

REDCap

1. *May we have multiple staff granted access to SAMS/REDCap?*

We are asking all recipients to initially identify two staff (primary and alternate) to streamline access. You will be able to request access for additional staff later.

2. *Working with partners is a big focus of the grant. Do partner organizations need to register with SAMS/REDCap individually, too?*

No, partner organizations do not need to register with SAMS/REDCap. Currently, we are asking all health department recipients to initially identify only two staff (primary and

alternate) to streamline access. You will be able to request access for additional health department staff later.

3. *When are REDCap progress reports due? When is the first one due?*

Quarterly progress reports are due 30 days after the end of each fiscal quarter throughout the period of performance. The first quarterly progress report will be due November 1, 2021. (October 31, 2021, falls on a Sunday.)

Monitoring and Evaluation

1. *I am interested in the small work group for evaluation and monitoring that was discussed during the orientation call presentation. Is there more information to share on this topic?*

The CDC evaluation team has reached out to a small cohort of recipients who have indicated interest in evaluation to invite them to participate in an evaluation work group. If you are interested in joining the workgroup, please send an email to 2103evaluation@cdc.gov.

2. *Will there be a repository of the key projects being funded by the other entities or some type of information repository so recipients can gain insight and learn from one another?*

We are actively building into our evaluation planning a way to share lessons learned. We are still exploring what this might look like, but we certainly agree that it is important to share what has been implemented and successful, and to build evidence-based cases for implementation activities and addressing disparities.

Allowable Costs

1. *What procurement guidelines do we need to follow?*

You should follow your state and local procurement guidelines.

2. *Can we use funds to provide incentives for community participants?*

Incentives are an allowable cost if they are reasonable and meet the goals and objectives of the project and the strategies outlined in the Notice of Funding Opportunity (NOFO). We are working on additional guidance related to incentives and expect it to be finalized soon. We intend to share this guidance with all recipients.

3. *Can we use the funds for food or beverages at community meetings?*

We cannot provide a yes or no answer to this question without knowing the details. There are numerous restrictions around the purchase of food or beverages. We encourage you to discuss this question with your project officer.

4. *To what extent can we use these funds for mental health services?*

These funds are not intended for direct patient care, which includes mental health services.

5. *To what extent can these funds be used for vaccination efforts?*

OT21-2103 funds cannot be used for purchasing or providing vaccines. Recipients are advised to use other existing funding sources intended for those purposes. OT21-2103 funding may be used for coordination and administration of vaccine services, including planning, and coordinating COVID-19 vaccine programs, storage, and education; media campaigns aimed at increasing vaccine uptake; and wraparound services that support access to vaccines.

6. *Can funds be used to support national accreditation efforts or support public health infrastructure capabilities?*

Funds may be used to support these efforts, and applicants should seek to make a connection between their use of the funding and the strategies and activities outlined in this NOFO. The budget narrative guidance states, “If applicable and consistent with the cited statutory authority for this announcement, applicant entities may use funds for activities as they relate to the intent of this NOFO to meet national standards or seek health department accreditation through the [Public Health Accreditation Board](#). Applicant entities to whom this provision applies include state, local, territorial, and freely associated state governments (including the District of Columbia, the Commonwealth of Puerto Rico, the US Virgin Islands, the Commonwealth of the Northern Mariana Islands, American Samoa, Guam, the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau), or their bona fide agents, political subdivisions of states (in consultation with states), federally recognized or state-recognized American Indian or Alaska Native tribal governments, and American Indian or Alaska Native tribally designated organizations. Activities include those that enable a public health organization to deliver public health services, such as activities that ensure a capable and qualified workforce, up-to-date information systems, and the capability to assess and respond to public health needs. Use of these funds must focus on achieving a minimum of one national standard that supports the intent of the NOFO. Proposed activities must be included in the budget narrative and must indicate which standards will be addressed.”

Grant Administration:

1. *Can the authorized organizational representative/authorized official (AOR) be the same as the principal investigator/principal director (PI/PD)?*

To observe a separation of duties, it is recommended that you identify two separate individuals to serve in the roles of PI/PD and AOR.

2. *How do we change the officials named in the Notice of Award (NOA)?*

To request changes to this information, recipients must submit a prior approval request as a “Change in Key Personnel” amendment in GrantSolutions. For more detailed guidance regarding the required documentation for this request, please refer to [CDC’s Guidance for Non-Research Prior Approvals](#).

3. *Did I understand correctly that we can have more than one AOR?*

Yes, you can have more than one AOR identified in GrantSolutions. However, only one individual may be listed on the NOA, and that person will be considered the primary AOR.

4. *Are all awardees required to submit revised work plans and budgets by August 16, 2021?*

All recipients should examine their technical review to identify, and address noted weaknesses within their work plan and budget. If you would like to make changes based on internal developments, we ask that you incorporate those changes into your August 16 submission. We are also asking all state recipients to revise their budgets to delineate the rural carve-out amount and the base award amount. To improve data quality and reporting, we are also asking recipients to revise their work plans based on updated work plan guidance provided by the OT21-2103 evaluation team. Lastly, for some recipients, the CDC Office of Grants Services (OGS) noted a requirement to address budget issues or missing documentation within the terms and conditions of the Notice of Award. These items were to have been addressed and submitted via GrantSolutions as a budget revision amendment no later than July 1, 2021. If you have any questions, please contact your project officer and grants management specialist.

5. *It was written in our work plan that we would push small subawards to various community groups in our state. Do we have the full two years to do that, or should it all be done within the first 6 months, for example?*

This grant provides for a 24-month period of performance. You may have different strategies with different time periods of implementation within the 24-month project period; therefore, your implementation of the subaward(s) should coincide with your work plan and how you have outlined your strategies and milestones. Keep in mind that these are emergency funds, and the goal is to get them into the community as quickly as possible. Also, please note that all activities must be completed by the end of the period of performance. Significant delays in issuing subawards could prevent the partners from completing activities.

Media

1. *Are there restrictions regarding announcing the award and specific language to be included?*

No, there are no restrictions or required language for announcing the award. Recipients should follow their agency/organization policies and procedures for announcing awards. CDC has a [public-facing website](#) that was created to announce important information about this grant, including the awards.

2. *Are press release templates available to announce receipt of award to our respective communities?*

We recommend recipients defer to local jurisdictional policies, procedures, and protocols regarding a press release.

Reporting

1. *Have the quarterly report templates been made available, or will we learn more about that during the REDCap trainings?*

CDC is still in the process of developing the quarterly report templates. More information will be shared with all recipients at a later date when available.

2. *What is the reporting schedule, and when is the first upcoming deadline?*

The NOFO requires that quarterly progress and financial reports be submitted in REDCap within the first 60 days after the award. The Federal Cash Transaction Reports are required by the Payment Management System (PMS). These reports are due 30 days after the end of every calendar quarter. The annual financial report (FFR) is due 90 days after the end of the first 12 months. The final report and all closeout documents will be due 90 days after the end of the period of performance. More detailed guidance on reporting requirements and the associated schedule has been provided to recipients.

3. *Will CDC require us to submit contractor notification letters in GrantSolutions once we identify our contractors?*

No, if CDC has already approved the contract, the scope of work, and the amount of the contract, no further approvals are required. However, recipients should notify their project officer for awareness.

4. *Can we submit the revised work plan much sooner than the due date in August?*

Yes, recipients may submit work plan revisions as soon as they would like.