

## HHS GRANT POLICIES AND PROCEDURES

### INTRODUCTION

#### *Purpose*

The following policies and procedures outline the process in which the Health and Human Services (HHS) Hospital Preparedness Program (HPP) grant funds will be distributed to hospitals and EMS providers. These policies address any unspent and returned funds as well as any unallowable and undocumented expenditures.

#### *Scope*

These policies and procedures are intended to ensure compliance with federal laws, regulations, and program requirements. The policies and procedures will ensure expenses submitted for reimbursement are reasonable, allocable and allowable.

### GENERAL POLICIES FOR THE MONITORING OF GRANT FUNDS

#### *Distribution of Grant Funds*

The regional coalition funding model will include set amounts for Administrative Designated Regional Coordinator (ADRC) contracts, Healthcare Coalition Regional Project contracts, and EMS DRC Stipend contracts. The spread of the distributed funds to each region by contract and project type will be reviewed by the HPP Advisory Committee upon or shortly after submitting the federal application each year. HPP staff will work closely with the Grant Principal Investigator during the application period through the time in which the notice of award is rendered to determine funds allocated for each regional healthcare coalition along with the necessary contracts. This will allow for a timelier execution of the awarded funds to the regions within the 90-day timeframe from the beginning of the budget period as described in the grant guidance.

- I. Health Care Coalition Regional Projects
  - a. The ADRC works with the Healthcare Coalition members to identify and prioritize regional projects for spending.
  - b. Projects may include services for trainings, education, exercises and supplies that advance the overall readiness for response of the coalition members.
  - c. An organization will be decided to accept the funds for the regional project and agree to the terms of reimbursement.
  - d. Final budgets must be submitted with the signed Participation Agreements
    - i. Corresponding quotes/bids must be provided with final budget proposals for regional projects that exceed the state purchasing procedures threshold of \$5,000.
    - ii. Additional level of detail and quotes should be submitted for projects exceeding \$15,000.
  - e. Matching documentation should be submitted with the final documentation.
    - i. Regional match can be met by utilizing staff time, storage space, meeting space, etc. from any HCC member.
    - ii. The ADRC will work with the receiving organization to collect matching documentation on behalf of the Coalition.

- iii. Staff time used towards the match should be verified with organizations to validate the time has not been used towards reimbursement for another federal program.

#### ADRC Contracts

- a. The person along with mechanism to execute the contract will be determined prior to or upon notification of award.
- b. ADRC contracts may be executed in one of the following ways:
  - i. Directly with an identified hospital within the coalition's boundaries, as an employee or Independent Contractor (IC)
  - ii. Limited Liability Company (LLC) through the Metropolitan Hospital Council of New Orleans (MCHNO)
  - iii. Employed by the MHCNO
- c. Accompanying documentation for the ADRC contracts will be based on contract type
  - i. Independent Contractors/LLCs supply invoices and check copies based on the amount agreed upon in the Services Agreement to meet the financial reporting obligation along with supporting documentation for activities to show the completion of deliverables identified in the scope of work.
  - ii. Hospital/Employee based contracts supply supporting documentation for expense designations (salary/benefits, equipment/supplies, etc.) identified in budgets to meet the financial reporting obligation along with supporting documentation for activities to show the completion of deliverables identified in the scope of work.
  - iii. Cooperative Endeavor Agreements (CEA's) are provided by ALL contracted individuals. If a contracted coordinator is a state employee, a CEA is not required.
  - iv. Budgets will be provided by ALL contracted individuals or organizations
- d. Scope of Work is provided as an attachment to the contract and outlines the deliverable the contractor is expected to meet.
- e. Quarterly reports must be provided based on the schedule outlined within the agreement and corresponding attachments. Documentation is expected to be submitted electronically via email and uploaded in the Grant Management System (GMS) by the contracted ADRC.

#### EMS DRC Stipend

- a. EMS DRC's are considered volunteer but their service can opt to receive a stipend to help offset some of their overtime, travel, or time away from daily duties
- b. EMS DRC stipend contracts are sent to existing providers and outline the stipend amount based on the corresponding number of DRCs provided to the ESF8 network.
- c. Documentation due prior to execution of the agreement:
  - a. Signed MOA between LDH and provider
  - b. Signed Participation Agreement
- d. Documentation due after execution of the agreement but prior to reimbursement:
  - a. Sign-in sheets
  - b. Attestation to meeting attendance
  - c. Any other documentation that supports participation in regional and state planning and response activities as described in the body of the agreement.

## II. Release and Return of Participation Agreements

Participation Agreements will be available electronically on the ESF 8 Portal for Hospital Chief Executive Officers (CEOs)/Administrators, EMS Directors/DRCs, and ADRCs. The deadlines for

returning the signed agreements to the HPP Grant Staff and accepting the grant electronically in GMS will be provided in the body of the agreement and in the corresponding mailed cover letter. Additional details for spending and timelines will be outlined in the body of the agreement(s).

Signature on the Participation Agreement must correspond with the Chief Executive Officer/Director name printed on front of the Participation Agreement. If signatures do not correspond, a letter from the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Administrator or Owner giving that person signatory authority must be submitted along with the Participation Agreement.

#### Proposed Budgets

Once the yearly Notice of Grant Award is received, draft budget proposals for regional projects must be submitted prior to the bi-annual HPP Advisory Committee. The budgets proposed should reflect project(s) that advance the current preparedness and response capabilities of the region and are supported by the healthcare coalition.

Proposed budgets submitted with signed Participation Agreements will be considered “final”. If applicable, required quote documentation will be due when the final proposed budget is submitted. Grant staff may request additional quote detail when reviewing the budgets for approval.

Questions or concerns about proposed expenditure should be directed to a Hospital Preparedness Program staff member and the ADRC prior to purchase.

### III. Reimbursement Schedule

- a. Regional Projects - Funds will be provided on a reimbursement basis. For organizations to be reimbursed, they must submit Acceptable Documentation of Proof of Payment for the Total Obligation Amount, including the 10% match by the established documentation deadlines and any other requested information as mentioned in the Participation Agreement. Matching expenses/contributions must meet requirements detailed in 45 CFR 74.23. See p. 1 of this document for Regional Project match details.
- b. EMS DRC Stipend – Funds will be provided after the final grant deadline and once all documentation supporting DRC activities has been collected.
- c. ADRC Contract – Funds will be provided upon receipt of the signed contract along with the additional documentation required (see ADRC Contracts section on p. 2 of this document).

**The Louisiana Hospital Association Research and Education Foundation (LHAREF) will issue reimbursement checks as soon as possible, but in no case longer than 15 days of receipt of funds from the Department of Health and Hospitals. This process should be completed within 60 days from the documentation deadlines mentioned in the Participation Agreement for those organizations that submit the Acceptable Documentation of Proof of Payment. For additional questions, please see the attached Frequently Asked Questions document.**

## **Monitoring Activities**

- I. Site Visits  
Site visits to organizations which have accepted grant funds may be conducted annually based on a schedule predetermined by the HHS Grant Staff. The frequency and schedule will be developed based on the Code of Federal Regulation Guidelines with additional input from the HPP Field Project Officer.
  
- II. Healthcare Coalition Conference (Rounds) Meeting  
HHS Healthcare Coalition Conference Meetings will be held at least once a year in each region of the state to provide information on spending priorities and programmatic grant objectives. Organizations accepting funds along with any healthcare coalition member are encouraged to attend these meetings for critical, necessary updates.

## **Collection and Review of Documentation**

Organizations must submit Acceptable Documentation for proof of payment as stipulated in their Participation Agreement. The HPP grant staff will review the submitted Acceptable Documentation of proof of payment and send an email confirmation to the corresponding organization stating whether their Acceptable Documentation of proof of payment is complete or whether additional information is needed.

Prior to being reimburse, organizations are required to use the electronic Grant Management System to submit Acceptable Documentation of proof of payment. The Grant Management System can be accessed using the link to the ESF 8 Portal located on the LHA Emergency Preparedness homepage at [www.lha-foundation.org](http://www.lha-foundation.org). Training on using the Grant Management System will be offered as needed. Contact HPP grant staff for assistance.

## **Extensions**

Requests for deadline extensions will be reviewed on a case-by-case basis.

## **Penalties for Noncompliance**

- i. Undocumented expenditures  
Organizations must submit Acceptable Documentation of Proof of Payment as stipulated in the Participation Agreement. If Acceptable Documentation of Proof of Payment is not submitted on or before the last documentation deadline, the organization forfeits those grant funds.
  
- ii. Unallowable expenditures  
All expenses submitted for reimbursement will be reviewed to verify they are allowable, documented and verifiable under 45CFR74 Subpart E and acceptable to meet grant deliverables. Reimbursement will not be provided for unallowable expenses.

## **Forfeiture of Grant Funds**

### Unspent Grant Funds

Organizations that do not spend the Total Obligation Amount and do not plan to purchase additional items should work with their ADRC to submit the remaining funds back to the region or state level to be used toward another identified special project.

## **REPORTS AND RECORDS**

### ***Filing System***

Organizations should keep a copy of all signed Participation Agreements and its attachments along with all Acceptable Documentation of Proof of Payment on file.

### ***Record Retention and Long Term Storage***

Per 45 CFR 75:361, financial records, supporting documents, and all other records pertinent to an award should be retained for a minimum of three (3) years from the date of submission of the final expenditure report for that program year.

Documentation should be kept longer under the following circumstances:

- i. If any litigation, claim, financial review and/or audit is started prior to the expiration of the three (3) year period, records should be retained until all litigation, claims, financial reviews and/or audit findings have been resolved and action has been taken; and
- ii. If real property and equipment acquired with Federal funds has been disposed of and/or transferred to another eligible recipient, records shall be retained for 3 years after final disposition.

### ***Record Protection***

To prevent original grant records from being destroyed by fire, theft or damaged by water, documents should be kept in a fire safety filing cabinet during the (3) three-year period.

### ***Property Records***

Award recipients must have property records of all grant purchases including data elements identified in 45 CFR 75.320 D. A copy of the inventory list should be kept with grant records.

## **POLICY REVIEW AND REVISIONS**

Review and revision of these policies and procedures shall occur as needed but at least every two years.