

Rural Provider Access & Affordability Stimulus Program Grantee Webinar 9.19.23

Overview

- First Congratulations! We're so glad you are here.
- Meeting purpose:
 - Key compliance standards
 - Provide onboarding overview
 - Walk through the onboard checklist
 - Answer your questions

Authorizing Legislation

- [Senate Bill 22-200](#) established the Rural Provider Access and Affordability Stimulus Grant Program
 - \$9.6 million in grants to rural hospitals through American Rescue Plan Act (ARPA) State and Local Fiscal Recovery Fund (SLFRF) dollars for rural hospitals to improve health care affordability and access to care in rural Colorado
- [10 CCR 2505-10, Section 8.8000](#) provides the regulatory framework



Compliance Requirements Training

Key Compliance Standards

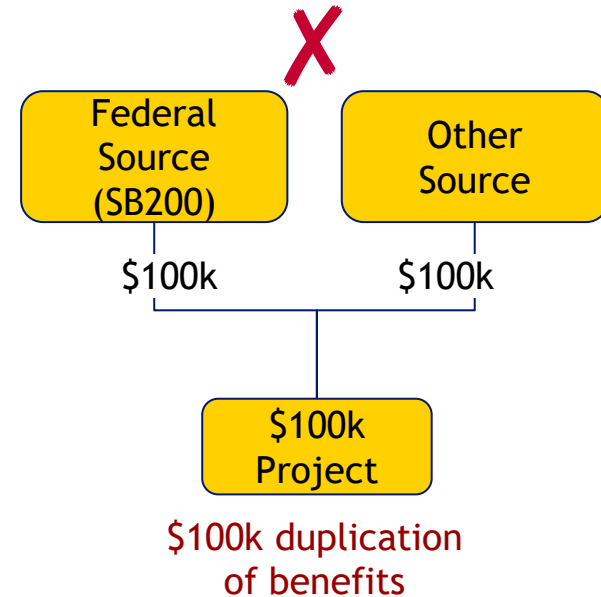
Areas of compliance for discussion today:

- Duplication of benefits
- Supplanting funding
- Procurement standards
- Reporting
- Record Retention

HCPF will check and monitor to ensure compliance

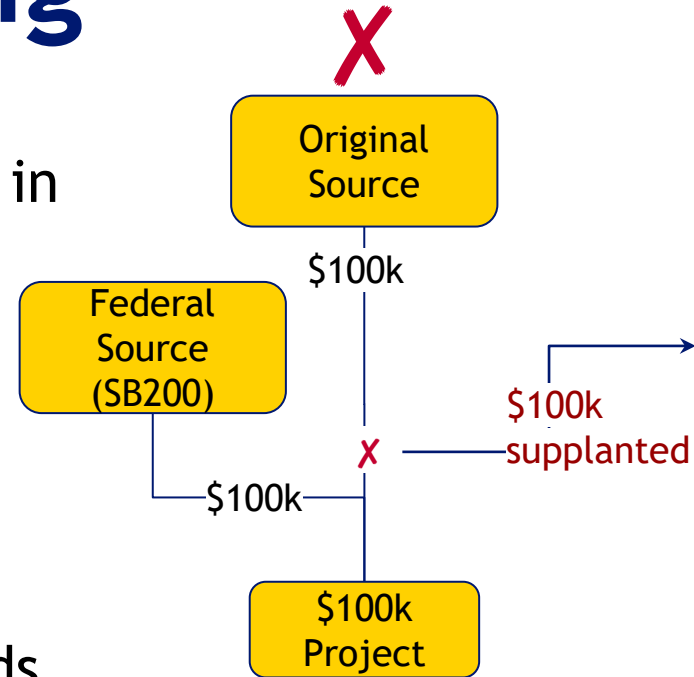
Duplication of Benefits

- The Uniform Guidance and SLFRF require that grantees avoid a duplication of benefits
- Duplication of Benefits occurs when the amount of the assistance exceeds the total allowable assistance
- Best Practices
 - Determine whether receiving assistance from other sources
 - Pay only for needs not met by other sources
 - Before you expend, ask!



Supplanting

- Federal grant funds are expended to benefit the intended purpose defined in authorizing statute
- **NOT** intended to cover expenses that would otherwise be paid out using other funds
- Ensures that the level of state/local support for a program remains constant/not replaced by federal funds
- Supplement=add to, Supplant = Replace



Supplanting - Best Practices

- Grant funds **MUST** be tracked separately
- Budget categories (personnel, equipment, supplies, etc) must be set up for each grant and funds spent according to how they were earmarked
- Ensure all expenses and reimbursements are consistently tracked for accuracy
- **NEVER** use funds to pay for existing employees, unless “back filling”
- **NEVER** use federal funds to pay for items or costs already obligated to pay with state, local or tribal funds
- Maintain supporting documentation that may address the reduction of non-federal funds
- Before you expend, ask!



Procurement Standards

Key Components of 2 CFR 200 - General Procurement Standards

- Procurement methods as defined in the state fiscal rule must be followed
 - Follow open competition policies
 - Adherence to Conflict of Interest Policy
 - Including prohibition on accepting gifts, gratuities or favors from contractors
 - Maintenance of procurement records including:
 - Rationale for the method of procurement
 - Selection of contract type
 - Contractor selection or rejection
 - Basis for contract price
 - Exercise proper oversight of your purchases and contractors



Procurement Standards cont.

Methods

- **Micro-Purchases:** Acquisition of supplies/services of less than \$50,000 (or \$10,000 w/o delegated purchasing authority).
 - Note: purchase may not be split to stay under threshold
- **Small Purchases:** Purchases up to \$250,000 through documented price or rate quotes for at least two qualified sources
- **Competitive Proposals:** Goods or services exceeding \$250,000, requires a competitive process

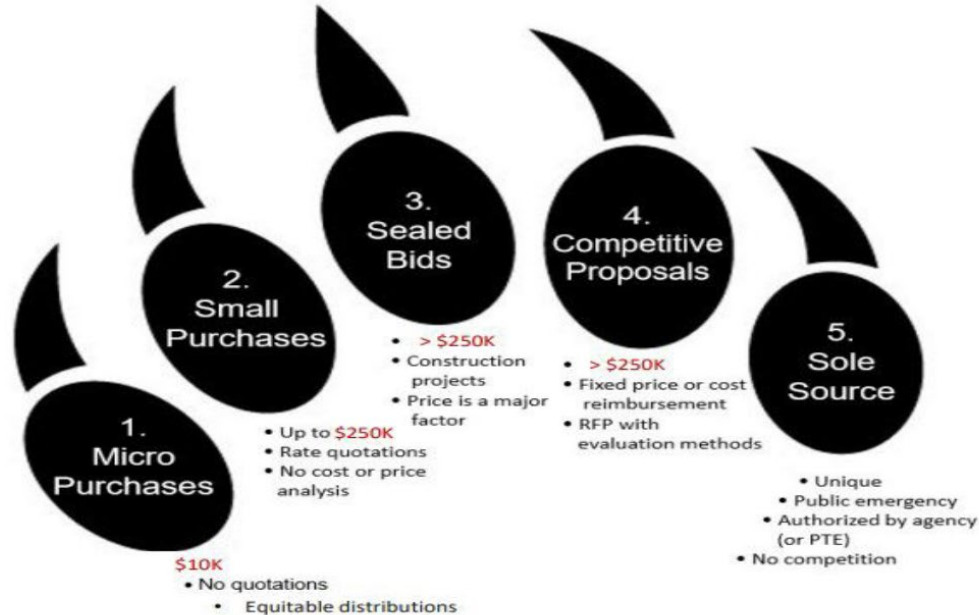
Please review competitive bidding requirements



- 2 CFR 200.317-327
- Equipment and real property purchases are governed by 2 CFR § 200.313 and § 200.436.
- State fiscal rules 24-30-202, C.R.S.

Procurement Standards cont..

Key Components of 2 CFR 200



Procurement - Best Practices

- Adhere to procurement standards
- Expenditures cannot occur prior to fully executed grant agreement or identified start date, whichever is later
 - No back-dating
- Maintain procurement records
- Oversee your purchases, vendors and contractors
- Before you expend, ask!

Reporting

- Subrecipients must submit:
 - Quarterly reports 10 days after the end of the quarter and use the reporting workbook that will be provided as part of the grant agreement.
 - Final report within 30 calendar days following the end of the grant agreement

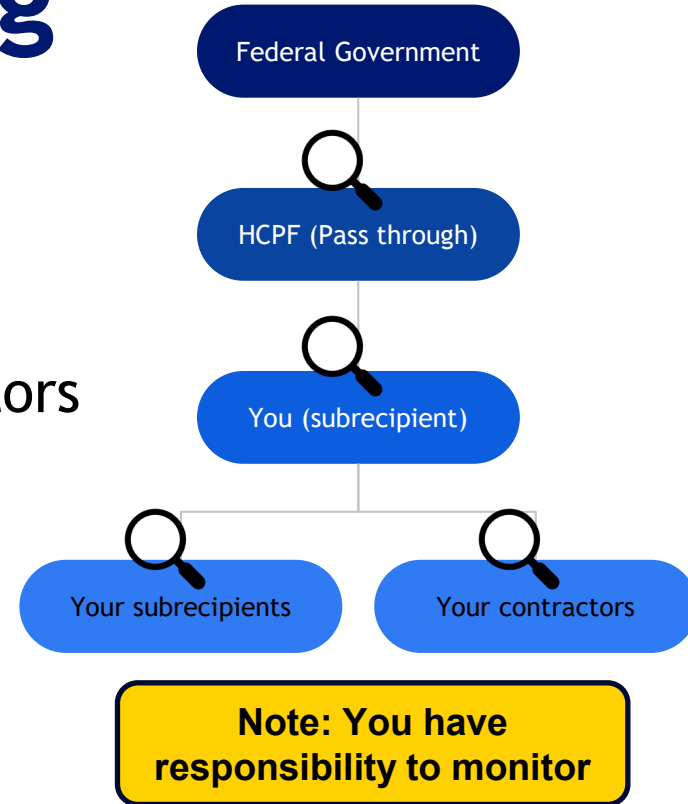
Record Retention

Record Retention Period mandates:

- According to [US Treasury Terms and Conditions](#), section 4.c., SLFRF records must be maintained for a period of 5 years after all funds have been expended or returned to Treasury.
- Record retention period begins
 - For a subaward the record retention period begins at the date of submission of the final expenditure report by the Subrecipient to the pass-thru entity
- If litigation or an audit is started before the expiration of the retention period, the records must be retained until all litigation or audit findings have been resolved

Monitoring

- Required per 2 CFR 200.332
- Federal rules, state rules
- Scope of the project
- Fraud, waste, misuse, abuse
- Oversee your subrecipients and contractors
- Best practices
 - Training early and ongoing
 - Risk assessments & desk reviews
 - Reviewing financial, organizational, and performance
 - Site visits



Grant Onboarding

Onboarding Overview

All grantees must maintain compliance Uniform Guidance (2 CFR 200)/SLFRF standards.

Legally bound by a fully executed grant agreement that will:

- Establish legal precedence
- Performance expectations/scope of performance
- Terms & conditions

Note: funds must be obligated by 12/31/24 and expended by 12/31/26

Onboarding Checklist

Requirement	Summary
For today: Review draft grant agreement	Except for project-specific details, the grant agreement is the same for subrecipients
For today: Review risk assessment requirements & questionnaire	HCPF will meet with each grantee to evaluate project risks prior to grant agreement execution. Familiarize yourself with the requirements in advance.
By 9/22: Verify System Award Management (SAM) registration	Must be in good standing. Visit www.sam.gov to confirm your status.
By 9/27: Complete the risk assessment questionnaire	Assemble related data/information. Your grant cannot be executed until this is completed.

Grant Agreement

All SLFRF grants share a common, standardized template. Key components include:

- General terms & conditions
- Statement of Work
 - Grantee responsibilities
 - Deliverables & payment
 - Reporting
- Budget

When grant awards are “fully executed” all terms and conditions become legally binding

Risk Assessment

Risk assessments serve to evaluate a subrecipient's risk of non-compliance with rules.

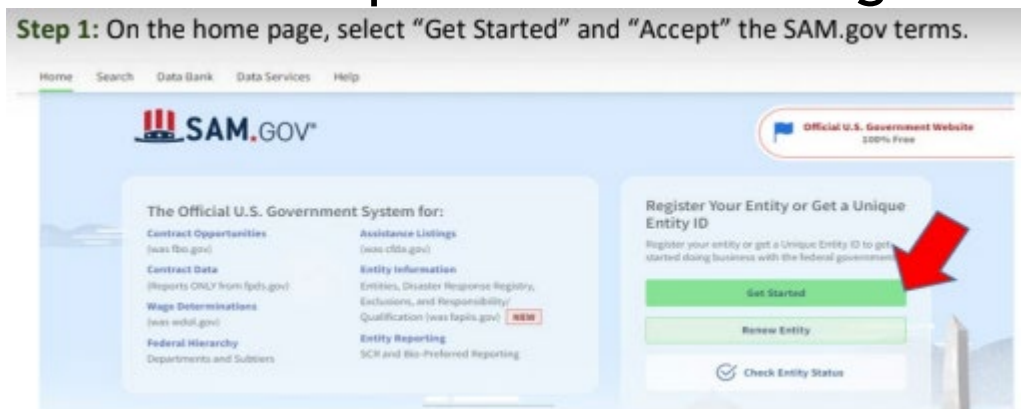
The risk assessment questionnaire includes questions related to:

- Prior experience with federal grants
- Financial audits & financial/grant management systems
- Documented policies supporting compliance
- Leadership/staff changes
- SAM registration
- Reporting/monitoring experience

In addition to completing the questionnaire, prepare supporting documentation

SAM Registration

[SAM.gov](https://sam.gov) registration must be up to date & validated for all subrecipients. A Unique Entity Identifier must also be obtained. Both are required to execute grant agreements.



Details regarding the validation process are found [HERE](#).

Onboarding Checklist cont.

Requirement	Summary
Within 10 business days of receipt: Review/respond to draft scope of work	Each grant agreement will have a project-specific draft scope of work provided by HCPF.
Prepare for compliance requirements	Review the SLFRF Compliance Resources (in the onboarding document).
Attend risk assessment SOW review meeting with HCPF	Bring all relevant materials and completed questionnaire.
Execute grant agreement	Final review of draft agreement with project-specific details included. Sign once finalized.

Risk assessment meetings but will occur this fall, with grant execution before 12/31/23

Collaboration & Monitoring Strategies

Short-term Goals & Strategies

- Goals:
 - Grant agreements in place as soon as possible
 - Structured monitoring processes in place *before* fund dispersal
- Strategies:
 - Google living documents for collaboration
 - Risk assessment
 - Draft statement of work and grant agreement
 - Onboarding assessments and project-specific training
 - Forecasted spending pace
 - Organization...organization...organization

Google Drive

■ Hospital Name

■ Grant Agreement

- 📄 Grant Agreement Onboarding Checklist
- 📄 Draft statement of work (coming soon)
- 📄 Draft grant agreement (coming soon)

■ Monitoring

- 📄 (coming soon)

Timeline

- SAM.gov registration by 9/22
- Risk assessment questionnaire is due 9/27
- Over the next 6 weeks, HCPF hold meetings with grantees individually
 - Review Draft SOW before our meeting
 - Review other documents directed to

Next Steps

Grant Agreement Checklist

	Requirement	Summary	Timeline	Complete
Prepare for HCPF webinar	Review draft grant agreement	Review blank draft agreement (absent project-specific details). Prepare questions.	By 9/19/2023	YES!
	Review the risk assessment and questionnaire	Familiarize yourself with the risk assessment requirements and review the risk assessment questionnaire below. Prepare questions.	By 9/19/2023	YES!
	Review compliance requirements	Review the SLFRF Compliance Resources below. Prepare questions. If applicable, review capital expenditure compliance requirements.	By 9/19/2023	YES!
	Attend the HCPF webinar	We will provide an overview of onboarding requirements and answer grantee questions.	On 9/19/2023	YES!
Prepare for risk assessment	Verify System Award Management (SAM) registration	Your organization must be in good standing in SAM registration to receive grant funds. Visit www.sam.gov to confirm your status and update your registration if needed. Complete and send confirmation of completion.	By 9/22/2023	No
	Complete the risk assessment questionnaire below	Complete risk assessment questions starting on pg. 5 below and assemble related data/information. Your grant cannot be executed until this is completed.	By 9/27/2023	No
Draft grant agreement	Review and respond to the draft SOW	Review your project-specific draft SOW.	In advance of the meeting	No
Prepare for risk assessment and grant agreement review	Prepare for compliance requirements	Review the SLFRF Compliance Resources below.	By XX/XX/XXXX	No
	Attend risk assessment & SOW review with HCPF representatives	This meeting will serve to review your risk assessment questionnaire and SOW prior to grant agreement execution.	XX/XX/XXXX	No
Execute grant agreement	Final review draft grant agreement project-specific details	All SLFRF grant programs have a standardized agreement with modifications related to each scope of work. Please review your draft agreement.	By XX/XX/XXXX	No
	Sign grant agreement		By XX/XX/XXXX	No

Next Steps cont.

- SAM.gov registration
- Risk assessment questionnaire within the onboarding packet
- Keep familiarizing yourself with compliance requirements and documents
- Keep a lookout for
 - your draft statement of work
 - a meeting invitation
 - other shared documents



Questions?

Contact Info

Nancy Dolson

Special Financing Division Director

Nancy.Dolson@state.co.us

Rebecca Parrott

Special Financing Division Deputy Director

Rebecca.Parrott@state.co.us

Send questions to:

HCPF_RuralGrantProgram@state.co.us

Appendix

Procurement Standards - Competitive Bid Requirements

- Publication of requests
- Solicited from adequate number of sources when available
- Written method for conducting technical evaluations of bids
- Qualifications and price are both considered
- Small, minority and women-owned businesses should be solicited whenever possible

Procurement Resources

- State
 - [State of Colorado Procurement Rules](#)
 - [Procurement Resources | OSC](#)
- Federal
 - [eCFR :: 2 CFR 200.317 -- Procurements by states.](#)
 - [eCFR :: 2 CFR 200.318 -- General procurement standards.](#)
 - [eCFR :: 2 CFR 200.319 -- Competition.](#)
 - [eCFR :: 2 CFR 200.320 -- Methods of procurement to be followed.](#)
 - [eCFR :: 2 CFR 200.321 -- Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.](#)
 - [eCFR :: 2 CFR 200.322 -- Domestic preferences for procurements.](#)
 - [eCFR :: 2 CFR 200.323 -- Procurement of recovered materials.](#)
 - [eCFR :: 2 CFR 200.324 -- Contract cost and price.](#)
 - [eCFR :: 2 CFR 200.325 -- Federal awarding agency or pass-through entity review.](#)
 - [eCFR :: 2 CFR 200.326 -- Bonding requirements.](#)
 - [eCFR :: 2 CFR 200.327 -- Contract provisions.](#)