



Community Project Funding/Congressionally Directed Spending (CPF/CDS) Construction Projects Post Award Technical Assistance Webinar

October 17, 2023

Office of Special Activities (OSA)
Office of Federal Assistance Management (OFAM)

Vision: Healthy Communities, Healthy People



Agenda

- Program Overview
- Notice of Award (NoA)
 - Terms and Conditions
 - HRSA Points of Contact
- Reporting Requirements
- Other Considerations
- Frequently Asked Questions
- Reminders and Resources



Webinar Details

Documents available for download: CPF/CDS Post Award Technical Assistance Webinar for Construction Projects Slides

Access the webinar recording:

- HRSA will send a copy of today's webinar recording and slides via email
- Webinar and slides will also be available on the [CPF/CDS website](#)

Questions: Contact your Program Official and/or Grants Management Specialist



Program Overview



CPF/CDS: Construction Project Overview

- Community Project Funding/ Congressionally Directed Spending (CPF/CDS) projects related to the construction and renovation (including equipment) of health care and other facilities.
- Based on FY 2023 Consolidated Appropriations Act (P.L. 117-328)



Award Information



Total Funding: approx. 1.4B

Total Number of Awards: 818

Period of Performance: Three years

HRSA Activity Code: CE1



Construction Project Types

Construction and Modernizations projects with or w/o equipment

- New building structure or facility
- Modernization - alteration, repair, remodeling, and/or renovation of a building
- Examples - construction of a new standalone service delivery site; modernizing facility interior

Design-Only (planning portion of a construction project)

Funds limited to allowable design/planning related costs for overall construction project

Moveable Equipment Only

Loose, moveable equipment not affixed to the physical building structure, and with a useful life of more than one year



Notice of Award



Notice of Award (NoA)

- NoA Includes the following:
 - Unique Award Number
 - Award amount
 - Approved budget and period
 - Recipient Project Director
 - HRSA Points of Contact
 - ✓ Program Official (aka Project Officer)
 - ✓ Grants Management Specialist
 - Terms, Conditions, and Reporting Requirements



Role: HRSA Program Official (PO)

- The NoA identifies the HRSA PO for your grant
- The PO provides guidance on overall programmatic objectives
 - Reviews and processes revised budgets, schematics, concept/site plans, and timelines
 - Reviews and processes prior approval requests (i.e., changes to project scope, project period extensions)
 - Provides ongoing program/project monitoring and technical assistance
 - Closeout



Role: Grants Management Specialist (GMS)

- The NoA for the grant also identifies the HRSA GMS for your award. The GMS is responsible for the business management and other non-programmatic aspects of an award.
 - Provides ongoing consultation and technical assistance to recipients on grants administration policies and procedures
 - Serves as the primary point of contact for the recipient when dealing with grants administration issues
 - Issues NoAs
 - Reviews and monitors receipt of the Federal Financial Reports (FFR)
 - Administers the closeout of grants



NoA Terms and Conditions

- Review **all** NoA terms and conditions before drawing funds
- Award **cannot be transferred** to another entity
- All grant conditions for the project must be approved and lifted in a revised NoA **before** drawing down funds
- Only incur costs or draw down funds to pay for related activities shown in your approved budget and to meet conditions:
 - Completing architectural and engineering plans
 - Meeting licensing and permitting requirements
 - Historic preservation consultation with the State Historic Preservation Office/Tribal Historic Preservation Office
 - Preparing the Environmental Assessment



Common NoA Conditions

Budget Revisions-
60 days of the NOA

Schematic Drawings-
60 days of the NOA

Property Information-
60 days of the NOA

Environmental/Historical
Preservation-
120 days of the NOA

Project Timeline-
60 days of the NOA

Property Documentation-
60 days of the NOA

Landlord Letter of Consent-
60 days of the NOA

Notice of Federal Interest
120 days of the NOA

Condition: Environmental and Historic Preservation

- Within 120 days of NoA, provide additional information to demonstrate compliance with all Federal environmental and historic preservation laws for the proposed project
- The HRSA Environmental Reviewer will contact awardees to identify information needed for the specific project, such as:
 - Environmental Assessment (EA)
 - Consultation under Section 106 of the National Historic Preservation Act
 - Hazardous materials survey
 - Coastal Zone Consistency Determination
 - Floodplain Management



Condition: Notice of Federal Interest (NFI)

- Within 120 days of the NoA, the award recipient must submit an NFI
- The federal government always retains interest in property constructed, acquired, or improved with federal funds (submission of the NFI remains enforced during active, and inactive, status)
- Applicants not required to file an NFI (A/R projects with total federal and non-federal costs less than \$500,000)
 - Federal Interest still exists
 - Maintain documentation regarding protection of all Federal Interest
- Equipment only projects are not required to file an NFI



Reporting Requirements



Semi-Annual Progress Reports

- Submission Timeframe – Every 6 months until the project is completed
- Progress report instructions and submission guidelines: late March
- Progress report will include – Project status: **% completed and 1-3 sentences of narrative**

Construction Reporting and Review Activities



Federal Financial Report

Federal Financial Report (FFR) – SF-425

- Reviewed by Grants Management Specialist
- Submitted in the Payment Management System (PMS)
- Due 90 days after the budget period end date. Refer to your NoA to determine that date.



SF-428 Tangible Personal Property Report

SF-428 Tangible Personal Property Report

- Reviewed by Grants Management Specialist
- Due within 90 days of the period of performance end date
- Tangible personal property means property of any kind, except real property, that has physical existence
 - ✓ Includes equipment and supplies
 - ✓ Does not include copyrights, patents, or securities

Division of Financial Integrity (DFI)

DFI, within the HRSA's Office of Federal Assistance Management, is responsible for ensuring grant recipients adequately administer their federal awards through their financial management systems. DFI accomplishes this through the performance of the following post-award oversight and monitoring activities:

- **Financial Management Reviews** – Post-award reviews for determining if grant recipients' 1) financial management systems are compliant with HHS regulations, and 2) policies and procedures address applicable legislative mandates limiting the use of HRSA grant funds. These are desk reviews.
- **Fiscal Technical Assistance** – Training provided to grant recipients designed to expand their knowledge and understanding of federal financial and grants management requirements enabling them to strengthen their financial management systems. This training may be provided virtually and onsite.
- **Grant Reviews** – Reviews are conducted in response to serious financial issues, allegations of fraud, waste, or abuse, or other concerns noted by HRSA employees and other stakeholders. These reviews ensure costs charged to HRSA awards during specific budget periods were allowable, allocable, reasonable and adequately documented per HHS federal regulations and grant terms and conditions. These reviews may be conducted as desk reviews or onsite.
- **Single Audit Resolution** – Resolution of procedural and monetary findings, pertaining to HRSA programs, cited in Single Audit Reports. The resolutions are performed as desk reviews.



Closeout and Property Reports

- Closeout documentation is required within 90 days of the completion of the project
- The closeout documentation consists of the following items:
 - Project Completion Certification
 - A certificate of occupancy or evidence of acceptance by the permitting authority
 - A certificate of substantial completion
 - Photos of the completed project (including before, during, and after photographs)
 - Final Federal Financial Report (FFR)
 - Tangible Personal Property Report (SF-428)

Other Considerations



Prior Approval Requests

Award recipients may be required to request prior approval from HRSA for changes that occur during the grant period

- Prior Approval (PA) will result in a new NoA
- Should additional information be needed, the recipient will be notified, and the PA request will be returned in the EHBs to allow for the revision



Examples of Prior Approval Requests

- Change of Project Site location or Project Type (Construction, Alterations/Renovations, Equipment)
- Change of Project Scope
- Revisions of Project Budget (exceeding 25%)
- Changes to the Project Director and/or Authorizing Official
- Extensions to the project period
- Changes that expand the building's footprint or the area of renovation
- New costs (must be reviewed to determine if allowable)
- Use of Force Account Labor
- All Pre-award Costs



Prior Approval Scenarios

Example #1

CDS Recipient wishes to change the scope of their project from a new building structure (i.e., brick and mortar) to a mobile unit to provide the same services indicated in the approved award application

This requires a simple PA review and processing



Example #2

CDS recipient wishes to change the scope of their project from one location to another and add 3,000 square feet of additional construction

This requires a complex PA review and processing; this scenario may require another environmental assessment and significant budget revisions

HRSA Electronic Handbook (EHBs) Registration

- The Project Director (PD) and Authorizing Official (AO) listed on NoA are required to register within HRSA's EHBs. Registration within HRSA EHBs is required only once for each user for each organization they represent.
- [Visit EHBs](#) to use the system.
- **Additional help** is available online or from the HRSA Call Center at 877-Go4-HRSA/877-464-4772.



Electronic Document Submission into EHBs

- Award recipients are **required** to submit all documentation in response to what is identified as a condition of award or reporting requirement on the NoA into HRSA's Electronic Handbook (EHBs) by the designated due date
- By default, the recipient's Project Director as shown on the NoA will have access to all EHBs submissions
- **All other users must be given privileges** to view, edit, or submit by the Project Director or other user with the ability to Administer User Privileges in the Grant Handbook
- HRSA Program or Grants Management Personnel may also request other information through the EHBs by either requests for information or additional conditions

****Failure to respond to submission requirements
in a timely manner may result in drawdown restriction****



Payment Management System

- The funds for this award are in a sub-account in the Payment Management System (PMS)
 - Allows recipients to specifically identify the individual grant for which they are drawing funds and will assist HRSA in monitoring the award
- You may use your existing PMS username and password to check your organizations' account access. If you do not have access, [complete a PMS Access Form \(PMS/FFR Form\)](#).
- If you have any questions about accessing PMS, [contact the PMS Liaison Accountant](#)
- PMS Help Desk [PMS Self-Service Web Portal](#) or call 877-614-5533



Procurement Rules

- Recipients are expected to follow their organization's documented procurement procedures for federal grants, which include any applicable state/local requirements, as well as federal procurement regulations as detailed in 45 CFR Part 75 / 2 CFR Part 200FR 45 part 75:
 - All contracts for goods and services equal or greater than \$250,000 must be competitively bid
- The simplified acquisition threshold applies to work < \$250,000
 - Recipients should keep in mind that they still need to get more than one quote (not bids) for the work to determine that the costs are reasonable, and the threshold shall not be broken down into several purchases or artificially reduced to smaller quantities to permit negotiations under simplified acquisition procedures
- The Davis-Bacon Act does not apply to CPF/CDS funding. However, you must follow state and local requirements for prevailing wages and fair labor policies.

Frequently Asked Questions



Frequently Asked Questions #1

Question:	Response:
We have completed our initial submission into the EHB for a condition of award, what are the next steps we need to take?	Once post award condition submissions are reviewed and approved by HRSA, you will receive a new NoA noting that condition(s) have been lifted. Once all conditions have been lifted, you may start your project activities and may draw down funds from PMS. If any changes are needed to your project, a prior approval request must be submitted into the EHB, and HRSA may take a maximum of 30 days to review. Should additional information be needed; the recipient will be notified, and the submission and/or PA request will be returned in the EHBs to allow for the revision. The final decision will result in a new NoA.
If our costs come in lower than anticipated in our submitted budget, can we use the remaining funds to purchase similar equipment that will be used for similar purposes to what was in our budget narrative?	These situations will be addressed on a case-by-case basis. All additional equipment purchases that were not included in the grant application will require HRSA approval. This approval is done through submission of a prior approval request for rebudgeting in the Electronic Handbooks. Recipients should contact their PO and GMS regarding the use of remaining funds to ensure costs are allowable and within approved scope of project.



Frequently Asked Questions #2

Question:	Response:
Why has money been disbursed to my organization if I have conditions on my award?	The grant funds are disbursed upfront and in full however, conditions of award must be satisfied prior to draw down other than for select expenditures as noted.
Do we need to request payment prior to purchasing the equipment or can we request payment as reimbursement for the purchase of budgeted equipment?	Payments for equipment should be requested as a reimbursement so that the amount draw down from the Payment Management System aligns with the exact amount billed and expensed.
Any clarification you can offer on the process for drawing down funds within the PMS would be helpful.	Recipients may make payment request as often as needed (i.e., daily, weekly, monthly or bi-monthly. However, in accordance with Department of Treasury regulations, federal cash must be drawn solely to accommodate immediate needs on an “as needed” basis only and must not be held in excess of three (3) working days. For more information, please visit the Payment Management System User Guide at https://pms.psc.gov/pms-user-guide/requesting-payment.html .



Frequently Asked Questions #3

Question:	Response:
Regarding the documents requiring submission 30-60 days from the award date – does that refer to the date on our attached NoA? Some of these documents were submitted previously in our application. Can you please confirm if we need to revise the documents since then or re-submit the original attachments?	The timeframe for your post award submission due dates begins with your award issue date which is the date your Notice of Award was released to your organization . Please contact your PO and GMS for more information regarding the documents necessary for submission.
Who did I contact in regard to a question on navigating in EHBs?	Please contact HRSA Help Desk is 877-Go4-HRSA/877-464-4772. In addition there are short videos available for EHBs navigation assistance: Knowledge Base - Knowledge Base - Electronic Handbooks Help and Knowledge Base (hrsa.gov).



Reminders and Resources



Reminders and Resources #1

- Review **ALL** the terms and conditions on your NoA
- Respond to conditions as applicable
- Submit all reporting requirements within the applicable timeframe
- Grant funds can only be used for your approved CPF/CDS project. Costs drawn down for items that were not described in your approved budget are subject to audit disallowance.
- If significant revisions to the approved budget are needed, recipients may submit a Prior Approval through the EHB
- All requested changes must be approved before recipients undergo modifications
- **Contact your Program Official or Grants Management Specialist with questions/concerns**



Reminders and Resources #2

- Visit [HRSA Manage your Grant](#)
- Visit [Community Project Funding \(CPF\) / Congressionally Directed Spending \(CDS\)](#)
- Visit [Frequently Ask Questions](#)



Thank you!

Office of Special Activities and
Division of Grants Management Operations

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

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