

RFGA Number: FY2015-RFGA-CY-509

Questions received by 5 PM on July 20, 2015 with responses

Questions from Representative #1:

1. **Question:** Where does our organization find the requested Certification Regarding Environmental Tobacco Smoke, PL 103-227, known as the PRO-KIDS Act of 1994 (page 6)?

Response: Applicants should certify (or state) that they will comply with the Act mentioned above. Please see #5 in the General Terms and Conditions for all mandatory grant programs administered by the federal Administration for Children and Families, https://www.acf.hhs.gov/sites/default/files/assets/general_terms_and_conditions_mandatory.pdf which reads:

“In accordance with Title XII of Public Law 103-227, the “PRO-KIDS Act of 1994,” smoking may not be permitted in any portion of any indoor facility owned or regularly used for the provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs wither directly or through State or local governments. Federal programs include grants, cooperative agreements, loans and loan guarantees, and contracts. The law does not apply to children’s services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions or facilities and used for inpatient drug and alcohol treatment.

The above language must be included in any subawards that contain provisions for children’s services and that all sub-grantees shall certify compliance accordingly. Failure to comply with the provisions of this law may result in the imposition of a civil monetary penalty of up to \$1,000 per day.”

2. **Question:** Where does our organization find the requested Confidentiality Certification (page 6)?

Response: Applicants should certify (or state) in their application that the organization will comply with the F. 6. Terms and Conditions - Confidentiality found on Page 17 of 32 in the RFGA.

3. **Question:** Our organization does not expend \$750,000.00 or more in federal awards (Circular A-133) Page 24. According to page 7 and page 11, applicants are to include a third party audit. Because of the size of our nonprofit, a third party audit has never been required. Will our application be disqualified without an included third party audit?

Response: RFGA Page 24, item 33.d. states: Non-federal entities that expend less than \$750,000 a year in total federal awards, from all sources, are exempt from the Federal audit requirements of OMB Circular A-133 for that year, but records must be available to

review or audit by appropriate officials of the federal agency, pass-through entity, and General Accounting Office (GAO).

Page 24 Item 33.e. states: A grantee (subrecipient) is prohibited from charging the cost of an audit to federal Awards if the grantee expended less than \$750,000 from all sources of federal funding in the grantee's fiscal year. If the grantee expends less than \$750,000 in federal funding from all sources in the grantee's fiscal year, but obtains an audit paid for by non-federal funding, then DHEC requests a copy of that audit to be sent to: DHEC Abstinence Education Grant Program, Bureau of Maternal and Child Health, Box 101106, Columbia, SC 29211.

Therefore, if an applicant certifies in their application that their entity expends less than \$750,000 per year in total federal awards and that the entity has not had a third-party audit in the past then the application will not be disqualified. If the entity does not have a third-party audit, please note in the application that you will make financial records related to any funding received available for review or audit by appropriate officials at HRSA, DHEC, or the General Accounting Office upon request.

Questions from Representative #2:

Regarding the required match

1. **Question:** Is each applicant responsible for the entire 43% of the required match for the Title V, Section 510 Supplemental Funds?
2. **Question:** It is my understanding that the funds South Carolina provides through its State Abstinence Education Funding and its Emerging Programs Abstinence Education Funds provide more than the required 43% match for South Carolina's allocation of our state's Title V, Section 510 funds. Is that correct?
3. **Question:** If my understanding in #2 is not correct and the allocated State Abstinence Education Funding and Emerging Programs Abstinence Education Funds do not cover enough of the required 43% match, how much of the match do the State funds cover? What would be the remaining amount of match that grantees would need to cover? In other words, if there are State funds that can be applied, would that decrease the percentage of the match that grantees must provide?

Response: On July 15, 2015 the South Carolina General Assembly approved provisos 34.46 and 34.47 for state Abstinence Education through DHEC. DHEC will utilize this state funding to provide the 43% match at the state level to meet the federal funding requirements. The amount of funding in these two provisos is adequate to cover the 43% match at the state level for the Title V, Section 510 grant funding.

At the time of posting of this RFGA, we had not received notification that the 2015-16 state budget had been finalized, and therefore could not commit those funds as the state match. The RFGA has been revised to reflect this change.

Regarding number of copies

4. **Question:** On page 1 of 2 the RFGA the requirement is to submit 1 original and 3 copies, but on page 4 of 32 in the application, #5, the requirement is one original and 2 copies. We want to get it right! Which is correct?

Response: We apologize for the discrepancy concerning number of copies in the RFGA. We would respectfully request 1 original document and 3 copies of the applications be provided. This discrepancy has also been revised in the RFGA.

Regarding counties served and programs provided

In Section E, in the “Note” at the bottom of page 8 of 32, there is a requirement for “high level of strategic planning and service coordination and communication, with only one (1) agency and/or program type to be funded per county with federal or state resources. Federal –funded program efforts must not duplicate state-funded (e.g., emerging program or evidence-based), or the state or federal funded efforts of another grantee. It is our purpose to provide quality programs and services that meet the requirement of strategic planning and service coordination and communication.” However, because we currently provide services in all counties under other contracts with SC DHEC, we have questions. There are counties we currently serve in which the population is underserved – there is more of a demand for our programs and services than we can currently provide. In other counties we currently serve, there is a need for expansion of services to include additional students, parents and other youth serving adults with maintenance and youth development activities, which we cannot currently afford to provide. We believe these considerations meet the requirement of applying a high level of strategic planning and service coordination and communication. In some counties, we are underserving the demands because of lack of resources. In others, there is a great need for maintenance programs for students and for additional training for parents and other adults. Our goal is to see the desired behavior, abstinence, increase. As such, we submit the following questions.

Federal funding question

5. **Question:** We are currently serving the state under Title V, Section 510 funding. Would we be allowed to expand those services in a county with the Supplemental Title V, Section 510 funds by adding additional completely separate program/services that are not provided under the current contract, or by another vendor, and/or by serving additional persons that are not being currently served in a particular county?

Response: It is our understanding that these supplemental funds are provided to complement current Title V Abstinence Education activity, providing additional resources to meet identified needs. Keeping in mind that we will be required to provide an unduplicated count of persons served by Title V funds, expansion of services as described above would be allowed. In order to avoid duplication of services in a county, DHEC can provide information to applicants on services being provided by other entities funded by Title V, Section 510 if needed.

All counties question

6. We currently provide some level of services to all counties, though the degree of services varies from county to county as determined by our limited resources. In some of the counties that want our program and services to expand their reach, may we apply for supplemental funds to expand those services? For example, if we are providing only services for adult training in some counties, may we add student services for those counties? In some counties, we are providing primarily student services. May we add services for adults in those counties? In some counties we provide only our core curriculum, but additional hours are requested – as is stated in the federal guidelines for Title V, Section 510. May we add additional but different maintenance and youth development programs and services that are directly addressing the A-H components of Title V, Section 510?

It would seem that our efforts to maximize our resources by serving as many counties as we possibly can manage to serve should not prohibit us from improving and expanding services where there is need and demand.

Response: It is our understanding that these supplemental funds are provided to complement current Title V Abstinence Education activity, providing additional resources to meet identified needs. Keeping in mind that we will be required to provide an unduplicated count of persons served by Title V funds, expansion of services as described above would be allowed. In order to avoid duplication of services in a county, DHEC can provide information to applicants on services being provided by other entities funded by Title V, Section 510 if needed.