



Office of
Population Affairs

PA-FPH-22-001 Notice of Funding Opportunity

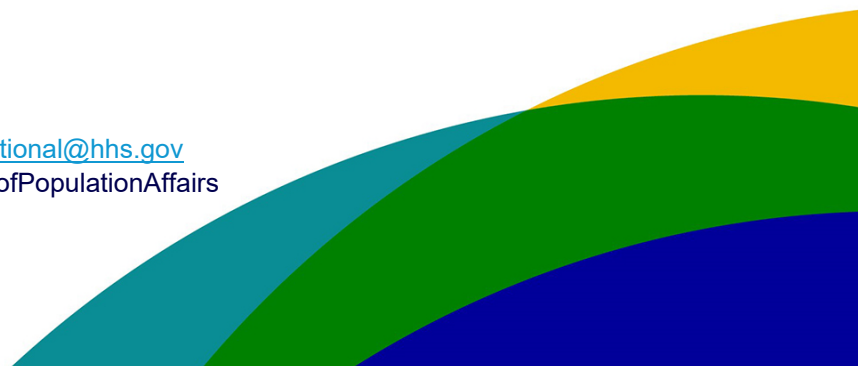
FREQUENTLY ASKED QUESTIONS – BATCH 2

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HHS Office of Population Affairs

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AUTHORITY AND ELIGIBILITY

1. **We do not have an existing health clinic in place, but we are working to develop a new health clinic. Is this Title X grant intended for existing clinics or would we be eligible to apply and write the grant to use some of the funding as startup costs to develop the clinic?**

Section E, pages 12-13, of the NOFO details who may apply for this funding opportunity. Section B, page 6, of the NOFO states “[g]rants funded through this NOFO will support Title X family planning services to millions of clients nationwide.”

Allowable costs must be allocable, reasonable, and necessary for the proposed project. The determination of allowability is made by the grants management officer (GMO) on a case-by-case basis after receiving a justification for the specific startup costs desired.

2. **Can for-profit clinics apply for this funding?**

For-profit organizations are not eligible to apply for PA-FPH-22-001. Section E of the NOFO, on page 12 states that eligible applicants include any public or private **nonprofit** entity located in a State (which includes one of the 50 United States, District of Columbia, Guam, the Commonwealth of Puerto Rico, the Northern Mariana Islands, the U.S. Virgin Islands, American Samoa, the U.S. Outlying Islands (Midway, Wake, et al.), the Marshall Islands, the Federated State of Micronesia, and the Republic of Palau) is eligible to apply for a grant under this announcement.

PREPARING TO APPLY

1. **Why are the middle names of key personnel necessary, is this not a security risk?**

HHS/OPA does not require applicants to provide key personnel middle names; nevertheless, as stated under Section F, page 30, of the NOFO, “[OPA] **encourage[s]** individuals to use their full name (first, middle, last) on these documents to distinguish them for verification in the System for Award Management exclusion records.”

2. **How do we know whether we need to submit proof of non-profit status?**

You do not need to submit proof of non-profit status in your application. However, as stated under Section F, page 35, of the NOFO, “[i]f you are a non-profit organization, you may be required to submit documentation of nonprofit status to confirm your status.”

3. **Should the contents of each appendix be submitted as one single electronic file? Or should all appendices be combined into a single electronic file and labeled by appendix number?**

Section F.8 on page 34 of the NOFO states “**Applications, excluding required standard forms, must be submitted as three (3) files (see acceptable file types below).** One file must contain the entire Project Narrative, another the entire Budget Narrative including supporting documentation described in the Budget Narrative content section; and the third file must contain all documents in the Appendices. Any additional

files submitted as part of the Grants.gov application will not be accepted for processing and will be excluded from the application during the review process.”

4. Do applicants need to include a Recipient Plan for Oversight of Federal Funds in their proposal?

Section F, pages 27-28, of the NOFO states that applicants “must include a plan for oversight of federal award funds which describes:

- how your organization will provide oversight of federal funds and how award activities and partner(s) will adhere to applicable federal award and programmatic regulations. Include identification of risks specific to your project as proposed and how your oversight plan addresses these risks.
- the organizational systems that demonstrate effective control over and accountability for federal funds and program income, compare outlays with budget amounts, and provide accounting records supported by source documentation.
- for any program incentives proposed, the specific internal controls that will be used to ensure only qualified participants will receive them and how they will be tracked.
- organizational controls that will ensure timely and accurate submission of Federal Financial Reports to the OASH Grants and Acquisitions Management Division via the Payment Management System as well as timely and appropriate withdrawal of cash from the Payment Management System.

If [an organization’s] internal controls are available online, it is recommended that [applicants] provide the link as part of [their] plan in the budget narrative. [OPA has] also included supplementary information in Section K.1, which contains questions applicants may find useful in considering their Recipient Plans for Oversight of Federal Funds.”

5. Are the forms uploaded as PDFs or are they completed in the application portal?

Please review the Application and Submission Information and Application Disqualification Criteria as described in the NOFO on pages 14-16 in Sections E and F.

Section F.2 of the NOFO states “Your application must be prepared using the forms and information provided in the online application package. This includes but is not limited to: SF-424 Application for Federal Assistance; SF-424A Budget Information for Non-Construction Programs; SF-424B Assurances for Non-Construction Programs.; SF-LLL Disclosure of Lobbying Activities; and Project Abstract Summary.”

6. We have a UEI number. Do we still need to use our DUNS?

As noted in Section F, page 30, of the NOFO, applicants “are required to provide a Dun and Bradstreet (D&B) Data Universal Numbering System (DUNS) number when applying for Federal awards through Grants.gov.”

7. Do forms count to page limitation?

Section F.2 on page 16 of the NOFO states “the Project Narrative, and total application including appendices, must adhere to the page limit indicated in Application Disqualification Criteria listed in Section. The page limit **does not include** the Budget Narrative (including budget tables), required forms, assurances, and certifications as described in the Application Disqualification Criteria.”

APPLICATION REVIEW

1. How will past performance of a grantees (audits, performance reporting) inform the funding decisions?

The Office of Grants Acquisition and Management (GAM) will conduct a review of risk posed by an applicant. As noted on page 38 of the NOFO in Section G. Application Review Information, #3. Review of Risk Posed by Applicant, “GAM will evaluate, in accordance with 45 C.F.R. § 75.205, each application recommended for funding by the program official indicated in Review and Selection Process for risks before issuing an award. This evaluation may incorporate results of the evaluation of eligibility or the quality of an application. If we determine that a Federal award will be made, special conditions that correspond to the degree of risk assessed will be applied to the Federal award. Such conditions may include additional programmatic or financial reporting or releasing funds on a reimbursable rather than cash advance basis. We will use a risk-based approach and may consider any items such as the following: a. Your financial stability; b. Quality of management systems and ability to meet the management standards prescribed in 45 C.F.R. part 75; c. History of performance. Your record in managing Federal awards, if you are a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, conformance to the terms and conditions of previous Federal awards, and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards; d. Reports and findings from audits performed; and e. Your ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities... We will consider any comments by you, in addition to the other information in the designated [SAM] system, in making a judgment about your integrity, business ethics, and record of performance under Federal awards when completing the review of risk.”

2. Are grantees considered "higher-risk" if they left in 2019 due to the rule change?

Former Title X grantees are not considered “higher-risk” simply for relinquishing their grant in 2019.

As noted under Section G, page 38, of the NOFO, GAM will evaluate an applicant’s risk in accordance with 45 CFR § 75.205(c). This regulation provides: “[i]n evaluating risks posed by applicants, the HHS awarding agency may use a risk-based approach and may consider any items such as the following:

1. Financial stability;
2. Quality of management systems and ability to meet the management standards prescribed in this part;
3. History of performance. The applicant's record in managing Federal awards, if it is a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, conformance to the terms and conditions of previous Federal awards, and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards;
4. Reports and findings from audits performed under subpart F of this part or the reports and findings of any other available audits; and
5. The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities."

PROGRAM EXPECTATIONS

1. **Should the work plan cover the first budget year, or must applicants provide a work plan for each of the 5 years?**

Section F, pages 28-29, of the NOFO states that applicant's work plan "should reflect, and be consistent with, the Project Narrative and Budget Narrative, and must cover all years of the period of performance. However, each year's activities should be fully attainable in one budget year. [Applicants] may propose multi-year activities, as well as activities that build upon each other, but each phase of the project must be discreet and attainable within a single budget year."

2. **On page 11 of the NOFO, it states: information re: QI/QA plan mentions that grantees will be required to collect data on Sexual Orientation and Gender Identity (SOGI) separate from FPAR 2.0 data elements, pending OMB approval. Do we need to include anything in the application re: SOGI data or anything?**

Section F.3 of the NOFO describes the content applicants are expected to include in their application. Page 19 of the NOFO states that applicants are expected to "Describe plans and strategies for providing family planning services that address OPA program priorities and data collection requirements, including... Implementing a QI/QA plan, including but not limited to, collecting, reporting, and using FPAR 2.0 data."

OPA's collection of SOGI data is pending OMB approval and will be required of all grantees upon OMB approval.

BUDGET

1. **Can program income be included as part of the cost-sharing requirement? What if this program income is coming from billing/participant payment as the required match?**

Yes, program income may be used as cost-sharing or matching. Please note that other Federal funds may NOT be used for cost sharing under the cost principles. Please refer to the section on Cost Sharing or Matching in the NOFO (pages 13-14) as well as the

Budget Narrative Content section (b) beginning on page 21 and subsection (q) Program Income Description on page 26.

“Program income means gross income earned by your organization that is directly generated by this project if funded except as provided in 45 C.F.R. § 75.307(f). Program income includes but is not limited to income from fees for services performed or the use or rental of real or personal property acquired under the award. Interest earned on advances of Federal funds is not program income. Except as otherwise provided in Federal statutes, regulations, or the terms and conditions of the Federal award, program income does not include rebates, credits, discounts, and interest earned on any of them . . . Describe and estimate the sources and amounts of program income that [your] project may generate if funded. Unless being used for cost sharing, if applicable, [program income] should not be added to your budget. This amount should be reflected in box 7 of the SF-424A.”

2. Can the money be used for planning grants or grants to help clinics build the infrastructure to provide Title X?

No, Title X funds cannot be used for planning grants. Section B, page 6, of the NOFO states “[g]rants funded through this NOFO will support Title X family planning services to millions of clients nationwide.”

Allowable costs must be allocable, reasonable, and necessary for the proposed project. The determination of allowability is made by the grants management officer (GMO) on a case-by-case basis after receiving a justification for the specific infrastructure desired.

3. Does the application require a budget for each year or just year 1?

Section F, page 22, of the NOFO states that applicants “must provide an object class category budget using Section B, box 6 of the SF-424A for the first year of the proposed project. Provide a budget justification, which includes explanatory text and line-item detail, for the first year of the proposed project. The budget narrative should describe how the categorical costs are derived. Discuss the necessity, reasonableness, and allocation of the proposed costs. For subsequent budget years, provide a summary narrative and line item budget. For categories or items that differ significantly from the first budget year, provide a detailed justification explaining these changes. Note, do not include costs beyond the first budget period in the object class budget in box 6 of the SF-424A or box 18 of the SF-424; the amounts entered in these sections should only reflect the first budget period.”

4. I believe previous NOFOs required a 10% cost-share. Is any specific minimum percentage required with this NOFO?

Page 2 of the NOFO states “[w]hile there is not a fixed cost-sharing percentage or amount, projects must include financial support from sources other than Title X. The proposed project budget must reflect non-federal financial support in addition to Title X funds on both the Standard Form (SF) 424A, Budget Information for Non-Construction Programs, and in the budget narrative. Recipients will provide family planning services that are in compliance with the Title X statute, regulations, and legislative mandates and that are guided by OPA’s key priorities.”

5. How do we use the Historical Data in preparing our budgets?

PA-FPH-22-001 does not include information on how applicants should use the historical data included in Section K.5. As stated under Section F, page 21, of the NOFO, "the information included in Section K.5 is provided only as background information for applicants interested in historical data. The information in the Table will not be used as the basis for determining funding levels in the current competition."

6. Is there a specific formula or other guidance on how to best determine the cost per client and cost per encounter requested in the NOFO?

PA-FPH-22-001 does not include information on a specific formula or other guidance on how to best determine the cost per client and cost per encounter. Section F, page 19, of the NOFO says that applicants should:

- Describe how grant funds will be used to best address the identified needs;
- Demonstrate that the cost per client and cost per encounter are reasonable; and
- Describe other non-Title X resources available to address the needs for family planning services within the proposed service area and how grant funds will be used to leverage and expand available resources, and not duplicate them.

This is a competitive NOFO, as such, applicants should put forward the best proposal the organization can create based on application and evaluation criteria published in the announcement.

7. Can the non-federal match be in kind donations or volunteers or must it be actual dollars?

Section F, pages 26-27, of the NOFO states "[f]or all federal awards, any shared costs or matching funds and all contributions, including cash and third-party in-kind contributions, must be accepted as part of the recipient's cost sharing or matching when such contributions meet all of the criteria listed in 45 C.F.R. § 75.306."

8. Can funds be used to purchase, operate and maintain a new mobile unit to provide place-based services in low-income neighborhoods that have faced significant barriers to care?

Yes, funds may be used to purchase, operate and maintain a new mobile unit to provide Title X family planning services. Allowable costs must be allocable, reasonable, and necessary for the proposed project. The determination of allowability is made by the grants management officer (GMO) on a case-by-case basis after receiving a justification for the specific startup costs desired.

9. Is there a recommended or suggested % increase in anticipated costs for which we should budget in the out-years of our proposed budget (Years 2-5)?

OPA does not have a recommended or suggested % increase that applicants should budget in out-years of their proposed budget. Applicants can ask for a budget increase in years 2-5 but will need to justify the request and include the request in the budget narrative. Funding for all approved budget periods beyond the first is generally level with the initial award amount and is contingent upon the availability of funds, satisfactory

progress of the project, adequate stewardship of Federal funds, and the best interests of the Government.

OTHER QUESTIONS

1. **If we already have funding for family planning services through a state grant will our state funding be expanded, or should we apply separately? Is a community health center too small to get their own federal grant?**

PA-FPH-22-001 does not include information on whether state family planning funding will be expanded. Section E, pages 12-13, of the NOFO details who may apply for this funding opportunity.