

FY 2020 CARES Act Supplemental Funding Guidance:

Initial Response Report Requirements for Ryan White HIV/AIDS Program – Parts A -D

Purpose

The fiscal year (FY) 2020 Coronavirus Aid, Relief and Economic Security Act -P.L. 116- 136 (CARES Act) provides one-time funding to help current Ryan White HIV/AIDS Program (RWHAP) recipients prevent, prepare for, and respond to the novel coronavirus disease 2019 (COVID-19).

The Health Resources and Services Administration (HRSA) has issued CARES Act Notice of Awards and award terms to funded recipients. As a requirement of the award, CARES Act recipients must submit an Initial Response Report (IRR). This document outlines the project and budget information required for completing the IRR and provides general guidance on the scope of funding activities. Recipients should review the [Examples of Allowable Uses of Funds](#) document for additional information on CARES Act program activities. Recipients must complete and submit the IRR in the HRSA Electronic Handbook (EHBs).

Funding Summary

The [CARES Act](#) appropriated \$90 million to help RWHAP recipients respond to clients' COVID-19 related health service needs, including coronavirus screening and testing. All activities and purchases supported by RWHAP CARES Act awards must be used for services, activities, and supplies needed to help prevent or minimize the impact of COVID-19 on RWHAP clients and organizations. As required by the appropriations language, HRSA has developed data driven methodologies to calculate award amounts for RWHAP Parts A-D. Funding allocation details can be found on HRSA's website on the [HAB COVID-19 Technical Assistance webpage](#).

The CARES Act provision for the RWHAP provides flexibility in how recipients can use the funding to prevent, prepare for, and respond to COVID-19 as needs evolve among RWHAP clients and organizations. The CARES Act awards offer recipients the flexibility to address COVID-19 related health and personal care needs of clients, by removing the 75 percent core medical services requirement. Removing this requirement for CARES funding allows recipients to allocate more funding for support services needed to address barriers to healthcare and personal care challenges experienced by RWHAP clients as a result of COVID-19. Without the 75 percent core medical services requirement, recipients have the option to expend all CARES Act award funds (not otherwise earmarked for administrative costs, clinical quality management, and planning and evaluation) for support services.

Additionally, HRSA has elected to exercise Section 2683(a) of the Public Health Service Act to waive several other RWHAP requirements for CARES Act awards that will help recipients expedite the expenditure of funds to address the urgent COVID-19 healthcare and service needs of the RWHAP community. For example, HRSA has waived RWHAP requirements for the: 50 percent Early Intervention Services (EIS) allocation ; Maintenance of Effort; Minimum Women, Infants, Children and Youth allocation and the Imposition of Charges. For a full list of requirements that have been waived for the RWHAP CARES Act awards please visit [HAB COVID-19 Technical Assistance webpage](#).

CARES recipients will also have other time-limited award administration flexibilities currently extended under the Office of Management and Budget (OMB) Memorandum [M-20-17](#) - Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19).

CARES award recipients may not use grant funds for costs that are reimbursed or compensated by other federal or state programs that provide for such benefits, including but not limited to the Small Business Administration's Paycheck Protection Program, the \$100 billion Public Health and Social Services Emergency, or unemployment compensation.

Funding may support a wide range of in-scope (allowable RWHAP) activities dating back to January 20, 2020. Testing, including temporary drive-or walk-up testing, and laboratory services is a paramount need in many communities. HRSA encourages recipients to leverage this funding to expand COVID-19 screening and testing for RWHAP clients, consistent with [CDC guidance](#) for healthcare professionals and Federal, state, territorial and local public health recommendations. Funding may also be used to support:

- Educational activities for recipient clients, staff, and providers
 - Assessments of RWHAP client symptoms,
 - including by telephone, text monitoring systems or videoconference,
- Hiring and contracting with providers and other personnel,
- Training,
- Vehicles to transport RWHAP clients, personnel of recipients, or supplies (e.g., personal protective equipment, infection control supplies),
- Equipment (e.g., telehealth equipment, temporary and non-fixed barriers to separate clients), and
- Health information technology (e.g., technology to support tracking, sharing, and reporting capacity).

Examples of uses of funding are available on the [HAB COVID-19 Technical Assistance webpage](#).

Required Supporting Documents

As stated in your Notice of Award (NoA), you must submit the following information via the HRSA EHBs within 30 days of award release date. Recipients are reminded that you are able to begin expending your funds immediately upon acceptance of the award. You are not required to wait until this report is submitted.

1. **CARES Activity Overview.** Provide a brief narrative (1-2 pages) describing how funds have been (dating back to January 20, 2020) or will be used to support activities to prevent, prepare for, and respond to COVID-19 using the categories below. Descriptions of each category provide general guidance; HRSA recognizes that many COVID-19 activities and uses of funds may apply to more than one category.
 - **Prevent**--Promote prevention practices and/or administer countermeasures to reduce risk of COVID-19 among RWHAP clients
 - **Prepare**—Enhance readiness, training, and services to respond to COVID-19 for RWHAP clients

- **Respond**—Assess, test, diagnose, treat, and limit the spread of COVID-19 among RWHAP clients

NOTE: HRSA acknowledges that your plans to use COVID-19 funds may change over time to respond to evolving circumstances. Re-budgeting is allowed as long as activities supported by COVID-19 funds comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards available at <http://www.ecfr.gov/cgi-bin/text-idx?node=pt45.1.75>, and continue to support in-scope COVID-19-related prevention, preparation, and response activities, consistent with the terms and conditions of the award.

2. **Budget Form.** Provide an SF-424A budget form that includes only the COVID-19 funds awarded. This award amount must be tracked separately from funds awarded under any existing RWHAP award issued to your organization. In alignment with standard program practice and in order to evaluate recipient's adherence to RWHAP legislative budget requirements, recipients must also provide a **separate program-specific line item budget or complete a program budget template** in accordance with your funded RWHAP program. Recipients should clearly identify costs subject to administrative and/or planning and evaluation cost caps.
 - For RWHAP Parts A, C and D recipients administrative cost should not exceed **10 percent** of the total award.
 - For RWHAP Part B recipient administrative costs must not exceed **10 percent** of the total award. The total combined costs of recipient administration and planning and evaluation (P&E) must not exceed **15 percent** of the total award.

The budget allocations on the line item must relate to the activities proposed in the project narrative. The total amount requested on the SF-424A and the total amount listed on the line item budget must match. The line item budget should be uploaded as an **attachment**. Please visit the HAB COVID-19 TA Webpage for [sample budget templates](#).

The following are ineligible costs:

- Cash payment to intended recipients of services
- Clinical research
- International travel
- Construction or land purchases (minor alterations and renovations to an existing facility to make it more suitable for the purposes of the award are allowable with prior HRSA approval)
- Syringe Services Programs (SSPs). Some aspects of SSPs are allowable with prior approval from HRSA and are in compliance with HHS and HRSA policy.
- Pre-Exposure Prophylaxis (PrEP) medications and related medical services or Post-Exposure Prophylaxis (PEP), as the person using PrEP or PEP does not have HIV and therefore, not eligible for COVID-19 funded medication.
- Funds may not be used for payments for any item or service to the extent that payment has been made, or reasonably can be expected to be made, with

respect to that item or service under any state compensation program, insurance policy, federal or state health benefits program or by an entity that provides health services on a prepaid basis (except for a program administered by or providing the services of the Indian Health Services).

Administration/Planning and Evaluation - Administration costs are costs associated with the administration of the grant. No more than 10 percent of the budget can be spent on administrative costs. You should allocate staff activities that are administrative in nature to administrative costs. The aggregate total of administrative expenditures for subrecipients, including all indirect costs, may **not** exceed 10 percent of the aggregate amount of all subawards.

For RWHAP Part B administration and planning and evaluation costs combined should not exceed 15 percent of the total award.

For RWHAP Parts A, C and D total administrative should not exceed 10 percent of the total award.

Please see PCN 15-01 for additional guidance on cost caps and indirect cost rates.

<https://hab.hrsa.gov/sites/default/files/hab/Global/pcn1501.pdf>

Budget Narrative. Your budget narrative must clearly detail costs for each federal object class category, with calculations for how each cost is derived, and not include any ineligible cost. As provided for in OMB Memorandum [M-20-17](#) - *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19)*, your budget should include any requested reimbursement of allowable costs incurred retroactive to January 20, 2020.

- 3. Equipment List (as indicated).** If your budget includes equipment, provide an Equipment List Form. Equipment is tangible personal property (including information technology systems) that has a useful life of more than one year and a per-unit acquisition cost of at least \$5,000. Moveable equipment can be readily shifted from place to place without requiring a change in the utilities or structural characteristics of the space. Any equipment purchased with award funds must be pertinent to the COVID-19 activities, procured through a competitive process, and maintained, tracked, and disposed of in accordance with [45 C.F.R. Part 75](#). While M-20-17 remains in effect, you may request that HRSA waive the procurement requirements contained in 2 CFR § 200.319(b) regarding geographical preferences, and 2 CFR § 200.321 regarding contracting small and minority businesses, women's business enterprises, and labor surplus area firms.

For each item on the Equipment List Form, the following fields must be completed:

- **Type** – Select clinical or non-clinical.
- **Item Description** – Provide a description of each item.
- **Unit Price** – Enter the price of each item.
- **Quantity** – Enter of the number of each item to be purchased.
- **Total Price** – The EHBs system will calculate the total price by multiplying the unit price by the quantity entered.

The selection of all equipment should be based on a preference for recycled content, non-hazardous substances, non-ozone depleting substances, energy and water efficiency, and consideration of final disposal (disposed in a manner that is safe, protective of the environment, and compliant with all applicable regulations), unless there are conflicting health, safety, and performance considerations. You are strongly encouraged to employ the standards established by either the Electronic Product Environmental Assessment Tool (EPEAT) or ENERGY STAR®, where practicable, in the procurement of equipment. Following these standards will mitigate the negative effects on human health and the environment. Additional information for these standards can be found at <http://www.epeat.net> and <http://www.energystar.gov>.

Technical Assistance

See the HAB's COVID-19 TA Webpage: <https://hab.hrsa.gov/program-grants-management/coronavirus-covid-19-response>; and [frequently asked questions https://hab.hrsa.gov/coronavirus-frequently-asked-questions](https://hab.hrsa.gov/coronavirus-frequently-asked-questions)

- Access information for a technical assistance call to support your 30-day reporting requirement submission
- Example uses of funding
- Blank and/or sample forms

Questions regarding your CARES 30-day reporting requirement should be directed to your HRSA Project Officer.