



AT THE SOUTHERN NEVADA HEALTH DISTRICT

**SOUTHERN NEVADA COMMUNITY HEALTH CENTER
POLICY AND PROCEDURE**

DIVISION: Administration	NUMBER(s): CHCA-001
PROGRAM: Finance	VERSION: 1.0 10
TITLE: Grants Management	Page: 1 of 6
DESCRIPTION: Managing Grants	EFFECTIVE DATE: <u>January XX, 2025</u>
APPROVED BY:	ORIGINATION DATE: <u>New May 11, 2022</u>
DISTRICT HEALTH CHIEF EXECUTIVE OFFICER - FQHC:	Replaces: New <u>May 11, 2022</u>
<u>Randy Smith, MPA</u> _____	_____ Date

I. PURPOSE

The Southern Nevada Community Health Center (SNCHC) is committed to ensuring federal cash draws are made and administered in a manner consistent with payment standards required by ~~the U.S. Department of Health and Human Services found at 45 CFR Part 75 Subpart E, 2 CFR 200, state and local statutes~~ federal law and regulations, HRSA policies, and executive orders, as applicable. Revisions to Uniform Grant Guidance are automatically included in the Center’s policy. See references at the end of this policy/procedure.

II. SCOPE

This policy applies to payments received for direct ~~or pass-through~~ federal grant funds awarded to SNCHC.

III. POLICY

The documentation maintained for each federal grant payment will account for the receipt, obligation, and expenditure of funds. SNCHC draws as a reimbursement for expenditures that have already been incurred.

IV. PROCEDURE

A. Documentation

The following documentation is kept for each draw ~~or request for reimbursement~~:

1. A general ledger listing of the expenditures that are being reimbursed in sufficient detail to satisfy the documentation requirements of Uniform Grant Guidance.
2. Information regarding the date of federal grant payment receipt and the timing of expenditures relative to the receipt of the federal funds.
3. Federal expenditures are tracked using a grant code in the general ledger. A report is run from the general ledger to determine the amount of the drawdown. An electronic copy of this report is attached to the draw down request by the accountant. This request is approved by ~~accountant~~ an accountant, accounting supervisor, and controller, ~~and~~ or CFO electronically through accounting software. After the appropriate approvals the accountant will make the draw through the Payment Management System (PMS) or other applicable system.
4. The health center's financial management system can account for all Federal awards (including the Federal award made under the health center program) to identify the receipt and expenditure of funds for federally funded activities in whole or in part. Specifically, the health center's financial records contain information and related source documentation pertaining to authorizations, obligations, unobligated balance, assets, expenditures, income, and interest under the Federal award as applicable.
- ~~5.~~ 5. The accountant will assure expenditures of Federal award funds are allowable in accordance with the terms and conditions of the Federal award including those that limit the use of Federal funds, and with the Federal Cost Principles in 45 CFR Part 75 Subpart E and/or 2 Code of Federal Regulations (CFR) Part 200 (Subparts A-F). ~~The a~~ An accountant, accounting supervisor and controller and/or CFO are ~~is~~ responsible to ensure that no Federal funds are used for mandated limitations/restrictions.

B. Timing

While cash advances are permitted, federal regulations require the timing and amount of cash advances shall be as close as is administratively feasible to the actual disbursements. SNCHC uses the reimbursement method for all grant draws. However, in the case of request as a cash advance, it is the SNHD's policy to ensure the following prior to requesting a cash advance:

1. The draw is the minimum amount needed.
2. The draw is timed in accordance with actual, immediate cash requirements.
3. That the draw is not done any earlier than necessary to make the payment thus minimizing the time between the draw and expenditure. The distinction is also that timing is based on when expenditures will be paid and not when the expenditure is accrued.
4. The draws will not be made to alleviate cash flow problems within SNHD.

C. Method

The preferred method of reimbursement is through electronic fund transfer if available. Requests for draws through the federal payment management system (PMS) will follow the steps and processes outlined with the system. If the draw is not through the federal payment management system, then the draw should be done consistent with the terms of the grant and the processes required by the awarding agency.

D. Oversight and Monitoring

Appropriate fiscal oversight will be maintained for all grants and awards. With respect to Federal funding and the requirements on restrictions to limitations ~~on use of Federal funds as mandated by the Department of Defense and Labor, Health and Human Services, and Education Appropriations Act, 2019 and Continuing Appropriations Act, 2019, Division B, Pub. L. 115-245,~~ the health center assures oversight and monitoring of changes to legislative mandates and other federal changes for compliance via SNHD grants management. The initial grant draw request and support for expenditures will be prepared by ~~the~~ an accountant.

~~The~~ An accountant, accounting supervisor, and ~~C~~ controller and/or CFO ensures that there is effective control over, and accountability for, all funds, property, and other assets associated with SNCHC projects. The Controller ensures the safeguarding of all assets to assure they are used solely for authorized purposes in accordance with the terms and conditions of the Health Center Program award/designation. SNCHC has the capacity to track the financial performance of the health center, including identification of trends or conditions that may warrant action by the organization to maintain financial stability.

E. Reporting

The standard financial reporting form SF-425 Federal Financial Report (FFR) is filed ~~quarterly~~ in accordance with HRSA guidelines. An annual FFR is compiled with any carryforward requested amounts noted on the form and followed through for HRSA approval. The ~~quarterly~~ PMS FFR reports are filed by the accountant after receiving the appropriate approvals. See references listed below.

1. The submission of quarterly and semi-annual interim FFRs, annual reports and/or final reports will be ~~on a quarterly, semi-annual, or annual basis,~~ as directed by the Federal agency or funder. A final FFR shall be submitted at the completion of the award agreement. ~~The following reporting period end dates shall be used for interim reports: 3/31, 6/30, 9/30, or 12/31.~~ For final FFRs, the reporting period end date shall be the end date of the project or grant period.

~~F. Quarterly and semi-annual interim reports shall be submitted no later than 30 days after the end of each reporting period. Annual reports shall be submitted no later than 90 days after the end of each reporting period. Final reports shall be submitted no later than 90 days after the project or grant period end date or as directed by the funder.~~

G.F. Mandatory Disclosures

Any violation of federal criminal law involving fraud, bribery and gratuity violations potentially affecting the award will be disclosed in writing to HHS within 14 days of discovery. This notification will be the responsibility of the DHO and the Board Chair.

H.G. Other Audit Objectives

Obtain an understanding of internal control, assess risk, and test internal control as required by 2 CFR section 200.514(c). Compliance Supplement 2024+ 3-L-4 ~~July 2021~~ May 2024 Compliance Requirements – Reserved.

Determine whether required reports for federal awards include all activity of the reporting period, are supported by applicable accounting or performance records, and are fairly presented in accordance with governing requirements.

SNCHC shall not use federal grant funds to pay the salary or expenses of any employee or agent of SNCHC for activities designed to influence the enactment of legislation, appropriations, regulation, administrative action, or Executive order proposed or pending before the Congress or any State government, State legislature or local legislature or legislative body, other than for normal and recognized executive-legislative relationships or participation by an agency or officer of a State, local or tribal entity/government.

V. REFERENCES

1. ~~Department of Defense and Labor, Health and Human Services, and Education Appropriations Act, 2019 and Continuing Appropriations Act, 2019, Division B, Pub. L. 115-245~~
2. ~~Health Resources and Services Administration. (2019). *Grants policy bulletin: Changes to HRSA grants policy statement* (No. 2019-02E). U.S. Department of Health and Human Services. <https://www.hrsa.gov/sites/default/files/hrsa/grants/manage/grants-policy-bulletin-2019-02.pdf>~~ RSA Grants Bulletin: 2019-02
3. ~~45 CFR 46.204(b) and section 498(b) of the Public Health Service Act (42 U.S.C. 289g(b))~~
4. ~~HS.142—113th Congress (2013–2014): Hyde Amendment Codification Act. (2013, January 24). <https://www.congress.gov/bill/113th-congress/senate-bill/142/text/yde-Amendment>~~
5. ~~Consolidated Appropriations Act, 2019 <https://www.congress.gov/resources/display/content/Appropriations+for+Fiscal+Year+2019>~~
6. ~~Controlled Substances Act, Section 202 <https://www.deadiversion.usdoj.gov/21cfr/21usc/812.htm>~~
7. ~~45 CFR Part 75 Subpart E: Cost Principles <https://www.govinfo.gov/content/pkg/CFR-2017-title45-vol1/xml/CFR-2017-title45-vol1-part75.xml>~~
 - a. ~~2 Code of Federal Regulations (CFR) Part 200 (Subparts A–F) <https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200>~~
 - b. ~~2 CFR Part 200 https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-2021-Compliance-Supplement_Final_V2.pdf~~
 - c. ~~Financial reporting, 2 CFR section 200.328.~~
 - d. ~~Monitoring and reporting program performance, 2 CFR section 200.329.~~
 - e. ~~Transparency Act, implementing requirements in 2 CFR Part 170 and the FAR~~

8. ~~The legislative statutes that establish, authorize, and govern specific programs, providing the legal framework and requirements for its implementation and funding. Program legislation~~
 9. ~~FRegulations issued by the federal agency responsible for awarding and overseeing grants, as outlined in applicable federal statutes and guidelines, such as those in the Code of Federal Regulations (e.g., 2 CFR Part 200).ederal awarding agency regulations~~
 - ~~The specific terms and conditions outlined in the grant award documentation that defines the requirements, responsibilities, and compliance expectations, as established by the awarding agency~~
 10. The terms and conditions of the award
1. [45 CFR Part 75 \(available at https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75?toc=1\)](https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75?toc=1).
 2. [2 CFR Part 200 \(available at https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1\)](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1).
 3. [HRSA Financial Management page \(available at https://www.hrsa.gov/grants/manage-your-grant/financial-management\)](https://www.hrsa.gov/grants/manage-your-grant/financial-management).
 4. [HRSA Reporting Requirements page \(available at https://www.hrsa.gov/grants/manage-your-grant/reporting-requirements\)](https://www.hrsa.gov/grants/manage-your-grant/reporting-requirements).
 - ~~5. HRSA Policies, Regulations, & Guidance page (available at https://www.hrsa.gov/grants/manage-your-grant/policies-regulations-guidance)~~

HISTORY TABLE

Table 1: History

Version/Section	Effective Date	Change Made
<u>Version 1</u>		<u>Formatted to current template, periodic review, updated references</u>
Version 0	05/11/2022	First issuance

VI. ATTACHMENTS
Not Applicable