



HRSA
Healthy
Grants
WORKSHOP

HRSA
Health Resources & Services Administration

2022 Grants Policy Check Up

HRSA Healthy Grants Workshop

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Vision: Healthy Communities, Healthy People



Agenda

- What Governs our Actions?
- COVID-19
- Legislative Mandates
- HRSA's Policy on Financial Conflict of Interest
- Changes to 2 CFR 200
- UEI has Replaced the DUNS
- OMB Memo M-18-24: Reducing Grant Recipients Reporting Burden
- FAPIIS
- Policy Questions and Answers



What Governs Our Actions?

- Our authorizing legislations and appropriations
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards
 - [45 CFR part 75](#)
- [HRSA Policy Bulletins](#)
- [Notice of Funding Opportunity and Notice of Award](#)



Where Can I Find Policies on HRSA's Website?

[Home](#) > [Grants](#) > [Manage Your Grant](#) > Policies, Regulations, & Guidance

Policies, Regulations, & Guidance

Policies, regulations, and guidance provide a consistent standard for HRSA grant recipients. Follow these when applying for, and managing, a grant.

Standard Terms

Review the [standard terms](#) for HRSA awards.

Policies

[Communicating and Acknowledging Federal Funding](#)

[Conflict of Interest \(COI\) Policy](#)

Grants Policy Bulletins

- [Grants Policy Bulletin: Implementation of 2 CFR § 200.216 - Prohibition on certain telecommunications and video surveillance services or equipment](#) (PDF - 54 KB)
- [Grants Policy Bulletin: Availability for Temporary Reassignment of State, Tribal, and Local Personnel during a Declared Public Health Emergency](#) (PDF - 193 KB)
- [Grants Policy Bulletin: Changes to Micro-Purchase and Simplified Acquisition Threshold Levels](#) (PDF - 163 KB)
- [Grants Policy Bulletin: Legislative Mandates in Grants Management for FY 2021](#) (PDF - 105 KB)
- [Grants Policy Bulletin: 2021 Salary Cap Limitation Update](#) (PDF - 62 KB)



COVID-19 Federal Response Appropriations

- There have been many supplemental appropriations addressing the COVID-19 Pandemic in 2020-2021 and most of them have expired and have been replaced.
 - Four COVID Relief Acts passed in 2020 – expired
 - One COVID Relief Act passed in December 2020
 - One COVID Relief Act passed in March 2021
 - Check with your Project Officer or Grants Management Specialist
 - [Coronavirus \(COVID-19\) Information](#)



Legislative Mandates in Grants Management for FY 2022

The Consolidated Appropriations Act, 2022 (Public Law 117-103) signed into law on March 15, 2022:

- Provides funding to HRSA for the fiscal year ending September 30, 2022.
- Includes statutory provisions that limit the use of funds on HRSA grants and cooperative agreements for FY 2022.



Legislative Mandates in Grants Management for FY 2022 (1-3)

Division E, Title VII:

1. Confidentiality Agreements (Section 742)

Division H, Title II:

2. Salary Limitation (Section 202)
3. Gun Control (Section 210)



Legislative Mandates in Grants Management for FY 2022 (4-7)

Division H, Title V:

4. Anti-Lobbying (Section 503)
5. Acknowledgment of Federal Funding (Section 505)
6. Restriction on Abortions (Section 506)
7. Exceptions to Restriction on Abortions (Section 507)



Legislative Mandates in Grants Management for FY 2022 (8-10)

Division H, Title V (cont'd):

8. Ban on Funding Human Embryo Research (Section 508)
9. Limitation on Use of Funds for Promotion of Legalization of Controlled Substances (Section 509)
10. Restriction of Pornography on Computer Networks (Section 520)



Legislative Mandates in Grants Management for FY 2022 (11-12)

Division H, Title V (cont'd):

11. Restriction on Purchase of Sterile Needles (Section 526)



Financial Conflict of Interest Policy

- Conflict of Interest Defined (45 CFR § 75.112)
 - A significant **financial interest** that could directly compromise or **bias** professional judgment and objectivity related to the management of federal financial assistance.
- HRSA award recipients are **REQUIRED** to have a written conflict of interest policy – **FOLLOW** it!
 - Outside activities, relationships, or financial interests – proper or improper?
 - What is the process of review?
 - How to address financial conflicts of interest?



Examples

- Use the reasonable person test: Would a reasonable person think that there is *or could be* a conflict of interest? Examples:
 - Accepting personal gratuities; Maintaining roles that conflict; Using or disclosing confidential information; One person overseeing all aspects of subcontracting or subawards; Conflicting employment outside the organization; Competing financial interests.
 - Report it! or possible additional conditions, suspension or debarment. HRSA will: Review; Respond; Add Terms and Conditions in Notice of Award if applicable.



Changes to 2 CFR 200

- 2 CFR 200 was updated – statutory requirements:
 - 2 CFR part 183 (effective Aug 13, 2020) – Never Contract with the Enemy; 2 CFR § 200.216 (effective Aug 13, 2020) – Prohibition on certain telecommunications and video surveillance services or equipment; Parts 25 and 200 to implement statutory changes to the Federal Awardee Performance and Integrity Information System (FAPIIS).
- We are waiting for guidance on implementing more updates, but HRSA recipients are still held accountable under 45 CFR 75.



UEI has Replaced DUNS®

The Federal Government has now adopted a new unique entity identifier (UEI), which will ultimately become the primary key to identify entities throughout the System for Award Management (SAM) and other downstream government systems.

- The DUNS® has been phased out as the primary key to identify every entity record within SAM.
- HRSA replaced the DUNS effective March 24, 2022, and the Federal Government on April 5, 2022.



OMB Memo M-18-24

(Reducing Grant Recipient Reporting Burden)

On January 1, 2020, SAM became the central repository for common government-wide certifications and representations required of federal grants recipients.

- The SF-424B has been gradually phased out.



Federal Awardee Performance and Integrity Information System (FAPIIS)

Overseen by the Office of Management and Budget (OMB) and the General Services Administration (GSA), FAPIIS provides access to:

- Integrity and performance information;
- Proceedings information from the System for Award Management (SAM) database;
- Suspension or debarment information from SAM.



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