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DEPARTMENT OF HEALTH AND HUMAN SERVICES





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Standardized RFR Submission Review and Approval Procedure August 7, 2023 Version 1.1

Changes indicated in red.

This procedure was written to create a standardized process for the handling of Requests for Reimbursement (RFRs) within the Bureau of Behavioral Health Wellness and Prevention (BBHWP). This document is meant to be shared with Bureau staff and subawardees and was based off the <u>DHHS Grant</u> <u>Instructions and Requirements (GIR)</u>. All font in blue reflects Bureau-specific language built into the GIR.

Information within this document is subject to change. Please ensure you're using the most updated version with the most recent date.

Upon subaward execution the following items must be sent to each subawardee:

- 1) Executed copy of the subaward
- 2) Section D Workbook
- 3) DHHS GIR
- 4) A copy of this procedure

RFRs may not be paid unless quarterly reports are up to date.

- Delay in payment of RFRs for this reason is at the discretion of the Bureau with the Bureau Chief's permission.
- If quarterly reports are not submitted on time, it is the Bureau's responsibility to proactively communicate with the subawardee regarding this requirement.

GIR-20-9 REQUEST FOR REIMBURSEMENT (RFR) INSTRUCTIONS

Definitions:

Equipment: Items valued at \$5,000 or more and a useful life of more than two years, with the exception of weapons, computers with licensed software, and software packages valued at \$5,000 or more, except for computers or software packages.

Requests for reimbursement (RFR): A document that is submitted each month by the subawardee to the Bureau for the approval and payment of programmatic expenditures in the previous month.

Reimbursement Submission Form: This form is found on the Bureau's website located here: <u>https://app.smartsheet.com/b/form/aca1b20a9d2648fc87613df1f80bd31d</u>. All RFRs must be submitted via this Smartsheet portal.

Subawardee: Partner of the BBHWP who is working alongside the Bureau to manage part or all of the respective program.

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Workbook: Pre-filled, formatted Excel mutli-tabbed workbook the Bureau provides subawardees to fill out to and submit to seek reimbursement for the previous month's expenditures.

- 1. The information provided on this report must reconcile with the Year-to-Date and Transaction List/Source Documentation Reports. The worksheet contains the same information that is within the subaward. All documents must reconcile to each other. If they do not reconcile, the RFR will be rejected for the subrecipient to determine the variance. This workbook is for subrecipient use and is their responsibility to verify formulas and information being submitted. Each RFR must be signed by the organization's authorized representative.
 - a. Upon execution of the subaward, the workbook should be provided to the subawardee.
 - i. The workbooks should not be locked. If your workbook is locked, please talk with your Bureau contact to have it unlocked.
 - ii. The appropriate tabs workbook will be prepared by the Bureau staff.
 - iii. The workbook should be maintained by the subawardees.
- 2. All Requests for Reimbursement must be submitted using the documents contained in the Request for Reimbursement Excel workbook format by the 15th of the month for the previous month, unless otherwise specified in the Notice of Subgrant Award (NOSA).
 - a. If no funds were expended in a month, a zero-dollar RFR must be submitted to the Bureau by the deadline.
 - b. RFRs must be submitted each month of the subaward period.
 - i. If the subaward period is 12 months, there should be 12 RFRs submitted.
 - ii. A 13th draw is allowed as the final draw at the end of the state fiscal year (SFY) but must be labeled "June FINAL" and submitted by the deadline to prevent a stale claim.
 - iii. If the "June FINAL" (or any other RFRs) are submitted after the year-end deadline, this payment is subject to a stale claim and will take up to 6 months for processing.
 - iv. June RFRs are always due on July 7th or the following Monday if July 7th falls on a weekend.
 - c. RFRs must be submitted via this Reimbursement Submission Form in the Smartsheet portal: <u>https://app.smartsheet.com/b/form/aca1b20a9d2648fc87613df1f80bd31d</u>
 - i. Subawardees must submit a signed PDF of the workbook cover page.
 - 1. The RFR will be rejected if it is not in PDF form and signed by the subawardee.

ii. All back up documentation should be attached with the signed cover page.

3. Request for Reimbursement Cover Page with Signature (2nd tab in workbook)

A. Approved Budget (Column A in Reimbursement Request tab): Approved Budget amounts must be populated based on the proposal and scope of work for the performance period of the subgrant. Any change to this amount must be approved in writing by the DHHS and requires a budget modification form (BMR) (10% or less of award) or an amendment (above 10%). The approved budget categories cannot be altered and are compliant with federal and state budgeting.

- a. All amounts in the RFR workbook must be based on the executed subaward.
- b. A budget modification of less than 10% of the total award can be done via email with your Bureau contact.
 - A budget modification request (BMR) form must be completed regardless of amount.
 - Emails indicating approved budget modifications of less than 10% should be saved in program files.
- c. Once a BMR is approved, the Bureau fiscal staff will update the workbook and resend to the subawardee.
 - o This new workbook must be used from that date forward for all future RFRs.

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- d. If the subawardee wishes to redirect funds to a line item that does not currently have any funds approved, a subaward amendment is required regardless of the amount.
 - This is due to a larger, more comprehensive change to the subaward.
 - Example: If there is not a line-item budget approved for Operating, but the subawardee needs to redirect 3% of the budget from Personnel to Operating, an amendment is required.

B. Total Prior Requests (Column B in Reimbursement Request tab): List the total expenditures for all previous reimbursement periods in this column, for each category, by entering the numbers found on Lines 1-8, Column D on the previous Request for Reimbursement/Advance form. If this is the first request for the contract period, the amount in this column equals zero. This amount should reconcile to the total of the amounts on the year-to-date report, sans the current month request.

a. Column B should equal Column D from the previous month's RFR.

C. Current Request (Column C in Reimbursement Request tab): List the current expenditures requested at this time for reimbursement in this column, for each category. Only current expenditures should be included as back up. The expenditures should be for the current month identified on the form. There should be only one PDF document with all the expenditures attached, in order, and documented as to what category they belong as part of the attachment.

a. Column C should match the year-to-date report and the transaction log.

D. Year to Date Total (Column D in Reimbursement Request tab): Adds Column B and Column C for each category.

E. Budget Balance (Column E in Reimbursement Request tab): Subtracts Column D from Column A for each category.

F. Percent Expended (Column F in Reimbursement Request tab): Divides Column D by Column A for each category and total. Monitor this column; it will help to determine if/when an amendment is necessary. Amendments MUST be completed (including all approving signatures) no later than 30 days prior to the end of the subgrant period. If an advance has been requested and approved, the second tab, Reimbursement Request – with Advance, will also have to be signed and completed. Each month under the "advanced pym recon" must be listed with the advance provided.

If there are no new advances for a month, the expended total should continue to deplete based on the current request (Column C), and the total funds advanced for that month should be zero. The months should be in order. If requesting a new advance, the form should be completed as if an award was being made in the month of the request. Please consult with program manager for detail. The "match reporting" must be modified to account for each month of advance. This area can have rows added until the match is met.

a. Amount determined in Column E cannot exceed 100%.

If amount is more than 100%, a BMR or amendment is needed (refer to 3A). BBHWP does not allow for advanced payments.

4. Year-to-Date Report: The information to be completed in this report must reconcile with the Request for Reimbursement (RFR) cover sheet. Starting with Section I, enter the information from the approved budget into this worksheet. Within the personnel category, please use one line per employee. For example, if you have five (5) Counselors, do not total them together. Use one line for each staff member, providing their last name and the amount for which you are budgeted annually. Expenditures in categories that are broken into sub-categories in the subaward document must be

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listed individually. In Section II, for each month, enter the total for the sub-category in each line. These dollar amounts must reconcile with the individual expenses listed on the Transaction List/Source Documentation. (3rd tab in workbook)

- a. Year-to-Date Report must be in PDF format and included in the backup documentation behind the signed cover page.
 - i. If it comes in Excel, Bureau staff should convert to PDF, and provide technical assistance to the subawardee regarding the correct way to submit in the future.
- b. Budget that is in subaward must match the Year-to-Date Report.
- c. Staffing changes should be included in the Year-to-Date Report line item by adding a line showing where one staff person leaves, and the next incumbent begins.
 - i. This can be done for other line items, as well, such as travel, contractual, etc.

5. Transaction List and Source Documentation: To be reimbursed for allowable expenses, the subrecipient must list each expenditure being requested in the appropriate category on the Transaction List monthly. Expenditures that are cost allocated to other funding streams must also include the funding allocation in columns to the right of the Total Cost. Upon submission of this document, the requester certifies that all source documentation is being maintained appropriately as required by 2 CFR 200.302. The source documentation must be specific to provide the documentation as required by 2 CFR 200.302. Subrecipients are not permitted to request reimbursement of expenditures on federal or state awards for any individual or contractor that has been debarred or suspended by a federal agency. To ensure no funds are paid to individuals or organizations that are on the Suspended and Debarred list, the subrecipient is required to search the Exclusions Database, Office of Inspector General, US Department of Health and Human Service for all contractors and employees, print the page that returns from the search, and maintain copy with grant file and/or contract for audit purposes. Subrecipients will be responsible to refund any monies paid to any individual or contractor who is included in the Exclusion Database. (4th tab in workbook)

For access to the site: https://exclusions.oig.hhs.gov/. Source Documentation to be Maintained by Subrecipient:

<u>Personnel:</u> Includes activity-based timesheets and/or the actual pay stubs that show all the deductions and hours worked by the employee. If the employee is not a 100% funded position, the notations must identify what other funds are paying the additional hours. Documentation must identify employer paid expenses. The Department reserves the right to request proof of payment of employer paid expenses.

- a) Proof of time tracking if staff are not 100 percent paid out of one funding source.
 - i. The Transaction Log and Source Documents tab of the Workbook must be filled out unless the subgrantee can produce a report that details the required data points as shown on the Transaction Log and Source Document tab.
 - ii. BBHWP must approve (via email request from the subawardee) the report that would take the place of the Transaction Log and Source Document tab.
 - iii. BBHWP reserves the right to request the Transaction Log and Source Document tab, as necessary.
- b) Supervisor signatures are required on timecards and/or time and effort documents.
 - i. Confirming supervisor at this step is not necessary and should be included in the site monitor when discussing organizational charts.

<u>Travel/Training</u>: Documentation includes mileage logs, invoices, training description, registration, agendas, receipts, and State Travel Reimbursement Form., or equivalent. In many instances travel and training expenditures require prior approval – see subaward and/or Program Manager for specifics.

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- a) The Section D RFR Workbook has a tab with the travel claim. Only this travel claim will be accepted with RFRs.
- b) All travel must adhere to General Services Administration standards.
 - i. If GSA rates cannot be maintained, justification is needed in the back-up documentation.
 - ii. A justification statement must include why travel is necessary during those dates/times, why the less expensive hotel option cannot be chosen, etc.
- c) Travel should be included in the original subaward. If planned travel is not in the original subaward, Bureau needs to sign off prior to travel occurring.
- d) However, if travel needs are urgent, and the subawardee feels it is within the scope of work of the subaward, the subawardee may travel at their own discretion as far as funding allows.
 - i. A justification statement is required explaining the critical and urgent need for the travel. This statement should be included with the subawardee's travel reimbursement request within the RFR.
 - ii. Bureau staff can approve urgent travel expenses at their discretion if it is within the approved travel budget and within the approved scope of work.
- e) Backup documentation must support the travel claim. Required backup documents for each travel claim include:
 - i. Receipts for:
 - a) Lodging
 - b) Ground Transportation
 - c) Baggage
 - d) Parking
 - e) Flights
 - f) Rental cars
 - g) Fuel for rental car
 - ii. Google Map (or equivalent) indicating mileage driven by subawardee or personal car.
 - iii. Tips should be covered by \$5 per day incidental rate. Additional tips will not be reimbursed. This includes tips for meals, bell hop, Uber, etc.
 - iv. Receipts for meals and incidentals are not needed.
 - v. If indicated on event agenda or hotel reservation that breakfast (<u>not</u> including continental breakfast) is served, breakfast cannot be reimbursed.
 - a) Justification is needed for food allergies, religious exemptions, or the exceptions.
- f) Mileage reimbursement must be from the duty station (subawardee address or out stationed location) to the place of travel.
 - i. Outstationed locations can only be considered for permanent outstationed employees of the subawardee. The subawardee is required to report this to the Bureau upon subaward negotiations and should maintain this documentation with the Bureau upon staffing changes.

<u>Operating</u>: Documentation includes all procurement material, purchase order, invoices, receipts, etc. For expenses paid through a revolving credit account, the Department reserves the right to request proof of payment to that account.

- a) Receipts must show proof of operating expenses.
- b) Must reflect cost allocation, if needed, based on approved subaward.
- c) If the subawardee is cost allocating expenses, this must be documented on the budget and RFR very clearly.

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<u>Equipment:</u> Documentation includes all procurement material, inventory and disposition, purchase order, invoices, receipts, etc.

- a) All computers purchased with funds must be assigned to a staff person funded with the same award. When a purchase is made, the staff person that is assigned the computer must be indicated on the computer receipt.
- b) Costs must be appropriate. Reimbursement of equipment over \$4,999.99 and all computer purchases must include three quotes from appropriate vendors.
- c) RFRs for equipment will not be reimbursed at a higher rate than what is budgeted in the subaward budget.
 - a. If a higher rate is unavoidable, a proper justification must be included with the RFR.
- d) Items that should be reimbursed as equipment (as defined on page 1):
 - i. Computers
 - ii. Laptops
 - iii. File servers
 - iv. Telephone systems
 - v. Other computer-related are deemed equipment.

<u>Contractual</u>: Documentation includes all procurement material, licensing, insurance requirements, invoices, etc.

- a) Proof of payment of invoices must be included with RFR.
- b) Brief description of activities provided must be included with invoice.
- c) Contractual line items in the RFR must be indicated in the executed subaward budget.

<u>Other Expenses</u>: Documentation includes all procurement material, purchase order, invoices, receipts, etc.

- a) Fee For Service requires spreadsheet with backup documentation with detailed encounter data. Payment is only allowed for uninsured individuals or uncovered benefits.
- b) Proof of funds spent and payment must be included with RFR.
- c) Subrecipients that have been awarded a fee for service subaward must comply with the Division's Utilization Management policy and the following billing and eligibility rules for claims processing.
 - i. For substance use services:
 - 1. The service must be delivered at a Division-certified facility.
 - 2. The certifications must cover the service levels under which the qualified service was delivered.
 - 3. The rate of reimbursement will be based on the Division approved rates (available upon request).
 - ii. For all fee-for-service:
 - 1. If an established rate study isn't in place within the Division, Nevada Medicaid rates must be utilized for fee-for-service reimbursement.
 - 2. The service must be provided by an appropriately licensed/certified staff member.
 - 3. The service delivered must be a Division-qualified service which is <u>NOT</u> reimbursable by Medicaid or other third-party insurance carrier.
 - 4. The subrecipient agrees to accept the Division reimbursement rate as full payment for any program eligible services provided.
 - 5. The subrecipient is responsible for ensuring that all third-party liabilities are billed and collected from the third-party payers and are <u>NOT</u> billed to the Division.

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- 6. Division funds will <u>NOT</u> be used to fund the services for self-pay clients or clients who elect not to use their insurance coverages. This includes clients that elect not sign up for insurance under the ACA [Affordable Care Act] or clients that have existing insurance and choose not to use their insurance for treatment services. In certain circumstances and upon written request to the Division, some services may be covered if an undue barrier to treatment exists.
- 7. Division funds will <u>NOT</u> be used to reimburse Medicare claims.
- 8. Division funds will <u>NOT</u> be used to reimburse claims for which the client is pending eligibility for insurance coverage.
- 9. Division funds will <u>NOT</u> be used to reimburse for claims denied by Medicaid or other insurance
 - a. carriers unless the claim was denied as "not a covered benefit".
- Claims denied as "not a covered benefit" and billed to the Division must have the

 accompanying denial attached in order to guarantee payment.
- 11. Division funds will <u>NOT</u> be used to cover any unpaid costs that Medicaid and/or other insurance carriers may not reimburse (i.e., copayments, deductibles).
- 12. The subrecipient agrees to use Division funds as the absolute "payer of last resort" for all services provided to clients. If an undue barrier to treatment exists, a written request to the Division may be submitted for review and some services may be covered upon written permission from the Division.

Indirect Expenses: The indirect cost rate may be used for expenditures that are not easily identifiable to one funding source. A subrecipient using an indirect rate may not request expenditures as direct costs that are indirect in nature (see Indirect (F&A) Definition at 2 CFR 200.414) and must comply with 2 CFR Section 200.68 for the Modified Total Direct Costs (MTDC) which consists of all direct costs (expenditures) less certain categories of exclusions.

- a) No back-up documentation is required to be submitted for indirect, however documentation must be kept at subawardee level to identify what is being charged to the indirect line item.
- b) The indirect being claimed must match the approved indirect rate on the executed award.
- c) When processing each RFR, the indirect must be calculated and verified by staff.

6. Training Breakdown: The training breakdown is specific to any travel, mileage or other expense incurred and must be reported for each employee with the appropriate source documentation. Source documentation includes copies of parking receipts, registration information, etc. All training travel must be approved by Program manager, in advance, if not specifically defined in the grant award.

- a) If training dollars are included in the executed subgrant, this tab on the workbook is required with each RFR that training expenditures are being claimed.
 *If not, the tab can be hidden or omitted.
 - Name of Staff
 - Brief description (name of training and location)
 - Dates of training relating to travel
 - Other expenses (registration)
 - Amount
- b) Proof of expenditures for the training, such as receipts and proof of payment, are required to support the items listed in the tab.

7. Travel Claims: This is a summary of the travel claim(s) submitted. Please provide the name(s) of the traveler(s), date(s) of travel and the amount being claimed. The total at the bottom of the form should reconcile with the amount you have submitted on your RFR. TRAVEL CLAIMS / TRAVEL BREAKDOWN: If

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reimbursement for any travel-related expenses is requested, Travel Claims and the travel breakdown information must accompany this worksheet. Additional travel claims may be added to the worksheet, as needed. Please remember that the worksheet submitted each month should only contain backup information for items that are included within that month's expenses. This form may be used for submitting backup documentation required for travel and training related travel. New tabs may be created and copied for multiple claims. For claims submitted electronically, please indicate "SIGNATURE ON FILE" on the signature line. All backup documents (e.g., hotel receipts, airfare, rental cars, parking, etc.) and the claim with the original signatures must be available for review during site-visits. All travel must be identified in the budget request and be specific for the travel approved. Any additional travel out of the county must be approved by the Program manager. All travel must comply with the organization's travel policy but cannot be less restrictive than the General Services Administration (GSA) regulations. If an organization does not have a travel policy, the State travel policy is applicable. A subrecipient organization that is able to generate system reports that duplicate all information for numbers 4, 5 and 7 may submit a request to the Department for consideration to use an alternate report.

- a) If travel dollars are included in the executed subgrant, this tab on the workbook is required with each RFR for each person with travel expenditures. This could result in more than one travel claim submitted with the RFR.
 - *If not, the tab can be hidden or omitted.
- b) Proof of expenditures for the training, such as receipts and proof of payment, are required to support the items listed in the tab. (See Section 6)

8. In-Kind Match: This form must be used when reporting required Match. Complete the Reported Match column for each month, additionally, complete the Match column (with months) to provide a total overview of match-to-date. Reported match may not include unallowable expenses, expenditures that have been reimbursed by a federal grant, expenditures that have previously been used for match or maintenance of effort purposes.

a) Based on the original funding source, some entities are required to report "match". This tab in the workbook is required to be completed for those entities.

i. The PATH federal grant requires subawardees to report match within their subaward. *If not, this tab can be hidden or omitted.

9. Budget Modification Form (BMR): The Budget Modification Form is a form used to request approval to redirect/modify the awarded budget that is less than 10% of the total awarded budget. All transfers between budget categories requires notification and approval. Complete the fields to depict the original or amended budget, the amount of change and the revised budget. The subrecipient must justify requested modifications and explain how it impacts associated objectives and goals of the award. The justification must be specific by category to provide the Department with the information as to why the subgrantee is requesting the change and how it will ensure compliance with the funding purpose and support the performance metrics and goals defined. No action can be taken regarding the budget modification until the state approves the modification.

a) The BMR is not a required document within the RFR.

b) The BMR must be completed and submitted by the subawardee to the Bureau program/fiscal staff to request a budget modification prior to expenditures. This includes moving money within and in-between categories.

1. If a category wasn't executed with dollars associated to it, and a modification is being requested to add money into that category, an amendment is required. Bureau staff must approve or deny this request for an amendment.

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2. If money is being requested to be moved around categories that have dollars associated with it, and it doesn't change the scope of work, and is under 10% of full award, this can be approved by Staff without an amendment. Bureau staff must approve or deny this request for a budget modification.

3. Staff must make decisions on whether to accept the budget modifications from the subawardee. Things to consider:

- Timing
- Appropriateness of funds
- Intent

c) Staff must review and work with their supervisor (if needed) to approve or deny the request.

d) Expenditures cannot be done prior to receiving approval from Bureau staff on a budget modification.

e) If approved, Bureau staff must update all fiscal documents to reflect the approved modification:

- Declining Balance Sheet
- Reconciliation
- RFR coversheet/Section D Workbook

f) Amendments are processed by the Bureau through a similar procedure as used in subaward initiation

g) Amendments should be avoided in the last quarter of the subaward.

1. Approvals for amendment is the last quarter of the subaward will be at the discretion of the Section Manager.

Helpful hints:

- Food, including water, cannot be purchased with any federal funds.
- Reimbursement for firearms is not allowed.
- Reimbursement for vehicle purchases is not allowed.
 - We can reimburse for mileage as described in this document.

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