



OFFICE OF
PREPAREDNESS
AND EMERGENCY
MANAGEMENT

GRANTS MANAGEMENT MANUAL

Budget Period 1

July 1, 2017 to June 30, 2018

Issued By:

Massachusetts Department of Public Health

Office of Preparedness and Emergency Management

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Section 1: Introduction and General Information

The purpose of the 2017-2022 Assistant Secretary for Preparedness and Response (ASPR) Hospital Preparedness Program (HPP) – Centers for Disease Control and Prevention (CDC) Public Health Emergency Preparedness (PHEP) Cooperative Agreement is to provide technical assistance and resources that support state, local, territorial, and tribal public health departments and healthcare systems/organizations in demonstrating measurable, sustainable progress toward achieving public health and healthcare preparedness capabilities that promote prepared and resilient communities. To support these goals, the Massachusetts Department of Public Health Office of Preparedness and Emergency Management (DPH OPEM) awards contracts to Health and Medical Coordinating Coalition (HMCC) Sponsoring Organizations for HPP and PHEP program implementation activities focused on development of the capabilities. Sponsoring Organizations are expected to use these state and federal funds to build and sustain the capabilities, ensuring that the preparedness funds are directed to priority areas within their jurisdictions. Sponsoring Organizations must demonstrate measurable and sustainable progress toward achieving all the preparedness capabilities over the five-year project period.

Cross-cutting HPP and PHEP activities should be managed, coordinated, and integrated where applicable. To further advance public health and healthcare preparedness, Sponsoring Organizations should consider organizing their programs to align and integrate with jurisdictional preparedness planning priorities. Establishing such an organizational structure will help assure public health and healthcare preparedness program components are integrated and associated requirements are achieved, helping to assure more effective coordination, administration, and oversight of strategic and tactical program implementation activities. Grant alignment efforts are intended to maintain the uniqueness of each program, while ensuring both programs are jointly planning, exercising, and implementing program operations in a more coordinated fashion.

Activities undertaken with these funds must be in accordance with the Public Health Preparedness Capabilities: National Standards for State and Local Planning issued by the CDC in March 2011 and the 2017-2022 Health Care Preparedness and Response Capabilities issued by the ASPR in 2016.

The PHEP and HPP award is based on the application submitted to and approved by CDC and ASPR and are subject to the terms and conditions incorporated either directly or by reference in the following:

1. [PAHPR Reauthorization Act of 2013, Public Law No. 113-5](#).
2. The restrictions on the expenditure of federal funds in appropriations acts to the extent those restrictions are pertinent to the award.
3. All entities: 2 CFR 200.69 (A-133); state, local and tribal governments: 45 CFR 92 (A-102), 2 CFR 225 (A-87); educational institutions: 45 CFR 74 (A-110), 2CFR 220 (A-21); hospitals or other non-profit organizations: 45 CFR 74 (A-110), 2 CFR 230 (A-122).
4. The US Department of Health and Human Services (HHS) Grant Policy Statement, including all appendices in effect at the start of the grant period (Publication Date: January 1, 2007).
5. All terms and conditions in the Notice of Grant Award.

6. All Commonwealth of Massachusetts laws, rules, regulations, and guidelines applicable to grant funding and procurement.
7. All policies and procedures that the Sponsoring Organization has set up to comply with State and Federal rules and regulations.

Section 2: Contract Administration

Contract Conditions. All entities receiving funding, either through a direct award or subcontract are required to abide by their contract terms, the [Commonwealth Terms and Conditions](#) and the provisions set forth in this manual.

Standard Contract Form. A Standard Contractual Form must be signed by the person who has the authority to bind the Sponsoring Organization into a contract with the Commonwealth.

Signatory Authorization Form. Sponsoring Organizations must provide a listing of individuals on the Contractor Authorized Signatory Listing (Appendix A) who are authorized as legal representatives of the organization who can sign contracts and other legally binding documents related to the contract on the organization's behalf. This person is normally designated formally by the organization's governing body, charter, or Articles of Organization. This form should be re-filed whenever the authorized signatory changes.

Contract start date. The effective start date shall be the date indicated on the Standard Contract Form. The fiscal year is July 1st through June 30th.

Internal control. An Internal Control plan is required of all contracted parties receiving federal funding under the OMB Uniform Guidance (formerly OMB Circular A-133 requirements). An internal control plan encompasses the highest-level goals and risks of the grantee. This high level guide must be supported by lower level detail, specifically grantee policies and procedures. The internal control plan shall demonstrate a willingness to maintain written procedures that minimize the time elapsing between the receipt of funds and the disbursement of funds. Effective control and accountability must be maintained for all grant cash, real and personal property, and other assets. The Sponsoring Organization must adequately safeguard all such property and must assure that it is used solely for authorized purposes.

Payment process. Payments will be made directly to each Sponsoring Organization. Payment Vouchers will be provided to the Sponsoring Organization and a signed, original payment voucher must be received by DPH OPEM to process payment. Electronic signatures are not acceptable. DPH OPEM will make every effort to notify programs of upcoming payments, but Sponsoring Organizations can also check upcoming payments and payment history at <http://massfinance.state.ma.us>

Payment vouchers shall be mailed to DPH OPEM, 250 Washington Street, Boston MA 02108.

To ensure compliance with federal requirements, payments will be disbursed in five allotments. Payments 1-4 will be consistent with the funding allocated in each quarter of the BP1 approved

budget. The final payment will be based on projected year end expenses. The target payment dates for vouchers are as follows:

1 st Payment	July 1, 2017
2 nd Payment	October 1, 2017
3 rd Payment	January 1, 2018
4 th Payment	April 1, 2018
Final Payment	Determined based on end of year projected spending

Sub-recipients. Sub-recipient means a non-Federal entity that receives a sub award from a pass-through entity to carry out part of a Federal program, but does not include an individual that is a beneficiary of such program. A sub-recipient may also be a recipient of other Federal awards directly from a Federal awarding agency. Any funding that is awarded from the sub-recipient to another entity will necessitate the need for that entity to comply with the same requirements and restrictions as the sub-recipient.

Subcontracts. Any contract entered into by a sub-recipient for the purposes of fulfilling the obligations or responsibilities outlined in their scope of work, must be in writing, authorized in advance by DPH OPEM following submission of the Subcontractor Identification List and shall be consistent with and subject to the provisions of the Commonwealth Terms and Conditions. See additional details in Section 5.

Subcontracts will not relieve or discharge a Sponsoring Organization from any duty, obligation, responsibility, or liability arising under a contract. The Department is entitled to copies of all subcontracts and shall not be bound by any provisions contained in a subcontract to which it is not a party.

Reporting of violations (fraud, waste, and abuse). It is the responsibility of all grant sub-recipients and their respective agency personnel, grantees, sub-grantees, and contractors under grants, to report to DPH OPEM or other responsible officers any alleged violations, serious irregularities, sensitive issues, or overt or covert acts that would use public funds or perform program or administrative requirements not consistent with grantor agency rules and regulations, related laws and/or regulations, appropriate guidelines, or purposes or objectives of the grant. The Office of the Inspector General of Massachusetts may be reached by phone at 1-800-322-1323 or email at MA-IGO-General-Mail@massmail.state.ma.us. The Health and Human Services (HHS) Inspector General may be reached at 1-800-HHS-TIPS or <http://oig.hhs.gov/fraud/report-fraud/>.

Site visits. DPH OPEM is responsible for sufficient oversight to ensure that federal and state funds are spent in accordance with grant requirements. As part of its obligation to monitor contracts, DPH OPEM may request annual site visits to review the fiscal/program records and practices of any funded program. The Sponsoring Organization is required to maintain records, books, files, and all data related to program operations. These records must be retained by the Sponsoring Organization

throughout the duration of their contract (including multi-years), and for the subsequent six years following the termination of the contract.

Program monitoring and evaluation. DPH OPEM will monitor the performance of each Sponsoring Organization through bi-annual management evaluations and financial reviews, ongoing data reviews, reviews of performance measures, annual site visits and vendor monitoring reports. DPH OPEM expects the Sponsoring Organization to self-evaluate its progress in meeting program performance standards and desired results. Additionally, it is the expectation that each Sponsoring Organization will evaluate its own progress and the progress of all sub-recipients awarded from this grant. DPH OPEM staff provides technical assistance, as needed, for Sponsoring Organizations to meet performance standards on program deliverables and fiscal reporting.

Based on Sponsoring Organization performance and/or findings at the bi-annual management evaluations, more frequent monitoring may be required. Sponsoring Organizations that fail to achieve 90% satisfactory performance on program deliverables and fiscal reporting may be placed on conditional status for one year at the discretion of DPH OPEM. A Sponsoring Organization placed on conditional status must develop and implement a corrective action plan in conjunction with DPH OPEM. If, at a subsequent management evaluation review, the Sponsoring Organization continues to fail to meet 90% of satisfactory performance on program deliverables and fiscal reporting satisfactorily, DPH OPEM may choose to procure another provider for Sponsoring Organization services in that region.

Contract termination. DPH OPEM may terminate a contract without cause or penalty or may terminate or suspend a contract if the contractor breaches any material term or condition or fails to perform or fulfill any material obligations required by a contract, or in the event of an elimination of an appropriation or availability of sufficient funds for the purposes of a Contract, or in the event of an unforeseen public emergency mandating immediate Department action.

Section 3: Administrative Responsibilities and Reporting

The Administrative responsibilities of the Sponsoring Organization include but are not limited to:

Contract documents. Complete all contractual and related documents required by DPH OPEM, including but not limited to amendments, budgets, work plans, subcontractor identification lists, expenditure requests, fiscal, and program reports.

Sub-recipients. Provide coordination, administrative, and fiscal support, and manage subcontracts with/for local health coalitions, hospitals, and Medical Reserve Corps (MRCs). Track progress of deliverables and submit required reports on deliverables to DPH OPEM. Support local health coalitions, hospitals, and MRCs as they prepare an annual work plan and budget, and review individual expenditures as outlined by DPH OPEM.

Reporting. Submit Quarterly Expenditure Reports and quarterly progress reports to DPH OPEM fiscal and programmatic staff, using the format and timelines (Section 4) specified by DPH OPEM.

Succession. Inform DPH OPEM of changes in senior personnel that are critical to Sponsoring Organization operation and identify a transition plan to address continuation of critical functions.

Responsiveness. Ensure timely response to DPH OPEM inquiries and requests. Provide information as requested for CDC/ASPR according to timeframes specified by the PHEP/HPP Agreements. Timeframes are subject to change by PHEP/HPP.

Section 4: Fiscal Responsibilities and Reporting

The fiscal responsibilities of the Sponsoring Organization include but are not limited to:

Budgets. The budget template is required for all budget submissions. Sponsoring Organizations are required to submit budgets for all sub-recipients within their region. Any sub-recipients budgeted to receive Federal or state funds, equipment, services, training reimbursements, or other support must be an active participant in their emergency preparedness program and be current in deliverables.

Quarterly expenditure reports. The accurate and timely reporting of fiscal information is a deliverable of all DPH contracts. Sub-recipients bill the Department for services rendered by submitting Quarterly Expenditure Reports (QER). Although sub-recipients are paid prior to reporting expenses, the QER functions as an invoice to bill the contract. Failure to complete and submit timely reports may result in a delay in payment to the Sponsoring Organization.

QERs must provide a level of detail that clearly indicates on how the funds were spent. Submitted reports are reviewed carefully by DPH OPEM, first for procedural or mathematical errors, and second, for programmatic concerns to ensure that spending has followed principles of sound fiscal management and is tied to the deliverables and tasks as outlined within the approved work plan. Documentation that does not provide this level of detail will be reviewed with the Sponsoring Organization for clarification. A signature by DPH OPEM indicates approval of the QER.

The QER is used to indicate expenses incurred by the Sponsoring Organization, or other sub-recipients, in each quarter. An expense is incurred when services are rendered or goods received, regardless of when the bill is received or paid. For example, if office supplies are delivered in September, but the bill does not arrive until October, the supplies are still considered a first Quarter expense. For the fourth quarter QER, only spending for items received or services performed before June 30th are allowable. Encumbrances or open purchase orders for which goods have not been received before June 30th cannot be included in the fourth QER and will not be paid.

If an approved budget item(s) cost is higher than expected; money may be shifted between categories to cover the overage(s) provided the shifted money does not exceed 10% of the budget of the category where the overage was incurred. A negative balance in any line item is the sole responsibility of the sub-recipient. Additionally, DPH OPEM cannot be responsible for expenses that exceed the Maximum Obligation.

Accounting records. The record keeping systems employed by contractors and subcontractors participating in the Commonwealth's Purchase of Service system must adequately document contractor activities and meet financial and program reporting requirements. The Commonwealth of Massachusetts Operational Services Division (OSD) has established record keeping requirements which are consistent with relevant industry standards as specified by

Generally Accepted Accounting Principles (GAAP). Failure to maintain adequate documentation upon inspection or audit may result in certain penalties, as listed in 808 CMR 1.04(11).

Funds received and approved in advance of expenditure by a sub-recipient for a capital budget item must be held in a segregated non-interest bearing account and must be expended within 60 days¹ (for policy on spending capital funds: Office of the State Comptroller, State Grants and Federal Sub-grants: <http://www.mass.gov/osc/publications-and-reports/policies/>).

Internal control. An Internal Control plan is required of all contracted parties receiving federal funding per the OMB Uniform Guidance (formerly OMB Circular A-133 requirements). An internal control plan encompasses the highest-level goals and risks of the grantee. This high level guide must be supported by lower level detail, specifically grantee policies and procedures. The internal control plan shall demonstrate a willingness to maintain written procedures that minimize the time elapsing between the transfer of funds and the disbursement of funds. Effective control and accountability must be maintained for all grant cash, real and personal property, and other assets. The Sponsoring Organization must adequately safeguard all such property and must assure that it is used solely for authorized purposes.

Budget control. Actual expenditures must be tracked against an approved budget.

Budget modifications. There will be three modifications allowed: at the end of the first quarter, mid-year, and prior to year-end. The Sponsoring Organization, and other sub-recipients, shall include a justification that includes details regarding which line item the funding is coming from and why the funds are not needed for the originally budgeted activity purchase. Retroactive budget modifications are not allowed.

Allowable costs. Applicable federal Office of Management and Budget (OMB) cost principles, agency program regulations, and terms of grant and sub grant agreements will be followed in determining whether costs are reasonable, allowable, and appropriately allocated. Refer to Section 7, Principles for Allowable Program Expenses for additional information.

Source documentation. Accounting records must be supported by such source documentation as cancelled checks, paid bills, payroll records, time and attendance records, contract and grant award documents, etc.

Fixed assets. Fixed assets are defined by the Commonwealth of Massachusetts Office of the Comptroller as singular assets (including infrastructure) such as equipment, furniture, computer software and all electrical and computer components with a useful life of more than one year and with a cost between \$1,000- \$49,999.

Sponsoring Organizations must establish and maintain a record for proper inventory control for any fixed asset purchased with emergency preparedness funds that costs \$1,000 or more and has a useful

¹Policy on spending capital funds: Office of the State Comptroller State Federal Grant Policies, see **Process Requirements for Awards of Discretionary Grant Funding** 2 (h) and **Grant Payments and Compensation & Grant Management and Close Out**).

The regulation for capital budget can be found in the administration of grants governed by 808 CMR 1.00.

life of one year or more (see Fixed Asset Inventory Report – Appendix B). The inventory tracking system must include the date of purchase; serial number or other unique identifier for each item purchased; address where the item is located; name of the person responsible for maintaining the item; date and reason item was moved or removed from service with exact disposition of location, e.g. storage, another department or entity; and other information as determined by DPH OPEM.

Fixed assets must be periodically verified to insure that information in the database is correct and up to date and also that materials remain in service. Assets will also be randomly selected for inspection during annual site visits.

Capital Assets Requests. The Federal Office of Management and Budget has established a capital threshold of \$5,000 for articles of nonexpendable, tangible personal property having a useful life of more than one year such as information technology hardware, software and modifications. Pre-approval by DPH OPEM is required for purchase of a capital asset (Appendix C).

Acknowledgement. All emergency preparedness educational and training materials developed or procured by the Sponsoring Organization with funding under this grant must be consistent with national and statewide standards and guidelines, e.g., CDCs PHEP Capabilities, ASPRs HPP Capabilities, National Incident Management System, and the Core Competencies for Public Health. In addition, all documents developed must include the following at the end of the publication:

This publication (journal article, etc.) was supported by the Cooperative Agreement Number CDC-RFA-TP17-1701 from the Centers for Disease Control and Prevention and/or Assistant Secretary for Preparedness and Response. Its contents are solely the responsibility of the authors and do not necessarily represent the official views of the CDC and/or ASPR.

A copy of the publication must be submitted to DPH OPEM forty five (45) days prior to submission for publication.

If a conference or training is funded with HPP and/or PHEP funds, the following statement must be included on conference materials, including promotional materials, agenda, and internet sites:

Funding for this conference was made possible (in whole or in part) by the Centers for Disease Control and Prevention and/or the Assistant Secretary for Preparedness and Response. The views expressed in written conference materials or publications and by speakers and moderators do not necessarily reflect the official policies of the Department of Health and Human Services, nor does the mention of trade names, commercial practices, or organizations imply endorsement by the U.S. Government.

The HHS, CDC, ASPR or DPH logo cannot be used on conference materials without express written consent of DPH OPEM and the CDC Project Officer, CDC Grants Management Officer, or ASPR Project Officer. For those wanting to obtain permission for this please contact the Public Health and Preparedness Response Manager or Hospital Preparedness Response Manager.

Distribution of funds. Funds tied to an approved workplan and budget may be distributed, as directed by DPH OPEM, from the Sponsoring Organization using a centralized or decentralized method of disbursement to support emergency preparedness planning and response activities.

The centralized method involves the Sponsoring Organization holding the funds and making payments on behalf of the sub-recipient based on a DPH OPEM approved workplan and budget. DPH OPEM recommends utilizing the centralized method of disbursement.

The decentralized method involves the Sponsoring Organization making allocations based on an approved DPH OPEM workplan and budget.

The Sponsoring Organization is responsible for ensuring all funds released to funded entities are properly utilized in support of approved activities.

Sponsoring Organizations are advised to speak with their certified public accountant to understand the auditing requirements in the OMB Uniform Guidance (formerly the OMB Circular 133 requirements) as they pertain to a centralized or decentralized method of fund disbursement.

Program income. Any program income generated under this cooperative agreement shall be used in accordance with the additional costs alternative. By using the additional cost alternative, a Sponsoring Organization uses program income funds in addition to any Federal and non-Federal funds to support an emergency preparedness project. These funds are used for expansion of the project. The disposition of program income must have prior written approval from DPH OPEM and the CDC and ASPR Grants Management Officer.

Fiscal Reporting Dates:

Expenditure reports: Required from each Sponsoring Organization for each budget submitted.

Quarterly expenditure reports shall be sent via email to dphhmcc@massmail.state.ma.us.

1 st Quarter (July 1- Sep 30)	October 27, 2017
2 nd Quarter (Oct 1-Dec 31)	January 26, 2018
3 rd Quarter (Jan 1- Mar 31)	April 27, 2018
4 th Quarter (Apr 1-Jun 30)	July 27, 2018

Budget modifications: Allowed three times during the fiscal year. Budget modifications shall be sent via email to: dphhmcc@massmail.state.ma.us

1 st Modification:	September 1, 2017
2 nd Modification:	December 1, 2017
3 rd Modification:	March 2, 2018

Fixed asset inventory report: The report shall include all purchases that qualify as a fixed asset.

The Fixed Asset Inventory Report shall be sent via email to: dphhmcc@massmail.state.ma.us

Fixed Asset Inventory Report:	June 29, 2018
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Section 5: Subcontracts

All sub-recipient subcontracts, must:

- Be submitted to DPH OPEM for approval prior to execution.
- Be comprised of a contractual agreement, a scope of service tied to a DPH OPEM approved sub-recipient budget, and if subcontract is with an individual, a resume.
- Contain a justification to demonstrate how the subcontract rate has been calculated.
- Contain language that the subcontractor will be held accountable to the applicable Commonwealth Terms and Conditions. Be listed on the DPH Purchase of Service Office Subcontractor Identification (Appendix D)
- Be obtained through a competitive process and in compliance with sound business practices. Please refer to the General Laws of Massachusetts; Chapter 30B for Procuring Supplies, Services and Real Property. <http://www.mass.gov/ig/publications/manuals/30bmanl.pdf>.
- Sub-recipients and subcontractors shall be solely liable for subcontracts which do not comply with the provisions of this section.

The Sponsoring Organization must:

- Resubmit the Subcontractor Identification List if there are any changes in the subcontractor entities or dollar amounts to already identified subcontractors.
- Ensure that all subcontractors are legal entities and eligible to conduct business with the Commonwealth.
- Ensure that the subcontracted providers submit timely monthly billing.
- Ensure that payments to subcontracted providers are processed within 30 days of receipt of invoices.

Please note: if a Sponsoring Organization has previously subcontracted for services, it does not need to re-bid those services each year if it can document that the original process was competitive. DPH OPEM requires that Sponsoring Organizations review any subcontracts for services in place for three to five years to determine whether re-opening the procurement of services could achieve lower costs or enhanced services.

Section 6: Contract Budgets

The DPH OPEM budget template is required for all budget submissions. Sponsoring Organizations are required to submit budgets for all sub-recipients within their region. All coalition level budgets that include community allocations must have detailed out those expenditures in the categories within the budget template. Any un-budgeted dollars may not be expended or distributed until a budget modification has taken place. Any sub-recipient budgeted to receive Federal or state funds, equipment, services, training reimbursements, or other support must be an active participant in the emergency preparedness program that funds it and be current in deliverables. Contract budgets must be directly related to supporting or enhancing public health and healthcare emergency preparedness

capabilities, and consistent with and within the scope of the federal grant guidance, MRC Funding Guidelines, DPH deliverables, and the OPEM Grants Management Manual.

Contract budgets are organized by direct and indirect costs.

Direct costs. Expenditures related to administration and support activities which are directly related to the emergency preparedness program are direct costs. These include:

Salary and Wages. This portion of the budget represents salaries and wages for all personnel to implement the contract and for whom payroll taxes are paid.

Fringe. Fringe benefits include health insurance, pension contributions, payroll taxes and all other non-salary/wage benefits received by budgeted staff. This does not include sick, personal or vacation time, which should be contained within the salary line. The fringe line should reflect the proportion of the staff salary supported by the contract.

Travel. Travel includes in-state and out-of-state costs for those who will travel including transportation, meals, lodging, and meeting registration. Mileage may be reimbursed for travel to allowable meetings if using a personal vehicle. Mileage must be reimbursed using the federal reimbursement rate.

Equipment. Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.

Supplies. Supplies means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life.

Contractual. Includes all subcontracts, including those for the services of planners and coordinators working as independent contractors, to develop, revise, implement and exercise plans and agreements. A subcontractor's role is to evaluate a client's needs and perform the work. Payment should be based on the number of hours needed to do the job times a fixed hourly rate and must be determined before the job begins. Subcontractors set their own work hours, furnish their own equipment, are responsible for incidental expenses, and their own training. DPH OPEM may require sub-recipients to document that sub-contractors with multiple engagements are capable of fulfilling the obligations of all sub-contracts.

Consultant. Consultants are typically used for short-term projects. A consultant's role is to evaluate a client's needs and provide expert advice and opinion on what needs to be done.

Other DPH funded. For items that do not fall within other budgeted categories, including allocations to communities.

Indirect or administrative costs. Expenditures that are not directly associated with any one program or a combination of programs but which are related to the overall implementation of the contract are indirect costs. These costs may include but are not limited to the following:

- general office supplies and materials;
- leasing or routine replacement of office equipment;
- office telephone lines of indirect staff;
- costs related to occupancy of administrative premises;
- administrative and support staff training and travel;
- parent organization costs; and
- legal fees.

The above costs shall not be budgeted as a direct cost and costs itemized as direct expenditures shall not be included as part of indirect or administrative costs.

To cover indirect/administrative costs, entities with a federally agreed upon indirect rate shall apply that rate on the basis permitted by the federal government. If the grant sub-recipient possess a federally agreed upon indirect rate, proof of such an agreement must be provided to DPH OPEM during the budget process. If an organization does not have a federally approved indirect rate to apply to administrative expenses incurred as a result of grant implementation, they may incur grant related expenses up to, but not more than, 15% of the award for such purposes.

Section 7: Principles for Allowable Program Expenses

CDC PHEP funds may be used to support public health emergency preparedness activities while ASPR HPP funds may be used to support healthcare system preparedness activities. Sponsoring Organizations are encouraged to consult with DPH OPEM to discuss the allowable use of grant funds.

7.1 Factors Affecting Allowable Costs

Costs must meet all of the following criteria:

- Be tied to an approved work plan that meets the goals and objectives of the DPH OPEM grant.
- Be reasonable and necessary for accomplishing the objectives of the program and for implementing activities as described in the proposed work plan. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. Consideration should be given to whether the cost is of a type generally recognized as ordinary or necessary for the operation or performance of the recipient.
- Build public health and healthcare system capacity to effectively respond to a range of public health threats, including but not limited to infectious diseases, natural disasters, and biological, chemical, nuclear, and radiological events.
- Be authorized in advance by DPH OPEM.
- Not be prohibited under State laws or regulations.

- Be consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other activities of the governmental unit.
- Be in accordance with generally accepted accounting principles.
- Be adequately documented.

7.2 Allowable Program Expenses

Advertising costs. Advertising costs are allowable only for recruitment by a recipient organization of personnel or volunteers required for the performance of obligations arising under a Federal award; procurement of goods and services for the performance of a Federal award; and disposal of scrap or surplus materials or other requests that may be approved and authorized by DPH OPEM.

Audit costs and related services. The costs of audits required by, and performed in accordance with, the single State Audit Act, are allowable as specified in OMB Uniform Guidance (formerly OMB Circular A-133), Section 200.425.

Communication costs. Data costs for phones and tablets are allowable for 24/7 points of contact for up to two individuals who have a defined role in responding to after-hours incidents and emergencies in a community or facility and for Sponsoring Organization staff who are identified as 24/7 points of contact in their HMCC Regional Coordination Plan. 24/7 contacts are expected to respond to drills conducted by DPH OPEM and the HMCC. This list will be reconciled with the drill results quarterly to ensure active participation of members on the 24/7 list.

Compensation and fringe benefit costs. Compensation includes all remuneration, paid currently or accrued, for services rendered during the period of performance under the DPH OPEM award, including but not limited to wages, salaries and fringe benefits.

Fringe benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe benefits include, but are not limited to, the costs of health insurance, pension contributions and payroll taxes, and all other non-salary/wage benefits received by budgeted staff.

Conference and training costs. Costs of attending or hosting trainings and conferences, the primary purpose of which is the dissemination of technical information related to public health or healthcare emergency preparedness, are allowable if consistent with the Conferences and Trainings Policy and approved through the Training Notification Form. This includes costs of transportation, rental of facilities, speaker fees and other items incidental to such meetings or conferences. Expenditures for out-of-state trainings must be approved by DPH OPEM in advance. See Appendix E for the Conferences and Trainings Policy.

Consultant service costs. Costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill, and who are not officers or employees of the recipient organization, are allowable. Consultants are typically used for short-term projects. A consultant's role is to evaluate a client's needs and provide expert advice and opinion on what needs to be done.

Equipment and supplies costs. Costs incurred for equipment, office supplies, and related expenditures necessary to carry out the award are allowable.

Meeting costs. Costs associated with conducting or attending business meetings, the primary purpose of which is for monitoring progress with work plan activities and information sharing related to public health or healthcare emergency preparedness, are allowable. This includes costs of transportation and facilities and other items incidental to such meetings or conferences, but excluding food and beverage for meetings lasting less than four hours.

Overtime. Sub-recipients may (with prior approval) use funds for overtime for individuals directly associated (listed in personnel costs) with the award.

Publication and printing costs. Publication costs include costs of printing (including the processes of composition, plate-making, press work, binding and the end products produced by such processes), distribution, promotion, mailing, translations and general handling.

Planners: Planners may be hired as sub-contractors to support the completion of grant deliverables. Their scopes of work must tie directly to an approved workplan and budget. Scopes of work may not overlap and supplanting of contract services is not permitted. A sub-contract review of planners services is required bi-annually.

Subscriptions and professional activity. Costs for subscriptions and professional activity directly related to emergency preparedness are allowable.

Travel costs. Costs for general travel to in-state and out-of-state emergency preparedness meetings, conferences and trainings must be in accordance with the Conferences and Trainings Policy and must be incurred by employees funded with HPP PHEP or state emergency preparedness funds or employees who have a defined role in responding to incidents and emergencies in a community or organization who are in travel status on official business of the recipient organization. These costs may be charged on an actual cost basis, on a per diem or mileage basis. Each grantee shall determine and document in writing its basis for reimbursing travel costs. Grantees without a formal written policy must use the GSA rates, <http://gsa.gov/portal/category/100120>.

Vehicles. PHEP awardees can (with prior approval) use funds to purchase material-handling equipment (MHE) such as industrial or warehouse-use trucks to be used to move materials, such as forklifts, lift trucks, turret trucks, etc. Vehicles must be of a type not licensed to travel on public roads.

Rental car costs are permitted only if it can be demonstrated that the cost of a rental vehicle is a more cost efficient means of transportation.

Section 8: Unallowable Costs

DPH OPEM grant funds may not be used for the following purposes:

Airfare. Funds may not be used for airfare costs in excess of the customary standard commercial airfare (coach or equivalent).

Back filling costs. Funds may not be used for the payment or reimbursement of back filling cost for staff, including healthcare personnel for exercises.

Bad debt. Funds may not be used to pay bad debts of any kind.

Buildings and land. Funds may not be used for the purchase or improvement of land, the purchase, construction, or permanent improvement of any building.

Charges. Funds may not be used to pay interest, late fees, or other finance charges.

Clinical care. Funds may not be used for clinical care.

Clothing. Funds may not be used to purchase clothing such as jeans, cargo pants, polo shirts, jumpsuits, sweatshirts, or T-shirts.

Compensation. Funds may not be used to pay contracts for compensation with advisory board members.

CMS Conditions of Participation. Funding to individual health care entities is not permitted to be used to meet Centers for Medicare and Medicaid Services (CMS) conditions of participation, including CMS-3178-F Medicare and Medicaid Programs: Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers.

Construction. Funds may not be used for construction or major renovations.

Consulting fees. Funds may not be used to pay consulting fees for salaried program personnel to perform activities related to grant objectives.

Entertainment. Funds may not be used for costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)

Food and beverage. Funds may not be used to pay for food, beverages, and snacks for a single meeting, conference or training lasting less than four hours. When hosting a meeting, conference or training, the agenda should be structured so that there is time for participants to purchase their own food, beverages and snacks. Funds may not be used to pay for food and beverages for receptions and “networking” sessions, regardless of duration. Funds may not be used for the cost of alcoholic beverages.

Influence. Funds may not be used to advance political or religious points of view or for fundraising or lobbying; payments to any person for influencing or attempting to influence members of Congress or the Massachusetts General Court are prohibited.

Medical Reserve Corps Funds. MRC funds may not be used to support public health emergency preparedness and response activities not directly related to MRC unit operations. MRC units may not use PHEP or state funds to support volunteer databases after December 31, 2017. Units are not

obligated to join MA Responds; however the resource is available to them free to charge should they wish to utilize the system.

Pre-award costs. Funds may not be used for reimbursement of pre-award costs.

Pre-payment. Funds may not be used for prepayment for services.

Promotional items. Funds may not be used for the purchase of promotional items. This includes, but is not limited to, pens, cups, key chains, baseball caps, paperweights, magnets, patches, logo shirts and apparel, balloons and buttons.

Refrigerators. Funds may not be used for the purchase of vaccine refrigerators unless the requesting party is making the purchase to provide operational redundancy to support the cold chain management provisions that are included in their current emergency dispensing site plan, and will directly support their capacity to receive and store medical countermeasures for prophylaxis or treatment as provided in Capability 8, Medical Countermeasure Dispensing.

Rental costs. Funds may not be used to rent equipment or space owned by the funded agency.

Research. Funds may not be used for research.

Seasonal influenza. Funds may not be used for costs associated with seasonal influenza vaccine clinics, including storage and supplies.

Supplanting. Funds may supplement, but may not supplant, existing programs.

Trainings and exercises. HPP funding may not be provided to individual health care entities for individual health care organizations' trainings and exercises. HPP funding may be used to plan and conduct trainings and exercises at the regional or HMCC level. All training, exercise and conference requests must be preapproved by DPH OPEM prior to the funds being expended. Federal or state preparedness funds cannot be used to support expenses related to the day-to-day operations of the Sponsoring Organization, or other sub-recipients. Trainings/conferences that are offered at no charge cannot be supported for with PHEP funds.

Section 9: Appendices



COMMONWEALTH OF MASSACHUSETTS CONTRACTOR AUTHORIZED SIGNATORY LISTING

CONTRACTOR LEGAL NAME :
CONTRACTOR VENDOR/CUSTOMER CODE:

INSTRUCTIONS: Any Contractor (other than a sole-proprietor or an individual contractor) must provide a listing of individuals who are authorized as legal representatives of the Contractor who can sign contracts and other legally binding documents related to the contract on the Contractor's behalf. In addition to this listing, any state department may require additional proof of authority to sign contracts on behalf of the Contractor, or proof of authenticity of signature (a notarized signature that the Department can use to verify that the signature and date that appear on the Contract or other legal document was actually made by the Contractor's authorized signatory, and not by a representative, designee or other individual.)

NOTICE: *Acceptance of any payment under a Contract or Grant shall operate as a waiver of any defense by the Contractor challenging the existence of a valid Contract due to an alleged lack of actual authority to execute the document by the signatory.*

For privacy purposes **DO NOT ATTACH** any documentation containing personal information, such as bank account numbers, social security numbers, driver's licenses, home addresses, social security cards or any other personally identifiable information that you do not want released as part of a public record. The Commonwealth reserves the right to publish the names and titles of authorized signatories of contractors.

AUTHORIZED SIGNATORY NAME	TITLE

I certify that I am the President, Chief Executive Officer, Chief Fiscal Officer, Corporate Clerk or Legal Counsel for the Contractor and as an authorized officer of the Contractor I certify that the names of the individuals identified on this listing are current as of the date of execution below and that these individuals are authorized to sign contracts and other legally binding documents related to contracts with the Commonwealth of Massachusetts on behalf of the Contractor. I understand and agree that the Contractor has a duty to ensure that this listing is immediately updated and communicated to any state department with which the Contractor does business whenever the authorized signatories above retire, are otherwise terminated from the Contractor's employ, have their responsibilities changed resulting in their no longer being authorized to sign contracts with the Commonwealth or whenever new signatories are designated.

Signature

Date:

Title:

Telephone:

Fax:

Email:



**COMMONWEALTH OF MASSACHUSETTS
CONTRACTOR AUTHORIZED SIGNATORY LISTING**

CONTRACTOR LEGAL NAME :

CONTRACTOR VENDOR/CUSTOMER CODE:

[Listing can not be accepted without all of this information completed.]

A copy of this listing must be attached to the "record copy" of a contract filed with the department.



COMMONWEALTH OF MASSACHUSETTS CONTRACTOR AUTHORIZED SIGNATORY LISTING

CONTRACTOR LEGAL NAME :
CONTRACTOR VENDOR/CUSTOMER CODE:

PROOF OF AUTHENTICATION OF SIGNATURE

It is required that Departments obtain authentication of signature for the signatory who submits the Contractor Authorized Listing.

This Section MUST be completed by the Contractor Authorized Signatory in presence of notary.

Signatory's full legal name (print or type):

Title:

X _____

Signature as it will appear on contract or other document (**Complete only in presence of notary**):

AUTHENTICATED BY NOTARY OR CORPORATE CLERK (PICK ONLY ONE) AS FOLLOWS:

I, _____ (NOTARY) as a notary public certify that I witnessed the signature of the aforementioned signatory above and I verified the individual's identity on this date:

_____, 20 _____.

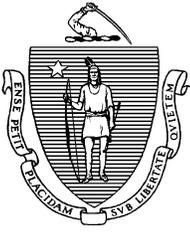
My commission expires on:

AFFIX NOTARY SEAL

I, _____ (CORPORATE CLERK) certify that I witnessed the signature of the aforementioned signatory above, that I verified the individual's identity and confirm the individual's authority as an authorized signatory for the Contractor on this date:

_____, 20 _____.

AFFIX CORPORATE SEAL



The Commonwealth of Massachusetts
 Executive Office of Health and Human Services
 Department of Public Health
 Office of Preparedness and Emergency Management
 250 Washington Street, Boston, MA 02108-4619

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Fixed Asset Purchase Policy
Budget Period 1
July 1, 2017 – June 30, 2018

Fixed assets are defined by the Commonwealth of Massachusetts Office of the Comptroller as singular assets (including infrastructure) such as equipment, furniture, computer software and all electrical and computer components with a useful life of more than one year and with a cost between \$1,000- \$49,999.

Fixed Asset Inventory Report

The Massachusetts Department of Public Health Office of Preparedness and Emergency Management (DPH OPEM) is responsible for oversight and tracking of fixed asset expenditures purchased with federal emergency preparedness funds. Health and Medical Coordinating Coalitions (HMCC) Sponsoring Organizations must maintain an inventory of all fixed assets and report them via the Fixed Asset Inventory Report to DPH OPEM.

The following criteria apply to the purchase of any fixed asset with a cost between \$1,000 and \$49,999 using federal or state emergency preparedness funding:

1. An inventory of all fixed assets must be maintained on the Fixed Asset Inventory Report and fixed assets must be tagged with a DPH OPEM tracking label upon receipt of the item.
2. The inventory tracking system must include the date of purchase; serial number or other unique identifier for each item purchased; address where the item is located; name of the person responsible for maintaining the item; date and reason item was moved or removed from service with exact current disposition of location, e.g. storage, another department or entity; and other information as determined by DPH OPEM.
3. Fixed assets purchased with funds provided from DPH OPEM are owned by and must be returned to DPH OPEM at the end of the contract period, if requested.
4. Fixed assets must be periodically verified to insure that information in the database is correct and up to date and also that materials remain in service.
5. Purchase of any fixed asset must follow all local, federal and state procurement regulations.
6. The Fixed Asset Inventory Report must be submitted to DPH OPEM at dphmcc@massmail.state.ma.us on June 30, 2018.

Capital Asset Requests

The Federal Office of Management and Budget has established a capital threshold of \$5,000 for articles of nonexpendable, tangible personal property having a useful life of more than one year. All fixed asset purchases valued at \$5,000 (capital threshold) or more must be pre-approved by DPH OPEM. *Noncompliance with this policy may necessitate repayment of funds received and/or ineligibility for future funds.*

Process for Capital Asset Purchase Submission, Review, and Appeal

1. HMCC Sponsoring Organizations must use the Capital Asset Request Form (Appendix C) to obtain pre-approval from DPH OPEM prior to using federal or state emergency preparedness funds to purchase a fixed asset costing \$5,000 or more. All form fields must be completed in order for the request to be considered. Completed forms must be provided to the HMCC Sponsoring Organization for submission to DPH OPEM via email at dphmcc@massmail.state.ma.us.
2. Upon receipt of a Capital Asset Request Form, DPH OPEM will review and log the Form.

Every request to purchase a capital asset will be reviewed and approved by either the Public Health Preparedness and Response Manager (for PHEP or state fund requests) or the Healthcare Preparedness and Response Manager (for HPP fund requests) (“review staff”). Each request will be reviewed to determine that the expenditure is part of an approved budget and reasonable, directly related to supporting or enhancing public health or healthcare emergency preparedness, and consistent and within the scope of the federal grant guidance, MRC Guidelines, DPH OPEM deliverables, and the DPH OPEM Grants Management Manual. Forms will be reviewed by review staff weekly.
3. When being considered, the review staff will review the Form and determine whether additional information is required prior to decision. If necessary, contact will be made with the HMCC Sponsoring Organization to request any additional information needed. The review staff will not consider a request until the form is complete and all necessary information has been obtained.
4. Following review, the review staff will approve or deny the request. DPH OPEM will maintain a log for each request reviewed by the review staff, noting the date of review and disposition of the request. If a request is denied, the log will include a statement of the reasons for the denial.
5. The review staff will notify the HMCC Sponsoring Organization in writing of its determination by close of business on the Friday immediately following the Thursday review. A request to purchase a fixed asset with a cost of more than \$5,000 may also require review and prior approval from CDC or ASPR. If this is necessary, DPH OPEM will seek approval as quickly as possible once the item has been approved within DPH OPEM.

If a request is denied, the notice will indicate the reason(s) for the denial, identify possible alternatives to address the need identified in the request, offer to schedule a conference call with the HMCC Sponsoring Organization to discuss the request, and describe the process for appealing the review staff's decision.

6. DPH OPEM will maintain copies of all requests received, supporting documentation, written notifications of the disposition of each request, requests for appeal, and disposition of any appeals.
7. If the review staff denies a request, the requesting entity may appeal the decision by sending a written notice of appeal to the Director of the Office of Preparedness and Emergency Management dph.emergencypreparedness@state.ma.us within **ten (10) business days** after the date that the notice of denial was sent.

In the notice to the DPH OPEM Director, the HMCC Sponsoring Organization should state its rationale for appealing the decision of the review staff, specifically addressing the reasons stated in the notification of denial as well as the feasibility of any alternatives suggested by the review staff.

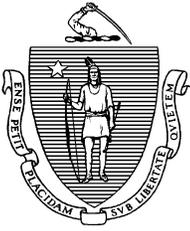
The Director will convene a conference call or in-person meeting to discuss the appeal as soon as practicable; participants for the conference call or meeting will include the director, the review staff and a representative from the HMCC Sponsoring Organization.

Prior to the conference call, the review staff will provide to the Director a copy of the notification of denial and the Capital Asset Request Form, along with any supporting documentation that was submitted and considered by the review staff. The requesting HMCC Sponsoring Organization may submit to the Director additional documentation to specifically address the reasons for denial and/or the feasibility of any alternatives suggested by the review staff.

During the conference call, the HMCC Sponsoring Organization will have an opportunity to provide its reasons for appealing the decision of the review staff, and to discuss any additional documentation submitted for review by the Director. The participants will review and discuss the reasons for denial, and consider any additional documentation submitted on behalf of the requesting entity. The focus of the discussion during the conference call will be to determine whether the proposed expenditure is reasonable, directly related to supporting or enhancing public health emergency preparedness, and consistent and within the scope of the federal grant guidance, MRC Guidelines, DPH OPEM deliverables, and the DPH OPEM Grants Management Manual.

The Director will provide a decision in writing to the HMCC Sponsoring Organization review staff within five (5) business days after the conference call. The response to the appeal will provide a summary of the discussion from the conference call or in-person meeting, and fully state the grounds for granting or denying the appeal. If the appeal is denied, the director will work with the HMCC Sponsoring Organization to determine

whether it wishes to request further review of the decision by the appropriate federal program Project Officer.



The Commonwealth of Massachusetts
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Capital Asset Purchase Request Form

Purchase of a capital asset, an item with a cost of \$5,000 or more and a useful life of more than one year, requires submission of this form for prior authorization by DPH OPEM. See Appendix C for an explanation of the Fixed Asset Purchase Policy.

- ✓ The requesting entity must complete and submit this form for each single item with a cost of \$5,000 or more and a useful life of more than one year. *All fields must be completed or the form will be returned.*
- ✓ The HMCC Sponsoring Organization will review and sign the form, and submit it to DPH OPEM at dphmcc@massmail.state.ma.us for approval.

Request submitted by		
Name:		Organization:
Address:	Phone number:	Email address:
Funding used for purchase:		
<input type="checkbox"/> Public Health Emergency Response (PHEP)	<input type="checkbox"/> Hospital Preparedness Program (HPP)	
Will funds from another source support the purchase:		
<input type="checkbox"/> No <input type="checkbox"/> Yes (include source and amount) _____		

General description	Brand
Model number	Number of items <i>(if more than 1)</i>
Cost per Item:	Total cost of request:

How will the fixed asset be used and by whom?:

How will the purchase directly support or advance a public health or healthcare preparedness capability:

Where will the fixed asset be located, and who is responsible for storing and maintaining the fixed asset? *Liability for theft and/or damage of the asset while in storage lies with party responsible for maintaining the fixed asset.*

Fixed asset location:

Name of responsible person: Address:

Email: _____ Phone: _____

For Sponsoring Organization or Host Agency use only

Reviewed by: _____ Date: _____

Date submitted to DPH OPEM: _____

For DPH OPEM use only

Date request received: _____

Date reviewed: _____ *Reviewed by:* _____

Approved *Not Approved*

Reason(s) for denial:

Notice of Decision Sent By: Name: _____ *Date:* _____

Appeal Requested *Yes* *No*

Date Appeal Request Received: _____

Summary of Appeal and Decision

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC HEALTH

SUBCONTRACTOR IDENTIFICATION LIST

Provider Name: _____ **Vendor No.:** _____

Program Name: _____ **Contract ID:** _____

Instructions: Providers must complete and submit to DPH at the time of initial contract execution AND at the beginning of each fiscal year of the contract AND when subcontract dollars and/or providers are added or deleted. This form must be signed by the DPH program representative to indicate program approval PRIOR TO the execution of said contract(s).

Subcontracted services must be competitively bid. Subcontractors must agree to the Terms and Conditions set forth in the RFR, which is part of this contract. Subcontracts must be in writing, in accordance with Section 9 of the Terms and Conditions for Human and Social Services. Providers should use the standard subcontract boilerplate to be located on the DPH home page, www.state.ma.us/dph/. All subcontracts must be available for review by authorized agents of the Commonwealth. DPH may require the submission of any relevant subcontract at any time during the contract period.

1. Total Direct Care Subcontract Dollars: \$ _____

2. Amount of #1 allocated to identified subcontractors (list below):

Subcontractor Name/Vendor Number	Subcontract Amount	Type of Service provided and number of service units, if applicable
TOTAL:		

3. Amount of #1 allocated to identified subcontractors: \$ _____

Submitted by: _____ **Phone:** _____
Host Agency Program Manager/Date

Approved by: _____ **Phone:** _____
DPH OPEM Program Director/Date



The Commonwealth of Massachusetts
 Executive Office of Health and Human Services
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**Policy for Use of Emergency Preparedness Funds
 To Attend Conferences and Trainings
 Budget Period 1**

Training and continuing education are an important part of building and maintaining emergency-ready public health departments and healthcare organizations. There is increased emphasis by funders on ensuring that funds are utilized efficiently and effectively to advance regional preparedness. Training must be purposefully designed to close operational gaps and sustain jurisdictionally required preparedness competencies, and to achieve the capabilities established by the Centers for Disease Control and Prevention (CDC) and the Assistant Secretary for Preparedness and Response (ASPR).

This policy establishes the criteria for use of Emergency Preparedness funds distributed by DPH OPEM to support participation by eligible local public health or healthcare personnel in conferences and trainings. It is the intent of this policy to provide a process that supports necessary training and education and ensures that all conference and training activities funded with emergency preparedness funds relate to identified preparedness capabilities.

In Budget Period 1 (BP1), a Public Health Coalition may use up to 10% or \$46,000 of CDC Public Health Emergency Preparedness (PHEP) funds, whichever is less, to support eligible expenses related to training and conference registration and travel costs over the course of the budget period.

Funding for training should be clearly identified in the budget, and documentation maintained to identify all personnel who have used emergency preparedness funding to attend a training or conference.

General Policy

Health and Medical Coordinating Coalition (HMCC) Sponsoring Organizations must submit a Training and Conference Request/Notification Form to the DPH OPEM at dphhmc@massmail.state.ma.us prior to the conduct of or attendance at a training and conference that is supported by PHEP, HPP, or state funds.

Eligible Costs:

Emergency preparedness funds may be used for full conference/training registration fees if:

1. The in-state conference sponsor has sought and received prior approval from DPH OPEM documenting that the curriculum is designed to close operational gaps and sustain jurisdictionally required preparedness competencies; and
2. The attendee spends at least 50% of his or her time at the conference/training, including plenary and breakout sessions, in eligible emergency preparedness session, based on the beginning and ending time of the conference day; and
3. The attendee can provide a copy of his or her continuing education credit form or some other documentation of attendance to the HMCC Sponsoring Organization, if requested; and
4. There is a current written policy on file with the HMCC Sponsoring Organization that governs selection of personnel to attend approved conferences/trainings that will be supported by emergency preparedness funds.

Travel and Related Expenses:

Attendees must comply with their employer's or HMCC Sponsoring Organization existing travel policy as it pertains to expenditures for travel, overnight accommodations, meals and incidentals. It is the responsibility of the individual traveler to determine which policy is applicable. If there is not an employer or HMCC Sponsoring Organization travel policy in place, GSA rates must be used. In no case is it allowable to reimburse attendees for more than the scheduled GSA rates.

<http://www.gsa.gov/portal/content/110007>

Emergency preparedness funds may be used for travel expenses if the criteria below are met:

1. Travel:
 - a. Air travel must be coach or equivalent lowest cost option; and
 - b. Travel to/from the airport must be the most economical and reasonable method available. Carpooling is encouraged. Mileage is reimbursable; and
 - c. Additional reasonable costs including public transportation, shuttle, or taxi to/from the airport, airport parking, and tolls will be reimbursable with receipts. Car rentals are not reimbursable.
2. Accommodations:
 - a. The one-way travel distance to the conference/training is 60 miles or greater from the attendee's office; and
 - b. Overnight accommodations are eligible for reimbursement the evening before a full day (at least 7 hours) of conference/training sessions which include eligible emergency preparedness sessions; and

- c. Overnight accommodations for the evening of the final day of an out-of-state conference are eligible for reimbursement when traveling by air and if the conference/training ends at or after 3 p.m. on that day (conference time zone) and there is no scheduled flight available after that time; and
 - d. Overnight accommodations for the evening of the final day of an in-state conference or training are not eligible for reimbursement.
3. Meals and Incidentals:
- a. Reimbursements may not exceed GSA per diem rates; and
 - b. Meal reimbursement will not be provided for meals which were provided by the conference organizer at no cost to the registrant over and above the conference/training registration fee; and
 - c. Emergency preparedness funds may not be used to purchase alcohol.