ARHTP Subrecipient Kickoff FAQ

Award Documents, Budget Approval, and Special Conditions

1. Where can subrecipients find the documents incorporated into our Subrecipient Agreement (SRA)?

The executed SRA identifies the documents incorporated into the award, including Attachments A through D and other governing materials. Current program guidance and resources will be posted on the ARHTP website. If you need an operative document or cannot locate the current version, contact your Grant Manager. Your executed SRA remains the controlling source for the documents applicable to your organization.

2. What does the Healthcare Exclusion Review consist of?

The Healthcare Exclusion Review is a mandatory compliance process designed to ensure that no federal grant funds pay for individuals or entities barred from participating in federal programs due to fraud, neglect, license revocation, or drug-related offenses. To satisfy the "exclusion-review documentation" requirement, you must screen every W2 employee, vendor, contractor, and subrecipient across three specific databases: 1) HHS-OIG List of Excluded Individuals/Entities (LEIE): The primary database tracking individuals or companies banned specifically from federal healthcare programs like Medicare and Medicaid, 2) SAM.gov Exclusions: The broader, government-wide database that tracks individuals and entities debarred or suspended from receiving any federal procurement or non-procurement contracts and grants, and 3) Alabama Medicaid Exclusion List (or relevant state list): State-level databases tracking providers and individuals terminated or barred from the local Medicaid network. Export and save the search certificates/receipts showing "No Results Found". Exclusion reviews are not a one-time task. While required within 30 days of the execution of the SRA, the federal standard requires running these checks monthly for the duration of the grant.

3. Are spending or performance extensions available?

The SRA provides that any term extension is discretionary, subject to CMS approval and the applicable federal period of performance, and effective only through a written amendment signed by ADECA and the subrecipient. Subrecipients should plan to complete work by July 31, 2027, and promptly notify their Grant Manager of material delays or implementation risks.

4. When will subrecipients receive conditional budget approval and will it be done through written notice?

Over the next five business days your organization will receive written notice when ADECA conditionally approves your current budget. The notice and accompanying pro-forma budget will define what is currently eligible to move into procurement review and, subsequently, reimbursement review.

5. Does conditional budget approval authorize every cost listed in the budget?

No. Conditional approval provides a foundation for procurement and reimbursement review, but it is not blanket approval of any purchase, vendor, procurement method, or expense. Each cost must still be within the approved scope and period of performance; allowable, necessary, reasonable, and allocable; properly documented; compliant with procurement requirements; and consistent with any special conditions or prior-approval

requirements. The subrecipient is ultimately responsible for ensuring its costs are eligible and compliant. If there is any question about whether a cost or procurement approach is permissible, the subrecipient should ask before proceeding.

6. Do subrecipients request special conditions?

No. Organization-specific special conditions are assigned by ADECA and appear in Attachment D of the executed SRA. Review each condition to determine what action or documentation is required and whether it restricts a purchase, contract, reimbursement request, hiring action, or other activity. Do not proceed with any restricted activities until ADECA provides the required written clearance.

Procurement and Contracting

7. Which procurements must be submitted for review?

As stated in kickoff training, all procurements must be submitted for review until final budget approval. When the final budget is approved, submit a procurement review for: (1) noncompetitive or sole-source procurements; (2) subcontracts or third-party contracts covered by Section 4(b) of the SRA; (3) new contracts or purchase orders at or above $15,000; (4) modifications or expansions of existing contracts; (5) construction or renovation of any value; and (6) procurements started before SRA execution when ARHTP funds will be charged. If there is any question about whether a procurement approach is permissible or requires review, the subrecipient should ask its Grant Manager before proceeding.

8. Does a budget submission or conditional budget approval count as procurement approval?

No. Budget review and procurement review are separate; it is possible for an allowable expense to be improperly procured.

9. How does the $15,000 micro-purchase threshold apply?

Use the aggregate value of the procurement transaction, not the price of each item or invoice. Include the total expected value of related items and applicable options, renewals, and extensions. Related purchases may not be split to remain below a threshold. You should distribute these purchases equitably among qualified local vendors rather than always using the same vendor. Even micro-purchases require procurement approval under a conditional budget. Keep in mind that a stricter State, local, or organizational rule may still apply.

10. How many quotes are required for simplified acquisition?

The governing standard is quotations from an adequate number of qualified sources. The current materials do not establish a universal fixed number. By rule of thumb, however, federal procurement specialists generally accept that three quotes are an adequate number provided that they are all within the same reasonable price range. Retain the quotes received, the selection rationale, and documentation supporting price reasonableness, and follow any stricter State, local, or organizational requirement. Ask your Grant Manager when the appropriate level of competition is unclear.

11. Where are procurement requests submitted?

Subrecipients will receive instructions as to the procurement review request process from their Grant Manager.

12. How long does procurement approval take?

There is no single guaranteed turnaround time. Timing depends on the complexity and completeness of the submission and how quickly follow-up questions are resolved. Build review time into the procurement schedule and submit a complete package as early as possible.

13. Does BDO approve contracts?

No. If a contract requires prior approval, the final approval decision will be made by ADECA and it will be provided in writing. BDO and your Grant Manager provide technical assistance, review submissions for completeness and compliance, and route matters requiring ADECA action.

Reimbursement and Cash Flow

14. Where are reimbursement requests submitted?

Submit reimbursement requests through the ARHTP Request for Reimbursement Portal.

15. How often should reimbursement requests be submitted?

Submit one reimbursement request per calendar month unless ADECA approves a different schedule in writing. A single request may include multiple eligible expenditures when each expenditure is fully supported and can be reconciled to the approved budget and accounting records.

16. Is there a required monthly submission date?

The SRA requires one request per calendar month unless otherwise approved in writing, but it does not establish a specific date for requests. Costs incurred on or before June 30, 2027, must be submitted by July 31, 2027, and the final reimbursement request is due by August 30, 2027.

17. How long will reimbursement take?

The SRA states that properly invoiced and documented reimbursement requests are payable within 30 days of ADECA's receipt, subject to available funding and resolution of any disputed or incomplete amount. In practice, incomplete documentation and delayed responses to follow-up questions can extend the process. Submit a complete package and respond promptly to requests for clarification.

18. Are costs incurred after SRA execution automatically reimbursable?

No. Costs incurred during the term may be reimbursable only if they are within the approved scope and budget, allowable, necessary, reasonable, allocable, properly documented, compliant with procurement and prior-approval requirements, and not restricted by Attachment D or another award term.

19. Are costs incurred before SRA execution reimbursable?

Costs incurred during the period of performance but prior to the execution of the SRA may be reimbursable. Subrecipients should contact their Grant Manager with questions regarding specific expenses incurred prior to SRA execution.

20. Can ADECA pay a vendor directly?

ADECA does not pay vendors directly. Vendors are paid by the subrecipient either (1) using the subrecipient's own funds followed by reimbursement from the program, or (2) through approved modified reimbursement.

Reporting, Records, and Program Support

21. How should subrecipients track, document, and verify subrecipient personnel effort?

Maintain records sufficient to show who performed the work, the dates and tasks performed, how the cost was calculated, and how the work benefited the approved project. Keep personnel support, general-ledger detail, allocation methods for shared costs and other source documentation required by ADECA. When in doubt, request Grant Manager assistance.

22. Can an organization have multiple portal users?

Yes. Each organization's primary user within the portal now has the ability to add additional users and ensure appropriate staff have access. Guidelines for adding additional users are available upon request from your Grant Manager.

23. When should a subrecipient provide written notice of a delay?

Provide written notice when there is a material delay or implementation risk and promptly notify your Grant Manager if the subrecipient determines it cannot complete the project by the end of the term. Contact your Grant Manager with the specific affected milestone or activity, cause of the delay, expected impact, mitigation steps, and any decision or approval needed.

24. Will ARHTP provide recordkeeping templates?

ARHTP will issue procedures, checklists, forms, templates, and training materials in the near future. Use the current versions provided through the ARHTP website or by your Grant Manager. Subrecipients remain responsible for maintaining compliant financial, procurement, property, performance, and record-retention systems even when a program template is not provided.

25. Will the kickoff PowerPoint and recording be available?

Program resources, guidance, and FAQs will be posted on the ARHTP website. Monitor the website for the kickoff presentation and recordings and contact your Grant Manager if you need an accessible copy or cannot locate the current version.

26. Can our organization use the ARHTP logo with our own logo?

Subrecipients may use their own logo in addition to the official ARHTP logo but the organization logo must be secondary in size and prominence to the ARHTP logo. Please refer to the official program approved Communications Guidance.

27. Will the Grant Manager be different from the BDO staff member who supported SRA development?

Each subrecipient will be introduced to its assigned BDO Grant Manager following kickoff. The Grant Manager will serve as the first point of contact for questions, submissions, and status updates. In many cases the assignment may remain the same, but the formal introduction will confirm the designated contact.