



## CORONAVIRUS RESPONSE AND RELIEF SUPPLEMENTAL APPROPRIATIONS ACT OF 2021 (CRRSA): GRANTS TO ENHANCE ADULT PROTECTIVE SERVICES TO RESPOND TO COVID- 19

### Frequently Asked Questions

*Updated March 23, 2023*

The Administration for Community Living (ACL) is establishing the “Coronavirus Response and Relief Supplemental Appropriations Act of 2021: Grants to Enhance Adult Protective Services to Respond to COVID-19” funding opportunity to implement Section 2042(b) of Subtitle B of Title XX of the Social Security Act, otherwise known as the Elder Justice Act (EJA) as authorized and funded through the Coronavirus Response and Relief Supplemental Appropriations Act, 2021. In accordance with these statutes, the purpose of this opportunity is to enhance and improve adult protective services provided by States and local units of government in response to the COVID-19 pandemic.

These frequently asked questions (FAQs) are provided to assist APS programs better understand the new funding opportunity. These FAQs further elucidate the information contained in [the Federal Register Announcement for this Opportunity](#), published on February 1, 2021, as well as all prior versions of FAQs for this opportunity.

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## ABOUT THIS FUNDING

### Statutory Reference

The statutory authority for grants under this program announcement is contained in the Elder Justice Act Section 2042(b) of Title XX of the Social Security Act [Public Law 74-271] [As Amended Through P.L. 115-123, Enacted February 9, 2018], and the Coronavirus Response and Relief Supplemental Appropriations Act, 2021.

### Funding Purpose

Funds expended from the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 are to be spent in accordance with Elder Justice Act Section 2042(b) for APS programs to respond to the Coronavirus Emergency. Funds awarded under this opportunity will provide Adult Protective Services programs (APS) in the States and territories with resources related to their response during the Coronavirus Public Health Emergency. APS programs must expend funds on allowable activities as defined by the Elder Justice Act and State and local policy. This funding is intended to enhance, improve, and expand the ability of APS to investigate allegations of abuse, neglect, and exploitation during the COVID-19 pandemic and to respond to the needs of adults experiencing such abuse, neglect and exploitation.

### Who Can Be Served?

*Because this is funded through the “Elder Justice Act,” are only “elders” eligible to be served?*

The funds may be used for any APS client who meets their State’s statutory or regulatory criteria for client eligibility for APS services in the State.

*Is there a citizenship requirement for recipients of goods or services secured with these funds?*

No; there is no citizenship requirement for APS clients to receive goods or services paid for with this funding.

### Covered Maltreatment Types

These funds may be used for clients experiencing any of the maltreatment types the state APS program is authorized to investigate and respond to.

## APPLYING FOR FUNDING

### Eligibility

*Who is eligible to apply?*

Per the Elder Justice Act Section 2042(b), eligible entities are the agency or unit of State government in each state or territory having the legal responsibility for providing adult protective services within the State.

*Are tribes eligible to apply?*

Section 2042(b) of the EJA, under which these funds are appropriated, specifies funding for 56 states, DC, and the territories. Under this funding opportunity, tribes are not eligible to apply. ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, as well as with their State Units on Aging, local and State Ombudsmen, Tribes, and other partners.

*Our State APS program does not have its own fiscal infrastructure. Pursuant to state statute, funding for local APS programs is distributed through a sister agency. The APS program retains administrative oversight of the local APS programs, but fiscal reporting is done through the sister agency's infrastructure. Who would be the applicant in this case?*

ACL's legal relationship is with the entity identified on the Notice of Award as receiving the grant funds. Therefore, if fiscal policies within a state require that a financial (or other) office outside of the state APS program receive and distribute the grant funds, then that entity is the one that must submit the Letter of Assurance. In this instance, the Letter of Assurance must clearly state that the funds will be distributed as the State APS program determines (a 5<sup>th</sup> Assurance), and must describe the partnership/relationship so that ACL can be sure that the funds are being used exclusively to support APS and consistently with the purpose of this funding opportunity. The Initial Spend Plan should still be drafted by the APS program office.

### Process

Eligible applicants submit all required materials by the due date. ACL will process the application and make grant awards, and anticipates issuing Notices of Award with an April 1, 2021, start date. The due date, required elements for the plan and letter, and details about to whom and how to submit, are outlined in the [Federal Register Notice](#).

*Can the spending plan be included in the Letter of Assurance, or should it be a separate document in the email?*

They can be combined if that is easiest. You can send one document with both the letter and the spend plan, or two separate documents. Please include both in one email when you submit your application.

*Will the Regional Administrator confirm receipt of the submission email?*

Yes; the Regional Administrator will confirm receipt.

## Letter of Assurance

### *Who can sign the Letter of Assurance?*

The Letter of Assurance should be signed by the APS agency's authorized official representative (AOR). Different states have different policies on who the AOR is -- in some cases the AOR is the Department Secretary or Commissioner, or it could be the office director, and in some it's a project director. The person signing the Letter of Assurance will be attesting that they are the AOR and have the authority to accept the funds on behalf of the state APS program.

## Spend Plan

### *Will the initial spend plan need to account for every dollar allocated?*

You will need to account for all the money in the spend plan. However, it might help to consider this similar to a budget for a discretionary grant. Pay attention to broad categories or activities. The initial spend plan is considered preliminary, and relatively brief at only 2-5 pages. The initial spend plan can be viewed as a budget planning tool. ACL expects things to shift as states move from initial planning to implementation.

### *Our state has a county run APS system, and we plan to distribute some of the funds using a formula to the counties who conduct investigations and arrange for services. Should our spending plan describe our distribution to formula for counties?*

Yes, if you will distribute funding using a formula, please include that formula in your spend plan.

### *If our state wants to use CRRSA funds for projects under ARPA, what is the process?*

You will need to revise your CRRSA spend plan to include the projects that you would like to fund with CRRSA funds. You will also need to revise your ARPA spend plan and remove these projects. If a project will be funded partially by CRRSA funding and partially by ARPA, you should revise both spend plans and indicate which part of the project will be funded by each grant.

### *Can states spend CRRSA funding for activities that are not included in the original Spending Plan? If a category of spending was not included in the CRRSA spend plan, may it be added now?*

Yes, states can spend CRRSA funding on activities that were not included in the original spend plan. The spending plan can be updated to include new categories that were not in the original plan.

### *Can states use CRRSA funding to pay for contracts that were entered into for ARPA funding?*

States can use CRRSA funding to pay for costs that were originally allocated to ARPA funding, and the spend plan should be revised to reflect these changes. However, states should consult with their fiscal, budget, and/or acquisitions offices to confirm such changes are allowable under their state's accounting practices.

## Templates

There are no templates that should be used or followed. The "Letter of Assurance" should be on agency letterhead and include the list of required assurances outlined in the [FRN](#). By signing the letter, the state is attesting to (or assuring) ACL that it will implement the funds as outlined in the [FRN](#).

The “Initial Spend Plan” can be a narrative, a table, or both, and should indicate how the state is envisioning using these funds. Formatting requirements are identified in the [FRN](#).

## USE OF FUNDING

### Allowable Use Examples

Funds must be expended on APS activities related to the Coronavirus Public Health Emergency. The pandemic has significantly impacted the daily lives of older adults and APS clients, increased expenditures to keep doors open, and increased costs to minimize disruptions in communities to continue to provide safe delivery of services to clients. Therefore, ACL considers the response to the COVID-19 pandemic to be all allowed APS services and programming, and all allowed APS expenses incurred during the project period may be allocated to the CRRSA grant award.

CRRSA funds can be used to acquire the necessary tools and resources to safely open, operate, and continue providing services to clients, including to improve and enhance and improve adult protective services at this critical time. Below are examples of how these funds could be used that would be responsive to the requirements. (See “Appendix” below for further information on prior approval for equipment purchases.) These examples are for consideration only, and do not replace existing fiscal requirements:

- Improving and Supporting Remote Work:
  - Purchase of equipment and associated technologies that will allow for secure remote work and enhance APS workers’ ability to interview and investigate while they cannot physically visit during the pandemic. This may include purchase and/or reimbursement of expenses related to remote work; such as:
    - laptops,
    - smart phones,
    - electronic tablets,
    - WiFi hotspots,
    - software to facilitate secure video conferencing and virtual meetings;
  - Purchase of new, or improvements to existing, data systems and/or technology infrastructure related to case management that enhance interoperability and communication of systems across locales, including across states, and reporting to the National Adult Maltreatment Reporting System (NAMRS).
- Costs for and associated with establishing new, or improving existing, processes for responding to alleged scams and frauds, especially those related to COVID-19 scams.
- Costs for and associated with community outreach, including: advertising, postage, and printing of brochures and similar educational materials.
- Costs for and associated with providing goods and services to APS clients during the COVID-19 pandemic.
- Costs associated with assisting APS clients secure the least restrictive option for emergency or alternative housing, and with obtaining, providing, or coordinating with care transitions as appropriate. This may include paying for cleaning services or paying back taxes on a property that would otherwise be

condemned or seized, especially in conjunction with financial management and a referral to legal assistance.

- Paying for staff extended hours, or hiring additional staff, and associated personnel costs. For more information on indirect costs, see [45CFR75.414](#).
- Costs for and related to training during COVID-19 pandemic (both remote and in-person) for current and new APS employees on conducting investigations, interviews, and documentation, as well as additional costs associated with advertising, recruiting, certifying, and providing continuing education.
- Funds for travel once in-person investigations resume. For more information on indirect costs, see [45CFR75.414](#).
- Acquiring personal protection equipment and supplies for program use, as appropriate, once in-person investigations resume, as well as costs for and associated with clean-up/sanitation services for an adult to return safely their home environment.

#### *May funds be used for state-level initiatives around COVID-19?*

Yes. Funds may be used at the state level, distributed to local APS programs, or may be contracted out, including to expand the pool of organizations available to provide services to at-risk individuals.

#### *If we are having issues spending down CRRSA funding, should we move activities from ARPA to CRRSA?*

Funds should be expended in the same order that they were received/awarded. If there are projects that will occur during the CRRSA project period, these projects can be funded through the CRRSA grant.

### **Administrative Costs**

The EJA does not restrict administrative or indirect costs. Funds expended for administrative or indirect costs must be reasonable, allocable, and allowable.

### **Conference & Association Fees**

As administrative costs are permitted, provided they are reasonable, allocable, and allowable, funds may be used to pay for conference attendance, or for membership in professional associations. To be allowable, grantees must demonstrate the information/training gained at the conference, or the membership, is consistent with the purpose of this funding. Please note, that costs of memberships whose primary purpose is lobbying are unallowable costs, please see [45CFR75.454](#) and [45CFR75.450](#) for more information.

Funds may also be used for travel, lodging, and per diem associated with attending the conference. If the APS program is hosting a conference where APS programs from other states may attend, the hosting state should only pay for their staff's conference travel and attendance. States should consider whether the number of staff

attending conferences with these funds is considered reasonable and allocable, and whether it is a cost-effective use of funds.

## Equipment

### *Prior Approvals*

Per [45CFR75.320\(a\)\(2\)](#) equipment purchases made by a direct grantee (i.e., APS entity) exceeding \$5,000 must receive prior approval from ACL prior to purchase. 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.

Note: Purchases of \$5,000 or more made by sub-grantees must receive prior-approval before the sub-grantee incurs the expense. The sub-grantee must submit the prior-approval request to the APS entity. If the APS entity approves the prior-approval request, the APS entity must then submit the request to ACL for final review and approval. ACL does not provide prior approval directly to sub-grantees.

*If we're planning an equipment purchase, do we need to request that before we submit the spending plan on 3/1?*

Prior approval must be secured before the grantee encumbers the property. You would not need prior approval to propose an equipment purchase in your application.

### *Submitting Equipment Purchase Requests?*

1. Provide the following information to your ACL project officer for review of any equipment purchase requests that are subject to prior approval:
  - Identification of and cost for purchase
  - Purpose and intended use of the purchase
  - Market research done (i.e., obtaining bids, assessment of lease vs. purchase)
  - Efforts to adhere to "Buy American".
2. Submit the information to ACL for ACL review.
3. Do not purchase the equipment until written approval is received from ACL. Once prior approval is received, the organization then follows its own procurement policies.

## Federal Funds as Match

Recipients under this funding opportunity must treat this grant as completely separate and distinct from any other federal grant. Funds awarded under one federal grant may not be used to cover expenses/activities under another grant. Federal funds cannot be used as match for other federal funds unless there is specific statutory authority to do so, [45CFR 75.306\(b\)\(5\)](#).



## Guardianship and Aging/Adult Services

*Can this funding be used to pay for APS to serve as, or arrange for, a guardian?*

In Section 2011(2)(D) of the EJA, the definition of APS includes the following: “providing, arranging for, or facilitating the provision of medical, **social service**, economic, **legal**, housing, law enforcement, or **other protective**, emergency, or support services” (emphasis added). ACL urges careful consideration of all options to support decision-making that are less restrictive than guardianship. If every other option that is less restrictive than guardianship has been thoroughly explored, and no other option is viable to support the decision-making capability of an APS client, and that assessment has been documented, and state law/regulations permit the APS agency to serve as or to pay for a guardian for an APS client, then under those circumstances it may be permissible to use funds authorized under this funding opportunity.

However, the Older Americans Act, the EJA, and ACL place clear emphasis on the right to autonomy, independence, and self-direction of older adults and adults with disabilities and directs entities to seek less restrictive alternatives than guardianship/conservatorship. ACL also notes the possible conflicts of interest that arise when the APS agency provides guardianship or other fiduciary or surrogate decision-making services for clients, while also being the statutory entity responsible for receiving reports of adult maltreatment, even of guardians. ACL encourages grantees to carefully consider these factors in tandem with state law, regulations, and policy in determining whether it is appropriate to use this funding for APS to serve as a guardian of last resort, or to pay for a guardian for an APS client.

*Can these funds be used to help individuals who are served in other Adult/Aging Services programs? For example, Adult Services is the guardian of an individual, and the APS program wishes to use funds to assist that person with services and supports that maximize independence.*

Costs for, and associated with, providing goods and services to APS clients, including assisting APS clients secure the least restrictive option for decision-making and emergency or alternative housing, are allowable provided they are reasonable, allocable, and allowable. The funds may also be used by APS to seek lesser restrictive alternatives to guardianship or limits on guardianship whenever appropriate. In the scenario presented, if the individual is also a client of APS the example use of funds would be allowable. However, in all cases ACL refers grantees back to their state laws, regulations, and written policies to determine if the person is eligible for or meets the threshold criteria for APS services.

## Hazard Pay

This funding may be used to pay for bonuses or hazard pay for APS staff, provided the expenditure is reasonable, allocable, and allowable. When implementing hazard pay or bonuses, a written policy and procedures should be followed, see [45CFR75.430](#) for more information.

## Services for Clients

These funds may be used to pay costs for, and associated with, providing goods and services to APS clients impacted by COVID-19 pandemic, including homecare.

## Other Grants

Recipients under this funding opportunity must treat this grant as completely separate and distinct from any other federal grant. Funds awarded under one federal grant may not be used to cover expenses/activities under another grant. Federal funds cannot be used as match for other federal funds unless there is specific statutory authority to do so, [45CFR 75.306\(b\)\(5\)](#). Funding made available through this opportunity may not be used to replace existing state, territory, or local funding already appropriated for APS programs and services. Existing funds for an existing project or activities may not be displaced by federal funds and reallocated for other organizational expenses. The funding through this opportunity must add to the state's/territory's current funding levels, not be used to replace funding.

## Shelter

*Can these funds be used to pay for emergency shelter or other housing?*

Yes. This is covered in the examples of allowable uses in the [FRN](#) and FAQ under both goods and services, as well as "Costs for and associated with assisting APS clients secure the least restrictive option for emergency or alternative housing."

*Can the funds be used to develop or enhance shelters for victims of abuse and neglect?*

Costs for, and associated with, providing goods and services to APS clients impacted by the COVID-19 pandemic, as well as costs for, and associated with, assisting APS clients secure the least restrictive option for emergency or alternative housing, are allowable provided they are reasonable, allocable, and allowable.

## Staffing

*Can the funds be used for hiring additional staff?*

The funding through this opportunity must add to the state's/territory's current funding levels and not be used to replace funding.

*For "temporary staff", can APS programs contract with agencies who provide case aid services?*

Yes.

*Can the funds be used to fill essential positions? I have positions that were defunded by the state legislature, but I continue to have the positions as unfilled FTEs.*

Per the "supplement not supplant" provision in the authorizing legislation, funding through this opportunity must add to the state's/territory's current funding levels.

*Can the funding be used to hire an APS training coordinator?*

Yes, you can use funding to hire an APS training coordinator provided the expense is reasonable, allocable, and allowable.

## Technology

This funding is intended to enhance, improve, and expand the ability of APS to investigate allegations of abuse, neglect, and exploitation in the context of the COVID-19 pandemic, and to respond to the needs of adults experiencing such abuse, neglect and exploitation. Examples of a technology or data system improvement that would be consistent with this purpose are:

- allows for secure remote work;
- enhances APS workers' ability to interview and investigate while they cannot physically visit;
- enhances interoperability and communication of systems across locales, including across states, and reporting to the National Adult Maltreatment Reporting System (NAMRS); or
- establishes new, or improves existing, processes for receiving and/or responding to reports.

## Vehicles

These funds may be used for vehicles that are used by APS investigators if the purchase or lease of the vehicle is consistent with the purpose of this funding, and is reasonable, allocable, and allowable. If the vehicle cost is greater than \$5000, prior approval from ACL is required.

## PARTNERING

ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, as well as with their State Units on Aging, local and State Long-Term Care Ombudsmen, Tribes, and other partners. Award recipients may allocate or distribute a portion of their funding to other state, local, or tribal agencies, provided the activities to be carried out by the partners are reasonable, allocable, allowable under the authorization and purpose of this opportunity.

### States with Bi-Furcated APS Programs

As the funding allotments are based upon the percentage of older adults in a state (per EJA Section 2042(b)), in a State where elder protective services is separate from adult protective services, the funds will go to the agency or unit of State government providing protective services to elders. In these states, the elder protective services agency must submit the "Letter of Assurance" and spend plan. ACL encourages recipient agencies in these states to work collaboratively with their protective services partners to implement this funding, as well as with their State Units on Aging, local and State Long-Term Care Ombudsmen, Tribes, and other partners.

### Tribes

States may use this funding to work with Tribes, provided the activities are consistent with the purpose of the funding opportunity, which is to enhance/improve APS response during COVID-19. In addition, ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, as well as with their State Units on Aging, local and State Long-Term Care Ombudsmen, Tribes, and other partners.

*If one agency is awarded this funding, can that agency share or allocate to other agencies for APS needs?*

ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, as well as with their State Units on Aging, local and State Ombudsmen, Tribes, and other partners.

## FISCAL

### CFDA

The CFDA number for this opportunity is 93.747.

### State and Territory Allotments

ACL will distribute funds to States and territories as required by the population-based formula prescribed in the Elder Justice Act Section 2042(b). That is, each State and territory shall be allocated a proportionate share of the total funding available from the appropriation based on the number of elders (age 60+) in each state. The EJA also establishes a “minimum allotment. No State (50 entities) shall receive less than 0.75% of the total appropriation, and no territory (6 entities) shall receive less than 0.10% of the total appropriation

The amount of funds allocated for each of the 56 state-level APS programs is posted in the [Federal Register Notice](#).

*Will American Samoa, the Commonwealth of the Northern Mariana Islands, the District of Columbia, Guam, Puerto Rico, and the US Virgin Islands be treated as States or territories for purposes of the funding formula?*

The distribution of these funds are in accordance with Section 2042(b) of the Elder Justice Act, which provides for minimum allotments to “50 States and 6 territories.” Therefore, American Samoa, the Commonwealth of the Northern Mariana Islands, the District of Columbia, Guam, Puerto Rico, and the US Virgin Islands will be treated as a territory for purposes of this funding opportunity.

### Match

Matching funds are not required.

### “Supplement, not Supplant”

The phrase “supplement and not supplant existing funding” means that the funding made available through this opportunity may not be used to replace existing state, territory, or local funding already appropriated for APS programs and services. Existing funds for an existing project or activities may not be displaced by federal funds and reallocated for other organizational expenses. The funding through this opportunity must add to the state’s/territory’s current funding levels, not be used to replace funding.

APS programs may reallocate which funds are spent on which activities, for example, choosing to reallocate more state funds to staffing and using federal funds for services, as long as the overall level of funding for APS provided by the state/territory is not reduced.

## Spending Timeframes

*How long do we have to use the funds?*

The project period for these awards is anticipated to be 30 months, with an estimated start date of April 1, 2021, and an estimated end date of September 30, 2023. Grant activities must be completed within the project period timeframe (i.e., spend it, incur an expense against it, and/or obligate it), that is by September 30, 2023.

*Can these funds cover expenses incurred after the date of enactment of the legislation but before the Notice of Award date?*

These funds are available to grantees for the timeframe that will be indicated on the Notice of Award. At this time, it is anticipated the project period start date will be April 1, 2021.

*Are there certain timeframes within the 30-month funding period by which funds need to be "encumbered" or targeted for use?*

Allowable costs may be obligated to the grant for activities occurring during the project period of the grant. Funds must be liquidated and a final report must be submitted 120 days after the project period end date. There are no other "draw down" or "commitment" milestones by which states must expend a percentage of their funds.

*How should I prioritize spending CRRSA grant funds vs. ARPA grant funds?*

The highest priority for spending ACL funding is the CRRSA funds, which have a project end date of September 30, 2023. Funds should be expended in the same order that they were received/awarded. That is, funds from the CRRSA grant should be targeted prior to spending ARPA grant funding, and states should review their spending plans to make sure costs are charged to the appropriate grant.

## What if the COVID-19 public health emergency ends?

The funding will be available for the full project period stated in the Notice of Award. The project period will be April 1, 2021 – September 30, 2022, with a no-cost extension granted through September 30, 2023. Based on current COVID-19 trends, the Department of Health and Human Services (HHS) is planning for the federal Public Health Emergency (PHE) for COVID-19, declared under Section 319 of the Public Health Service (PHS) Act, to expire at the end of the day on May 11, 2023. Even though the public health emergency is ending on May 11, 2023, there will still be expenses related to the coronavirus response, such as costs associated with in-person visits to clients and purchasing of personal protective equipment, for example. Therefore, the project period will continue through September 30, 2023, but there will not be another opportunity for a no-cost extension.

## Bucketing of Funds

Under a Major Disaster Declaration, are funds available for “bucketing” like the Older Americans Act funds? No. The funds are administered under the authority of the Elder Justice Act, and do not have the same flexibilities as the Older Americans Act funding.

## REPORTING REQUIREMENTS

### Financial Reporting

Grantees are required to submit a [financial report SF-425](#) on a semi-annual basis. Reports are due within 30 days of the periods ending March 31 and September 30 (i.e., due April 30 and October 30), through September 30, 2023. A final PMS drawdown and a final SF-425 are due within 120 days after September 30, 2023 (i.e., due January 29, 2024). If a final SF-425 report will be submitted January 29, 2024, a semi-annual report is not required to be filed for report ending September 30, 2023.

For all states who received a no cost extension through September 30, 2023, there will be five (5) SF-425 report due:

- **October 30, 2021**
- **April 30, 2022**
- **October 30, 2022**
- **April 30, 2023**, and a
- Final Report **January 29, 2024**.

On the SF-425 form, lines 10 a. through c. are reported on a quarterly calendar year basis (for the periods ending 12/31, 3/31, 6/30, 9/30) at the HHS’ Payment Management System (PMS). Reconciliation of advances and disbursements is required for each quarter and the report must be completed within 30 days of the end of each quarter (i.e., by 1/30, 4/30, 7/30, 10/30). This reporting requirement is separate from completing the entire SF-425 as denoted in the financial reporting term.

Update – In Spring 2022, HHS/PMS eliminated the requirement for quarterly cash transaction reporting (last quarter would have been March 2022). Now, lines 10a and 10b are automated based on the grantee’s disbursement total. For interim SF-425s, lines 10a and 10b are editable. For final SF-425s, the grantee cannot modify lines 10a and 10b because it is expected that the grantee’s disbursement total will match its recorded expenditures. More information about the end of quarterly cash transaction reporting and updated SF-425 guidance is available on this webpage - [FFR Information | HHS PSC FMP Payment Management Services](#).

### *Submitting Financial Reports*

The SF-425 shall be submitted using the HHS’ Payment Management System (PMS). PMS website is located at: <https://pms.psc.gov>.

### *Are fiscal reports still required through the grant end date if we run out of funding?*

The reporting requirements are set by the length of the project period. Even if funding is completely expended before the end of the project period, grantees are still required to adhere to the reporting requirements. In this case, the reports would indicate \$0.

*Should we include an SF-424 and SF-424A with the spend plan?*

An SF-424 and SF-424A are not required. An SF-425 is required semi-annually once the notice of award is issued.

*What happens to reporting if a state receives a no cost extensions?*

Additional reports will be required during the additional 12 months of the project period, this would mean that two additional semiannual fiscal reports are due in PMS, and that the final report will be due January 29, 2024.

**Programmatic Reporting**

Grantees may use the [Current Guidelines for Preparing Performance Reports for Grants \(PDF, 332KB\)](#). ACL has provided [additional guidance](#) to grantees specific to this funding. Programmatic reports are due annually beginning with 12 months from the date of the notice of award. A final report will be due 90 days after the projected project end date. For states who receive a no cost extension, an additional annual report will be required covering the additional 12 months, and there will be three (3) programmatic reports due:

- **April 30, 2022** (covering April 1, 2021 – March 31, 2022),
- **April 30, 2023** (covering April 1, 2022 – March 31, 2023), and
- Final report **December 30, 2023** (cumulative covering April 1, 2021 – September 30, 2023)

*Submitting Programmatic Reports?*

Grantees will upload their annual programmatic report as an attachment under “Resources” in NAMRS. All grantee agencies should already have access to NAMRS. If you need additional assistance accessing NAMRS to submit your programmatic reports, please contact the APS Technical Assistance Resource Center (<https://apstarc.acl.gov/>).

*Do we need to update our ACL project officer if our spend plan changes over the course of the grant?*

Unlike discretionary grants, changes to the spend plan will not require an "amendment" or prior approval by your ACL project officer. However, your project officer should be updated when the spend plan or planned activities change to ensure that the use of funds remains consistent with the purpose of this grant. This can be done via email. Please Note: Changes to scope or budget of 25% or more are considered “significant.” Project officers should be notified of significant changes, and spending plans should be updated, as soon as possible.

*Are programmatic reports still required through the grant end date if we run out of funding?*

The reporting requirements are set by the length of the project period. Even if funding is completely expended before the end of the project period, grantees are still required to adhere to the reporting requirements. In this case, the reports would indicate there were no activities for the covered period.

## Documentation of Expenses

*What “proof” of expenses will ACL request/require?*

ACL does not require proof (financial records and documentation) of expenditures on a regular basis. However, the grantee accounting practices must be consistent with the cost principles outlined in [45CFR75.400](#), support the accumulation of costs as required by the principles, and must provide for adequate documentation to support costs charged to the federal award that are allocable, allowable, and reasonable. Additionally, ACL has the authority to request financial documentation when it is determined needed. More information on financial record retention and access to records can be found at [45CFR75.361](#) and [45CFR75.364](#).

*If used for salaries, do we need to track staff hours that are charged to the grant?*

ACL is not requesting detailed reporting by staff for salary. Grantees should report overall expenditures for staffing, and financial records should be kept on staff time allocated to the grant.

## TECHNICAL ASSISTANCE

ACL recognizes that a new opportunity like this could seem a lot for a state/territory APS program to undertake. ACL is committed to the success of these projects and is prepared to provide technical assistance to all 56 grantees on programmatic, fiscal, and technology issues and questions. For technical assistance requests, please contact the ACL project officer identified for your grant award.