



## HEALTHCARE INFRASTRUCTURE GRANT PROGRAM FREQUENTLY ASKED QUESTIONS

July 26, 2022

Below are answers to many of the questions that grantees have submitted to the Healthcare Infrastructure Program through the email address or during the post-award webinar held on June 22, 2022. Duplicative questions have been omitted. If you do not believe your question has been answered below, or if you have additional questions, please submit your follow-up questions to: [DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

### **Grant Agreements**

#### **1. When will grant agreements be executed?**

DocuSign versions of the grant agreements have been distributed to all grantees as of June 24, 2022. Grantees should complete all required fields in the DocuSign agreement and submit it to the Program at their earliest convenience. We would like to have all grant agreements executed within the next 30 days. If you have not received your DocuSign version of the agreement or have any questions about the agreement, please contact the Program at:

[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

#### **2. Are you taking comments/questions about the grant agreement?**

The Program is not anticipating making amendments to the grant agreement for individual grantees. The Program is accepting comments and questions via the Program email:

[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

#### **3. How do we change the authorized signatory on the grant agreement? The person in our organization will be leaving in the upcoming weeks.**

Please send an email to the Program email stating the grant project ID, the former authorized signatory name and contact details, and the new signatory's information.

[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

#### **4. Upon submitting the agreement in DocuSign, how soon can we expect a final, executed agreement to be returned with DOA's authorizing signature?**

The Program expects to review and approve grant agreements on a rolling basis as they are submitted. Grant agreements that require additional information will be voided and resent by the program via DocuSign.

#### **5. As a tribal government, we may need some modifications to the boilerplate Grant Agreement. How should such requests be made?**

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Requests of this nature should be submitted to the program email:  
[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

### Disbursement of Grant Award Funds

**6. Our organization would like to know if we will be reimbursed for expenses or if we will get the funds up front.**

Grant awards will be provided to grantees as advances in semi-annual disbursements. The first disbursement will be made within approximately 30 days of the grantee's submission of its properly completed grant agreement, including Attachment C to the agreement, which is the Semi-Annual Report and Payment Request Form. Subsequent disbursements generally will be made in January and July of each year as advances for grantee expenditures during the upcoming six-month period.

The first grant disbursement will cover both past expenses (if they were included in grantee's original budget) and future expenses. It will cover eligible expenses incurred, or to be incurred, on or after March 3, 2021 (the earliest date permitted by the American Recovery Plan Act) through December 31, 2022.

**7. When will we receive our grant award funds?**

The first disbursement will be made within approximately 30 days of the grantee's submission of its properly completed grant agreement, including Attachment C to the agreement, which is the Semi-Annual Report and Payment Request Form. Subsequent disbursements generally will be made in January and July of each year as advances for grantee expenditures during the upcoming six-month period.

**8. Will the awards be made in a lump sum to Grantees?**

Awards will generally be distributed in semi-annual advances that correspond to the activities the grantee expects to engage in during the upcoming six months. However, where necessary based on the circumstances of a particular grantee's project, awards may be made as a lump sum.

**9. What time period will the first grant disbursement cover?**

The first grant disbursement will cover both past expenses (if they were included in grantee's original budget) and future expenses. It will cover eligible expenses incurred, or to be incurred, on or after March 3, 2021 (the earliest date permitted by the American Recovery Plan Act) through December 31, 2022.

**10. How far in advance should we ask for funds, and how long until disbursement of funds should reasonably be expected?**

Grantees must submit payment requests at least 30 days before the start of each semi-annual payment period. Payment requests must be made using the Semi-Annual Report and Payment Request Form included as Attachment C to your grant agreement. Disbursements generally will be made at the start of the payment period. See Attachment C to your grant agreement for more information.

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**11. Must a purchase order be in place before we can request advance payment for an upcoming expense?**

No. Grantees may request funds in advance for any eligible costs that may be incurred during the upcoming reporting period, regardless of whether a formal purchase order has been issued yet.

**12. How and when do we submit request for payment of expenses between the time the grant agreement is executed and 12/31/22?**

Initial payment requests may be submitted at or after the time of execution of your grant agreement. The initial payment request will cover expenses through December 31, 2022.

**13. If we miss the July 1 disbursement date do we have to wait for December 1 to request for January 1?**

No. Grantees' first request for payment is considered the Initial Payment Request Period and may be submitted within 30 days after grant agreement execution.

**14. How long will it take to reimburse the grantee after a semiannual payment request is made?**

In general, if the grantee submits a properly completed Attachment C – Semi-Annual Report and Payment Request Form, payment will be made within 30 days. For payment requests that are incomplete or require additional information, the period may be longer.

**15. How will you decide if payment is by ACH or by check?**

Funds will be distributed via check or ACH at the State's discretion based on how your organization is set up in the State's financial system.

### **Period of Performance**

**16. What is the timeline for beginning work?**

The grant Performance Period is March 3, 2021, through December 31, 2024.

Eligible expenses for your project incurred on or after March 3, 2021 and included in the Grant Agreement Attachment B – Budget may be submitted for payment.

**17. Will the deadline for spending grant award funds be extended?**

The current intent is for the Performance Period to end on December 31, 2024 and grantees should plan accordingly. The Program will evaluate the need for any potential extensions as it monitors grantees' progress.

**18. Can we charge project expenses incurred before the grant agreement is executed?**

Yes. All eligible expenses for your project incurred on or after March 3, 2021 and included in the Grant Agreement Attachment B – Budget may be submitted for payment. Grantees' first request for payment is considered the Initial Payment Request Period and may be submitted within 30 days after grant agreement execution.

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**19. Is there any requirement that money be spent or costs be incurred during 2022?**

No. Spending during 2022 is not required. However, project activities are expected to begin soon if they have not already started. The Performance Period ends on December 31, 2024. All expenses must be incurred and projects completed by that date. Grantees will be required to report on their progress as a condition of receiving each semi-annual disbursement of grant award funds.

**20. Our grant award will be used to build a new facility. The funding is a small portion of the overall funding. Does the overall project need to be completed by December 31, 2024 or do we just need to have spent the grant money?**

In general, those portions of your project funded with your grant award must be completed by December 31, 2024. Further information is required to respond to this question as it pertains to your specific project. Please provide further detail by emailing the Program:

[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

**21. How are supply chain constraints being considered in the project completion timelines for these projects? What resources can DOA provide to navigate such considerations?**

The current intent is for the Performance Period to end on December 31, 2024 and grantees should plan accordingly. The Program will evaluate the need for any potential extensions as it monitors grantees' progress.

**22. Can spending start on or after July 1, 2022 with our new fiscal year?**

Yes, spending can start on or after July 1, 2022.

**23. Does spending end at the projected end of a specific project being funded? On 12/31/2024? Or on 12/21/2026?**

The Performance Period of this grant program is March 3, 2021 through December 31, 2024. All spending must be completed by December 31, 2024. The Program will evaluate the need for any extensions as it monitors grantees' progress.

### **Excess Funds**

**24. Because a portion of the grant award will be made as an advance to grantees, what will happen to any excess funds remaining at the end of any six-month period?**

In general, any funds remaining at the end of a period may be used toward eligible costs for the upcoming reporting period. Payment requests submitted for upcoming periods may be reduced, or advances may be postponed, to account for unspent funds. The Program may require that any funds remaining at the end of the Performance Period (December 31, 2024) be returned to the State.

**25. If you request an advance of funds, do 100% of those funds need to be disbursed in the following period?**

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Funds remaining at the end of a period may be used toward eligible costs for the upcoming reporting period. Payment requests submitted for upcoming periods may be reduced, or advances may be postponed, to account for unspent funds.

**26. What happens if the project doesn't use all the funds before December 31, 2024? Do they lose the remaining balance or do all the funds go back?**

The Program's goal is to help grantees successfully complete their projects. Only in exceptional circumstances would a grantee be required to return all grant funds. Because funds will be distributed to grantees on a semi-annual basis and grantees are required to submit progress reports, this is unlikely to occur. Grantees must notify the Program at least 90 days in advance of the end of the Performance Period (December 31, 2024) if they expect any funds not to be expended by that date, so the Program can determine whether a return of remaining funds is necessary.

### Procurement/Bidding

**27. The project was advertised and competitively bid prior to the grant award. Is it necessary to re-bid the project post-award?**

It depends. Grant recipients' procurement procedures must comply with the federal requirements of 2 CFR Part 200. Many grantees likely use processes satisfying those requirements. However, if the procedures used did not comply, the project may need to be re-bid. See 2 CFR [§§ 200.317](#) through [200.327](#) for more information.

**28. There was reference to a competitive bid requirement in the webinar. Please provide more detail or refer me to the requirement or guidance.**

Under the federal requirements of 2 CFR Part 200, certain purchases (but not all) may require competitive bidding. See response to Question 23.

**29. If an organization indicated in its grant application who the agent or developer would be for the project, is a competitive bid now required to use the designated developer?**

The fact that an agent, developer, or other contractor was identified in a grantee's application does not exempt the grantee from federal procurement requirements. However, the federal regulations do not require competitive bidding for all purchases. See 2 CFR [§§ 200.317](#) through [200.327](#) to determine whether competitive bidding is required in your situation.

**30. What are the standards for consultants and design? Can the work be self-performed?**

Grantees' engagement of consultants and designers is subject to the federal procurement requirements of 2 CFR [§§ 200.317](#) through [200.327](#). The term "self-performed work" potentially encompasses a wide variety of scenarios that cannot be addressed here. However, grantees should be aware that under federal regulations they are expected to engage only contractors believed to be competent and who charge fair market prices. Grantees are further required to

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have “written standards of conduct covering conflicts of interest” in their procurement processes. See [2 CFR § 200.318](#).

**31. If a firm writes the grant and administers the grant, can the same firm provide design and engineering?**

Further information is required to respond to this question. However, grantees should be aware of the federal conflict of interest regulations regarding procurement. See [2 CFR § 200.318](#). For more information about the specific issues raised in this question, please provide further detail by emailing the Program: [DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

**32. What procurement standards will apply for projects at various stages of development funded through these funds?**

Grant recipients’ procurement procedures must comply with the federal requirements of 2 CFR Part 200. Many grantees likely use processes satisfying those requirements. See 2 CFR [§§ 200.317](#) through [200.327](#) for more information.

**33. Is there a recommended process for engineering/design or can we follow our entity’s policy?**

Grant recipients’ procurement procedures must comply with the federal requirements of 2 CFR Part 200. See 2 CFR [§§ 200.317](#) through [200.327](#) for more information.

**34. What are unallowable expenses?**

All expenses must comply with 2 C.F.R. Part 200 and Program requirements. For more information about the ARPA State Local Fiscal Recovery Fund and 2 CFR Part 200 see the links below.

Treasury SLFRF Website:

<https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds>

Federal 2 C.F.R. Part 200 (Uniform Guidance):

<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1>

### **Budgets**

**35. Are we to provide detailed costs on attachment B through DocuSign, as opposed to providing spreadsheet?**

Yes. During the grant agreement execution process in DocuSign grantees are instructed to complete Attachment B – Budget by entering grant funding and cost-share (if applicable) amounts in the appropriate cost-category. The Program will not accept spreadsheets in lieu of completing Attachment B – Budget.

**36. Is there a process for resubmitting budgets to account for increased costs due to inflation? Is there a set limit allowable as a percent-increase?**

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Total grant award amounts will not be increased. However, the Program will consider adjustments to line items within the grantee's budget to account for increased costs. Grantees may submit a revised budget for consideration as part of the grant agreement execution process. Once the agreement is executed, any future adjustments to the budget must be approved by the Program. Adjustments between existing line items on Attachment B - Budget that impact 10% or less of the total budget will be approved. Adjustments impacting more than 10% of the total budget will be evaluated on a case-by-case basis.

**37. You mentioned the possibility of resubmitting budgets. What is the process and what limitations do you have on this?**

During the grant agreement execution process, grantees will be asked to complete Attachment B – Budget. Grantees may not submit budgets that substantially deviate from the project activities, budget and timeline proposed in the grant application. However, the Program recognizes that certain costs may have changed since the filing of your grant application. Other limitations apply to Attachment B - Budget, such as grantees may not submit an Attachment B – Budget with a total award amount greater than the amount identified on the Notice of Intent to Award. Further details are contained in Attachment B - Budget.

**38. If the total award amount does not change, is it possible to move funding from one category to another in the application categories?**

It depends. Grantees may not submit budgets that substantially deviate from the project activities, budget and timeline proposed in the grant application. However, the Program recognizes that certain costs may have changed since the filing of your grant application and certain other adjustments to your project may be necessary as it develops. Once the agreement is executed, any future adjustments to the budget must be approved by the Program. Adjustments between existing line items on Attachment B - Budget that impact 10% or less of the total budget will be approved. Adjustments impacting more than 10% of the total budget will be evaluated on a case-by-case basis.

**39. Our grant application included the cost of purchase and remodeling of a building that will be used as a new clinic. The cost of both went up significantly between the time we submitted our application and the time we were awarded the grant. Is it possible to use money from another part of the grant to cover the costs? For example, can we use the money for the X-ray equipment to cover the additional building cost? Or would that be a violation of the grant requirements?**

See response to Question 38.

**40. If our budget has changed, is it okay to just update it in the agreement when submitted, or are there additional steps that should be taken?**

Yes, updated budgets should be submitted via the grant agreement. See the response to Question 38 for further information.

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- 41. Is payment for a project manager consultant an eligible expense? We are a small non-profit without in-house expertise for this work and need to contract for these professional services. Would this be managed as an Indirect Cost? We will not have other Indirect Costs.**

Payment for a project manager may be an eligible expense. It would be included as a contract for services, not an indirect cost.

### Audits

- 42. I heard a quick mention of "will be audited" during the webinar. Please describe what/when or any guidance related to audit.**

If you spend more than \$750,000 of federal award money in a year, federal regulations require that you have an audit performed. These are the "single audit" requirements of the federal Uniform Guidance, which you will find at 2 C.F.R. § 200.501. The \$750,000 requirement is based on all federal awards you spend, so even if you don't spend \$750,000 of your ARPA grant money this year you might still need to have an audit performed if you have other federal award spending. For those grantees who spend less than \$750,000 in a year, the State will be performing other forms of monitoring which could include an examination of records showing how your grant award funds were spent.

### Scope of Work

- 43. Must we strictly adhere to the scope of the project as described in our grant application, or can we allow for additional build out to serve the broader need in the community Also, can we amend the timeline for our project?**

Proposed changes to the scope of a project will be evaluated on a case-by-case basis. A change in scope may be permitted if it: i) is consistent with the overall project described in the grant application, ii) would not increase the total grant award amount, and iii) is consistent with federal requirements. If you believe your proposed change of scope meets these criteria, you should include the revised description in the Scope of Work you submit as Attachment A to your grant agreement.

### Affirmative Action

- 44. Is evidence of compliance with the affirmative action processes/documents/data required from us?**

Yes. This is required of grantee's subcontractors as well. DOA staff will work with grantees' subcontractors to ensure compliance with this requirement. Watch for further instructions from Program staff regarding this topic.

- 45. The survey we filled out included questions about affirmative action plans. We do not have a formal affirmative action plan. Is one required?**

Our affirmative action compliance team will be in touch regarding affirmative action requirements based on your organization's survey results.

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### Davis-Bacon/Prevailing Wage

**46. Have Davis-Bacon Act requirements regarding prevailing wages been waived for these grant projects?**

Yes. The U.S. Department of the Treasury's SLFRF Final Rule FAQ dated April 27, 2022 states: "[T]he Davis-Bacon Act requirements (prevailing wage rates) do not apply to projects funded solely with award funds from the SLFRF program." For more information, please see the SLFRF Final Rule and further Treasury Guidance available on the [Treasury SLFRF Website](#).

**47. Do State of Wisconsin prevailing wage requirements apply to construction projects under this program?**

No. The 2017 - 2019 state budget repealed Wisconsin's prevailing wage laws. However, the State and the Treasury Department encourage ARPA funding recipients to "use strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions." Grantees may be asked to provide documentation on wages and labor standards to meet Treasury reporting requirements.

### Environmental

**48. Is an environmental document required?**

The Program does not require that any environmental compliance documents be submitted to the Program. However, recipients must comply with any federal or state environmental laws and regulations that apply to their activities.

Regarding the federal National Environmental Policy Act (NEPA), the Treasury Department's SLFRF Final Rule FAQ dated April 27, 2022 states: "NEPA does not apply to Treasury's administration of the funds, including funds expended under the revenue loss, public health and negative economic impacts, and water, sewer, and broadband infrastructure eligible use categories. Projects supported with payments from the funds may still be subject to NEPA review if they are also funded by other federal financial assistance programs or have certain federal licensing or registration requirements."

### Miscellaneous

**49. Any specific aspects of complying with ARPA and 2 CFR Part 200 (Uniform Guidance) that you'd like to highlight for us - particularly applicable to this grant?**

The requirements of ARPA and 2 CFR Part 200 are too extensive to address here. The Program plans to distribute separate guidance regarding certain requirements of 2 CFR Part 200 in the near future. For more information about the ARPA State Local Fiscal Recovery Fund and 2 CFR Part 200 see the links below.

Treasury SLFRF Website:

<https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds>

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Federal 2 C.F.R. Part 200 (Uniform Guidance):

<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1>

**50. Regarding outcomes and measures during past and planned periods - are we to address construction-related only? If other types of performance measures, by whom and when are those determined/defined?**

Attachment C – Semi-annual Report and Payment Request Form requires grantees to provide a description of their project activities during the past reporting period and a description of project activities for the upcoming reporting period. Grantees should provide details related to the project activities that are funded by the grant (construction and otherwise) and consistent with the project described in the grant application and specifically outlined in the Scope of Work (Attachment A). Grantees should include proposed outcomes and measures in their Scope of Work. The Program may require the submission of additional information regarding outcomes and measures on a case-by case basis. Examples of outcomes and measures that may be included in the Scope of Work and reported on include milestones such as completing a solicitation, obtaining all required permits, achieving substantial completion, etc.

**51. If the scope of our project expands in terms of types of users of the facility to be built, is that permitted and what modifications to the application would be required?**

Further information about the specific project and the proposed changed is required to respond to this question. Please provide further detail by emailing the Program:

[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

**52. Has the funding been defederalized?**

No. The funding is provided by the federal State and Local Fiscal Recovery Fund and is subject to federal regulations, including 2 CFR Part 200 (Uniform Guidance).

**53. Is the funding considered state or federal for grant matching purposes?**

The answer depends on the requirements of the program for which you are attempting to provide matching funding.

**54. Must all use of funds fall into either a subaward or a vendor service agreement with the full suite of Uniform Guidance procurement rules attached? Are there any other methods of spending funds, such as subsidies, allowed?**

Further information is required to respond to this question. In particular, please provide further information regarding “subsidies” and how the cost is both an eligible cost and consistent with the intent of the Program. Please provide further detail by emailing the Program:

[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

**55. What is the best way for us to ask questions as we go forward? Email or phone?**

Please continue to contact the program via email at

[DOAHealthcareInfrastructureGrantProgram@wisconsin.gov](mailto:DOAHealthcareInfrastructureGrantProgram@wisconsin.gov).

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**56. The State of WI (DOA) is the "pass-through" entity. The entity receiving the grant is variably referred to in the Final Treasury ruling (January 2022) and 2 CFR Part 200 as sub-recipient and non-federal entity, correct?**

That is correct. Grantees under the Healthcare Infrastructure grant program are considered subrecipients.