

INSTRUCTIONS TO REQUEST FY 2013 MCH TRIBAL SETASIDE SUBGRANT

Funding Source: Title V / Maternal & Child Health Services (MCH) Block Grant Program
U.S. Department of Health and Human Services (HHS)
Health Resources and Services Administration (HRSA)
Maternal and Child Health Bureau (MCHB)
CFDA #93.994 awarded to Nebraska Department of Health and Human
Services (DHHS)

Pass through: Nebraska Department of Health and Human Services (DHHS)
Division of Public Health

Project Period: October 1, 2012 – September 30, 2013

Instructions Issued: September 12, 2012

Electronic Version: <http://dhhswebsiteauthoring/publichealth/Pages/MCHTribalGrant.aspx>

Request Due Date: September 28, 2012

Issuing Office: Lifespan Health Services -- Planning & Support
Nebraska Department of Health and Human Services
Division of Public Health
301 Centennial Mall South, PO Box 95026
Lincoln NE 68509-5026
(402) 471-0197 -- local
(800) 801-1122 -- toll free
rayma.delaney@nebraska.gov

September 12, 2012

MCH Tribal Setaside Subrecipients:

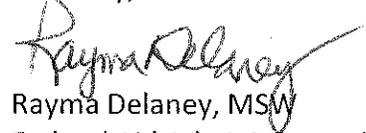
On behalf of Joann Schaefer, M.D., Chief Medical Officer and Director of the Division of Public Health for the Department of Health and Human Services (DHHS), I am pleased to announce DHHS's intention to continue the MCH Tribal setaside for FY 2013 (October 1, 2012 – September 30, 2013). Only the four federally-recognized Tribes headquartered in Nebraska are eligible to apply.

Subgrant awards are subject to the receipt of federal funds. For FY 2013, there is more emphasis on that statement due to the spending reduction process known as sequestration to take effect on January 2, 2013, as stipulated by the Budget Control Act of 2011 (P.L. 112-25). At this time, DHHS plans to support Nebraska Tribal activities for maternal and child health in the year ahead by maintaining level funding, i.e. at the same amount as in the prior year. A total \$170,000 is projected to be available for the FY 2013 setaside. The total is split into four awards using a methodology selected by the four Nebraska Tribes.

The *instructions* and *forms* to request the MCH Tribal setaside funding are available electronically at <http://dhhswebsiteauthoring/publichealth/Pages/MCHTribalGrant.aspx>. Use the link at the top of the webpage to subscribe to it in order to be automatically notified by email when updates are made to the webpage.

If possible, please submit your FY 2013 MCH Tribal Setaside funding request by Friday, **September 28, 2012**. In addition to timeliness, careful attention to detail will expedite the process (see Attachment 4, Common Mistakes and Omissions). I hope you will contact me with any questions at (402) 471-0197 or rayma.delaney@nebraska.gov.

Sincerely,



Rayma Delaney, MSW
Federal Aid Administrator, Lifespan Health Services

INSTRUCTIONS to submit required subgrant documents
Nebraska MCH Tribal Setaside FY 2013

The paperwork and process for the FY 2013 MCH Tribal Setaside is mostly the same as the prior subgrant period. Item 3 is added as a helpful resource to budget the personnel costs allocable to subgrant funds and/or matching.

1. Subgrant Agreement (2 signed originals)
2. Description of Planned Activities
3. Personnel Cost Worksheet (suggested form)
4. Budget Justification
5. Line Item Budget (required form)
6. Management Plan

Each item is described in detail in the instructions, with additional information referenced and/or attached. The FY 2013 subgrant documents are requested by September 28, and submitted to:

Nebraska Department of Health and Human Services
Division of Public Health
Lifespan Health Services -- Planning and Support
P.O. Box 95026
Lincoln, Nebraska 68509-5026
Attn: Rayma Delaney

For questions about the subgrant, please contact Rayma Delaney, (402) 471-0197, rayma.delaney@nebraska.gov.

1. **Subgrant Agreement.**

The agreement will not be posted on the webpage with the other materials. A pdf of the particular agreement between DHHS and the Tribe will be sent electronically to the respective Tribal contacts. Print two agreements, having both originals signed by the person authorized by the Tribe to sign legally-binding documents. Submit to DHHS for 2nd signature. When the agreement is signed by DHHS, one fully-executed agreement will be returned to the Tribe, and the other retained by DHHS. Indicate by name and address (United States Postal Service) to whom to return one fully-executed document to the Tribe.

2. **Description of Planned Activities.** No specific form or format is required for this description, which does not minimize the importance of this item. Carefully describe the planned activities that correspond to the budget. The typed narrative does not need to be lengthy, but it should be detailed enough to identify to a reader what the proposed activities are, for what purpose, and when activities will be implemented.

3. Personnel Cost Worksheet.

This item is new for FY 2013, and is electronically available at <http://dhhswebsiteauthoring/publichealth/Pages/MCHTribalGrant.aspx>. Open and save it to your computer before entering information. This worksheet is for funding requests that include personnel costs by either subgrant funds or matching. While not required, it is strongly encouraged as a helpful resource to accurately budget the personnel costs allocable to subgrant funds and/or matching. If the worksheet is used for both subgrant funds and matching, clearly indicate in the Budget Justification and the Line Item Budget the source of the funds. An example follows on the next page.

Do not use this worksheet for personnel services in any contract(s). The nature of the relationship should be clear; i.e. contractors are not employees of the subrecipient. Any contract under the subgrant should be described in the Budget Justification, including the basis for the fee which may include costs for personnel services.

Personnel Cost Worksheet (Example)

This is an embedded image of an Excel worksheet. To access the file to use for the subgrant request, visit <http://dhhswebsiteauthoring/publichealth/Pages/MCHTribalGrant.aspx>. Open and save the file to your computer before entering information.

INSTRUCTIONS: For each Employee Name [A] and Job Title [B], enter data in white cells. Yellow cells contain formulas to calculate Transfer totals for Columns J and K to the *Budget Justification* (Attachment I) and *Line Item Budget* (Attachment J).

Formulas are based on the following information using 40 hours/week X 52 weeks = 2,080 hours/year for full-time equivalent (FTE).

D= C divided by 2,080

I= H divided by C

J= E multiplied by I

K= F multiplied by I

A	B	C	D	E	F	G	H	I	J	K	L
		For The Organization					Allocable to the Grant				
Employee Name	Job Title	Annual Hours	Organization FTE	Annual Salary / Wage	Annual Fringe Benefits	Organization Salary + Fringe	GRANT Hours	% of GRANT	GRANT Salary/Wage	GRANT Fringe Benefits	GRANT salary/wage + fringe benefits
Pat Smith	Project Coordinator	2080	1.00	\$ 60,000.00	\$ 15,000.00	\$ 75,000.00	1248	60%	\$ 36,000.00	\$ 9,000.00	\$ 45,000.00
Terry Jones	Project Assistant	1040	0.50	\$ 24,000.00	\$ 3,000.00	\$ 27,000.00	310	30%	\$ 7,153.85	\$ 894.23	\$ 8,048.08
		0	0.00			\$ -		0%	\$ -	\$ -	\$ -
		0	0.00			\$ -		0%	\$ -	\$ -	\$ -
		0	0.00			\$ -		0%	\$ -	\$ -	\$ -
		0	0.00			\$ -		0%	\$ -	\$ -	\$ -
		0	0.00			\$ -		0%	\$ -	\$ -	\$ -
									\$ 43,153.85	\$ 9,894.23	\$ 53,048.08
TOTALS											

4. **Budget Justification.** Use the format shown below. The Budget Justification describes the need for and shows the calculations of each item of cost. The Budget Justification, as a counterpart of the Line Item Budget, contains the exact budget categories and line items. An acceptable Budget Justification identifies each item of cost and the methodology used in projecting the cost. Explain and show the method used to allocate expenditures to more than one funding source. Information must be provided in sufficient detail to support items of cost for both subgrant funds and match.

Clearly identify all resources as either subgrant funds, cash match, or in-kind. If matching is cash, identify the original source of the funds, e.g. 638 contract, any non-federal funds, program income, etc. If in-kind, identify the calculations to assess value to third-party contributions. (Note: DHHS interprets the PL-638 contract funds as cash match, not in-kind.)

The following examples do not include all allowable cost categories or lines.

The **Personnel Cost Worksheet** replaces the instruction immediately below for describing allocable personnel costs. Submit the Personnel Worksheet if it is used to calculate allocable costs. If the worksheet is not used, then use the following instruction to describe personnel costs:

PERSONNEL*

Position Title/Name	FTE	Annual Salary	Months	Amount
Project Coordinator, Barb Taylor	1.00	\$45,000	12	\$45,000
Outreach Supervisor, Bill Smith	.50	\$28,500	12	\$14,250
Activities Director, Kim Young	1.00	\$25,000	6	\$12,500

* Include brief descriptions of staff positions that are funded in whole or in part with MCH subgrant funds, i.e. indicate the full-time equivalent (FTE) of personnel paid with MCH funds and/or match. "Allocable costs" are a critical aspect of federal grants. A cost is allocable to a particular cost objective if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received. Any cost allocable to a particular federal award may not be charged to other federal awards to overcome fund deficiencies.

For either method used to show the allocable costs of personnel, describe the scope of responsibility for each position, relating it to the accomplishment of outcomes stated in the planned activities.

OFFICE EXPENSES

Supplies (\$75/month x 12 months)	\$ 900.00
Printing (1,000 brochures x \$.15/ea.)	\$ 150.00
Rent (\$3/sq. ft x 200 ft. x 12 mos)	\$7,200.00

TRAVEL**

Mileage (300 mi. x 55.5¢/mi.)	\$ 121.50
Meals (\$25/diem x 5 days)	\$ 125.00
Lodging (\$100/night x 4 nights)	\$ 400.00

**Travel costs that could be considered excessive should be further clarified, e.g. delineated by in-state or out-of-state travel, purpose, number of persons, etc.

CONTRACT SERVICES

Use the six items below to provide details in the Budget Justification about each contract agreement, as relevant:

1. Name of contractor
2. Organizational affiliation, if applicable
3. Nature of services to be rendered
4. Relevance of service to the planned activities
5. The basis for the fee
6. The expected expense compensation (travel, per diem, other associated costs)

INDIRECT COST

If claiming indirect costs, identify the base used in establishing the rate, state the rate, and show the calculation leading to the claimed indirect costs in the Line Item Budget. The rate identified in a negotiated rate agreement should be the same as that used in the line item budget and the budget justification. State if there are under-recovered indirect costs that are budgeted as match.

5. **Line Item Budget.** Access the required Microsoft Excel spreadsheet at <http://dhhswebsiteauthoring/publichealth/Pages/MCHTribalGrant.aspx>. The file has been updated FY 2013. Open and save it to your computer before entering the current information.

A Line Item Budget is used to identify and categorize items of costs for subgrant funds and match. A budget should contain detail sufficient in line items to show the proposed items of costs that comprise the budget category. Budget categories are useful for organizing and clarifying line items. Costs must be clearly identified in the budget and justification in order for DHHS to determine if allowable, allocable and reasonable, and to consider if the cost is essential for achievement of intended outcomes of the planned activities.

In the Excel file, click on the bottom tab entitled "Budget and Revisions". Enter the budget for both subgrant and match on that worksheet. The spreadsheet contains formulas for calculating the addition of columns (total expenditures of subgrant and match by quarter) and rows (cumulative expenditures for the fiscal year period by line item). **Do not add or**

delete rows or columns in the spreadsheet as these methods could affect the formulas and subsequent calculations in the spreadsheet.

The budget entries will link from that worksheet into the separate expenditure worksheets for each quarter (see bottom tabs entitled “1st Qtr”, etc.) Later, when expenditures are entered in the expenditure worksheets relevant to each quarter report, the formulas will calculate budget-to-expenditure amounts (% Grant Expend) and subgrant balances *by line* and *total*.

The Excel budget worksheet contains pre-filled budget categories / line items as examples of allowable costs; these are not prescriptive for the budget. ***The Tribe should use categories or line items as relevant to their organization and the proposed activities.*** Category headings and line item descriptions may be edited in the worksheet to fit the unique characteristics of an organization and the subrecipient’s budget. (**Caution:** Edit text within the existing worksheet cells to change any pre-filled description; do not delete or add rows or columns to the spreadsheet. As noted above, adding or deleting could affect the formulas and subsequent calculations in the spreadsheet.)

Develop a budget with allowable, allocable, and reasonable costs that clearly support the planned activities for this subgrant-funded work. It is critical to consider the following information:

- “Miscellaneous” or “other” are not acceptable budget categories or line items, as these do not provide an adequate description to determine if the cost is allowable.
- Each item of cost must be treated consistently in like circumstances either as a direct or an indirect cost, *e.g.* direct costs cannot include costs already reflected in an indirect cost rate, if an indirect cost rate is proposed.
 - Direct Costs -- Any cost that can be identified specifically with a particular project or program (contrast to indirect costs).
 - Indirect Costs -- Indirect costs (IDC) are those costs incurred for common or joint purposes, and are usually allocated among an entity's services in proportion to each service's share of direct costs. Because of the diverse characteristics and accounting practices of governmental units, the types of costs, which may be classified as indirect costs, cannot be specified in all situations. However, typical examples of indirect costs, may included certain general administration of the subrecipient department or agency, accounting and personnel services performed within the subrecipient department or agency, and the costs of operating and maintaining facilities. Use the IDC rate agreement negotiated by the federal cognizant agency. Attach a copy of the Tribe’s most current indirect cost rate agreement which supports the use of the “indirect costs” line item. The Indirect Cost Rate Agreement is needed to confirm that it is a current rate negotiation, to understand how the rate is being applied, and to verify that the rate is applied

correctly, e.g. mathematically and that the base to establish the rate does not include subgrant funds budgeted as direct costs.

- **Match and program Income.** Match, or as sometimes referred to as “*cost sharing*”, is that portion of project or program costs not borne by the Federal government. **Match is ‘in addition to’ the subgrant funds.** Generally, federal funds¹ cannot be matched with other federal funds. However, it is permissible for Native American Tribes eligible under P.L. 93-638 to use 638 contract funds in conjunction with federal funds. For example, personnel costs can be split between multiple sources of support, each source paying the ‘fair share’. (It is unallowable, however, to claim costs for exactly the same expense or activity from two sources of funds.) Nebraska MCH Tribal Setaside and 638 contract funds can work together, with the 638 funds reported as matching. Show the relationship in the line item budget. Note: 638 contract funds should be shown in the cash match column (not in-kind). (The relationship between the two sources of funds shall be fully described in the item 2 Budget Justification.)

There are two types of match, cash and in-kind. Delineate the two types of match by entering the budgeted match in the appropriate column in the Line Item Budget.

- **Cash** -- An entry in the “Cash Match” column indicates a product/service is budgeted with cash provided by the Tribe. Acceptable forms of cash match include non-federal funds, program income, and agency funds. Projected program income should be identified in the line item(s) of cash match to show where program income is expected to be re-invested in the MCH activities. (Contrast cash match to a “third-party contribution” referred to as “in-kind”).
- **In-kind** -- An entry in the “In-kind” column indicates a third-party contribution, *i.e.* a donated service or product to which a value can be assessed. If in-kind is budgeted, describe in the Budget Justification how a value will be assessed to the donated product or service.

The Tribe must match at least 20% of the subgrant award. This support is included with State funds to meet DHHS’s match requirement of three dollars for every four dollars of federal MCH Block Grant funds. ***Attachment 1 provides additional information about matching.***

Program income means gross income received by the Tribe that is directly generated by a MCH subgrant-supported activity, or earned only as a result of the MCH subgrant during the project period. Program income is encouraged to defray project costs. If earned, program income may be used to meet the matching requirement. Three alternatives for using program income are:

¹ The Nebraska MCH Tribal Setaside subgrant funds are federal funds, not state funds. DHHS is the prime recipient of the federal Title V/MCH Block Grant funds, and the pass-through entity for the subgrants made to community-based organizations and Tribal governments.

- a. Matching. Applicants shall budget any projected program income in the cash match column of the Line Item Budget.
- b. Addition. Any income in excess of the 20% minimum match may be added to the funds committed to the subgrant agreement and shall be used for the purposes and under the conditions of the agreement.
- c. Deduction. If the alternative of addition is not exercised, income in excess of 20% of total project costs must be deducted from outlays of the federal subgrant award rather than to increase the funds committed.

The Tribe will be expected to identify through quarterly reports the program income earned and how it is used. If the final expenditure report for any fiscal year does not have a zero balance for program income, prior to close out of the subgrant the final reimbursement will be reduced by the amount of unused program income. Program income shall be disbursed as earned, and cannot be carried over between fiscal years.

If the subgrant funded activities do not earn income, or if program income is insufficient to meet the minimum match requirement, the match requirement must be met by one or a combination of the following options:

- a. non-federal funds not already used towards satisfying a cost sharing or matching requirement of another grant agreement, and/or
- b. third party in-kind contributions not already used towards satisfying a cost sharing or matching requirement of another grant agreement.

Program income defrays costs and assists with the sustainability of the activities. If feasible, program income is strongly encouraged. Not all subgrant-funded activities earn income, but if the Tribe anticipates program income, include the projected amount in the budget in the "cash match" column. Use the Budget Justification to describe the methodology used to calculate projected income and how it will be reinvested in the subgrant-funded activities.

6. **Management Plan.** The Management Plan describes the procedures for successfully managing the proposed work with subgrant funds and match. Enter contact information in the form provided in Attachment 2. Add the additional information in the unformatted space that follows the form, and/or attach additional documents as relevant:

- Contact information for the key persons who will implement and monitor the MCH subgrant-funded activities in both finance and program operations [**Attachment 2**];
- Include an organization chart to identify the roles, relationships, and routines needed to successfully manage the proposed MCH subgrant-funded activities;
- A clear statement of the responsibilities and qualifications of the persons who will be involved in the MCH subgrant-funded efforts, as follows:

➤ **finance operations**

- management/oversight
- accounting/financial reporting

➤ **program operations**

- management/oversight
- implementation and reporting of the Work Plan activities

- ❑ Identification of policies, practices, orders, and other key instructions that represent a basic framework to be used in the implementation and monitoring of the MCH subgrant-funded activities. Describe compliance with these policies, practices, orders, and other key instructions.
- ❑ If the proposed activities require the hiring of staff or contract services, the Management Plan should address recruitment efforts to support start-up activities within the timeframe described in the planned activities and to meet the minimum qualification requirements. Address basic considerations related to retention, e.g., comparable salary and benefits, or contract compensation, staff development, employment policy/procedures, etc.
- ❑ Depending on the nature of the proposed activities, describe applicable requirements and how those requirements will be addressed, such as confidentiality and security of patient records, clinic licensure, scope of practice/supervision of medical personnel, quality assurance, a plan to achieve compliance with the four mandated National Standards for Culturally and Linguistically Appropriate Services in Health Care (CLAS) [**Attachment 3**], new staff orientation and on-going staff development, etc.

Additional Information about Match

Tribe's records for tracking match must be kept in the same manner as records for claiming subgrant expenditures. Match will be subject to monitoring if a subgrant is awarded.

1. To be accepted, all matching contributions, including cash and third party in-kind, shall meet all of the following criteria:
 - (a) Are verifiable from the Tribe's records;
 - (b) Are not included as contributions for any other federally-assisted project or program;
 - (c) Are necessary and reasonable for proper and efficient accomplishment or project or program objectives;
 - (d) Are allowable under the applicable cost principles;
 - (e) Are not paid by the Federal Government under another award, except where authorized by Federal statute to be used for matching;
 - (f) Are provided for in the approved budget.
2. Values for recipient contributions of services and property shall be established in accordance with the applicable cost principles.
3. Under-recovered indirect costs may be included as part of matching.
4. The following information in this item pertains specifically to the Tribe's supporting records for in-kind contributions from third parties.
 - (a) Volunteer services shall be documented and, to the extent feasible, supported by the same methods used by the Tribe for its own employees, including time records.
 - (b) The basis for determining the valuation for personal service, material, equipment, buildings, and land shall be documented.
 - (c) Volunteer services furnished by professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as matching if service is an integral and necessary part of an approved project or program. Rates for volunteer services shall be consistent with those paid for similar work in the subrecipient's organization. In those instances in which the required skills are not found in the subrecipient's organization, rates shall be consistent with those paid for similar work in the labor market in which the subrecipient competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, allowable, and allocable may be included in the valuation.
 - (d) When an employer other than the Tribe furnishes the services of an employee, these services shall be valued at the employee's regular rate of pay (plus an amount of fringe benefits that are reasonable, allowable, and allocable, but exclusive of overhead costs), provided these services are in the same skill for which the employee is normally paid.
 - (e) Donated supplies may include such items as expendable property, office supplies, laboratory supplies or workshop and classroom supplies. Value assessed to donated supplies included in the matching share shall be reasonable and shall not exceed the fair market value of the property at the time of the donation.

Management Plan

Project Director or primary contact person:

Name: _____
Title: _____
Address: _____
City: _____
Phone: _____ Fax: _____
email: _____

Financial Officer:

Name: _____
Title: _____
Address: _____
City: _____
Phone: _____ Fax: _____
email: _____

Other staff involved in this subgrant:

Name: _____
Title: _____
Address: _____
City: _____
Phone: _____ Fax: _____
email: _____

Other staff involved in this subgrant:

Name: _____
Title: _____
Address: _____
City: _____
Phone: _____ Fax: _____
email: _____

Other staff involved in this subgrant:

Name: _____
Title: _____
Address: _____
City: _____
Phone: _____ Fax: _____
email: _____

Other staff involved in this subgrant:

Name: _____
Title: _____
Address: _____
City: _____
Phone: _____ Fax: _____
email: _____

National Standards for Culturally and Linguistically Appropriate Services in Health Care (CLAS)

What are CLAS Standards?

The collective set of Culturally and Linguistically Appropriate Services mandates, guidelines, and recommendations issued by the U.S. HHS Office of Minority Health intended to inform, guide, and facilitate required and recommended practices related to culturally and linguistically appropriate health services.

What is cultural and linguistic competence?

Cultural and linguistic competence is “a set of congruent behaviors, attitudes, and policies that come together in a system, agency, or among professionals that enables effective work in a cross-cultural situation”.

“Competence implies having the capacity to function effectively as an individual and an organization within the context of the cultural beliefs, behaviors, and needs presented by consumers and their communities.”

Cross, T., et al, *Towards a Culturally Competent System of Care*, Volume 1, 1989.

Why are CLAS Standards needed?

The standards “respond to the need to ensure that all people entering the health care system receive **equitable and effective** treatment in a culturally and linguistically appropriate manner” and are proposed “as a means to **correct inequities** that currently exist in the provision of health services and to make these services more responsive to the individual needs of all patients/consumers.”

“They are especially designed to address the needs of racial, ethnic, and linguistic population groups that **experience unequal access** to health services” and “ultimately to contribute to the elimination of racial and ethnic health disparities and to improve the health of all Americans.”

How are the CLAS Standards applied?

There are 14 Standards. Four of the Standards (4,5,6, & 7) are mandates and are required to be adopted for all recipients of Federal Funds. These four standards are based on Title VI or the Civil Rights Act of 1964 (Title VI) with respect to services for limited English proficient (LEP) individuals. Additionally, nine of the Standards are guidelines that are activities that are recommended by the Office of Minority Health (OMH) for adoption as mandates by Federal, State, and national accrediting agencies. This distinction applies to Standards 1,2,3,8,9,10,11,12, & 13. Finally, Standard 14 is a recommendation that is suggested by OMH for voluntary adoption by health care organizations.

What is Title VI?

This refers to Title VI of the Civil Rights Act of 1964. Specifically, Title VI provides that no person in the U.S. shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Full text of the Act may be found in *Title VI of the Civil Rights Act of 1964*, as amended, 42 U.S.C. §2000d, *et seq.*

A manual providing an overview of the Act may be found at http://www.usdoj.gov/crt/grants_statutes/legalman.html#Introduction

The courts have held that Title VI prohibits recipients of Federal financial assistance from denying LEP persons access to programs, on the bases of national origin. Any organization, or individual, that receives Federal financial assistance, either directly or indirectly, through a grant contract, or subcontract, is covered by Title VI. For more information on Title VI Language Assistance obligation, see:

<http://www.hhs.gov/ocr/civilrights/resources/specialtopics/lep/factsheetguidanceforlep.html>

Which CLAS mandates are current Federal requirements for all recipients of Federal funds based on Title VI?

Standards 4, 5, 6 & 7 are mandates. These standards are:

4. Health care organizations must offer and provide language assistance services, including bilingual staff and interpreter services, at no cost to each patient/consumer with limited English proficiency at all points of contact, in a timely manner during all hours of operation.
5. Health care organizations must provide to patients/consumers in their preferred language both verbal offers and written notices informing them of their right to receive language assistance services.
6. Health care organizations must assure the competence of language assistance provided to limited English proficient patients/consumers by interpreters and bilingual staff. Family and friends should not be used to provide interpretation services (except on request by the patient/consumer).
7. Health care organizations must make available easily understood patient-related materials and post signage in the languages of commonly encountered groups and/or groups represented in the service area.

As a recipient of Federal funds, what are some options to comply with the language access requirement?

For oral language assistance, options that can be used to comply with the language access requirement include: hiring bilingual staff for patient and client positions, hiring staff interpreters, contracting for interpreter services, engaging community volunteers, and contracting for

telephone interpreter services. Translation of written documents depends on several factors, including the size of the population being served.

Which CLAS Standards are recommendations?

CLAS standards that are recommended by the Office of Minority Health (OMH) for adoption are Standards 1, 2, 3, 8, 9, 10, 11, 12 & 13:

1. Health care organizations should ensure that patients/consumers receive from all staff members effective, understandable, and respectful care that is provided in a manner compatible with their cultural health beliefs and practices and preferred language.
2. Health care organizations should implement strategies to recruit, retain and promote at all levels of the organization a diverse staff and leadership that are representative of the demographic characteristics of the service area.
3. Health care organizations should ensure that staff at all levels, and across all disciplines receive ongoing education and training in culturally and linguistically appropriate service delivery.
8. Health care organizations should develop, implement, and promote a written strategic plan that outlines clear goals, policies, operational plans, and management accountability/oversight mechanisms to provide culturally and linguistically appropriate services.
9. Health care organizations should conduct initial and ongoing organizational self-assessments of CLAS-related activities and are encouraged to integrate cultural and linguistic competence-related measures into their internal audits, performance improvement programs, patient satisfaction assessments, and outcomes-based evaluations. Title VI Language Assistance Obligations.
10. Health care organizations should ensure that data on the individual patients/consumer's race, ethnicity, and spoken and written language are collected in health records, integrated into the organization's management information systems, and periodically updated.
11. Health care organizations should maintain a current demographic, cultural and epidemiological profile of the community as well as a needs assessment to accurately plan for and implement services that respond to the cultural and linguistic characteristics of the service area.
12. Health care organizations should develop participatory, collaborative partnerships with communities and utilize a variety of formal and informal mechanisms to facilitate community and patient/consumer involvement in designing and implementing CLAS – related activities.
13. Health care organizations should ensure that conflict and grievance resolution processes are culturally and linguistically sensitive and capable of identifying, preventing, and resolving cross – cultural conflicts or complaints by patients/consumer.

Which CLAS Standard is suggested by OMH for voluntary adoption by health care organizations?

Standard 14 is suggested as a voluntary step:

14. Health care organizations are encouraged to regularly make available to the public information about their progress and successful innovations in implementing the CLAS standards and to provide public notice in their communities about the availability of this information.

Where can I find more information about CLAS Standards?

The Office for Civil Rights (OCR) has a website that provides information on Title VI Language Assistance Obligations, compliance with the language access requirement, examples of prohibited practice, and compliance and enforcement.

<http://minorityhealth.hhs.gov/templates/browse.aspx?lvl=2&lvlID=15>

Nebraska is in HHS Region VII, with its headquarters in Kansas City, MO. The Regional Office of Civil Rights Manager can be reached at 816-426-7277, fax 816-426-3686, and TDD 816-426-7065.

Common Mistakes and Omissions

Using this checklist, carefully review your MCH Tribal Setaside subgrant funding request before submitting to DHHS. Avoiding these common mistakes and omissions will expedite review.

Please avoid these common mistakes and omissions:

	<p>The <u>type</u> of match (cash vs in-kind) is incorrectly identified. <i>Review these Instructions carefully to be clear on the differences and why it is important.</i></p>
	<p>Program income is confused with subgrant funds. <i>Review the definition and how to budget for projected program income. Program income is always cash match, but not all cash match is program income.</i></p>
	<p>The <u>source</u> of match is not identified, especially the original source of <u>cash</u> match. <i>Review these Instructions carefully to understand why this is important.</i></p>
	<p>Budget lines <u>do not mirror</u> the Budget Justification. <i>Use exactly the same lines in both spreadsheet and the narrative of the justification of each line item. Clearly distinguish between subgrant funds, cash match, and in-kind in the narrative description to justify the proposed costs related to proposed activities.</i></p>
	<p>Subgrant budget <u>exceeds the level</u> of subgrant funds available. <i>A FY 2013 award cannot exceed the prior FY 2012 award.</i></p>
	<p>Non-specific line item in the Budget, e.g. <u>cannot use</u> “miscellaneous” or “other”. <i>“Other” and Miscellaneous” are inadequate descriptions to determine if the cost is allowable based on the OMB Cost Principles as relevant to the type of entity. Also, each item of cost must be treated consistently in like circumstances either as a direct or an indirect cost.</i></p>
	<p>Indirect costs are budgeted, but the Indirect Cost Rate Agreement is not attached. <i>The Indirect Cost Rate Agreement is needed to confirm that it is a current rate negotiation, to understand how the rate is being applied, and to verify that the rate is applied correctly, e.g. mathematically and that the base to establish the rate does not include subgrant funds budgeted as direct costs.</i></p>

Checklist

This Checklist summarizes all parts of the MCH Tribal Setaside subgrant request. Carefully review the Checklist to be certain items 1-6 are accurately prepared and submitted. *If possible, submit the subgrant request by **September 28, 2012.***

<p>1. Subgrant Agreement – A pdf of the particular agreement between DHHS and each respective Tribe will be sent electronically to the Tribal contacts. Print two agreements, having both originals signed by the person authorized by the Tribe to sign legally-binding documents. Submit to DHHS for 2nd signature, and when signed by DHHS, one fully-executed agreement will be returned to the Tribe, and the other retained by DHHS. Indicate by name and address (United States Postal Service) to whom to return one fully-executed document to the Tribe.</p>	
<p>2. Description of Planned Activities – No specific form or format is required for this description. Carefully describe the planned activities that correspond to the budget. The typed narrative does not need to be lengthy, but it should be detailed enough to identify to a reader what the proposed activities are and for what purpose.</p>	
<p>3. Personnel Cost Worksheet – Strongly recommended, but not required. If the worksheet is not used, use the format described in the Budget Justification to demonstrate how allocable personnel costs are budgeted.</p>	
<p>4. Budget Justification - The Budget Justification shall clearly describe the need for each item of cost, <u>showing calculations</u> how amounts were determined. Reflect any program income projections in the justification for line items budgeted with cash match. Attach current negotiated rate agreement to support indirect costs. Budget at least 20% match (.20 x subgrant funds requested = minimum match).</p>	
<p>5. Line Item Budget – The Line Item Budget must mirror all line items from the Budget Justification (item 4), including both subgrant funds requested and matching resources. Use the “budget & revisions” tab (see bottom of worksheet) within the Microsoft Excel spreadsheet available. Budget entries link to other worksheets that will be used for reporting expenditures for each of the four quarter reports.</p>	
<p>6. Management Plan –This narrative describes the procedures for successfully managing the <u>Planned Activities</u> (item 2) with the financial resources proposed in the <u>Budget</u> (items 4 and 5). Identify key individual(s) by name, title and contact information who will implement and monitor both finance and program operations.</p>	