



## FREQUENTLY ASKED QUESTIONS

### Centers for Independent Living: Expanding Disabilities Network's (CILs) Access to COVID 19 Vaccines Funding (v1.0)

April 14, 2021

The Administration for Community Living (ACL) announced a new funding opportunity to increase vaccine access for people with disabilities. With funding and partnership support from the Centers for Disease Control and Prevention (CDC), ACL is providing grants to disability networks to provide critical services to help communities combat COVID-19. A leading priority of this joint effort is to ensure vaccines are equally accessible to the disability population.

#### **Q1: What are the allowable activities for this award?**

**A1:** Expenses related to the following activities are allowable to be charged to this award:

- Education about the importance of receiving a vaccine;
- Identifying people unable to independently travel to a vaccination site;
- Helping with scheduling a vaccine appointment;
- Arranging or providing accessible transportation;
- Providing companion/personal support;
- Reminding people of the second vaccination appointment if needed; and/or
- Providing technical assistance to local health departments or other entities on vaccine accessibility.

All these activities are also allowable under the CARES Act. The FAQ for CARES Act can be found here (<https://acl.gov/covid19/aging-and-disability-networks> ). **It is critical to understand that this is unique and optional opportunity from CARES Act funding. This opportunity is focused exclusively on the areas listed above.**

There are no changes or expansions to the allowable expenses outlined in 45 CFR 75 or the Rehabilitation Act, as amended (Rehab Act). CILs are especially encouraged to review the section on reasonableness of costs (45 CFR § 75.404) to assure allowability of costs. Please contact your PO with question.

Whether or not a cost is allowable depends on many variables. Grantees are expected to make prudent, reasonable decisions regarding the use in the same manner the grantee would determine use of any other funding stream.

#### **Q2: What is the Project Period for this award?**

**A2:** Awards made under this announcement have an estimated start date of April 1, 2021 and an estimated end date of September 30, 2022. The period of liquidation runs through December 31, 2022.

**Q3: Can we use multiple funding sources in funding the activities allowed using the CDC funding?**

**A3:** Yes, in fact, many grantees are “braiding” or combining resources where different funding sources are used to cover different parts of a project, such as Part C, CARES Act funds and now CDC funding, to meet consumer needs. The key is to not double bill, i.e., charge the exact same expense to multiple sources.

Please also note that funding utilized, and the related activities and outcomes, will need to be reported. Grantees are encouraged, up front, to plan for expenses that can be tracked and reported specific to this funding source.

**Q4: Will funding received under this award be factored into funding formulas for current or future awards my CIL currently receives from ACL?**

**A4:** No. CDC funding is one-time funds from another HHS division and therefore will not be factored into future Part C allocations.

**Q5: Do I need to apply for these funds?**

**A5:** In order to receive these funds a grantee must submit a completed letter of assurance indicating both a desire to receive funds and an assurance that funds will be expended according to requirements for the CDC funding. Please contact your PO for a copy of this template. The Letter of Assurance must be received by 11:59 p.m. Eastern Time April 23, 2021.

**Q6: Can these funds be declined?**

**A6:** Yes, there is a line on the assurance template to indicate the grantee chooses to decline funding. Please note, not receiving a signed affirmative assurance by 4/23/21 will also be interpreted as declining funds.

Please note that all activities allowable under this funding are also allowable under CARES Act award. In order to minimize unused funds, grantees are encouraged to review their current ability to utilize CARES Act funds, remaining balances and future plans when deciding whether or not to submit for this additional funding.

**Q7: How are funding amounts determined?**

**A7:** The total available funding for this opportunity is \$5,000,000. The funds will be distributed in equal amounts to the CILs that submit Letters of Assurance. The exact amounts will be determined after the submission date of 4/23/21. CILs who do not complete assurance requirements or otherwise indicate no desire to receive funds will be excluded from receiving funds. This will have the effect of increasing the amount of funds available for eventual recipients.

**Q8: How will funds be distributed?**

**A8:** ACL has determined that if funding were allocated based on previously utilized formulas that a number of grantees would receive funding that was not sufficient to provide any substantive work. As a result, ACL will be distributing the \$5,000,000 evenly to all Part C grantees that complete the assurance. This equates to a minimum award of \$14,204 (\$5,000,000/352). This figure is based on 352 recipients and would rise if some grantees decline the funds or do not complete the assurance.

**Q9: Can I transfer these funds to another entity?**

**A9:** No. A grantee may contract or otherwise purchase services or goods with these funds as it would in normal agency activities, but it is ACL's expectation that the recipient remain in control of the funds at all times.

**Q10: Will there be reporting requirements specific to this award?**

**A10:** Yes. As indicated in the assurance template, recipients of this award must also submit programmatic and financial reports that reflect use of this funding. Specific reporting tools and deadlines are being developed. We will provide information about reporting requirements as soon as we can.

**Q11: Will I need to track these funds separately?**

**A11:** Yes. As noted above, grantees will be expected to report specifically on the use of these funds, and as such should ensure funds are utilized in a way that allows for specific tracking and reporting.

**Q12: Do I have to open a Consumer Information File (CIF, formerly known as Consumer Service Record) or complete an Independent Living Plan for each person who receives services from this funding source?**

**A12:** No. Please make every reasonable effort, but ACL understands there may be situations where this is simply not practical or even doable. It is advisable to document the circumstance behind why an ILP or CIF was not developed; even in the absence of a complete CIF with a signed ILP, consumer goals and services should be documented as part of the annual reporting. CILs should consider following their usual internal processes to identify whether or not a CIF or ILP would be prudent.

**Q13: How do we get required consumer signatures during stay-at-home and social distancing orders?**

**A13:** The Rehab Act is clear that Independent Living Plans must indicate agreement between staff and consumers. Any format, electronic or otherwise, is allowable as long as that agreement is documented.

Not all documents utilized at a CIL are governed by ACL; for example, a Release of Information or personnel documents. Those are governed by rules outside of ACL's jurisdiction and thus CILs are responsible for understanding and implementing the requirements of each document. The specifics of how any of these items are defined and administered in a CIL should be documented within CIL policies.

**Q14: Is this funding limited to services or goods purchased, or must it also be utilized for related administration or other costs?**

**A14:** Costs charged to this award should follow the same rules, including those established in the Notice of Award (NOA), an approved Indirect Cost Rate, a Notice of Award or applicable under 45 CFR 75, as any other Federal funding source.

**Q15: Can I purchase equipment or make capital improvements to facilities with CARES Act funds?**

**A15:** Yes. As has always been true, prior approval is required for equipment or capital expenditures with a per-unit acquisition cost over \$5,000 (45 CFR § 75.439). To begin this process, contact your PO with the following information:

- Are the costs being allocated out, or is there a plan to pay for a proportion of the costs not related to COVID-19 with other funds?

- What funding will be used to cover long-term costs such as insurance and repair when this funding is no longer available?
- Does your CIL have established policies for use of the piece of equipment?

ACL strongly encourages CILs to plan carefully with large expenses, paying particular attention to any long-term expenses (upkeep, repair, insurance, etc..) that the purchase would require.

Please note that while CARES Act funds can be used to make the purchase, any costs incurred after the CARES Act expires must be charged to each program that benefits from the purchase and in proportion to the benefit received.