

# Public Health Emergency Preparedness Budget Instructions Fiscal Year 2021-22



Wisconsin Department of Health Services  
Division of Public Health  
Office of Preparedness and Emergency Health Care  
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## Budget Guidelines: Introduction

This section identifies basic concepts and rules that apply to the budget template. Many of the hyperlinks that appear in this document are located on the Partner Communication and Alerting Portal (PCA Portal). The PCA Portal requires a Wisconsin Logon Management System (WILMS) ID. For access to or technical questions about the PCA Portal, please contact [dhspcaportal@wisconsin.gov](mailto:dhspcaportal@wisconsin.gov).

Auditors would use a budget if the state or local health departments were audited. Please keep this in mind while explaining functions of purchases and justifications throughout each budget. Following these budget guidelines will help ensure a correctly completed budget.

- Allocations: Each budget must match the corresponding allocation award. To determine the grant allocations, see [BP1901-03 Local Public Health Agency \(LPHA\) and Tribal Public Health Emergency Preparedness \(PHEP\) Allocations](#).
- Itemization: Use only one line per item or one line per multiple of the same item. Do not copy additional information on to a second line.
- Justifications: Provide a justification for each line item in the budget that explains how the position or item supports public health preparedness.
- Western Wisconsin Public Health Readiness Consortium (WWPHRC): Members of the Western Wisconsin Public Health Readiness Consortium (WWPHRC), please see the [Appendix](#).
- Supplanting: Funds may not be used to cover positions and other expenditures already funded by other sources.
- Expense Preapproval Guidelines: To request preapproval for any expense for which it is required, [contact](#) the OPEHC grants manager or PHEP program coordinator.

# Step-by-Step Budget Instructions

Below is a list of steps necessary to complete the PHEP budget. Completing these steps will minimize errors and delays. Following these steps, there are detailed instructions for each tab of the budget.

1. Review the [Budget Guidelines Section](#). This section explains basic concepts and prohibited expenditures that apply to the budget templates.
2. Identify your grant allocation. See [PCA Portal announcement](#).
3. Download and save the correct budget template from the [PCA Portal Budget Management page](#) located near the bottom of the page. Please **save as** to your desktop, otherwise your template will save to the PCA Portal. **Do not save the template directly to the webpage.**

**Common Error:** The use of an incorrect budget template.

4. Name the spreadsheet using the format “[your agency] BP3 1901 PHEP Budget” or “[your agency] BP3 1901 PHEP CRI Budget.”
5. **As you fill out the budget, verify the completion of the Budget Breakdown by Capability** for all rows in each tab on the budget spreadsheet for which a cost is listed. These breakdowns are featured on the far right of each budget tab. Make sure that each row totals to 100 percent in the Budget Breakdown by Capability. Below is an example of a correctly completed Budget Breakdown by Capability.

**Common Error:** Failure to complete the Budget Breakdown by Capability. Ensure that the Budget Breakdown by Capability table is complete in each tab.

Budget Breakdown by Capability															
CP	CR	EOC	EPIW	FM	IS	MC	MCD	MMMD	MS	NPI	PHLT	PHSEI	RSH	VM	TOTAL
50%	0%	20%	0%	0%	0%	15%	0%	0%	0%	0%	0%	15%	0%	0%	100%
20%	20%	0%	20%	0%	20%	0%	0%	0%	0%	0%	0%	0%	20%	0%	100%

Figure 1: Correctly Completed Budget Breakdown by Capability

## Summary Tab

### Directions

Ensure that you are using the correct budget template. Remember to name the spreadsheet using the following format: “[your agency] BP3 1901 PHEP Budget” or “[your agency] BP3 1901 PHEP CRI Budget.”

Please only add information to the yellow highlighted cells on the Summary tab. Enter the name of the health department into cell B15 and the allocation amount into cell B16. Each tab total (Salary & Fringe Benefits, Travel, etc.), once completed, will automatically populate in the remaining cells on the Summary tab. Enter indirect cost expenditures in cell B28.

**Verify the completion of the Budget Breakdown by Capability** for all rows on the Summary tab. These lines should populate automatically after all tabs are completed.

## Indirect Costs

### Directions

LPHAs are expected to follow their agency’s policies for establishing indirect costs and fringe benefit rates. Documentation of these rates must be made available to the Office of Preparedness and Emergency Healthcare (OPEHC) upon request.

The following are examples of expenditures that may be covered by indirect costs rate:

- Financial tracking and report preparation
- Information technology distributed costs
- Distributed accounting costs
- County counsel time
- Administrative services
- Facilities operations charges
- Department analyst time
- Auditor/controller time working on the grant
- Liability insurance
- Personnel services
- Overhead costs

## Salary and Fringe Benefits Tab

### Directions

For each requested position, provide the following information:

- Name of personnel occupying the position (if not available use "vacant")
- Position title
- Annual salary
- Description of position
- Percentage of time budgeted for this program (full time equivalent [FTE])
- Number of months budgeted
- Fringe as a percentage of salary **or** fringe as a fixed amount

Fringe benefits are usually applicable to direct salaries and wages. Provide information on the rate of fringe benefits used and the basis for their calculation. If a fringe benefit rate is not used, enter a fixed amount. Include either fringe as a percentage of salary or fringe as a fixed amount. **Do not** include both; use one or the other.

**Remember to fill in the Budget Breakdown by Capability table and ensure that each row totals to 100percent.**

Name of Personnel	Position Title	Annual Salary	Description of Position	FTE	# of Months Budgeted	Amount Requested for Salary	Fringe as a % of Salary	Fringe as a Fixed amount	Amount Requested for Benefits
<i>Example: Susan Taylor</i>	<i>Project Coordinator</i>	<i>\$ 45,000</i>	<i>This position directs the overall operation of the PHEP program for the health department; is responsible for overseeing the implementation of program capabilities, and coordinating with other agencies.</i>	<i>25%</i>	<i>12</i>	<i>\$ 5,360.16</i>	<i>0%</i>	<i>\$ 359.13</i>	<i>\$ 359.13</i>
<i>Example: (Vacant)</i>	<i>Outreach Supervisor</i>	<i>\$ 27,000</i>	<i>This position will assist with writing and editing communication documents to meet PHEP grant objectives, including plans and AARs.</i>	<i>100%</i>	<i>12</i>	<i>\$ 27,000.00</i>	<i>27%</i>	<i>\$ -</i>	<i>\$ 7,290.00</i>

Figure 2: Example of a Correctly Populated Salary and Fringe Benefits Tab

### Common Errors in Completing the Salary and Fringe Benefits Tab

- Name of Personnel column lists only generic groups, such as “public health staff” or “department staff.” Make sure to list names of individual personnel on separate lines.
- The Description of Position is left blank. Remember that each staff member listed must have a corresponding Description of Position.
- Fringe as a Percentage of Salary and Fringe as a Fixed Amount are both filled out. Make sure to fill out Fringe as Percentage of Salary **or** Fringe as a Fixed Amount, but not both.

## Travel Tab

### Directions

The following are reimbursement options for all OPEHC grantees and contractors:

- Option 1: [State of Wisconsin travel reimbursement rates](#)
- Option 2: [Federal \(GSA\) travel reimbursement rates](#)
- Option 3: Agency or organization’s travel reimbursement rates as set forth in an established policy

Each LPHA will be given the opportunity to select their preferred reimbursement option from the list above to apply to their travel portion of the budget for the duration of the fiscal year. These choices are available beginning immediately with the current fiscal year (July 1, 2021–June 30, 2022).

When submitting the budget for approval, please note in the *Comments, Initial* section of the Local and Tribal Preparedness Budget Form which travel reimbursement option your LPHA will be selecting. In future fiscal years, selecting your preferred travel reimbursement rate will be part of the annual budget and contracting process.

Please note that all reimbursement options are negotiable. OPEHC retains the right to deny a grantee or contractor's reimbursement rates (Option 3) if they are deemed significantly in excess of state or federal rates and would strain fiscal resources.

On separate lines, enter the name of each person who will be travelling. Provide the position title of each traveler. Provide a brief narrative justification for travel describing why the travel is required, how it relates to public health emergency preparedness, and approximate dates (such as National Association of County and City Health Officials (NACCHO) Conference May 2022). State the function of travel (such as for training or for a conference) and specify if travel is in-state or out-of-state.

### **Out-of-State Travel**

Generally speaking, the amount of PHEP funds used to support multiple travelers for multiple out-of-state trips should be limited. Authorization from OPEHC is required prior to budgeting multiple out-of-state travelers or multiple out-of-state trips.

PHEP grantees in travel status are expected to use good judgment when incurring travel costs. Only expenses incurred while conducting official PHEP business will be reimbursed. Reimbursement claims must represent actual, reasonable, and necessary expenses. Reimbursements may not cover the entire cost if they exceed prescribed limitations.

**Note:** If the traveler is not listed on the Salary and Fringe Benefits page, the traveler must be involved in preparedness work.

Provide a narrative justification describing staff travel. List destination, number of trips planned, traveler name, and dates. If mileage is to be paid, provide the number of miles using your preferred reimbursement rate of the three options listed above. If meal costs are to be reimbursed, indicate the number of days and meal costs, as well as the number of nights and estimated cost of lodging. Again, use your preferred reimbursement rate of the three options listed above. **If you have any questions about allowable expenses, please [contact](#) the OPEHC grants manager or PHEP program coordinator.**

If travel costs include a registration fee, please list the expense in the Other column on the Travel tab, and specify this cost in the Justification for Travel.

**Remember to fill in the Budget Breakdown by Capability and ensure that each row totals to 100 percent.**

Name of Personnel	Position Title	Justification for Travel	Function of Travel	In-state/Out-of-state
<i>Example: Susan Taylor</i>	<i>Project Coordinator</i>	<i>The Project Coordinator will take 1 trip to the Dells to attend the WPHA Conference in May 2022. This estimate includes \$300 for conference registration.</i>	<i>Conferences/Trainings</i>	<i>In-state</i>
<i>Example: (Vacant)</i>	<i>Outreach Supervisor</i>	<i>The Outreach Supervisor will travel to Atlanta to attend the CDC Conference scheduled for April, 2022. This estimate includes \$400 for airfare and \$300 for registration.</i>	<i>Conferences/Trainings</i>	<i>Out-of-state</i>

Number of Miles	Rate per Mile	Total Mileage	# Days	Meal Costs	# Nights Lodging	Lodging	Other	Budget TOTAL
120.00	\$ 0.510	\$ 61.20	3	\$ 38.00	1	\$ 82.00	\$ 300.00	\$ 557.20
50.00	\$ 0.510	\$ 25.50	3	\$ 50.00	2	\$ 150.00	\$ 700.00	\$ 1,175.50

Figure 3: Example of a Correctly Populated Travel Tab

### Common Errors in Completing the Travel Tab

- The Justification for Travel column does not provide a clear link between travel and public health preparedness work. Remember to include a justification for each line item that highlights how travel relates to public health preparedness.
- Only the Budget TOTAL column is populated. Make sure to fill out the following information according to your anticipated travel: mileage, per diem, lodging, or other.
- Entries in the Other column are not clarified in the Justification for Travel section. If including costs in the Other column, make sure to explain what these funds are used for in the Justification for Travel sections, such as conference registration fees, airfare, parking, or ground transportation.

### Equipment Tab

#### Directions

The Equipment tab is for items costing greater than \$5,000. Items costing less than \$5,000 should be listed in Other. Provide a description of the item and justification for the purpose of each item. Relate each item to a specific public health preparedness program capability.

This section is for items that are **not** considered supplies. Equipment refers to an item that is durable and will be used beyond the budget period (such as electronics or refrigerators), and for the purposes of this budget, **is at least \$5,000 per unit cost**. If multiple items total more than \$5,000, such as the purchase of three laptop computers at \$2,500 each, these do not go in the Equipment tab, as their **individual cost is less than \$5,000 each**.

Maintenance or rental fees for equipment should be included in the Other tab.

**Note:** If using PHEP funding to partially pay for an item, include the full cost of the item under the acquisition cost and include the percentage of PHEP funds used to purchase the item. The formula under the “\$ of PHEP



Funds” section will calculate the dollar amount.

**Note:** The PHEP program collects equipment information as part of the federal asset reporting requirements. The PHEP program may follow up in future years to determine the disposition of these items.

**Remember to fill in the Budget Breakdown by Capability and ensure that each row totals to 100 percent.**

Item	Description of Item	Justification of Item	Serial Number or Other Identification Number	Acquisition Date	Acquisition Cost	% of PHEP Funds	\$ of PHEP Funds
<i>Example: Shelter Tent</i>	<i>Example: Western Shelter Gatekeeper 1-20 all Hazards Emergency Facility</i>	<i>This item allows the Department to train staff and volunteers on sheltering procedures, including use in our annual exercise.</i>	<i>GK120</i>	<i>3/16/2014</i>	<i>\$ 108,194.68</i>	<i>75%</i>	<i>\$ 81,146</i>

Figure 4: Example of a correctly populated Equipment Tab

### Common Errors in Completing the Equipment Tab

- Individual items priced at less than \$5,000 are included in the Equipment tab. Please only include individual item costs greater than \$5,000.
- Equipment listed falls outside of federal guidelines and has not received prior approval from OPEHC.

## Supplies Tab

### Directions

Supplies are generally consumable and expendable, or items such as electronics that cost less than \$5,000 each. List each supply item individually. List the cost per unit and total amount. Supply items should **not** include services purchased. Services, such as monthly service contract or maintenance fees, should go in the Contractual tab.

If appropriate, general office supplies may be shown by a jurisdiction approved basis of allocation (e.g., \$200 per year per FTE @ 3.5 FTE = \$700).

**Note:** The purchase of promotional items such as giveaways, tote bags, magnets, etc. with PHEP funds is [prohibited](#).

**Remember to fill in the Budget Breakdown by Capability, and ensure that each row totals to 100 percent.**

Description of Items	Unit of Measure (i.e., month, item, case, etc.)	Quantity	Cost per Unit	Other Cost	Budget Total
<i>Example: General office supplies (pens, pencils, paper, etc.)</i>	<i>Months</i>	<i>12</i>	<i>\$ 20.00</i>	<i>\$ -</i>	<i>\$ 240.00</i>
<i>Example: Educational pamphlets (3,000 copies @ \$1 each). Other costs includes \$38 for shipping.</i>	<i>Item</i>	<i>3000</i>	<i>\$ 1.00</i>	<i>\$ 38.00</i>	<i>\$ 3,038.00</i>
<i>Example: Replacement of tablet computer and related software.</i>	<i>Item</i>	<i>1</i>	<i>\$ 700.00</i>	<i>\$ -</i>	<i>\$ 700.00</i>

Figure 5: Example of a Correctly Populated Supplies Tab

### Common Errors in Completing the Supplies Tab

- Unit of measure, quantity, or cost per unit are not specified.
- Services are included. Services should be listed in the Contractual tab.
- Promotional items are included. Promotional items are not an allowable expense (See [Funding Restrictions](#)).

- Description of Item is general and does not provide details or itemization (i.e., “miscellaneous costs”). Items must be specified.

## Contractual Tab

### Directions

For contractual costs that are general in nature, such as janitorial, maintenance, payroll services, or Certified Public Accountant (CPA), include the Description of Service and detailed Justification. For services, summarize the scope of work (for example, what you will receive) under Description of Service, and indicate how the contractor was selected (for example, bid or sole source) under Mode of Selection. Follow local procurement guidelines. If sole source, please provide a detailed justification as to why this approach was utilized as opposed to a bid method. Documentation of contracts or purchases must be made available to OPEHC upon request.

**Note:** Centers for Disease Control and Prevention (CDC) uses this category for any item where you could use a “contract” when purchasing from a vendor. For example, if you purchase personal protective equipment (PPE), it would be via a “contract” with a vendor (like a purchase order) or you may hire a trainer and develop a “contract” with a “scope of work” to define what the trainer will accomplish for you.

**Remember to fill in the Budget Breakdown by Capability and ensure that each row totals to 100 percent.**

Name of Vendor	Description of Service	Justification	Mode of Selection	Total Cost
<i>Example: HMS Inc.</i>	<i>Annual maintenance fee and annual service fee for public health surveillance system capable of collecting data relevant to public health both automatically and in real time.</i>	<i>Ongoing, annual contract that was initially awarded via a bid process. This service is necessary to meet DHS WEDSS public health surveillance requirements.</i>	<i>Sole Source</i>	<i>\$ 9,450</i>
<i>Example: ABC Training</i>	<i>Provide training to local emergency responders.</i>	<i>This training will address identified gaps from After Action Report (AAR) findings</i>	<i>Bid</i>	<i>\$ 600</i>
<i>Example: AVI Technical Services</i>	<i>Provide upgrades to the EOC, including new wiring and upgrades to display various data systems needed to conduct and participate in conference calls during an emergency.</i>	<i>These upgrades are necessary to facilitate emergency operations coordination for the public health EOC</i>	<i>Sole Source</i>	<i>\$ 5,000</i>
<i>Example: Dr. John Smith, Local Medical Center</i>	<i>Provide medical advice during an exercise event scheduled for August 28th and evaluate the effectiveness of the protocols.</i>	<i>A subject matter expert is needed to provide the medical perspective on medical surge during a public health emergency exercise. Sole source vendor (joined with other county contract).</i>	<i>Sole Source</i>	<i>\$ 3,000.00</i>
<i>Example: XYZ Postage Rental Equipment</i>	<i>Postage machine rental and required maintenance approximately 3 times per year</i>	<i>Total postage costs are anticipated to be \$2,000 based on previous year actual cost and \$700 annual required maintenance.</i>	<i>Sole Source</i>	<i>\$ 2,700.00</i>

Figure 6: Example of a Correctly Populated Contractual Tab

### Common Errors in Completing the Contractual Tab

- The Mode of Selection and Justification columns are left blank or are inadequate.
- A detailed justification is not included when sole source method versus bid method is utilized for mode of selection. When sole source selection is utilized, a justification for this mode of selection must be provided.

## Other Tab

### Directions

The Other tab is where you would include items such as phones, copiers, and software license costs or other

items that would be "enterprise services" within your agency and are "billed" back to you by your agency. Maintenance or rental fees for equipment should be listed here.

Individually list each item requested and provide appropriate justification related to the program capabilities. Complete the Description of Item or Service, Justification/Basis for Allocation, and Total Cost.

If appropriate, detail monthly or other recurring costs in the Justification/Basis for Allocation column.

Membership fees should also be listed here and should receive prior [approval from OPEHC](#).

**Remember to fill in the Budget Breakdown by Capability and ensure that each row totals to 100 percent.**

Description of Item or Service	Justification/Basis for Allocation	Total Cost
<i>Example: Local and long distance telephone costs</i>	<i>Total phone costs are anticipated to be \$4,800 based on 8 FTE x \$50 per month x 12 months.</i>	\$ 4,800.00
<i>Example: Software License</i>	<i>Total software license costs are anticipated to be \$300 annual based on 8 FTE = \$2,400</i>	\$ 2,400.00
<i>Example: Occupancy costs</i>	<i>The Health Department's rent per person, based on the cost allocation plan, is \$1,000 per month. Based on 2 FTE, total cost will be \$24,000</i>	\$ 24,000.00

Figure 7: Example of a Correctly Populated Other Tab

#### Common Errors in Completing the Other Tab

- Numerous items are listed together in the same line of the budget. Make sure to list distinct items on separate lines.
- Quantity and unit cost of items are not specified. If purchasing multiples of the same item, list the quantity and unit cost of each item in the Justification/Basis for Allocation column.

## Finalizing and Uploading the Budget

1. Ensure the Total Expenditures on the Summary-Total tab equals your allocation amount once your budget is complete. Cells B16 and B29 on the Summary-Total tab must be equal.
2. Ensure that your budget is saved with the correct title: “[your agency] BP3 1901 PHEP Budget” or “[your agency] BP3 1901 PHEP CRI Budget.”
3. Verify the completion of the Budget Breakdown by Capability for all rows in each tab on the budget spreadsheet for which a cost is listed before submitting a completed budget. Make sure that each row totals to 100 percent in the Budget Breakdown by Capability.
4. Go to the Local Preparedness [Budget Management page](#) on the PCA Portal, and click on “submit anew budget.”
5. Select the appropriate budget period or cooperative agreement from the drop down menu.
6. Select your jurisdiction from the drop down menu.
7. Attach your appropriately-named, completed budget to the “Attach Worksheet” box.
8. Use the summary information from your budget to enter initial budget numbers into the Local and Tribal Preparedness Budget Form by June 30, 2021. Note: As of fiscal year 21-22, “Consultant” is no longer a category in the PHEP budget. Disregard this line in the budget form.
9. Update the Local and Tribal Preparedness Budget Form with mid-year expenditures by February 28, 2022.
10. Update the Local and Tribal Preparedness Budget Form with final expenditures for the BP3 1901 budget period by August 15, 2022.

**Note:** If there are comments that you would like OPEHC to review, write them in the comments section.

Local and Tribal Preparedness Budget Form			
Cooperative Agreement/Budget Period: <input type="text"/>			
Jurisdiction: <input type="text"/>		Attach Worksheet (Initial Budget Only) <input type="button" value="Click here to attach a file"/>	
	Initial Budget	Mid-year Expenditures	Final Expenditures
Personnel Salary	<input type="text"/>	<input type="text"/>	<input type="text"/>
Fringe	<input type="text"/>	<input type="text"/>	<input type="text"/>
FTE	<input type="text"/>	N/A	<input type="text"/>
Travel	<input type="text"/>	<input type="text"/>	<input type="text"/>
Equipment	<input type="text"/>	<input type="text"/>	<input type="text"/>
Supplies	<input type="text"/>	<input type="text"/>	<input type="text"/>
Contractual	<input type="text"/>	<input type="text"/>	<input type="text"/>
Consultant	<input type="text"/>	<input type="text"/>	<input type="text"/>
Other Allowable Expenses	<input type="text"/>	<input type="text"/>	<input type="text"/>
Indirect Costs	<input type="text"/>	<input type="text"/>	<input type="text"/>
<b>Total</b> (calculated after submission)	<input type="text"/>	<input type="text"/>	<input type="text"/>
Indirect Rate (enter 0.05 for 5%) <input type="text" value="0"/> ----- This value applies to all reporting periods -----			
Comments, Initial:	Comments, Mid-year:	Comments, Final:	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
<input type="button" value="Submit"/>			

Figure 8: Local and Tribal Preparedness Budget Form. All summary information must be included.

If you have questions or need assistance, please [contact](#) the OPEHC grants manager or PHEP program coordinator.

# Funding Restrictions

## [Notice of Funding Opportunity \(NOFO\) Restrictions—PHEP Cooperative Agreement CDC-RFA-TP19-1901](#)

### General Restrictions

- LPHAs may not use funds for research.
- LPHAs may not use funds for clinical care except as allowed by law.
- LPHAs may use funds only for reasonable program purposes including personnel, travel, supplies, and services.
- Generally, LPHAs may not use funds to purchase furniture or equipment. Any such proposed spending must be clearly identified in the budget.
- Reimbursement of pre-award costs generally is not allowed, unless the CDC provides written approval to the LPHA.
- Other than for normal and recognized executive-legislative relationships, no funds may be used for:
  - Publicity or propaganda purposes, for the preparation, distribution, or use of any material designed to support or defeat the enactment of legislation before any legislative body.
  - The salary or expenses of any grant or contract recipient, or agent acting for such LPHA, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or executive order proposed or pending before any legislative body.
- See [additional requirement \(AR\) 12](#) for detailed guidance on this prohibition and [additional guidance on lobbying for CDC recipients](#).
- The direct and primary recipient in a cooperative agreement program must perform a substantial role in carrying out project outcomes and not merely serve as a conduit for an award to another party or provider who is ineligible.
- In accordance with the United States Protecting Life in Global Health Assistance policy, all non-governmental organization (NGO) applicants acknowledge that foreign NGOs that receive funds provided through this award, either as a prime recipient or sub-recipient, are strictly prohibited, regardless of the source of funds, from performing abortions as a method of family planning or engaging in any activity that promotes abortion as a method of family planning, or to provide financial support to any other foreign non-governmental organization that conducts such activities. See [AR 35](#) for applicability.
- Recipients may supplement but not supplant existing state or federal funds for activities described in the budget. Federal law prohibits recipients of federal funds from replacing state, local, or agency funds with federal funds.
- Payment or reimbursement of backfilling costs for staff is not allowed.
- None of the funds awarded to these programs may be used to pay the salary of an individual at a rate in excess of executive level II or \$189,600<sup>1</sup> per year.
- Funds may not be used to purchase or support (feed) animals for labs, including mice.
- Funds may not be used to purchase a house or other living quarters for those under quarantine. Rental may be allowed with approval from the CDC Office of Grants Services.

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<sup>1</sup>Updated per the notice of award

## Supplanting

Recipients may supplement but not supplant existing state or federal funds for activities described in the budget. Federal law prohibits recipients of federal funds from replacing state, local, or agency funds with federal funds. For example, funds may not be used to cover positions and other expenditures already funded by other sources.

## Personnel Costs

LPHAs may (with prior approval from OPEHC) use funds for overtime for individuals directly associated (listed in personnel costs) with the grant.

## Travel

Travel or conferences not specific to public health emergency preparedness are not allowed.

## Lobbying

Other than for normal and recognized executive-legislative relationships, PHEP funds may not be used for:

- Publicity or propaganda purposes, for the preparation, distribution, or use of any material designed to support or defeat the enactment of legislation before any legislative body.
- The salary or expenses of any grant or contract recipient, or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or executive order proposed or pending before any legislative body.

See [AR 12](#) for detailed guidance on this prohibition and additional guidance on lobbying for CDC recipients.

## Construction and Major Renovations

- LPHAs may not use funds for construction or major renovations.
- Generally, LPHAs may not use funds to purchase furniture or equipment. Any such proposed spending must be clearly justified in the budget.

## Passenger Road Vehicles

- Funds cannot be used to purchase over-the-road passenger vehicles.
- Funds cannot be used to pay for over-the-road passenger vehicle registration or maintenance.
- Funds cannot be used to purchase vehicles to be used as means of transportation for carrying people or goods, such as passenger cars or trucks, and electrical or gas-driven motorized carts.
- Funds can (with prior approval from OPEHC) be used to lease vehicles to be used as means of transportation for carrying people or goods, for example, passenger cars or trucks and electrical or gas-driven motorized carts during times of need, such as to transport personnel and supplies to support medical countermeasure points of dispensing (POD) operations.
- Funds can (with prior approval from OPEHC) be used to make transportation agreements with commercial carriers for movement of materials, supplies, and equipment. There should be a written process for initiating transportation agreements (such as contracts, memoranda of understanding [MOU], formal written agreements, and other letters of agreement). Transportation agreements should include, at a minimum, the:
  - o Type of vendor.
  - o Number and type of vehicles, including vehicle load capacity and configuration.
  - o Number and type of drivers, including certification of drivers.
  - o Number and type of support personnel.

- o Vendor's response time.
- o Vendor's ability to maintain cold chain, if necessary to the incident.
- o This relationship may be demonstrated by a signed transportation agreement or documentation of transportation planning meeting with the designated vendor. All documentation should be available to the CDC project officer for review if requested.

## Transportation of Medical Material

- Funds can (with prior approval) be used to procure leased or rental vehicles for movement of materials, supplies, and equipment.
- LPHAs can (with prior approval) use funds to purchase material-handling equipment (MHE) such as industrial or warehouse-use trucks to move materials, such as forklifts, lift trucks, or turret trucks. Vehicles must be of a type not licensed to travel on public roads.
- LPHAs may purchase basic (non-motorized) trailers with prior approval from OPEHC.

## Procurement of Food and Clothing

- Funds may not be used to purchase clothing such as jeans, cargo pants, polo shirts, jumpsuits, sweatshirts, or T-shirts.
- Purchase of vests (or similar items) that may be used multiple times by numerous individuals, to be worn during exercises or responses, are allowed.
- Generally, funds may not be used to purchase food. However, with prior approval from OPEHC, funds may be allowed for the purchase of food at the approved state government rates. Specifically, if providing a meal and/or refreshments is necessary to avoid negatively impacting the effectiveness of a training or exercise (such as time considerations related to attendees leaving the premises to purchase food, delayed start time of training or exercise, etc.), preapproval may be requested.

**Note:** LPHAs are required to maintain an agenda and a meal sign-in sheet at the local level for auditing purposes. See [45 CFR 75.432](#) for additional information.

## Vaccines

- LPHAs can (with prior OPEHC approval) use funds to purchase caches of antibiotics for use by public health responders and their households to ensure the health and safety of the public health workforce during an emergency response or an exercise to test response plans. Funds may not be used to supplant other funding intended to achieve this objective.
- LPHAs can (with prior OPEHC approval) use funds to purchase caches of vaccines for public health responders and their households to ensure the health and safety of the public health workforce.
- LPHAs can (with prior OPEHC approval) use funds to purchase caches of vaccines for select critical workforce groups to ensure their health and safety during an exercise testing response plans.
- LPHAs may not use PHEP funds to supplant other funding intended to achieve these objectives.
- LPHAs must document in their submitted exercise plans the use of vaccines for select critical workforce personnel before OPEHC will approve the vaccine purchase.
- Recipients of PHEP-funded vaccines (within the context of the exercise) may include:
  - o Persons who meet the criteria in the [CDC Advisory Committee on Immunization Practices \(CDC/ACIP\) recommendations](#) for who should receive vaccine.
  - o Persons who are not eligible to receive the vaccine through other entitlement programs such as Medicare, Medicaid, or the Vaccines for Children (VFC) program. VFC-eligible children or Medicare beneficiaries may participate in the exercise; however, they should be vaccinated with vaccine purchased from the appropriate funding source.
- PHEP funds may not be used to purchase vaccines for seasonal influenza mass vaccination clinics or other

- routine vaccinations covered by Advisory Committee on Immunization Practices (ACIP) schedules.
- PHEP funds may not be used to purchase influenza vaccines for the general public.

LPHAs may not use funds for clinical care except as allowed by law. Per the PHEP Notice of Funding Opportunity, clinical care is defined as "directly managing the medical care and treatment of individual patients." PHEP-funded staff may administer medical countermeasures (MCMs), such as antibiotics or vaccines, as a public health intervention in the context of an emergency response or an exercise to test response plans. CDC does not consider this clinical care since it is not specific to an emergency response or an exercise to test response plans.

## Laboratory Supplies

Instruments, reagents, and supplies for the following are not generally purchased with PHEP funding:

- Instruments, reagents, and supplies for testing seasonal influenza
- Instruments, reagents, and supplies for testing rabies
- Instruments, reagents, and supplies for routine food testing (surveillance)
- Instruments, reagents, and supplies for testing vaccine preventable diseases (such as measles or mumps)
- Instruments, reagents, and supplies for routine testing of vector-borne illnesses (both clinical and vector surveillance)
- Routine drug screening of laboratory staff
- Influenza vaccines (for the general public)

Because recipients receive substantial assistance from CDC through other programs, recipients should ensure these line items are funded under the appropriate program.

## Advertising and Public Relations, Supplies, Meetings, Promotional Items and Memorabilia

[\(Federal Regulation Codes under section 200.421: PART 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards\)](#)

- (a) The term "advertising costs" means the costs of advertising media and corollary administrative costs. Advertising media includes magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.
- (b) The only allowable advertising costs are those which are solely for:
- (1) The recruitment of personnel required by the non-federal entity for performance of a federal award (See also §200.463 Recruiting costs).
  - (2) The procurement of goods and services for the performance of a federal award.
  - (3) The disposal of scrap or surplus materials acquired in the performance of a federal award except when non-federal entities are reimbursed for disposal costs at a predetermined amount.
  - (4) Program outreach and other specific purposes necessary to meet the requirements of the federal award.
- (c) The term "public relations" includes community relations and means those activities dedicated to maintaining the image of the non-federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.
- (d) The only allowable public relations costs are:
- (1) Costs specifically required by the federal award.
  - (2) Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the federal award (these costs are



considered necessary as part of the outreach effort for the federal award).

- (3) Costs of conducting general liaison efforts with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.

(e) Unallowable advertising and public relations costs include the following:

- (1) All advertising and public relations costs other than as specified in paragraphs (b) and (d) of this section
- (2) Costs of meetings, conventions, convocations, or other events related to other activities of the entity (see also §200.432 Conferences), including:
  - (i) Costs of displays, demonstrations, and exhibits.
  - (ii) Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events.
  - (iii) Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings.
- (3) Costs of promotional items and memorabilia, including models, gifts, and souvenirs.
- (4) Costs of advertising and public relations designed solely to promote the non-federal entity.

## General Procurement Standards

Some of the general standards over procurement include:

- Every non-federal entity receiving federal awards must have documented procurement procedures that reflect federal law, Uniform Guidance standards, and any state regulations.
- Entities should focus on the most economical solution during the procurement process, and must avoid using federal funds for the acquisition of unnecessary items. Organizations are encouraged to consider the use of shared services and intergovernmental agreements to foster greater economy and efficiency.
- Written conflict-of-interest policies are required. No employee or agent of the entity may participate in the selection, award, or administration of a contract funded by federal grant dollars if they have an actual or apparent conflict of interest.
- The organization must document the procurement steps and activities required to be completed. This includes the basis for the type of procurement, contract type, and the basis for the contractor selection and price.
- Ultimately, the recipient of federal awards must maintain an appropriate level of oversight to ensure that contractors perform in accordance with the terms of their contract.

### The Uniform Guidance outlines five methods of procurement:

- **Micro-purchase:** purchases where the aggregate dollar amount does not exceed \$3,000 (or \$2,000 if the procurement is construction and subject to Davis-Bacon). When practical, the entity should distribute micro-purchases equitably among qualified suppliers. No competitive quotes are required if management determines that the price is reasonable.
- **Small purchase:** includes purchases up to the Simplified Acquisition Threshold, which is currently \$150,000. Informal purchasing procedures are acceptable, but price or rate quotes must be obtained from an adequate number of sources.

- **Sealed bids:** used for purchases over the Simplified Acquisition Threshold, which is currently \$150,000. Under this purchase method, formal solicitation is required, and the fixed price (lump sum or unit price) is awarded to the responsible bidder who conformed to all material terms and is the lowest in price. This method is the most common procurement method for construction contracts.
- **Competitive proposals:** used for purchases over the Simplified Acquisition Threshold, this is currently \$150,000. This procurement method requires formal solicitation, fixed-price or cost-reimbursement contracts, and is used when sealed bids are not appropriate. The contract should be awarded to the responsible firm whose proposal is most advantageous to the program, with price being one of the various factors.
- **Noncompetitive proposals:** also known as sole-source procurement, this may be appropriate only when specific criteria are met. Examples include when an item is available only from one source, when a public emergency does not allow for the time of the competitive proposal process, when the federal awarding agency authorizes, or, after a number of attempts at a competitive process, the competition is deemed inadequate.

## **Memberships**

Generally, funds may not be used for membership fees. However, with prior approval from OPEHC, under certain conditions, funds may be used for membership fees.

To request preapproval for any expense for which it is required, [contact](#) the OPEHC grants manager or PHEP program coordinator.

# Appendix

## **Western Wisconsin Public Health Readiness Consortium (WWPHRC) Expenditures**

Counties that participate in the WWPHRC will establish an MOU with the consortium that directs OPEHC to reduce their allocation by a certain dollar amount. OPEHC will reduce the LPHA's dollar amount in the actual contract and increase by that amount the contract for Eau Claire County (the fiscal agent for the WWPHRC).

**Please do not include the WWPHRC dollar amount in your county budget posted on the PCA Portal.** On the local and tribal preparedness budget form, in the initial budget column, do not include amounts from your original LPHA allocation. Rather, **list the dollar amounts that are included in your contract with OPEHC**, which reflects the amount redirected to the WWPHRC.

For example, if your initial LPHA allocation from OPEHC is \$100,000, but 25 percent is being redirected to WWPHRC (off the top) then your initial budget should total \$75,000. Please do not list your initial budget as \$100,000 with a contractual line item of \$25,000 to the WWPHRC. That does not reflect the actual amount in your contract and Community Aids Reporting System (CARS) profile.