



# Financial Reporting Guidelines

## Public Health Emergency Preparedness (PHEP)

### Cooperative Agreement

#### Budget Period (BP4) - July 1, 2022 – June 30, 2023

#### **Definitions**

Contractor: Regional PHEP Fiduciary

Subcontractor: Local Health Departments and Districts

OPHPR: DPH Office of Public Health Preparedness and Response

CGMS: DPH Contracts and Grants Management Section

FER: Financial Expenditure Report

BRR: Budget Revision Request

#### **Contractor - Financial Expenditure Reporting**

- The contractor will submit FERs according to the approved financial reporting schedule in the contract through the CORE CT system.
- CGMS will review the FER. If the FER is financially correct, CGMS will process payment accordingly to the payment schedule in the contract.
- If the FER is incorrect, CGMS will contact the contractor to resolve depending on the need for clarification and copy OPHPR.
- Once the FER is corrected, upon approval, CGMS will process payment according to the schedule in the contract.
- CGMS will forward all final FERs to OPHPR for final review and approval.
- CGMS will make any final payment or request refund as appropriate.

#### **Contractor - Budget Revision Requests**

- The contractor agrees to spend funds according to the approved contract budget.
- The contractor may incur expenses up to 20% over any budget cost category or line item without requesting prior approval from OPHPR.
- The contractor must submit a BRR for the following requests:
  - expenditures that exceed 20% of a cost category or line item
  - new cost category or line item(s)
  - a change in personnel
  - a change in the scope of services or activities (e.g. contracting for services that were to be performed by the contractor or moving funding from one subcontractor to another)
  - redirection of unspent subcontractor funding to support regional activities
    - A “Regional PHEP Activities Approval Form” for unspent subcontractor funding must be completed and submitted to OPHPR when changing award amounts of subcontractors to support regional activities. Based on the redirection of subcontractor funding, OPHPR staff will determine if a formal BRR is needed or not.
- The contractor must request prior approval from OPHPR before submitting a BRR via email to [PHEP.DPH@ct.gov](mailto:PHEP.DPH@ct.gov).

- If approved by OPHPR, the contractor will prepare the BRR with justification and submit through CORE-CT.
- Upon receipt, CGMS will review the BRR for financial accuracy.
- If the BRR is financially correct, CGMS will forward the BRR to OPHPR for review and approval.
- OPHPR staff will review, approve and submit a program approval form to CGMS to process the BRR.
- CGMS will adjust the budget categories or line items to reflect the BRR and submit the new approved revised budget through CORE-CT.
- If the BRR is NOT financially correct, CGMS will return the BRR to the contractor to correct through CORE-CT and copy OPHPR staff on correspondence.
- If the BRR is financially correct and OPHPR staff reviews and justifications do not align with preparedness deliverables and activities, OPHPR staff will contact the contractor directly to resolve.
- If contractor has questions regarding BRRs they should submit questions to the at [PHEP.DPH@ct.gov](mailto:PHEP.DPH@ct.gov).

### **Sub-Contractor - Financial Expenditure Reporting**

- The sub-contractor will submit FERs according to their approved budget with the contractor based on the sub-contractor financial reporting schedule in their contract agreement.
- FERs should be submitted to a place and in a format provided by the contractor.
- The contractor will review and approve the subcontractor FER. If the subcontractor FER is correct, the contractor will aggregate all approved sub-contractor expenditures, for total dollars spent contractually, and report on the total expenditures through CORE- CT.
- If the sub subcontractor FER is not financially correct, the contractor will return the FER to the sub-contractor for correction, copying their Regional MCM Coordinator.
- The sub-contractor should submit a corrected FER to the contractor or should not be paid by the contractor until a corrected report is received.
- All final sub-contractor FERs will be submitted to the OPHPR at the end of each contract period.

### **Sub-Contractor - Budget Revision Requests**

- The sub-contractor agrees to spend funds according to the approved contract budget.
- The sub-contractor may incur expenses up to 20% over any budget cost category or line item without requesting prior approval from the contractor.
- The sub-contractor must submit a BRR for the following requests:
  - expenditures that exceed 20% of a cost category or line item
  - new cost category or line item(s)
  - a change in the scope of services or activities (e.g. contracting for services that were to be performed by the contractor)
  - change in personnel
- The sub-contractor should request prior approval in writing to the contractor with a copy to the Regional MCM Coordinator. Budget revision must align with budget guidelines.
- Budget revision requests can be submitted twice a year, on December 1 and March 31 and within any other contractor deadlines as appropriate.
- The BRR justification must include the reason for the BRR and how it supports the subcontractor's PHEP contractual activities and deliverables.

- If the BRR is financially correct and aligns with PHEP contractual activities and deliverables, the contractor will approve the BRR and send an approved revised budget to the sub-contractor, copying the Regional MCM Coordinator.
- If BRR is not fiscally correct, the contractor will return to subcontractor for corrections.
- If the BRR does not support PHEP contractual activities or deliverables or is not within budget guidance, the contractor will contact their Respective MCM Coordinator to discuss. After discussion, the contractor will then approve, disapprove or ask for additional information/justification to support the BRR and copy the Regional MCM Coordinator on correspondence.

### **Regional Activity Approval Form**

Unspent sub-contractor PHEP funding may be redirected to support Regional PHEP Activities. Regional activities must be approved through Regional ESF8 meetings and the Department of Public Health.

- Complete a Regional Activity Approval form with the budget revision request forms from each subcontractor allocating funding to support the regional activity. Submit all documentation to the [PHEP.dph@ct.gov](mailto:PHEP.dph@ct.gov) with a copy to your Regional MCM Coordinator. A Regional Activity Approval form must be completed and submitted no later than May 1<sup>st</sup> of each contract budget period. The proposed regional activity must be completed by June 30<sup>th</sup> of each contract budget period.
- If a Regional Activity form is not submitted by May 1<sup>st</sup>, or the regional activity is not completed by June 30<sup>th</sup>, funding must be refunded.

### **Health Departments and Districts Declining Funding**

If a director of health would like to decline PHEP funding, the following steps will need to be completed:

- A letter from the Chief Elected Official (for municipal health departments) or District Board Members (for district departments of health) must be submitted to the fiduciary, with a copy to the OPHPR Regional MCM Coordinator stating that they are declining PHEP funding.
  - The letter from the chief elected official/board chair should include (1) the individual within the jurisdiction who will be responsible for public health preparedness (e.g., emergency manager), (2) what funding will be used to support ongoing public health preparedness in the community in the absence of these DPH contract funds, (3) the points of contact for emergencies (three-deep listing), and (4) medical countermeasures point of dispensing site (and back-up) locations; and (5) a representative that will attend ESF8 meetings.
  - Even in the absence of accepting funds, jurisdictions would remain responsible for demonstrating operational readiness, and coordinating with surrounding towns and the DPH on public health preparedness plans, initiatives and responses.
- If the jurisdiction declines funding, and after receipt of the letter, the fiduciary should discuss the availability of funding with regional members and then, complete a Regional Activity Approval form that supports regional planning activities focused on the prioritized capabilities selected each year.