# PUBLIC HEALTH INFRASTRUCTURE GRANT FAQs

NOTE: These funds should be used in addition to and not in substitution for, comparable activities provided with Federal assistance. Therefore, in expending these funds all LPHAs should identify gaps across their entity, identify which funding stream can fill those needs and identify what gaps this NOFO can fill because of the flexibility.

• Is the incentive pay that is allowable a "raise" i.e. 10% pay bump for getting a master's degree or a one-time bonus of say \$1000 for getting a certification?

This aligns with Key Activity 1 (and possibly Key Activity 2) of Strategy A1 (page 11 of NOFO). This grant can be used to improve hiring incentives for the public health workforce (i.e., tuition reimbursement, scholarships, salary increases) and to create new hiring mechanisms (Key Activity 1). This grant may also be used to retain public health staff (Key Activity 2). In this instance, please clarify what the incentive is (hiring mechanism or retention incentive) and ensure equitability for this activity. Information regarding **why** the incentives is important for the agency/ community would be recommended as well.

• I can't hire anyone because I have no place to put them. Can this be used towards our new building funding? What about renovation? If we can't pay for construction or renovation, can we use money to lease space?

Only minor renovations or alterations that do not increase the square footage are allowed by this NOFO. Office space can be leased, but justification will be needed. Alterations and Renovations (A&R) will require prior approval/justification to be submitted. If the LPHA still has ELC-ED Expansion funds, those funds will need be utilized first before any infrastructure funds. All A&Rs must less than 50% of the LPHAs total square footage.

Can an Accreditation Coordinator be hired under A1 direct funds?

The funds are to enable recipients to hire public health workers and strengthen their foundational capabilities. Hiring new staff is allowable. Justification for how the staff will support the NOFO will be needed.

• If our nurse has student loans this could help pay them off for her?

This answer would be the same as the first question. Retention incentive programs and new hiring mechanisms are supported by this grant. Please ensure these new activities/ strategies are equitable throughout the LPHA.

• Can we utilize funds to establish a tuition reimbursement program: credit hours, fees, books? (LPN to RN, RN to BSN, etc.)

This aligns with Key Activity 1 and Key Activity 2 of Strategy A1 (page 11 of NOFO). This grant can be used to improve hiring incentives for the public health workforce (i.e., tuition reimbursement, scholarships, salary increases) and to create new hiring mechanisms (Key Activity 1). This grant may also be used to retain public health staff (Key Activity 2). Please clarify

if the tuition reimbursement will be used as a recruitment/ hiring incentive or retention incentive.

• Would our Electronic Medical Records (EMR) cost be covered under the infrastructure grant to be able to sustain it?

Is there a system in existence that is being updated or is a new system being implemented? The funding can be used to strengthen organizational competencies addressing information technology. Improving or advancing your EMR system would be an allowable activity. More information will be needed regarding what the EMR costs mentioned include and to be mindful of interoperability.

• Can A1 direct funding be used to increase local public health programs and initiatives such as chronic disease prevention?

Funding is to be used to improve the workforce and strengthen foundational capabilities. More details would be needed regarding how this activity supports the NOFO. (Page 11 of the NOFO provides details about how the funding can be used to strengthen recipients' overall systems, processes, and policies to ensure a strong core infrastructure needed to protect health and provide fair opportunities for all.)

• Can A1 direct funding cover the cost of office space at home, internet phones, laptops, internet fees?

Funding can be used for supplies that will support your workforce. Telecommunication costs are allowable except for circumstances that are explained in 2 CFR 200 (page 47 of the NOFO).

- Can the funds be used for Attorney consultation fees to review policies/procedures?
   Organizational costs such as attorney fees are unallowable except with prior approval of the Federal awarding agency (2 CFR 200, page 47 of the NOFO). More information could be advantageous to determine what outcome the LPHA is wanting to achieve and to explore activities to help guide the LPHA to achieve their desired outcome.
- For the retention incentives, can we purchase items like a treadmill or exercise bike. My staff want to
  exercise during their lunch period. They also want a massage chair... Are these types of items allowed?
   More clarification and justification would be helpful and how this activity ties into the NOFO.
   Retention incentives are acceptable with our grant.
- Are we able to use cash or gift cards as retention incentives? What are the restrictions?
   This is an acceptable retention incentive. Specifics regarding how staff will receive these incentives/ what successes will you be looking for in staff to receive the incentives would be helpful? For retention incentives, a review of the plan would be helpful as well. Please ensure the plan is equitable across the organization.
- Is incentive pay allowable with current/new employees? What are the restrictions?
   As indicated in the NOFO, incentives for current and new staff which will help to improve workforce engagement and help improve emotional, mental and physical health outcomes of

the workforce are allowable. What is the incentive plan? How is eligibility determined? How is the plan equitable? Ensure this activity is tied back to the NOFO.

Is retention pay allowable with current/new employees? What are the restrictions?

As indicated in the NOFO, retention mechanisms for current and new staff which will help to improve workforce engagement and help improve emotional, mental and physical health outcomes of the workforce are allowable. What is the retention incentive plan? How is eligibility determined? How is the plan equitable? Ensure this activity is tied back to the NOFO.

• Is bonus pay allowable with current/new employees? What are the restrictions?

As indicated in the NOFO, incentives for current and new staff which will help to improve workforce engagement and help improve emotional, mental and physical health outcomes of the workforce are allowable. What is the incentive plan? How is eligibility determined? How is the plan equitable? Ensure this activity is tied back to the NOFO. How will this bonus pay help your organization reach the desired outcomes of this grant?

• Can LPHAs bill back to December 1, 2022 when the grant first started?

This will be dependent upon state and local policies and procedures. We will not be providing additional funding besides what has already been allotted to the state recipient.

• Would ADA compliant renovations be allowable?

These would need to be identified. Minor renovations that do not increase the square footage are allowed.

• Can we incentivize our employees for training? (Example: They complete four trainings in one month, we can give them \$200.) Any restrictions?

As indicated in the NOFO, incentives for current and new staff which will help to improve workforce engagement and help improve emotional, mental and physical health outcomes of the workforce are allowable. What is the incentive plan? How is eligibility determined? How is the plan equitable? Ensure this activity is tied back to the NOFO. How will this incentive help your organization reach the desired outcomes of this grant?

• Can we pay for educational training for an LPN to become an RN or BSN? Or for clerical staff to become an LPN if we need more vaccinators/nurses?

As indicated in the NOFO, training for current and new staff which will help to refresh skills or knowledge or to learn new skills, given a dynamic public health work environment are allowable. What does the plan consist of? How is eligibility determined? How is the plan equitable? Ensure this activity is tied back to the NOFO. How will providing pay for educational training help your organization reach the desired outcomes of this grant?

• Can we incentivize our employees for completing education/college (i.e. for an LPN to become a RN or BSN or clerical staff to become an LPN or RN? What are the restrictions?

As indicated in the NOFO, incentives for current and new staff which will help to improve workforce engagement and help improve emotional, mental and physical health outcomes of the workforce are allowable. What is the incentive plan? How is eligibility determined? How is

the plan equitable? Ensure this activity is tied back to the NOFO. How will this incentive help your organization reach the desired outcomes of this grant?

• Would it be allowable to promote current employees to a new position with a new role and duties/position description?

Promotions are allowable. Hiring, retaining and sustaining public health workforce are important activities within this grant. Please ensure these positions help your agency to meet the objectives of the NOFO.

• Is it appropriate to use this funding for Community Health Worker training?

Trainings are acceptable. Per page 10 of the NOFO, new and existing staff always need training, whether to refresh skills and knowledge or to learn new skills, given a dynamic public work environment. Please ensure that this training would help your staff meet the needs of your community and meet the objectives of the NOFO.

• Can the LPHA pay current staffing out of this funding?

These funds may be used to fund new roles. These funds may be used to retain employees. In this instance, these funds may be used to retain an employee that was funded by another grant that may be ending soon, and these funds can be used to pick off where the funding ends. Please show how these new roles or roles that are to be obtained help to meet the objectives of the NOFO.

Can the funds be used to pay for any brochures about any health education?

As a gentle reminder, the NOFO on page 12 lists 8 public health infrastructure foundational capabilities: 1) Assessment/Surveillance, 2) Emergency Preparedness and Response, 3) Policy Development and Support, 4) Communications, 5) Community Partnership Development, 6) Organizational Competencies, 7) Accountability/Performance Management, and 8) Equity. Will these brochures help your agency in any of these areas? Within Strategy A2 of the NOFO, key activities include enhancing communications, strengthening community partnership development and engagement and improving equity and organizational competencies.

• Can these funds be used by LPHA's for overtime pay?

Reviewing staff roles and organizational competencies could take place. Overtime costs can occur. Depending upon your state's reporting requirements, this may mean providing who receives overtime within your budget and your policy for your agency.

• Can these funds be used to help our agency buy into Missouri LAGERS, helping to boost our benefits package so as to recruit and retain a competent public health workforce?

Clarification was obtained regarding the retirement question. If an LPHA would like to propose benefit increases for their entire staff, the justification should include how this is a retention incentive not retirement enhancement. When analyzing the overall outcome of this particular investment, the justification should connect back to the NOFO. The NOFO specifically indicates that incentives can be provided to hire and/or retain employees. Retirement is not mentioned. Therefore, strong justification for benefit enhancement should demonstrate how/ if this is a retention incentive.

#### • Can these funds be used for childcare?

Per OGS, childcare is an allowable expense. NOFO guidance: This aligns with Key Activity 1 and Key Activity 2 of Strategy A1 (page 11 of NOFO). This grant can be used to improve hiring incentives for the public health workforce (i.e., tuition reimbursement, scholarships, salary increases) and to create new hiring mechanisms (key activity 1). This grant may also be used to retain public health staff (key activity 2). CDC Guidelines: 45 CFR 75.430(f) Incentive compensation. Additional information needed: Clarification regarding what the incentive is (hiring mechanism or retention incentive) and who will be impacted by the incentive (ensure equitability). How will this help strengthen workforce? An SOP should be developed for administering incentives, bonuses, etc. if one has not been established already.

## • Can cost for electronic health records software be paid with this grant?

Those investments can be made with A1 funding. However, there would need to be strong justification and alignment with the NOFO. There may also need to be internal conversations regarding enterprise wide DMI planning that may be taking place to see if these LPHA investments also align with the state's DMI vision as a whole as well.

## • We have software for EPHS, can we pay the renewal with this?

Those investments can be made with A1 funding. However, there would need to be strong justification and alignment with the NOFO. There may also need to be internal conversations regarding enterprise wide DMI planning that may be taking place to see if these LPHA investments also align with the state's DMI vision as a whole as well.

#### • Are Zoom subscriptions approved?

If the LPHA provides strong justification for how it aligns with the NOFO, then yes. Reviewing the Appendix 1 from the NOFO (attached) can also help with understanding allowable costs and to see how the activity may align with some sample activities provided within the NOFO.

## • Are retirement benefits allowable?

Clarification was obtained regarding the retirement question. If an LPHA would like to propose benefit increases for their entire staff, the justification should include how this is a retention incentive not retirement enhancement. When analyzing the overall outcome of this particular investment, the justification should connect back to the NOFO. The NOFO specifically indicates that incentives can be provided to hire and/or retain employees. Retirement is not mentioned. Therefore, strong justification for benefit enhancement should demonstrate how/ if this is a retention incentive.

• Is it allowable to use PHIG funds to add to employees' Health Savings Account (HSA), these are part of their benefits package?

Yes, this would fall under both an incentive and retention. Please ensure a standard procedures and policies are in place to support.

• Would it be allowable to use funds to pay a massage therapist to come into the office for staff massages as part of their wellbeing and mental wellness piece?

This would require strong justification of how this would sustain staff along with help with staff emotional and physical well-being or strengthen workplace policies that support staff emotional, mental, and physical well-being.

• Is it allowable to us funds for parking lot repair or maintenance?

No, fixing cracks in a parking lot is not the best use of PHIG funds as a parking lot is not considered an existing structure. Rather, it is encouraged that PHIG funds be used for staffing purposes such as hiring, retention efforts, sustaining the workforce, enhancing workforce processes, etc.

Can the funds be used for uniform, clothing, t-shirts?

This does not fall within the scope of the grant

• Would it be allowable to use funds to pay a personal trainer to come into the office for staff?

This would depend on the justification. What type of incentive is this initiative? This would likely fall under § 75.459 Professional service costs and be considered allowable.

• Is allowable to enhance benefits for all employees?

Clarification was obtained regarding the retirement question. If an LPHA would like to propose benefit increases for their entire staff, the justification should include how this is a retention incentive not retirement enhancement. When analyzing the overall outcome of this particular investment, the justification should connect back to the NOFO. The NOFO specifically indicates that incentives can be provided to hire and/or retain employees. Retirement is not mentioned. Therefore, strong justification for benefit enhancement should demonstrate how/ if this is a retention incentive.

Are gym memberships or partial gym memberships allowable?

Offsite gym memberships are not reasonable costs. Gym memberships fall within § 75.454 and/ or § 75.445 and are considered unallowable.

- § 75.454 Memberships, subscriptions, and professional activity costs.
- (d) Costs of membership in any country club or social or dining club or organization are unallowable.
- 75.445 Goods or services for personal use.
- (a) Costs of goods or services for personal use of the non-Federal entity's employees are unallowable regardless of whether the cost is reported as taxable income to the employees.

#### Are smart watches and fitness trackers allowable?

This does not fall within the scope of the grant.

- 75.445 Goods or services for personal use.
- (a) Costs of goods or services for personal use of the non-Federal entity's employees are unallowable regardless of whether the cost is reported as taxable income to the employees.