

Questions for  
FY2024-RFGA-MC-404, Title V State SRAE Grant

Organization 1

1. Page 1 of 56 and 13 of 56 state subrecipients have the option to submit their applications electronically at [RFGA@dhec.sc.gov](mailto:RFGA@dhec.sc.gov).

Question: Are there specific instructions on how to properly submit the application electronically?

Response: In order to submit the application electronically, please just add the document as an attachment when sending to the email above. It will be received by the DHEC Contracts Department. Please make sure that document is still in the same format as a hard copy. When the RFGA closes, all applicants will receive an email notifying submission.

2. Pages 4 and 5 of 56 state the total dollar amount under this RFGA is \$600,000.00

Question: Why is the amount less than last year's RFGA of \$683,921.00?

Response: This year, DHEC has to cover programmatic enhancement costs. If there is additional funding after that project is completed, it will be offered as supplemental funding during the grant period.

3. Page 6 of 56 states "Applicants must implement in-person SRAE services and outreach efforts in Priority Areas 1-3.

Question: Does In-person SRAE services mean "not virtual or online" SRAE services?

Response: Correct. In person means face to face services. However, virtual is allowed as long as there is two way visual and audio communication. This accommodation was allowed by FYSB during the COVID-19 pandemic and continues to be an option for the subrecipients.

4. Page 11 of 56 lists Grant Reporting Requirements – Monthly Invoicing (Excel Document), Monthly Implementation Plan and Activity Log Submission, Monthly Data Submission, Quarterly Subrecipient Meetings, Site Visit Monitoring, Additional Documentation and Reporting Requirements, and Annual Subrecipient Risk Assessment.

Question: Aren't these the usual reporting requirements but now the RFGA is listing all the Grant Reporting Requirements?

Response: Yes, these are the usual reporting requirements.

## Organization 2

5. On pages 6 and 16, the RFGA states that “Reviewers may deduct up to 3 points for activities provided in Priority Areas 4-6” and then also includes a geographical services grid of Priority County rankings (1 being the highest and 6 lowest). In the DHEC official response to Title V RFGA questions for FY2021-RFGA-MC-918, an official letter from Kimberly Seals was referenced that during a protest and appeal process in reference to the point deductions, she stated that the deduction language used in a RFGA was *“described as punitive by some of our partners and therefore not implemented with the final scoring. To ensure equity and fairness were upheld in the process, I reviewed each score sheet and added the 2 points back into each scoresheet impacted by this deduction.”*

Because there is already a precedent of DHEC viewing this point reduction language as punitive, we request that DHEC remove the point deduction language from this current FY2024-RFGA-MC-204. The RFGA language is already clear that DHEC wants services focused in Priority 1, 2 and 3 counties, but we request that no points will be deducted for *also* serving youth in Priority 4-6 counties if justification can be provided. Because of the current risk of penalty, we would be forced to deny services to more than 9,000 youth considered part of justified populations within priority 4-6 counties (including minority youth, youth within under-resources and underrepresented Title I schools, and youth within foster care and the juvenile justice system) who have already requested services for this upcoming grant year. It has been such an honor and privilege to build partnerships with districts, schools, and youth-serving agencies who enthusiastically have requested our services. Also, as DHEC knows, the parents or guardians of every South Carolina student we serve sign a parent’s permission form indicating parental support for their youth’s attendance in our classes. We have strong respect for parents and their consent/desire for their children/students to attend our classes. We believe it would be categorically very unfortunate to withhold services to these youth in “justified populations” based on their county of residence (over which they have no control). The justified populations in the following counties would be discriminated against and denied access to services, due to risk of applicant penalty: Bamberg, Calhoun, Charleston, Edgefield, Georgetown, Kershaw, Oconee, Saluda, Abbeville, Beaufort, Horry, Lexington, York, Berkeley, Dorchester, Greenville, Pickens and Spartanburg. Therefore, we request that DHEC remove the point deduction language from this current RFGA.

**Response: The letter referenced was an unrelated matter and pertains to a closed funding cycle. Questions receive during FY2024-RFGA-MC-204 Q&A’s period should only pertain to the current posted announcement.**

**To clarify, the intention is not to discourage subrecipients to refrain from providing services in Priority Areas 4-6 as the RFGA language reads, “Applicants must implement in- person SRAE services and outreach efforts in Priority Areas 1-3. Activities proposed in Priority Areas 4-6 may be considered and approved with proper justification. Please**

Note: Reviewers may deduct up to (3) points for activities provided in Priority Areas 4-6.”

6. On page 10, the RFGA states that “Please note: Personnel costs (to include salaries, contracted persons, etc.) CANNOT exceed more than 65% of the requested budget. Administration cost cannot exceed more than 10% of the total budget amount.” On page 13, it reads “Reimbursable direct personnel costs cannot exceed more than 65% of the requested budget. Administration costs cannot exceed more than 10% of the total budget amount...See Proviso 117.103.”

- a. We request that “contracted persons” not be considered Personnel and be removed from the description on page 10, so that it matches the description on page 13. Contracted persons are not employed by the applicant, do not receive salary from the applicant, do not receive any fringe benefits from the applicants, and are expected to complete tasks rather than hours. Contractual services are a separate category on the RFGA’s Budget template and not listed as applicant personnel, as the template recognizes that contracted persons are not employed by the applicant.

Response: **Your request has been noted and will be taken into consideration.**

7. We request that the restrictions from Proviso 117.103 be removed from this RFGA, as that Proviso legally governs the State Evidence-based Abstinence Funds and is not applicable to nor does it have authority of the federal Title V funds. Imposing it on the federal Title V program creates an impossible financial dilemma.

Response: **Your request has been noted and will be taken into consideration.**

8. We request that the restriction on both personnel and administration be removed from the RFGA. It is our understanding that neither of these caps are directed by law in the federal Title V guidance nor from State legislation, which means DHEC would have flexibility to remove them. These newly imposed caps first added just this past year on these two categories have significantly and negatively affected our ability to maximize services to youth. These caps have been a tremendously onerous parameter/restriction for us operationally and financially and has been detrimental to the reach of our work by limiting the amount of teachers we can have on staff to provide services. Best Practices approaches for Sexual Risk Avoidance Education include having Educators that are passionate and well-trained in the message to deliver the services. The core of our program is our personnel. This focus on expert personnel matches those Best Practices for getting behavioral results. The staff are the ones making the difference in the lives of the SC youth, and they are the essence of our quality education service delivery to every location—it is a service-driven program that takes staff time. It’s their time and investment into SRAE services that get the SRAE results. The costs of program supplies are minimal compared to the personnel time necessary for staff to complete the SRAE services. Before these new caps on the budget last year, we were able to operate effectively by maximizing time in order to achieve positive behavioral outcomes. The cap

on personnel means that we have been forced to cancel schools or instruction days because the grant wouldn't reimburse for the appropriate amount of time for the staff to complete the curriculum or project. Or, because we don't want to deny any group requesting services, these caps have forced us to supplement program and personnel expenses from a scarce and quickly-depleting savings account, all while the DHEC grants are able to take credit for the service provided. Essentially, these caps are COSTING us more money to complete the DHEC projects, yet there is money available in other categories of the budget that could be more effectively used on the personnel expenses. Removing the newly imposed caps and allowing more flexibility would help us facilitate operational excellence and efficiency, which is our ultimate goal.

Response: **Your request has been noted and will be taken into consideration.**

9. We request that DHEC provide a requirement to reviewers to provide comments justifying any point deductions on the scoresheet. Without comments, it cannot be determined what justified the deduction, which also makes it more subjective than objective and can conceal bias. Also with comments, DHEC is able to determine if reviewers took subjective liberty in a category that isn't subjective (for example, an organization's organizational chart isn't subjective, but is required to be included, and points given if included). Also, applicants cannot learn from any feedback for improvement for future applications if comments/feedback are not provided.

Response: **All panelists will be directed to provide comments on any deductions made.**

10. If changes are made to the RFGA in response to stakeholders' questions and feedback, we request that DHEC highlight any and all changes to assure that applicants and reviewers do not miss major changes. In the past, Track Changes was also used to help identify additions, deletions, and edits.

Response: **All major changes will be highlighted.**