

Ohio Department of Health
Grants Administrative
Policies and Procedures Manual

Chapter 500

Chapter: 500 Compliance Requirements		Section (s): 500.0 – 503.4
Effective Date: 05/01/2003	Revision Date: 05/01/2003	Revision: #1

This Chapter provides an overview of policies and procedures for handling subgrantee compliance issues.

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500.0

Contract Provisions

All contracts awarded by a subgrantee including small purchases, shall contain the following provisions as applicable:

Equal Employment Opportunity – All contracts shall contain a provision requiring compliance with E.O. 11246, “Equal Employment Opportunity,” as amended by E.O. 11375 “Amending Executive Order 11246 Relating to Equal Employment Opportunity,” and as supplemented by regulations at 41 CFR part 60, “Office of Federal Contract Compliance Programs, Equal Employment Opportunity, and Department of Labor.”

Copeland “Anti-Kickback” Act (18 U.S.C. 874 and 40 U.S.C. 276c) – All contracts and subgrants in excess of \$2000 for construction or repair awarded by recipients and subrecipients shall include a provision for compliance with the Copeland “Anti-Kickback” Act (18 U.S.C. 874), as supplemented by Department of Labor regulations (29 CFR part 3, “Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States”). The Act provides that each contractor or subrecipient shall be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he is otherwise entitled. The recipient shall report all suspected or reported violations to the Federal awarded agency.

Davis-Bacon Act as amended (40 U.S.C. 276a to a-7) – When required by Federal program legislation, all construction contracts awarded by the recipients and subrecipients of more than \$2000 shall include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 276a to a-7) and as supplemented by Department of Labor regulations (29CFR part 5, “Labor Standards Provisions Applicable to Contracts Governing Federally Financed and Assisted Construction”). Under this Act, contractors shall be required to pay wages to laborers and mechanics at a rate not less than the minimum wages specified in a wage determination made by the Secretary of Labor. In addition, contractors shall be required to pay wages not less than once a week. The recipient shall place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation and the award of a contract shall be conditioned upon the acceptance of the wage determination. The recipient shall report all suspected or reported violations to the Federal awarding agency.

Contract Work Hours and Safety Standards Act (40 U.S.C. 327-333) – Where applicable, all contracts awarded by recipients in excess of \$2000 for construction contracts and in excess of \$2500 for other contracts that involve the employment of mechanics or laborers shall include a provision for compliance with Sections 102 and 107 of the Contract Work Hours and Safety Standards Act (40 U.S.C. 327-333), as supplemented by Department of Labor regulations (29 CFR part 5). Under Section 102 of the Act, each contractor shall be required to compute the wages of every

mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than 1 ½ times the basic rate of pay for all hours worked in excess of 40 hours in the work week. Section 107 of the Act is applicable to construction work and provides that no laborer or mechanic shall be required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily on the open market, or contracts for transportation or transmission of intelligence.

Chapter: 500 Compliance Requirements		Sub-section (s): 501.0 – 501.1
Section: 501 Administrative Compliance Questionnaire (Section D)		
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501.0

Administrative Compliance Questionnaire

The Administrative Compliance Questionnaire (known as Section D) is used to assure agency compliance with ODH and Federal grant administrative standards. The questions in this section are part of the application Budget Section (Chapter 200) and should be answered as accurately and as completely as possible. If a question is not applicable, enter N/A. Any deviations from the administrative system described in this section may result in future audit findings. Questions regarding the completion of this section should be directed to your GAU consultant.

501.1

Compliance Questions 1 – 17

QUESTION 1 - involves the applicant share commitment to the program as listed in the Budget Summary – 1. Funding Sources, Applicant Share. The “authorizing authority” is the ruling, legislation, budget, or award that authorizes the applicant agency to spend funds on the program.

1. Does the program’s budget include any applicant share (listed in Item 1)?

YES NO

- What actions will be taken if actual income is less than anticipated? (Explain where funds will be sought to replace deficit or which expenditures will be cut should replacement funds not be available.)

QUESTION 2 - involves the program income as entered in the Budget Summary – 1. Funding Sources, Program Income. The applicant agency is required to allocate program income to the program accounts when received and the accounted for program specific expenditures. Program income may be expended only in accordance with the budget approved by ODH as part of the application or a subsequent revision. In the space provided, the applicant is to enter in the expected action to be taken when income is less than or greater than anticipated.

2. Does the program’s budget include any program income (listed in Item 1)?

YES NO

- What actions will be taken if actual income is less than anticipated? (Explain where funds will be sought to replace deficit or which expenditures will be cut should replacement funds not be available.)
- Is program income maintained in a separate account?

YES NO

- If program income IS NOT maintained in a separate account, enter plans and timetable for doing so. If program income is maintained in a separate account, describe how program income is identified or allocated to the program.

QUESTION 3 - requests an explanation of the procedure for spending program funds. The payment process should be explained from the point of origin to the actual printing of the warrant/check or releasing of cash. If the process differs for various types of expenditures this should be explained. It is important to include the titles of personnel involved, the forms, used and the role of the program director in the expenditure process.

3. Briefly explain the applicant agency's procedure for expending program funds. (Describe check or warrant processing system when paying employee salaries, employee travel reimbursement, vendors or contractors, and include the titles of agency personnel involved in the process, the role of the program director, and the forms used. These forms become source documentation for accounting records.)

QUESTION 4 - explains cost controls used to assure that program funds do not exceed budgeted amounts. The subgrantee cannot exceed the approved NOA. A 10% allowance is permitted in the Other Direct Costs and Equipment categories (ONLY), assuming there is an approved line item in the category, and will not necessitate a budget revision. There is no 10% allowance in Personnel and Contract categories. Money can be shifted within the personnel category, within budgeted amounts (i.e., amounts to be spent, or approved, budgeted positions) without requiring a budget revision; however, the grantee cannot add positions (more than those approved) without a budget revision. **THE PERSONNEL TOTAL CATEGORY CANNOT EXCEED THE BUDGETED AMOUNT.**

4. Are controls used to assure that expenditures of program funds do not exceed budgeted line-item accounts?

YES NO

- If yes, please explain system. If no controls presently exist, explain controls to be implemented and include timetables.

QUESTION 5 - involves an explanation of the program accounting system. The grantee must maintain separate accountability of program funds and expenditures. If such a system does not exist the applicant is required to explain the existing system and systems changes necessary for compliance. It is required that a program's accounting system provide for current and accurate fiscal information, and that accounts be established so that the balance of unspent, unobligated grant funds, and program income can be returned upon termination of the grant.

5. Is a separate program account maintained to identify expenditures of program funds (consisting of grant funds, program income and applicant share)?

YES NO

- Please explain program accounting system. If a separate accountability of program expenditures is not maintained enter plans to change the present system in order to provide separate accountability and include timetables. Include an explanation of accounting for in-kind applicant support.
- Does the present accounting system provide current and accurate fiscal information to assure that expenditure reports are submitted when due?
 YES NO
- If the answer is no, please explain changes to be made to the system to comply and include timetables.

QUESTION 6 - identifies the program's accounting system as on the cash basis, accrual basis, or modified accrual basis. A system on the cash basis recognizes expenditure at the time cash is dispersed. A system on the accrual basis recognizes expenditure at the time an obligation is incurred, although the cash may not be dispersed until a later time. A modified accrual system is a combination of the cash and accrual systems. When modified accrual system is used an explanation of the system should be entered in the space provided. Funds cannot be encumbered when the accounting system is maintained on a cash basis.

6. Program expenditures are reported on (check one):

Cash Basis An Accrual Basis A Modified Accrual Basis

- If a modified accrual system is used, please explain system.
- If an accrual or modified accrual system is used please explain agency's system for encumbering or obligating funds. (Describe forms used, flow of paper, and authorizing authorities.)

QUESTION 7 explains the method for allocating personnel costs to the program. If an employee spends less than 100% of his/her time on the program the most desired method of allocating the costs of employee time spent on the program is through the use of a time/activity record keeping system. Program funds may not be used for employee costs of non-program activities.

7. Are time/activity records maintained for program personnel to account for time spent on the program?

YES NO

- If not, describe how personnel costs are allocated to the program. (Include system controls to avoid duplicate charges to various Federal and State programs.)

QUESTION 8 lists employee fringe benefits to be charged to the program and the methods used to determine the costs. When a rate is used, please explain the method for calculating it, using actual costs when available. Program funds may not be used to pay for any employee fringe benefits that the applicant agency does not normally allow for non-program personnel.

8. List employee fringe benefits (summarized in Budget Section - Explanation of Personnel Funding Fringe Benefits Column) and explain how each fringe benefit is charged to the program. If a rate is used, explain how the rate is calculated, using actual figures when available. Provide details to explain use of rate:

QUESTION 9 - explains the method(s) used to allocate non-personnel costs that are shared by program and non-program activities. Personnel costs are discussed in question 7. Since ODH does not reimburse its programs using an indirect cost rate, costs of an indirect nature must be identified for reimbursement and should be explained in this section.

9. Are there any agency non-personnel costs that are shared by program and non-program activities in the Other Direct-Cost, Equipment and Contractual categories?

YES NO

- Provide necessary allocation plans for shared expenses. If yes, list them and explain how they are allocated to the program. If no, go to question 10.

QUESTION 10 - explains the method used by the agency to charge the program for goods and services provided. The program is to be charged an amount not to exceed agency's actual costs of such goods and services plus a reasonable amount to cover the costs of maintaining and operating a central store. The program should not pay an amount that exceeds the usual market price for such goods and services.

10. Does the agency have an in-house billing system when providing goods and services to the program?

YES NO

- If yes, explain the inter-agency billing system detailing titles of individuals involved and forms used. If no, go to question 11.
- Does an appointed program representative periodically review charges set by central stores to assure that charges to the program do not exceed cost of goods plus a reasonable amount to cover the costs of maintaining and operating a central stores' organization? If yes, please explain the review procedures, review frequency, and documentation of such reviews that will be made available to ODH and Federal auditors. If the answer is NO, please explain changes to be made to the system for compliance and include timetables.

YES NO

QUESTION 11 - examines travel and per-diem costs listed in Budget Summary Section A, 2b. When actual costs of travel using agency vehicles is charged to the program, the method used to allocate and account for such costs is to be explained. If the vehicle(s) was (were) purchased with state or federal funds, depreciation or use costs of such vehicle(s) cannot be included in travel charges to the program.

The usual method for charging a program when a non-agency vehicle is used for transportation is to allow an established rate per mile traveled. The method used for determining the rate (using actual figures when available) and the method used to

account for miles charged to the program are to be explained. Also to be explained is the method used to allocate travel costs to the program when the travel is for both program and non-program activities. Reimbursement from program funds may not exceed the amount allowed by the State for ODH employees.

The amounts allowed for per-diem expenses of program employees, such as breakfast, lunch, dinner, lodging and parking, are to be listed and the method used to account for such charges is to be explained. As in travel reimbursement, program funds may not be used to pay for per-diem in excess of that allowed by the State for ODH employees.

11. Does the program incur travel costs?

YES NO

- If yes, describe the procedure used to determine the program travel costs incurred when using agency vehicles (include most recent costs when available) and briefly describe program accounting system for such expenses (include a description of forms or form numbers used.) If no, go to question 12.
- If a rate has been established for reimbursing employees when using their own vehicles, enter the rate, explain how the rate was established (use figures when available and/or cite agency policy when applicable), and briefly describe program accounting system for such expenses (include a description of forms or form numbers used.)
- If per diem is paid to employees on travel status, enter agency's per diem policy. Include amounts authorized for lodging, subsistence and related travel items, and describe accounting system and forms used for expenditures. (NOTE: the rates and amounts listed for travel and per diem cannot exceed those allowed by the agency for non-grant activities. Any rates or amounts in excess of the amount authorized by the State for ODH employees will not be approved from program funds, but must be paid by the applicant agency.)

QUESTION 12 - discusses the applicant agency's procurement policy. In order to use program funds for equipment, supplies and contracts the policy must provide for free competition among the vendors; prevent agency officials from influencing a procurement for their own personal gain; encourage procurement from minority owned and operated organizations; and prevent any "kickback" to the agency or its officials.

12. Are program funds budgeted for equipment, supplies and contracts?

YES NO

- If yes, please explain agency's procurement policies and procedures for equipment, supplies, and contractual goods and services. Detail provisions that assure free competition among suppliers; that prevent agency officers or personnel having a personal interest in the selection from influencing the procurement; that encourages procurement from minority owned and/or operated organization; and that assures compliance with the Copeland "Anti-Kick-Back-Act" (1B USSC 874 as supplemented in the Department of Labor Regulations 41 CFR Part 60.)

QUESTION 13 - lists conditions of compliance for any contract involving program funds. There must be a sound and complete agreement that is to the benefit of both parties; administrative remedies must be set forth in the contract in the event either party violates its conditions; and the contract must include provisions for termination by either party prior to the expected termination date.

13. Is the program entering into any contracts for the procurement of goods and services?

YES NO (If NO, go to question 14)

- If yes, do contracts meet the following conditions:
 - a. Definition of a sound and complete agreement. YES NO
 - b. Administrative remedies for violations. YES NO
 - c. Termination provisions. YES NO

If the answer is NO for any of the three conditions above, please explain and describe actions that will be taken to correct the discrepancy.

QUESTION 14 - concerns equipment purchased in whole or in part with program funds. All such equipment becomes the property of the Ohio Department of Health and must be marked as such. Current and accurate inventory records must be maintained and periodic inspections of such equipment must be conducted and documented.

14. Has equipment been purchased in whole or in part by the program with previously awarded program funds?

YES NO (If NO, go to question 15.)

- Is all such equipment tagged or otherwise identified as "Property of the Ohio Department of Health"?
 - YES NO
- If not, please enter a timetable in which such compliance will be met. If yes, explain procedure and frequency. If no, please develop and explain an equipment audit policy and schedule.

QUESTION 15 - when equipment is purchased for program use it may be charged to the program in the period which it was purchased, or a depreciation or use charge may be levied against the program over the life of the equipment. Agency automobile usage or depreciation that is charged to the program as part of travel costs explained in question 11 should be addressed here also.

15. Explain agency's method for depreciation of equipment?

QUESTION 16 - concerns audits of program funds conducted during the past year or scheduled for the coming period for which funds are being requested. This includes comprehensive audits of which only a portion of the activities audited are program activities, but does not include any audit conducted by ODH.

16. Has an audit of program funds been conducted during the past year other than by ODH?

YES NO

- If yes, please attach a copy with this application.
- Is an audit of program funds anticipated during the coming year?
 YES NO
- If yes, what individual(s) or organization is scheduled to perform the audit and what is the approximate date of completion?

QUESTION 17 - addresses fidelity bond coverage for non-governmental agencies. This includes the specifics of the bond coverage; type(s) of coverage, employees covered, minimum and/or maximum amounts of indemnification. Applies only to non-governmental agencies.

17. If the applicant is a non-governmental agency does it carry adequate fidelity bond coverage as indemnification against losses resulting from the fraud or lack of integrity, honesty or fidelity of one or more employees, officers or other persons holding a portion of trust?

YES NO

- If yes, attach a copy of the bonding agreement. If no, explain actions that will be taken to comply.

Any deviations from the administrative system described in this section may result in future audit findings. Technical assistance is available, through GAU.

Chapter: 500 Compliance Requirements Section: 502 Subgrantee Compliance Committee	Sub-section(s): 502.0 –502.0
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502.0

Subgrantee Compliance Committee

The purpose of the Subgrantee Compliance Committee (SCC) is to monitor subgrantees compliance with ODH, State and Federal rules and regulations. On a monthly basis the Committee reviews any subgrantee compliance issues brought forward by Program or Administrative staff for review. The committee receives a brief written summary of the subgrantee issue and reviews the report with appropriate program, BIOS, OFA and GAU staff. Upon review the Committee:

1. May return the issue to program to program and/or GAU to resolve based on GAPP policies and procedures.
2. May make a recommendation to the Director to grant an exception to a GAPP policy or procedure (with appropriate corrective and future preventive action included.)
3. May recommend to the Assistance Director for Programs probation, suspension, termination or debarment actions pertaining to a grant or a subgrantee agency. Appeals are heard by the Director or Director's designee.

On a monthly basis the SCC reviews the list of all grants having outstanding special conditions and/or payments withheld. The Committee may or may not take action based on their review.

On a quarterly basis the SCC will receive any requests for review of particular programs or subgrantee agencies from Program, EEO, Audit, and GAU staff, via Division Chief, OFA Chief or the Assistant Director for Administration. The Committee may or may not take action based on their review.

The SCC includes the following members: Audit Chief (Chair); Office of Financial Affairs Chief; Legal Counsel; Grants Administration Unit; and Bureau of Information and Operational Support representative from division of Family, Administration and Prevention.

503.0

High Risk Scope

The Ohio Department of Health believes that the great majority of its subgrantees are competently managed, responsible and fully committed to achieving the goals and objectives of the grants they receive. Experience has shown, however, that a minority of subgrantees create relatively high risks of poor programmatic use and financial stewardship of grant funds. These subgrantees subject themselves to a status of High Risk that imposes additional and potentially severe sanctions or requirements.

503.1

High Risk Status

Placement into High-risk status will be determined for individual subgrantees based upon ***the subgrantee's failure to comply with any Federal or State applicable rules and regulations or the terms and/or conditions of the Award. These may include:***

Serious deficiencies in program or business management systems (e.g., substantial failure to comply with the financial management standards or procurement standards).

A history of unsatisfactory performance, material violations of grant terms, or large cost disallowance on previous awards from the same or other federal programs.

Poor financial stability (i.e., insolvency or threat of insolvency).

The severity of the subgrantee issues or deficiencies will dictate the level of potential Imposed Protective Conditions applied. High-risk status may be imposed on subgrantees in the form of probation, suspension, termination, debarment, or such other remedies as may be legally available and deemed appropriate. The ODH Subgrantee Compliance Committee (SCC) will recommend to the Director whether a subgrantee shall be placed in high-risk status. ***Determination for SCC recommendation will be based upon non-compliance with or the subgrantee's failure to comply with any Federal or State applicable rules and regulations or the terms and/or conditions of the Award.*** The decision will be enforced until compliance standards are met, a pre-specified time period has lapsed, or other administrative measures are imposed. The ODH Director or his designee will notify the subgrantee Agency Head in writing, with copies of this letter sent to: 1) the subgrantee agency head 2) the Program Director, 3) the respective ODH Division Chief, 4) ODH Program Coordinator, 5) GAU, and 6) audit staff.

The Imposed Protective Conditions and/or monitoring techniques to be used will depend on the nature and extent of the risk. Special conditions, which constitute deviations from GAPP or program rules, may be used only when recommended by the SCC and approved by the Director or his designee.

To minimize the risk after determining that a subgrantee is at high-risk, ODH as the granting agency may elect to:

1. Award a grant (probation) but arrange for appropriate technical assistance to the subgrantee – Based on documentation submitted, the subgrantee is determined to be HIGH RISK by the SCC. The subgrantee would be required to seek additional documented technical assistance. An on-site review by ODH may be conducted.
2. Award the grant (probation) but with Imposed Protective Conditions and generally closer monitoring – Based on documentation submitted, the subgrantee is determined to be HIGH RISK by the SCC. The subgrantee would be required to adhere to protective conditions and may be restricted to reimbursement status only until corrective actions are agreed upon. Internal ODH reviews would be considered on a quarterly basis, or an on-site review by ODH may be conducted.
3. Not award the grant (suspension/termination/debarment) based on documentation submitted, the subgrantee is determined to be HIGH RISK by the SCC and may not be fundable until corrective actions and time frames are agreed to and implemented. Internal reviews by ODH will be on going and may require an on-site review.

503.2

Imposed Protective Conditions

The severity of the subgrantee issues or deficiencies will dictate at which level of sanction will be imposed. The imposition of High Risk revokes any existing subgrantee flexibility under Section 306.0 and may include additional requirements by ODH. The subgrantee shall be informed, by written notice, of the specific areas of non-compliance that cause the imposition of High Risk.

Probation – This is the first (1st) level of High Risk, which applies to the agency level and affects all current ODH grants with the subgrantee.

The goal of Probation is for the subgrantee to satisfactorily correct all issues of non-compliance. Probation requires the subgrantee to prepare and submit a written Corrective Action Plan with specific completion dates. The Corrective Action Plan will be reviewed, approved and returned to the subgrantee for implementation.

Probation may include any of the following additional requirements:

1. Revokes any existing flexibility status,
2. Requires **All** expenditures for all grants on actual cost reimbursement,
3. Prohibits any increases in current awards and,
4. May require additional reporting and/or documentation.

Probation does not affect the current Notice of Award(s).

When a subgrantee is placed on **Probation**, appropriate technical assistance to that subgrantee will be considered. The purpose of the technical assistance is to raise the level of subgrantee compliance so that the subgrantee is no longer treated as High Risk. Technical assistance may be offered by individual ODH units, or by an on-site review.

Suspension – This is the second (2nd) level of High Risk, which is grant specific (a subgrantee with multiple grants could have one Suspended, while the others are not). Suspension of a specific subgrant is imposed for a subgrantee’s failure to satisfy issues of non-compliance in the Corrective Action Plan from Probation. This is a subgrantee’s final chance for resolution of non-compliance on a specific grant. Suspensions remain in effect until corrective action is satisfactorily completed or until ODH terminates the grant.

Suspension shall include the following:

1. Written notice to the subgrantee stating the reasons for suspension, effective date and requirements for Corrective Action,
2. Halting of all ODH payments for the specific grant and,
3. Prohibiting any new obligations for that specific grant.

Suspension may affect the current Notice of Award.

Necessary and otherwise allowable expenditures of grant funds or program income which the subgrantee could not reasonably avoid during the suspension period will be allowed if they result from obligations properly incurred by the subgrantee before the effective date of the suspension.

At the discretion of ODH, local funds expended and third party in-kind contributions to the project applicable to the suspension period may be allowed in satisfaction of cost sharing or matching requirements.

Termination - This is the third (3rd) level of High Risk, which is grant specific. Termination of a specific grant is imposed for a subgrantee’s failure to satisfy issues of non-compliance from Probation and/or Suspension.

Termination shall include the following:

1. Written notice to the subgrantee stating the reasons for the Termination and the effective date,
2. Prohibition of any new grant obligations,
3. Return to ODH any unexpended funds previously advanced.

Termination requires the issuance of a revised Notice of Award.

Debarment - This is the third (4th) and final level of High Risk, which applies to the entire subgrantee. Debarment of a subgrantee is imposed for a subgrantee’s failure to satisfy issues of non-compliance from Probation, Suspension and/or Termination. This is the act of prohibiting the subgrantee for conducting any related business with ODH.

Debarment shall include the following:

1. Written notice to the subgrantee stating the reasons for the debarment and the effective date
2. Prohibition of **ANY** further related activities
3. Return to ODH any unexpended funds previously advanced

Debarment requires the issuance of revised Notice of Award(s) as necessary

503.3

High-Risk Progress

The SCC will monitor the status of each subgrantee deemed high-risk on a monthly basis to ensure implementation and compliance of approved corrective action plans. If subgrantee demonstrates implementation and completion of satisfactory corrective action, SCC will make a recommendation to the Director or his designee to remove the subgrantee from High Risk status. If there are no documented changes, response or implementation by a subgrantee, the SCC will make a recommendation to the Director or his designee for the next progressive stage of high-risk.

The Director's decision will be made from the SCC recommendation. The Director or his designee will communicate the decision by sending an Imposed Protective Condition notice to the subgrantee by certified mail. The letter will document the deficiencies, effective time periods, and any other administrative measures imposed. A copy of the letter will be sent to: 1) the subgrantee agency head, 2) the Program Director, 3) the respective ODH Division Chief, 4) ODH program, 5) GAU, and 6) audit staff.

Appropriate adjustments to payments under the suspended grant will be made either by withholding subsequent payments, or if the payments have been made, by not allowing the subgrantee credit for disbursements during the suspension period.

503.4

High Risk Appeal Process

The subgrantee Agency Head has **15 calendar days** from receipt of the related letter of high-risk to request a hearing with the ODH Director or his designee. Documentation to support the appeal and the Request for Administrative Hearing form must accompany the letter submitted to the Director. The ODH Director or his designee will review the documentation, and notify the subgrantee within 45 calendar days after receipt of the subgrantee's appeal letter and documentation. All decisions are final. **Appeals received after the 15 calendar days deadline will not be reviewed.**