



Substance Abuse and Mental Health
Services Administration

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Harm Reduction Program NOFO Frequently Asked Questions

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Eligibility

Eligible Entities

- *Are colleges and universities eligible to apply?*

Institutions of higher education are eligible to apply for the Harm Reduction Program Grant so long as they also meet the eligibility criteria listed on page 13 of the NOFO: States; Local, tribal, and territorial governments; Tribal organizations; Non-profit community-based organizations; and Primary and behavioral health organizations.

- *Can individuals apply for and receive funding for the Harm Reduction Program?*

Eligibility for this grant program is defined in Section 2706 of the American Rescue Plan Act of 2021 and listed on page 13 of the NOFO. Eligible applicant organizations include States; Local, tribal, and territorial governments; Tribal organizations; Non-profit community-based organizations; and Primary and behavioral health organizations.

- *Do non-profit community hospitals fit in the “non-profit community-based organizations” category?*

Non-profit hospitals may be eligible as a primary and behavioral health organizations.

- *Can an organization currently in the process of securing nonprofit status apply?*

Organizations must submit documentation of their nonprofit status as Attachment 8 of their application. Please review acceptable documentation on page 17 of the NOFO.

- *Is this opportunity available for enhancing pre-existing programs to add new positions?*

There are two key staff positions for this program, the Project Director, and the Peer Support Worker. Additional staff may be hired by each grant recipient organization based on the needs of their approved project. This should be indicated in Section D of the application and in the budget justification.

- *Can a county public health department apply?*

The eligibility for this grant program is defined in Section 2706 of the American Rescue Plan Act of 2021. Eligible applicants include States; Local, tribal, and territorial governments; Tribal organizations; Non-profit community-based organizations; and Primary and behavioral health organizations. Please see page 44 of the NOFO for examples of government organizations, which include county, city, and township governments.

- *Why are police being allowed to receive these funds?*

The eligibility for this grant program is defined in Section 2706 of the American Rescue Plan Act of 2021. Eligible applicants are States; Local, tribal, and territorial governments; Tribal organizations; Non-profit community-based organizations; and Primary and behavioral health organizations.

- *Can churches apply?*

Non-profit churches may be eligible as community-based organizations.

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- *Page 11 states that Primary and behavioral health organizations are eligible. Is that specific to non-profit primary and behavioral health organizations only or would for profit primary behavioral health organizations be considered?*

Per Appendix C of the NOFO: For-profit organizations are not eligible to apply for SAMHSA grants.

- *Many applicants may be from states in which SSPs are underground. How does SAMHSA recommend handling this within the application?*

Per page 8 of the NOFO, harm reduction programs that use federal funding must adhere to federal, state, and local laws, regulations, and other requirements related to such programs or services.

Fiscal Sponsorship

- Are organizations that have a fiscal sponsor allowed to apply? Additionally, would the fiscal sponsor submit application on their behalf or would the SSP be able to apply and provide verification of their fiscal sponsorship arrangement?

Any entity that meets the eligibility criteria can apply (including a fiscal sponsor). Additionally, a fiscal sponsor can apply as the primary applicant and choose to subcontract with other nonprofits so long as they ultimately meet all grant requirements. Please see the NOFO for additional guidance on subcontracting.

- *Can a 501c3 apply with a major portion of the budget subcontracted to an organization that does not meet the eligibility requirements?*

Any entity that meets the eligibility criteria can apply (including a fiscal sponsor). Grant recipients may subcontract to entities that help them meet approved program goals and objectives.

Partnerships and Subcontracts

- *Can an agency be included in another organization's application as a subcontracted partner and submit their own proposal?*

Yes, this is allowable.

- *Can community health organizations partner with local or state agencies for a joint application?*

Different community-based organizations may partner or subcontract to one another if the primary applicant meets the eligibility criteria listed on page 13 of the NOFO, and their respective roles are well defined.

Program-Related Questions

Key Staff

- *What are the minimum qualifications for project directors?*

Position descriptions may be written by each grant recipient organization based on the needs of their program.

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- *Please share the qualifications of the peer support worker position that is required. Does the peer support worker have to be credentialed or can that be someone who self-identifies as a person with lived experience?*

Position descriptions may be written by each grant recipient organization based on the needs of their project. SAMHSA encourages grant recipients to hire people with lived experience.

- *Is there an FTE requirement for the project director and the peer support worker?*

There is not an FTE requirement for key staff however it is expected that both positions make a substantial contribution to the project.

Required/Allowable Activities

- *Do projects need to conduct all the required activities or just some?*

All required activities must be implemented, including purchasing equipment and supplies. However, it is not expected that all equipment and supplies listed on page 8 of the NOFO be purchased.

- *Would medication assisted treatment be something that falls into these activities?*

Harm Reduction Program funds may not be used to purchase medicine for treatment however, harm reduction equipment and supplies are allowed. Please see page 8 of the NOFO for a list of harm reduction prevention equipment and supplies that may be purchased with Harm Reduction Program Grant funds.

- *Can funds be used to purchase buprenorphine?*

Low threshold buprenorphine as a prevention effort to sustain overdose reversals will be allowable. Grant recipients may be required to submit additional documentation per the terms of their award.

- *What overdose reversal medications are allowable for purchase?*

All overdose reversal medications approved by the FDA are allowable.

- *Can funds be used for providing therapy services in conjunction with harm reduction?*

Time-limited therapeutic crisis interventions as crisis prevention to prevent overdose or death are allowable. Additionally, funds may be used to provide support services such as those listed on page 9 of the NOFO.

- *Can funding be used for individual's treatment costs?*

No, harm reduction funds may not be used to pay for treatment.

- *Is syringe distribution a required activity?*

Syringe distribution is not a required activity. Please see pages 7 and 8 of the NOFO for a list of required activities.

- *Would a safe injection site trial qualify under this grant?*

Safe injection site functions are not an allowable activity.

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- *If we cannot provide an activity ourselves, can we subcontract out the activity to another provider?*

Different community-based organizations may contract or sub to one another if the primary applicant meets the eligibility criteria listed on page 13 of the NOFO, and their respective roles are well defined.

- *Would folding the harm reduction advisory board into an existing advisory board be allowable?*

The harm reduction advisory council can be pre-existing so long as the requirements listed on page 8 of the NOFO are met and depicted in Section C of the application.

- *Does the Harm Reduction Advisory Council need to already exist, or can that be built during the planning period of the grant?*

The harm reduction advisory council can be assembled during the planning period of the project so long as the requirements listed on page 8 of the NOFO are met and depicted in Section C of the application.

- *The NOFO states that the strategic action plan needs to be developed within 6 months of award but when do direct services need to start? What services need to start at the 4-month mark?*

Project implementation is expected to begin by the fourth month of the grant. Per Section C of the NOFO (page 22), grant applications must show that the applicant organization has necessary resources in place so that the project can be implemented, and service delivery can begin as soon as possible and no later than four months after grant award.

Funding Questions

Allowable Expenses

- *Can you clarify supplement vs. Supplant? For instance, an entity that currently has harm reduction activities funded by PDO, would they be eligible for this grant?*

“Supplant” is defined as replacing funding of a recipient’s existing program with funds from a federal grant. Grant funds may be used to supplement existing activities and may not be used to supplant current funding of existing activities.

- *Is rent for space to house the program allowable?*

Yes, generally as part of an approved Indirect Cost Rate, but in some cases may be charged directly to the grant and may fall under the “Other” budget category if not included in an approved indirect cost rate.

- *Was it said that housing costs can be supported with these funds?*

Organizations may not use Harm Reduction Program funds to purchase and maintain housing. However, organizations may use funding to provide the required and allowable activities listed on pages 8-9 of the NOFO for housing support services.

- *Can the funds be used for fentanyl test strip kits?*

Yes, fentanyl test strips are an allowable purchase.

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- *Can this project fund drug testing equipment, ex. mass spectrometry and other testing tools?*

Please review the NOFO for required and allowable activities. Please justify additional activities in your application as they relate and support harm reduction, the NOFO and your organization's goals and objectives.

- *Can funds be used to purchase mobile units such as vans?*

While organizations may not use Harm Reduction Program funds to purchase a mobile unit, organizations may use funding to support existing mobile units by purchasing, stocking, and distributing the equipment and supplies listed on page 8 of the NOFO.

- *Can grant funds be used to start a new overdose prevention program, or must the overdose prevention program be in place at the time of application?*

Per page 22 of the NOFO: Grant applicants must show that the applicant organization has necessary resources in place so that the project can be implemented, and service delivery can begin as soon as possible and no later than four months after grant award.

- *Can applicants submit a budget for less than \$400,000 per year?*

Grant applicants may submit a budget for any amount up to \$400,000 per year.

- *Are we allowed to purchase syringes and/or cookers with this funding?*

Per page 8 of the NOFO, the Harm Reduction grant program is authorized under Section 2706 of the American Rescue Plan Act of 2021 which is not subject to the same syringe funding restrictions as other federal grants. Syringes to prevent and control the spread of infectious diseases are allowed for purchase with these grant funds. The proposal of using grant funds to support harm reduction supplies not listed on page 8 of the NOFO must be justified as to how they contribute to preventing and controlling the spread of infectious disease in the Harm Reduction grant application. Harm reduction programs that use federal funding must adhere to federal, state, and local laws, regulations, and other requirements related to such programs or services.

Administrative Costs

- *Please explain further what is included in the administrative costs. It was mentioned that it includes evaluation, data entry, participant incentives. Does it include institutional indirect costs as well?*

Administrative costs are the same as indirect costs and include costs incurred for common or joint objectives that cannot be identified specifically with a particular project. Facilities operation and maintenance, depreciation, and administrative expenses are examples of indirect costs. For additional information, please review the Funding Limitations/Restrictions guidance listed on page 19 of the NOFO.

- *Is that no more than 20% for each of those items or 20% combined? For example, could you have 20% in admin costs and then 5% in data collection?*

The 20% should be assessed against the total award amount, regardless of arrangements with subrecipients. Per page 19 of the NOFO No more than 20 percent of the total grant award for the budget period may be used for: Administrative costs; and Data collection, performance measurement, and performance assessment, including incentives for participating in the required data collection follow-up.

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- *Is the project manager included in administrative costs or elsewhere?*

Project staff, including key personnel, must be listed under Personnel Costs of the Budget. For Sample Budget and Justification guidance, please see Appendix L of the NOFO.

Data Collection/Reporting

- *Will the GPRA data be the same as required by other SAMHSA programs?*

SAMHSA has developed a GPRA tool specifically for the Harm Reduction Grant Program that is currently going through the OMB approval process, which includes a 60-day public comment period. We do not plan on using a previously developed GPRA tool and have made efforts to respect reporting burden on the grantees.

- *How can we participate in OMB's 60-day public comment period for the data collection tool?*

The public comment period will be held through the Federal Register. We don't have an anticipated posting date, but you can sign up to receive notifications here: <https://www.federalregister.gov/>.

- *How often will GPRA data be collected?*

Recipients will be required to report on the indicators listed on page 10 of the NOFO on a quarterly basis and set targets annually via SAMHSA's Performance Accountability and Reporting System (SPARS).

- *Please clarify the definition of encounters referenced in the NOFO. Does this count 1-on-1 contacts with clients or would group education?*

For the purposes of this indicator, "encounters" are defined as the individual connections/contacts with clients. If there were 15 people in an audience, there would be 15 service encounters.

- *Does "unduplicated" refer to different individuals in a given fiscal year or does it refer to new clients/participants only who have never received HR services in project?*

Unduplicated individuals should be referenced throughout the 3 years of the program, so we have a final unduplicated number at the end of the grant project.

Application Questions

Population(s) of Focus

- *Is there a particular definition of 'rural' being used?*

Per the Office of Management and Budget (OMB), all counties that are not part of a Metropolitan Statistical Area (MSA) are considered rural. Micropolitan counties are considered non-Metropolitan or rural along with all counties that are not classified as either Metro or Micro. To confirm whether the geographic catchment area in which you're proposing services to be delivered is considered rural, please review the Metropolitan and Micropolitan Statistical Areas Map:

https://www2.census.gov/geo/maps/metroarea/us_wall/Mar2020/CBSA_WallMap_Mar2020.pdf

- *Can organizations apply if more than more than 50 percent of their total population(s) of focus do not belong to underserved communities?*

All organizations that meet the eligibility criteria listed on page 13 of the NOFO are eligible to apply.

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- *Does “population of focus” refer to the clients being served by this grant, or our agency’s overall population of focus?*

The population(s) of focus included in the grant application should be those prioritized for the grant project, not the applicant organization.

- *To meet the 50% population of focus bonus points threshold, should my proposed project serve all of the underserved communities listed in section 2 of [Executive Order 13985](#)?*

The priority populations for this program are underserved communities that are greatly impacted by SUD. To be eligible for the bonus points listed on page 21, more than 50 percent of the proposed project’s total population(s) of focus, either individually or collectively, should belong to underserved communities defined under section 2 of Executive Order 13985.

Other Application Questions

- *On page 33 of the NOFO, there is a statement that you can submit via ERA ASSIST or grants.gov. Can all required documents be submitted through grants.gov? I’m unfamiliar with ERA ASSIST though our agency is registered.*

Yes, you can use either system. Applicants must register with NIH’s eRA Commons to apply. This process takes up to six weeks. If you believe you are interested in applying for this opportunity, you must start the registration process immediately.

- *From page 20 of the NOFO: “The project narrative describes what you intend to do with your project and includes the evaluation criteria in sections A-D below. Your application will be reviewed and scored according to your response to the requirements in Sections A-E”. Does the project narrative include sections A-E or A-D?*

The project narrative should include sections A-E and can be found on pages 20-23 of the NOFO.

- *Will SAMHSA have any external reviewers with expertise in harm reduction programming scoring the proposals? Will there be a recruitment for external reviewers? It’s important to ensure an expert and diverse review panel to give proposals adequate review.*

All SAMHSA applications are peer-reviewed by external reviewers and this NOFO will be reviewed by peer reviewers with harm reduction expertise. Note that decisions to fund a grant are based on the strengths and weaknesses of the application as identified by peer reviewers. The results of the peer review are of an advisory nature. The program office and approving official make the final determination for funding.

Webinar Access

- *How can we access the Harm Reduction Notice of Funding Opportunity Webinar recordings from December 20, 2021, and January 26, 2022?*

To access the webinar recordings, visit: <https://www.samhsa.gov/find-help/harm-reduction#webinar>.