

Patient Centered Medical Home – Facility Improvement (PCMH – FI)  
HRSA-14-074 PCMH  
Post Award TA Call  
September 15, 2014  
2pm ET

Matt Kozar: Thank you and thank you all for joining us today on our Webinar that will go through the Patient Centered Medical Home Facility Improvement grants that were awarded late in August. We're going to give you some helpful information on this call today mainly focusing around the requirements of the grant. We'll go through the conditions of the award, the reporting requirements as well as some high level, requirements related to just the overall grant in and of itself. It'll assist you with the implementation of the project that you were funded for.

We're very excited about this program. The applications that were submitted were very competitive. We're hoping that as a result of the projects that you were funded to complete that this will move you towards PCMH recognition if you're not already recognized or if you are recognized to obtaining a higher level quality of care at your facilities. And with that I will turn it now over to Bill Hemmingson who will start you off on the presentation.

Bill Hemmingson: Thank you Matt and good afternoon on the East Coast, and good morning on the West Coast. Just a couple notes as we get started, we're trying something a little bit different. And in this presentation that rather than having you call in with questions at the end of the presentation we will answer questions through the Adobe Connect Chat Box.

Of course we'd like for you to listen to the presentation and then you can enter your questions or you can enter them in as we are speaking but hopefully will cover a lot of issues that you may have through the course of the presentation. If there are questions you do need to have a discussion with someone in particular on your grant we will also address that at the end of the presentation.

So on to the next slide. So the objectives of this presentation are to describe the expected outcomes of the Patient Centered Medical Home Facility Improvement program. This is also known as the PCMH-FI program or the P-FI program. We'll discuss the project management and critical compliance requirements. We'll review the terms and conditions of the notices of award in a general sense and explain the process of post award submission and review.

Next slide please. As Matt said it was a highly competitive application process. We were able to award 147 grants to health centers for a total of \$35.7 million. Each grant has a two year project period. The project period started on September 1st of this year. The awards are limited in that they were only able to fund one project at a distinct site.

Projects could be only for alteration renovation project for an existing facility or propose the expansion or construction of an existing site. No equipment only projects were permitted and limited the total amount of purchases of loose movable equipment to 50% of the project cost.

These grants will have an activity code in your Electronic Hand Book portfolio of C8C. There's a separate payment management system subaccount located in Box 17 on the Notice of Award. I believe that's on the cover page.

The funds will be accounted for and reported separately under from your other grants through the 330 program and other Affordable Care Act funds.

If other sources of funding exist to support the PFI project you would need to draw down proportionally to the approved federal percentage share. So if your project is not 100% funded you are expected to draw down in accordance to the federal percentage share as you make payments through the course of the project.

Next slide, please. A quick reminder on ineligible costs - cost prior to 90-days prior to the award date, which would be any cost prior to June 1, 2014, are unallowable. Physical construction costs prior to the award date are unallowable. Costs that do not meet the federal procurement guidelines as listed in the reference section there on the slides are unallowable. It is necessary to ensure that all the contracts you sign and purchases you make follow federal procurement guidelines. These grant funds cannot be used to purchase land or building or for lease payments, and cannot be used for operational costs or related to the expansion of the center. HRSA cannot pay for permanent relocation costs, for expenditures for personnel that are not related to the project. You are permitted to draw down funds that are for personnel that are working directly on the project but not for unrelated expenses. Mobile vans were not allowable, electronic health records (EHR), operation and maintenance are allowed as part of this opportunity. Abatement of site and building hazardous materials were - are unallowable. Also disposable items for office, medical or educational supplies are also unallowable for these grants.

Next slide, before you're able to begin construction it's important that you review all the terms and conditions in the Notice of Award.

Do not begin construction or drawing down funds for demolition, site preparation, construction activity until all grant conditions have been approved and are lifted. By lifted I'm referring to it would be noted as lifted in a revised Notice of Award that you would receive through the Electronic Hand Book.

Even though the projects may seem simple on your level, HRSA is required to make sure that they comply with all the environmental, historic preservation issues that may or may not occur to your site. Until we have verified that we cannot allow you to begin construction on project. You can incur cost to draw down funds for related non-construction activities such as planning, administrative costs that are preliminary, trying to meet the environmental and historic preservation, requirements, architectural and engineering fees.

The next slide covers the Electronic Hand Book (EHB). A folder has been created for the grant within your organization's EHB portfolio. The authorized official needs to ensure that he or she has been added - has added the grants to their portfolio. You will need to add the grant into your portfolio before you can actually begin working on it.

If there have been any changes to the award personnel there's some changes you can make internally. The program director can only be changed through a prior approval. I'll talk about that a little bit at the end.

If you need assistance with the Electronic Hand Book there's a link on this slide on Slide 7 that can take you to some help to show you how to add the grant to your portfolio.

On Slide 8, there are two individuals who you will work closely with throughout the course of the grant. One is the project officer. The project officer will provide guidance on the overall programmatic objectives, review processes budget schematics, site plans and construction timelines. They'll also review and process prior approval requests and will provide ongoing project monitoring and technical assistance as you need it throughout the course of the project. And they'll also work with you on the close out of the grant.

On Slide 9 is the second person that you'll work closely with - your grants management specialist. They'll assist with ongoing financial and grants management monitoring and technical assistance. They'll review the federal interest submission, lease documentation, and revised budgets, annual federal financial reports that are required. And they'll also process the prior approval and issue any revised Notice of Award to lift any conditions. They'll also work with the project officer on the closeout of the grant.

So with that note I'd like to turn the presentation over to Ann Piesen within our program lead and we'll carry on starting at Slide 10.

Ann Piesen: Thank you Bill. Before I read this slide I wanted to let everybody know that about 99.9% of the summary statements have gone out through the Electronic Hand Book.

So you should have received or will be receiving a copy of your cover letter and summary statement score and notes through the Electronic Hand Book notification.

If you've not received something by tomorrow morning please feel free to send me a message to [bphccapital@hrsa.gov](mailto:bphccapital@hrsa.gov).

On Slide 10, the project officer listed in your C8C grant folder is responsible for managing and monitoring the award. It really is imperative that you work with the C8C project officer. Project officers for other grant awards including your H80 health center project officer are not responsible for this award and cannot authorize any actions for it.

I (Ann Piesen) am identified as the project officer on all of your Notices of Award. That was done in order to get those awards out for you quickly. But the actual project officer for each award is listed in the Electronic Hand Book. We have assigned those project officers and I believe that almost all the project officers have completed their outreach to individual grantees.

On Slide 11, If you have any questions as to where to locate who your current project officer and grants manager specialist please go to the Electronic Hand Book step one, find your C8C grant and click on the grant folder, step two.

And the last step is within the grant folder you will select HRSA contacts where you will easily see who your current project officer is as long as your - as well as your grants management specialist along with their phone number and email.

Slide 12 covers submitting documents into the Electronic Hand Book. Grantees are required to submit all documentation identified as a condition of award or a reporting requirement into EHB. By default the project director shown in EHB will have access to all the submissions but the PD must give those permissions to any other users. If somebody else also has it, the

administrative user privileges in the Grants Hand Book they can also assign other users to have those privileges.

In addition to submitting the documents the conditions and reporting requirements listed on your Notice of Award, HRSA program or grants staff may also request information through the Electronic Hand Book through specific requests for information or additional conditions. This will always be based on project specific situations. So it doesn't happen frequently but be aware we can request additional information.

What is approval of a submission? Only responses from HRSA, such as a Notice of Award provided by the Grants Management Officer, are considered to be valid. Recipients that proceed on the basis of action by officials that are not authorized to do so are proceeding at their own risk. HRSA will not be bound by such responses. There is no such thing as a verbal approval for something that requires formal approval.

Anything that requires a prior approval will get a Notice of Award that says it's been approved. Be aware that if you do not get prior approval you'll always run the risk of being placed on drawdown restriction or having costs disallowed. If you have questions regarding a specific action and whether it requires prior approval or not please do contact your C8C project officer.

Slide 13, condition deliverables and due dates. If you need an extension to a conditional reporting requirement please contact your C8C project officer or GMS. In your request for an extension please provide a justification as to why you need the request and describe if there will be an impact on the overall construction timeline. We understand that everybody has the same reporting deadlines whether it's 60 days or 90 days and that this may not

match up perfectly with your particular construction schedule. So please do clarify in your request. Conditions with award issue deadlines - please be aware that the deadline was based on the award release date which may be earlier or later than the award issue date in box one of the Notice of Award. In this case it was based on; the deadline dates were based on August 25 or 26, not September 1.

One more thing with the request for extension deadline you may not be able to see that under the individual condition or reporting requirement initially. You will be able to see this drop-down box closer to the deadline date. If you have any questions do contact your project officer. And with that I'm going to turn over to Neal Meyerson.

Neal Meyerson: Well thank you Ann. Okay we've already have the next slide.

Good afternoon. I'm Neal Meyerson. I'm the Grants Management Team Leader for this program.

First I want to go through Slide 14, the federal interest conditions. The federal government will always retain an interest in property that is constructed acquired or improved with federal funds. All construction projects regardless of the costs are required to file a notice of federal interest.

Alteration and renovation projects with total cost, that's federal and nonfederal that cost more than \$500,000 excluding movable equipment must also file a Notice of Federal Interest. Applicants that are not required to file a Notice of Federal Interest are alteration and renovation projects with total federal and nonfederal costs that are less than \$500,000. In these cases

the federal interest still exists and the grantee should maintain documentation regarding protection of the federal interest. And there are some additional resources. And if you have questions you can call your grants management specialist.

Slide 15, leasehold improvement conditions - funds may not be used to pay for the actual cost of leasing. Funds for leased property cannot address needs that are part of the terms of the lease, i.e., something that the lessor is supposed to do. If funds address improvements that would impact terms of the lease, for example double paned windows, applicants must have written evidence of a negotiated offset in the rent.

The landlord letter of consent or statement of agreement from the owner of the facility has to address the following items. Approval of the scope of the project, agreement to provide the applicant health center with reasonable control of the project site for the required number of years. They must also agree to file a Notice of Federal Interest in the land records of the local jurisdiction before the project begins again if applicable. HRSA will determine if the terms of the lease are sufficient for the full value of the grant supported improvements to benefit the grant activity. HRSA will take into account the purpose and duration of the grant, the expected life of the facility and that use of the facility for grant supported purposes. Again the lease agreement must provide the applicant with reasonable control.

Slide 16. Some notes about the procurement rules and regulations. Grantees must comply with the applicable procurement regulations. First all contracts for goods and services equal or greater than \$100,000 are required to be competitively bid. And we have indicated a place for technical assistance is available. The simplified acquisition threshold applies to work

with a cost of less than \$100,000. Keep in mind that they still need to give more than one quote, not a bid but a quote, for the work to determine that the costs are reasonable. And also the threshold should not be broken down into several purchases of artificially reduced to smaller quantities to permit negotiations under the simplified acquisition procedures.

And I will turn it back to Ann Piesen.

Ann Piesen: Slide 17, environmental and historic preservation conditions. Most projects for PCMH-FI grants will include several conditions for environmental or historic preservation reviews in compliance.

Please, please do not begin construction or drawdown funds for demolition, site prep, or construction activities until you have had use conditions met and lifted from a notice of, you know, with issuance of a Notice of Award. So with that in mind please plan accordingly. If you're scheduling construction be aware that consultation under Section 106 of the National Historic Preservation Act can take a minimum of a month to prepare while an environmental assessment may take several additional months to prepare, review and receive final public comments. We want to avoid a situation where all of a sudden your contractor is very upset that he can't do work but, you still have conditions on the award which you're working towards having lifted. For this reason grant recipients should be working closely with their project officer under the C8C grant and their environmental reviewer.

And I believe everyone should have been contacted by their environmental reviewer as well by now and I believe the names are (Duncan), (Nancy), (Colin) and (Stephanie). So if you haven't heard from someone and you have environmental conditions on your award please contacts your C8C project

officer. There is also quite a bit of technical assistance to explain environmental and historic preservation requirements at the link provided.

And I wanted to make one note because this was a frequently asked question. I know many grantees out there have received previous capital awards under ARRA or a SIP and possibly for the same site. Previous Section 106 consults cannot be submitted for this grant because the 106 consultation is project specific not just the site is cleared, the project and the site. So and you have a condition on this award you will have to reinitiate the Section 106 consultation.

Slide 18, other policy requirements. Projects must also be compliant with the following uniform relocation assistance under 45 CFR Part 15. So if you are displacing residents or commercial tenants please contact your project officer. The Americans with Disability Act accessibility guidelines for building and facilities under 28 CFR Part 36, the 2010 Standards for Assessable Design, real property insurance and maintenance disposition and federal interest 45 CFR Part 74 and 92, respective to nonprofits and state and local governance as well as the CHS - I'm sorry Homeland - CHS, Health and Human Services grants policy statement.

Slide 19 -- Design considerations. Grantees are encouraged to consider the following as well during their project planning. NFPA, National Fire Protection Association, 101 Life Safety Code, there's a 2015 addition, I think American Institute for Architect guidelines for design and construction of hospital and healthcare facilities.

Sustainable design practices for both renovation and construction which can be provided through the Green Guide for healthcare and Leadership in

Energy and Environmental Design principles, LEED, the links are provided as well as considerations for equipment purchases. Sustainable equipment is available out there and using it reduces your energy usage. You can find that under the Electronic Product Environmental Assessment Tool EPEAT and Energy Star products. In the long run the incorporation of these features will result in cost savings, reduction of energy usage, safer facilities and healthier facilities for both staff and patients.

I will turn the presentation back over to Neal.

Neal Meyerson: Okay thank you again Ann. Continuing with Slide 20, routine reporting.

Quarterly progress reports will be due starting January 1, 2015. This will include information on the progress of the planning and implementation of the project. Additional information on the quarterly project report or QPR can be found at the indicated link, the manual, the quick guide and the presentation, a walk-through of the submission process.

There will be a separate technical assistance call in December to prepare for the first reports due in January.

Next slide please, Slide 21, financial reporting is done with the Federal Financial Report. This is reviewed and approved by your grants management specialist.

And there are two parts to this, the Financial Status Report which is submitted annually and the Federal Cash Transaction Report which is submitted to the payment management system quarterly.

And there are some links for some additional information. And your assigned grants management specialist can also probably answer most if not all of your questions about these.

Next slide please, Slide Number 22, the Federal Funding and Transparency Act known as FFTA. For each federal award of \$25,000 or more, grantees must report information about the recipient and the project being funded. Frequent questions and additional requirements are available at the indicated link. And you can also contact your grants management specialist also.

And I will now turn it over to Bill.

Bill Hemmingson: Thanks Neal. So we're on to Slide 23. And again we've been talking about the grant conditions so that there's also of the reporting that you have to do. There are four on this slide that occur prior to beginning the construction. So the project implementation certification is also assigned a date in the Electronic Hand Book.

The project implementation certification is normally submitted to HRSA after you procured a contract with the architect or engineering firm that is going to prepare the drawings. It's HRSA's expectations that the grantees will engage the services of an architect or engineer to develop the pertinent construction documents as well to administer the construction phase of the project.

There's also the Certificate of Final Design which is issued by the architect engineering firm when the drawings are complete. That is submitted by that firm or from that firm to you and then you'll submit it to HRSA.

Once you have obtained a construction contract you completed your bidding of the work and you've obtained a construction contract there's a requirement for the bonding coverage certification. That's a HRSA template letter as well as the first two that would be on your letterhead.

And then the construction contract information is also related. Now there's no template for the construction contract. You would select the format for that. But we do we also require with that in addition to the contract you submit letters of contract certification by the architect of record. There is a template certification letter that you can use in on the Web site for that. The architect engineering firm would certify that the contract is reasonable using the template.

There's the copy of the formal recommendation of the award or the award letters from the grantee organization or from the governance board to the selected contractor. There's a statement either from the grantee or from the architect of record that determines that the selected contractor's not on the barred list. The information's on the slide there. There is a requirement that if you decide to award a contract to anyone other than the lowest bidder that you would need to submit that documentation with the submission in the EHB.

And a similar these guidelines would also follow for subcontractor awards. So if there's subcontractor awards that are not being awarded to anyone other than the lowest bidder you would need to keep the records of that.

And there's a link at the bottom of this slide for templates. And this is our capital Web page that I referred to earlier.

I understand there may be a slight problem with the environmental requirement in the link. But that link is on this page so you can go to this page first and then you'll see all the links to the environmental information. That's your - I know someone was having some trouble linking to the environmental page.

Next slide is Slide 24. HRSA also retains the right to request additional information to verify the status of your project such as milestone, construction schedules, observation reports, application for payment, specific documentation.

We may request these if we feel there's a need for it. These are certainly things that you could submit or report on in your Quarterly Progress Report to update the schedule, update the payments and that sort of thing in the Quarterly Progress Report.

And the next slide is Slide 25. During the course of the administration of the grant as with other HRSA grants you may be required to request prior approval from HRSA for changes that occur.

A construction project, there are opportunities for changes to occur. We understand that part of it. But you are limited in that you would need to request prior approval for items such as significant changes to the approved budget including increase or decrease of the total project cost or changes in specific line items that, you know, may have occurred as you develop the - those drawings or as you go out for bid.

Changes to the approved physical scope of the projects. So if there's changes in the amount of square foot that's being worked on the changes in the way space is organized -- other things like that -- that may require prior approval.

Changes to the project director, I had mentioned that earlier. If the person that's assigned on your Notice of Award now if there's any changes in that throughout the course of the life of the grant you would need to request prior approval for that primary person.

The other people that you may want to receive notices could be changed on your end. But you would need prior approval for the changes to the project director and extensions to the project period if that's needed at the end of the grant period.

And then with each of these prior approvals you would receive approval through a Revised Notice of Award so we would issue a Revised Notice of Award when that request has been processed.

The next slide is Slide 26. And similar to the other reporting requirements the closeout reporting requirements are assigned a date in the Electronic Hand Book but if you're - if you complete your project in the first year say you can certainly submit them early. We'd like for you to close them out as soon as you're done.

So the closeout of the document is required within 90 days of completion of the project. Then you would report that as completed in your Quarterly Progress Report.

The closeout documents would consist of a project completion certification. That again is a template on that capital page that I referred to a few moments ago.

And that includes a (certificate) of occupancy or more commonly with these renovation projects, evidence that you received your final inspections by the permitting authority.

A certificate of substantial completion is a statement from the architect or engineer of record that would state that the project is complete.

And there's some other statements in that template including a statement that you have insurance coverage.

Also you - we would submit at the final budget information, the final equipment list the final budget page and budget justification.

And then photos of the completed project as well as before projects. We also encourage you to submit photos during construction so you have a bit of a short record of it at the end of the project.

And then there's also a requirement as part of closeout is both a final FFR and a Tangible Personal Property Report, FF428.

And the next slide is sorry, Slide 27. This page includes some Electronic Hand Books and other resources. The first link there, the EHB link will have some interesting information.

If you're not 100% sure on how to do certain activities in your Electronic Hand Book you can go to - that Web page will help you and have some helpful links and some demonstration pieces on there.

The HRSA Call Center is really more related to - and now that you've been awarded it's really more related to if you can't access the Electronic Hand Book, if you need help with username or password issues or any access to the grant.

We more like to refer you to the BPHC Helpline. And the number is shown on there and it's also the email address. And that will help you with more specific things.

If there's some function you don't understand or your have questions about how to submit something it'll - they can walk you through some of those issues.

The next slide is just a bit of a wrap-up here that we have a link to where this call presentation was. So hopefully you've seen the slides as we've gone through them.

Also the transcript of this session today will be there sometime later this week if you missed anything or someone has - you'd like to refer someone to it.

Also if there's other technical submissions are on that. And that's the same Web page I referred to easy. That's our capital Web page that has the submission templates, FAQs on the program, environmental review forms

and compliance, historic preservation, issues of FAQ on procurement and on federal interest.

So with that I think we've reached the end of our slides. And what we've - we have had some questions. And we would encourage you to type in the Adobe Connect any questions that you might have or have - may come up during this presentation.

If - we're hoping to get to as many as possible. If we don't get to your specific question or we cover a similar question and you need to follow-up you can certainly either send an email to your project officer or your grants management specialist.

With that I think we do have a few questions that we can look at Matthew...

Matt Kozar: Yes a couple of questions that are coming in over the Adobe Connect are focused in around the summary statements. Ann can you remind everyone about where we're at with issuing summary statements and...

Ann Piesen: So the summary statements should have gone out today. It may take a little while to connect within EHB. The Electronic Hand Book should be sending all of you a message saying here's your cover letter, congratulations plus an attached summary statement of the score plus any strengths and weaknesses listed by the ORC panel.

So I would say if you don't see anything within the next several days in your email inbox please do send an email to [bphccapital@hrsa.gov](mailto:bphccapital@hrsa.gov).

Bill Hemmingson: And that would be - you would receive an email or it would go to the person that's the contact person in the Electronic Hand Book.

Ann Piesen: And occasionally there are technical errors with email. So again just send us a message.

Matt Kozar: Ann another question is the grant subject to the Davis-Bacon Act?

Ann Piesen: This is a very popular question. The Davis-Bacon Act only applies if specifically required by the program authorizing statute. So no, this is the authorizing program is the Affordable Care Act and it did not require Davis-Bacon.

That does not mean that you aren't subject to other equal employment opportunity, labor standards, or other contract requirements that may be required by your state or local government or other federal agencies if they're funding part of this project.

Matt Kozar: We had a question about the first FFR being due in October 2014. I don't think that's the case. I'll turn it over to Neal.

Neal Meyerson: No, the federal financial report is due every 12 months. So you would - there would be one coming in October 2015.

Ann Piesen: If you see something on your Notice of Award that says 2014 please do contact your project officer or grants management specialist.

Matt Kozar: So the question shall we update our project officer of any and all changes to our budgets or only if the changes exceed a certain threshold?

I think a number of us could probably answer that in that, you know, we love to have you tell us of all, you know, modifications or changes as it relates to the project that we're funding.

The - one of the main mechanisms is to identify that through the Quarterly Progress Report, you know, the project officer assigned to your grants review those and if, you know, additional information is required they'll reach out to you.

If there are significant changes or just changes that you want to sort of vet through your project officer, you know, we suggest you either call or email the project officer if it's not close to the time where you're looking you're receiving the Quarterly Progress Reports.

And they'll work through with you, you know, those changes to determine if there is any updates needed to the project scope or if there's any specific documentation that we would need to have you submit.

Ann Piesen: The other thing is to make sure that you've read all of the terms and conditions. And there is a specific paragraph on prior approval and what activities specifically trigger a prior approval requirement.

So, you know, you should have that on the back burner if you plan to make a change to your project which would fall into any of those categories. That is the time to have that chat with your project officer.

Matt Kozar: We have a question do architectural services need to be bid?

Bill Hemmingson: We had that frequently asked question on procurement that actually addresses that specific topic because there are some restrictions on all contracts would need to be procured in a fair and competitive manner regardless of the cost.

There's the simplified acquisition for smaller contract amounts still would need to obtain some - make sure that the contract has been fairly procured. And that's often made restrict or not allow you to use the architect that prepared the drawings in the application of the grant.

So I refer you to that frequently asked question and under procurement on the Web page.

Matt Kozar: We have another question about whether or not there needs to be a separate account for the grant funds associated with this award.

And, you know, just wanted to have you go to Slide 4 and read through the information there where we describe that there's a specific activity code C8C.

This is separate from your H80 grant. The funds will be separate. You should not co-mingle the - your H80 funds with the C8C funds.

There's also an area expertise for our grants friends. Neal, do you have anything to add on that?

Neal Meyerson: No that's - you basically answered the question. And they should call us if they have questions.

Matt Kozar: Yes. That would be contact your grants management specialist if you have specific questions associated with the payment management system accounts.

Neal Meyerson: And for some questions you may need to deal with payment management.

Bill Hemmingson: There is a question here about whether or not there are certain circumstances where a project only needs limited architectural or engineering consultation.

Any types a question like that I would refer you to discuss it with your project officer. I think we - I think and to review your Notice of Award and what are the requirements for obtaining architectural services and permit drawings.

Questions I think we have a couple other ones. We'll wait for people if anyone else wants to type in some questions.

One question is related to if you can - and it's similar to another question that came in the degree of changes to the project. And the question is can you make substitutions or can you switch out some equipment purchases on the award?

And again I'll just remind you that there - the grant is limited to 50% of the funds so the total project cost cannot - the cost of equipment cannot exceed 50% of it.

Anything that would be over 25% of the equipment line item would need to be - have prior approval. And anything that way change the direction or the types of services you're providing or anything along those lines that would be

considered a significant from a service point of view I think would also require prior approval.

Other than that you have some flexibility and in your final submission or any re-budgeting for that matter you would need to make sure you provide a comment or a justification for those types of changes. Even if they're relatively minor it's good to have a note in the file why you had made some substitutions.

Another question is that came up is just how soon you could draw down funds for the project. And again I think we've gone over some of the limitations in terms of that and what types of funds could be drawn down.

But you may draw down for pre-construction costs as you begin to incur them for architectural fees for obtaining historic preservation documentation or environmental testing. Those things you could draw down funds.

Funds are always drawn down as they incur so not - and you don't draw down in anticipation of getting a bill but it's after you've received an invoice at that point you could drive down funds for that.

So and I'm not sure other than that we have other questions right now. I guess there was one final question on here that I see is that when do we need a construction permit?

All grantees are required to follow their local jurisdiction. So and these are all commercial buildings. So the expectations that you would need to receive a permit for any type of alteration renovation project.

If you have questions more than that I would just discuss it further with your project officer because we can't cover every particular case. I'd say a lot of these projects are - have their own nuances and needs so I think I would refer that to your H - I'm sorry to your C8C project officer.

Ann Piesen: With that we're going to conclude the call. Thank everybody for being on the line. We hope it was very informative.

And if you have any additional questions please feel free to contact your C8C project officer or send an email to [bphccapital@hrsa.gov](mailto:bphccapital@hrsa.gov). Thank you and have a great day.

END