

Questions for FY2021-RFGA-MC-918

Organization #1

1. Page 2 of 64 under Eligibility states applicants must be a non-profit 501c3 with a minimum of a three (3) year documented history of providing abstinence until marriage program services . . . Page 5 of 64 states Eligible applicants are state and local or non-profit organizations who can document their capacity to implement programs utilizing SRAE strategies . . .

Question: Which is it? Only non-profit 501c3 or a wider range of competing organizations (State, local, or nonprofit organizations)? Is there a requirement that applicants have a minimum of a three (3) year documented history of providing abstinence until marriage program services as stated on page 2 of 64?

Response: Applicants must be a non-profit 501c3 with a minimum of a three (3) year documented history of providing abstinence until marriage program services.

2. Page 8 of 64 and other pages of the RFGA refer to A - F legislative language for Title V programs.

Question: Is it A- F or A - H?

Response: For Title V the requirement is A-F. For state funds, it is still A-H. The state provisions have not been updated to reflect the changes made federally.

3. Page 8 of 64 refers to a ten (10) month implementation plan and page 10 of 64 (plus other areas of the RFGA) refer to a 9-month budget and plan.

Question: Please verify that a 9-month plan and budget is what is required.

Response: The correct response is a 9 month plan and budget. We will correct in the RFGA.

4. Page 14 of 64 states applicants must complete a pre-award Subrecipient Risk Assessment survey and only one copy with the application.

Question: Where should the Risk Assessment Survey be placed? With the original application copy? Should the Risk Assessment survey be numbered and/or be part of the 75 maximum pages allowed?

Response: The Risk Assessment Survey should be placed with the original application copy. It is not to be numbered and included in the 75 allowable pages.

5. Page 14 of 64 states a Certificate of Existence from the Secretary of State be provided.

Question: Our organization provided a Certificate of Existence in July 2020 for the state-Evidence Based RFGA application. Can our organization use the same Certificate for this application?

Response: Yes, you may submit a copy of the Certificate of Existence completed in July of this year.

6. Page 7 of 64 states the State Performance Measures for FY 2021.

Question: Are applicants required to incorporate all 4 State Performance Measures including #4 parent/child events in targeted communities in SC?

Response: The numbers included in the RFGA are example numbers (targeted), however, yes all 4 measures are to be incorporated.

7. Page 4 of 64 clearly states the background and spirit of Title V programs that provide education to youth 10-19 that normalizes the optimal health behavior of avoiding non-marital sexual activity.

Question: Will SC DHEC make an effort to get evaluators for the applications of this RFGA who are educated in SRAE and have an appreciation for effective Sexual Risk Avoidance Education? Will SC DHEC make an effort to ensure the evaluators have no conflict of interest with any of the applicants? Will SC DHEC check the score sheets of evaluators for bias, math errors, and inconsistencies?

Response: As we use outside evaluators, DHEC makes every effort to ensure that all evaluators are both knowledgeable and have an appreciation for Sexual Risk Avoidance Activities. Each evaluators sign a conflict of interest form stating and are trained on the appropriate scoring procedures. DHEC reviews scoresheets all scoresheets for errors and equity.

Organization #2

1. On page 1, the RFGA states that “DHEC may base responsibility determinations on any available information, including information not contained in applicant’s submission.” Is this determination in reference to the deductions mentioned on page 17, or is it based on some subjective determination? What specific objective measures will be used to determine whether an applicant is “responsible”? In a competitive bid process, each applicant has the right to know how they will objectively be determined as being “responsible” or not.

Response: The below paragraph is also noted on page 1 and references what a responsible applicant is (see below)

“A responsive applicant is one who has submitted a proposal that conforms in all material aspects to this RFGA. A responsible applicant is one who has the capability in all respects to perform fully the grant requirements and the integrity and reliability which will assure good faith performance that may be substantiated by past performance. DHEC may base responsibility determinations on any available information, including information not contained in the applicant’s submission. DHEC may reject any proposal from a nonresponsive or no responsible applicant, regardless of score.”

2. On page 1, the RFGA states that “award of a subaward under this RFGA will be in DHEC’s sole discretion” Questions:
 - a. Will DHEC use their sole discretion to review each of the reviewers’ scoresheets to determine if the reviewers stayed within the guidelines and boundaries of the RFGA?
 - b. Will DHEC use their sole discretion to review each of the reviewers’ scoresheets to determine if there is an outlier score that is skewing the scores?

- c. Will DHEC use their sole discretion to review each of the reviewers' scoresheets to determine if the reviewers' points/deductions/comments are accurate compared with the submitted application?
- d. Will DHEC use their sole discretion to determine if reviewers' deductions were based on a subjective perspective, a misunderstanding of the applicant's intent, a misunderstanding of the focus of the scoring category, or an inserted idea outside the requirement of the RFGA, rather than substantiated?
- e. Will DHEC use their sole discretion to determine award amounts or is it based solely on the top applications as scored by the review panel? Essentially, who decides the award amounts: DHEC or the reviewers?

Response: Authority to make the award decision is with DHEC. The evaluation panel acts under DHEC's authority and oversight and its evaluation and scoring are part of the decision-making process. The DHEC SRAE program will instruct evaluators to operate within the RFGA guidelines. DHEC's exercise of discretion involves judgment of various factors and information, as described in the RFGA, and includes weighing the panel's evaluation.

3. On page 2 of the RFGA, there are percentages for funding of valid applications. This formula creates the possibility of awarding substantial funds to low scoring applications which feels like an "everyone wins a trophy" method without consideration of how efficiently and effectively the funding would be used. This method assumes that even if an application scores the least amount of points, and is an application that reasonably should not receive funding or much funding, it would still get a substantial amount of funding (20- 40%, range based on # of applicants) at the expense of much more efficient and effective proposals. From the other end of the spectrum, the overly simplistic assumption appears to be that there will be only one excellent application, according to the scoring. And, if another application is within a few points of the highest score but still excellent, this method provides that second application with substantially less funding. This method eliminates the possibility of more than one excellent application. Questions:
 - a. Are these percentages for funding of valid applications definite, or will DHEC use sole discretion in determining whether they are appropriate amounts? Will number of people to be served, project size, proven behavioral outcomes, demonstration of financial integrity, or application strength be taken into consideration when DHEC determines the award amounts or will the amounts only be based on the published percentages? Will DHEC use sole discretion in award amounts or will it be left solely up to reviewers to determine?
 - b. Also, if an applicant requests less than the amount than the percentage formula would award, will DHEC still use this formula to award the applicant over and above the applicant's proposed budget and workplan?

Response: DHEC is appreciative of all applications received and welcome all applications that meet eligibility. The percentage formula was created by DHEC to remove subjectivity in determining award amounts. If applicants requests less than the amount to be awarded, DHEC will review each qualifying application to determine how to award funds equitably.

4. On page 2 of the RFGA, eligibility requires that the applicant have “a minimum of a three (3) year documented history of providing abstinence (avoidance) until-marriage program services using an education curriculum for which funding is being applied.” Questions:
 - a. This eligibility requirement is not mentioned specifically in Section C Required Elements and Scoring Criteria (pages 14-16) and needs to be added there as well as to reviewers’ scoresheets. Because this is an eligibility requirement intended to protect the purpose and integrity of the use of the funding, it must be included in the Program Assurances as it would determine whether an applicant is responsive. Will this be corrected?
 - b. What assurances will DHEC provide that applicants will be verified as eligible based on actually **providing** abstinence services for 3 years, and not just receiving services?
 - c. What assurances will DHEC provide that applicants will be deemed eligible only if they have provided abstinence services **using the proposed curriculum** for 3 years (and not some other curriculum for which they are applying)?
 - d. What documentation will be necessary to supply evidence of provision of abstinence services for at least 3 years and evidence that the proposed curriculum was provided by the applying agency for at least 3 years?

Response: Evaluators are made aware of the requirements as outlined in the RFGA. This will not be added in the Program Assurances section as it is already stated in the beginning of the RFGA to ensure that those who are applying are eligible to apply.

5. On page 4, the RFGA states that “each award applicant shall use Federal SRAE funds administered by DHEC to provide services in the same or substantially same manner as detailed in DHEC’s FY2018 SC SRA Education Plan, which can be found [on DHEC’s website].” The Title V work plan posted on the DHEC website is expired and does not reflect DHEC’s Title V work plan for the 2021 year. Since this requirement utilizes the word “shall,” we request that SC DHEC’s Title V work plan for this upcoming year(s) be posted publicly on the DHEC website immediately, well before the applications are due so that applicants have time to review. In the past, this has been done prior to the release of the Title V RFGA.

Response: Currently, this is up to date plan. In 2021, DHEC will update the state plan and post it to our SRAE webpage. This RFGA outlines current objectives.

6. On page 5, the RFGA states that a “pre-award risk assessment survey must be included with the application” and a copy is provided in the attachments. In previous years, DHEC also provided an electronic version of it in Word or in fillable pdf so that the responses could be typed rather than hand-written. We request that DHEC again provide a version this year that can accommodate typed responses.

Response: DHEC will obtain a different version to accommodate typed responses and send it out to all interested parties.

7. Where does the pre award risk assessment belong in the application since only one copy is requested to be submitted? Also, does it take up the limited application page count, or can it just be included in separate folder in the package of applications since all reviewers will not be seeing it?

Response: **The Risk Assessment can be included in a separate folder and it will not be included in the allowable 75 page count.**

8. On page 6, the RFGA states that “Applicants may be deducted up to 2 points for not serving priority areas of 1, 2, or 3.” In a recent official letter from Kimberly Seals during a protest and appeal process in reference to the point deductions, she stated that the deduction language used in a previous 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.”*

Is it correct to understand that the current language is a change from a previous RFGA, and that this change makes it clear that while DHEC wants services for Priority 1, 2 and 3 counties, no points will be deducted for *also* serving youth in Priority 4-5 counties if justification can be provided? Many counties designated as lower priority have much greater populations and thus substantially more youth in need of these services. We request that this be clarified considering the need for correction in a previous appeal process.

The RFGA states that an applicant can “provide justification for the inclusion of lower priority counties (such as plans to serve a high-risk population or a larger number of youth)”, so it appears that there will be no deducted scoring if justification is provided for serving youth in counties deemed by DHEC a lower priority, but that have significant numbers of youth in need according to the purpose of the funding. As such, can applicants be assured that the reviewers will receive instructions about not deducting points if applicants “provide justification for inclusion of lower priority counties (such as plans to serve a high-risk population as described above or a larger number of youth)”? (RFGA, p.6 & p.15)

Response: **The DHEC SRAE program will instruct evaluators to operate within the RFGA guidelines and scoring. Language has been clarified regarding the 2-point deductions in the current Title V RFGA.**

9. On page 12, the RFGA states that proposal packets must not exceed 75 pages. Last year, we asked this question in response to the Title V RFGA: *“Would DHEC consider removing the “program assurances” from the page count? We don’t have control over the length of those required documents, and with the amount of supporting documents and MOUs that we have, it does not leave enough pages for us to adequately answer all of the required sections and explain our proposed implementation plan.”* The following response was officially provided by DHEC: *“Yes. We ask that when applications are submitted, please note in this section that the assurances will be in the back of your application. We will inform panelists as well of this change so that assurances will not be included in the page count.”* For this year’s Title V RFGA, we are asking that the same concession be allowed as last year so that assurances are not included in the page count, for the same reasons we gave as last year. We don’t have control over the length of those required documents, and with the amount of supporting documents and MOUs that we have, it does not leave enough pages for us to adequately answer all of the required sections and explain our proposed implementation plan. Also, recent reviewers on a

different application complained that the required documents were not legible because we had to make them so small to fit many on a page with page limitations, and we believe that it would be better to have legible documents for the reviewers to see rather than documents reduced in size in order to fit a page count restriction.

Response: **Yes, we will uphold the same concession this year.**

10. On page 12, the RFGA lists format requirements. Questions:

- a. Are the logic model, budget, tables, and charts allowed to be single-spaced, as has always been allowed in the past? These important required documents take up a lot of the space allowed for answering all other required information. They are legible when single spaced.
- b. Can the required logic model be provided in a reduced, but easily legible, font so that it increases readability/flow by having the entire model on the same page? It is difficult to read when the entire model is divided on different pages, and if required to be in the large font, the model is wider, by necessity, than the width of a page. This allowance would be greatly appreciated, and we believe would help the reviewer better understand the logic model than if it were split up.

Response: **Yes, the logic model, budget, tables, and charts can be single spaced. Yes, the logic model can be reduced in font if it is legible.**

11. Required Assurances begin on page 14 of the RFGA and are typically reviewed and checked by reviewers. Reviewers should not have the responsibility of determining whether an applicant is responsive and meets required assurances, as this is the responsibility of DHEC. Applications not meeting required assurances should not be given to reviewers or scored. Since these are required qualifiers for applications, will DHEC provide assurance that these be reviewed, approved, and verified by experts on DHEC staff that have an adequate understanding of the importance and meaning of the required assurances, prior to giving to reviewers?

Response: **DHEC follows all protocols to ensure that applications meet requirements as outlined in the RFGA.**

12. Also, while a majority of the assurances are sufficiently addressed by a simple “yes” or “no,” others require consideration regarding the strength of the response. For example, the financial risk assessment provided may indicate risk, a serious consideration that should be the responsibility of DHEC staff rather than invited reviewers of applications. How will DHEC objectively determine the strength of a financial risk assessment and whether the applicant is qualified to apply? How is the pre-award risk assessment used in determining the strength of the application?

Response: **DHEC program staff will continue to assess the requested documents for appropriateness in applying for this grant.**

13. The Pro Kids Act is not mentioned or included in the Assurances or in the RFGA. Is this no longer a DHEC requirement?

Response: **DHEC has not required the certification of the Pro Kids Act in the last 5 Title V RFGAs.**

14. On pages 14-16 of the RFGA, each section has been assigned a points value. However, we request that DHEC assign points in the RFGA to EACH requirement included in each section. It is difficult to discern how to best use the space allocated by DHEC without a more detailed points system, such as typically provided in federal RFGAs. Applicants need much more detailed guidance as to how the reviewer will be scoring, lest it become a subjective score.

Specifically:

- 1) the Organizational Experience and Qualifications Section is worth 6 points and has 8 requirements—how is each requirement weighted in score value, especially as it assumes that there are some that are worth less than 1 point?
- 2) the Program Description and Implementation Plan Section is worth 24 points with 11 requirements—how is each requirement weighted in score value?
- 3) the Reporting and Evaluation Section is worth 10 points and includes 5 requirements—how is each requirement weighted in score value?
- 4) the Budget Narrative and Summary Section is worth 10 points with 6 requirements--how is each requirement weighted in score value?

Response: **For this RFGA, points will stand as described as we will have to adjust numerous documents to accommodate this request. However, we will take this into consideration for the upcoming RFGAs.**

15. On page 17, the RFGA outlines possible point deductions of any past sub grantees. New applicants will not have any possible deductions. How will DHEC ensure that new applicants will not have an unfair advantage over past sub grantees? This could result in unintended bias towards first time applicants since new applicants could start with a higher score than past sub grantees.

Response: **As part of the requirements for the this RFGA, applicants who do meet the 3-year documented history requirement, are not eligible for this grant. Eligibility requirements are outlined in the RFGA. The DHEC SRAE program will instruct evaluators to operate within the RFGA guidelines and scoring processes. DHEC uses an objective process and instruct the evaluators to do so as well.**

16. In attachment I-C, there are mileage reimbursement rates for 2018 and 2019. Please provide the expected reimbursement rates for 2021 so that we may budget appropriately.

Response: **Regular Miles- \$0.575 per mile**

17. In email communications with DHEC in June 2019, we requested that “*The ‘points descriptions’ sentences used in each section of the scoresheet be copied verbatim from the ‘points description’ sentences provided in each section of the RFGA. There is no defensible reason to tell the*

applicant one thing and then tell the people scoring the applications something else that has been reworded at the discretion of whoever is creating the scoresheet.” SC DHEC responded with “*We agree.*” However, the scoresheets for previous applications have not matched verbatim the points sections in the RFGA. Will DHEC provide assurance that the reviewers’ scoresheets will be **verbatim** to the points section of the RFGA and that all required elements from the RFGA be included.

Response: **DHEC evaluates the scoresheet regularly and make changes to the scoresheet so that items are consistent with the RFGA.**

18. In email communications with DHEC in June 2019, we requested “*The scoresheets should be distributed with the RFGA. Years of discrepancies between what the RFGA says and what the scoresheets say have made this request necessary. This way, any concerns about the scoresheet’s points’ descriptions not being exactly the same as the RFGA points descriptions – or either not being consistent with the funding legal standards – can be addressed prior to the process rather than after it is finished and awards have been announced, which makes the entire process harder on everyone involved.*” SC DHEC responded with “*We agree.*” We strongly request that the scoresheet that will be used for scoring this application be included within the RFGA. Will DHEC include the scoresheet in the RFGA?

Response: **The scoresheets will not be included in the RFGA and are reserved for evaluators. DHEC evaluates the scoresheet regularly and make changes to the scoresheet so that items are consistent with the RFGA.**

19. 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, applicants cannot learn from any feedback for improvement for future applications if comments/feedback is not provided. Will this requirement be added?

Response: **DHEC will instruct reviewers to provide comments for any deductions given.**

20. 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 do not miss major changes. In the past, Track Changes was also used to help identify additions, deletions, and edits.

Response: **Yes, if changes are made, they will be highlighted.**