

Call for Applications: Urgent Response to COVID-19

Funded Project Compliance Overview

The following information briefly highlights the process and requirements for projects that are successfully awarded funding from AHW. AHW recognizes that the response to the new coronavirus/COVID-19 public health emergency is fluid and changing rapidly and will make all efforts to support funded projects with reasonable timelines and support regarding requirements.

Reporting Requirements

There are multiple means used to communicate award progress between AHW staff and funded projects, including direct communication and progress reports, among others.

Progress Reporting

Progress reports, site visits, conference calls, and other periodic project updates may be required throughout the duration of the project. Funded projects will be required to submit a final progress reports no later than sixty (60) days after the award end date. Progress reports must be submitted electronically to AHW according to the instructions provided during the funded project orientation. Failure to provide a progress report could result in termination of the project and/or ineligibility for future AHW funding.

AHW uses the information provided in progress reports and other project updates to monitor progress, provide periodic updates to AHW’s governing bodies for review, and prepare public communication pieces that demonstrate the benefits of AHW funding to improve the health of Wisconsin residents. As such, progress reports should be written using lay-friendly language to the extent possible.

The primary community partner organization contact and/or the MCW PI are expected to be responsive to requests for information on continued progress, sustainability of the project and/or partnerships and collaboration, and other developments beyond the award period.

Financial Compliance

Projects funded through this funding opportunity will be expected to adhere to AHW’s financial compliance requirements:

Community-Led Awards	Responsibility: The primary community partner organization contact and/or MCW School of Medicine academic partner are jointly responsible for ensuring compliance with fiduciary requirements throughout the award period.
	Orientation: Upon funding approval, responsible parties, along with any staff with administrative responsibility on the award, will be required to attend an orientation session with AHW staff to discuss award and financial compliance requirements.

	<p>Funding Agreement: Upon funding approval, the primary community partner organization and/or MCW academic partner will be required to execute a Funding Agreement with the Medical College of Wisconsin (MCW) before the project activities can officially commence. Only the primary community partner organization and/or MCW academic partner should be listed on the Funding Agreement, and only these entities will be able to directly invoice MCW for project costs. The Funding Agreement must be submitted to AHW prior to project commencement along with the following documents:</p> <ul style="list-style-type: none"> - MCW or Children’s Hospital of Wisconsin (CHW) Institutional Review Board (IRB) approval letter - Annual audit for the primary community partner organization
	<p>Annual Financial Audit: Per the Funding Agreement, community organizations receiving funds from AHW are required to furnish an annual financial audit, the cost of which must be borne by the community organization. A federal single audit or an audit performed in accordance with Government Auditing Standards will fulfill the audit requirement. If such audits are not performed, the community organization will need to work with AHW staff to determine how to best meet this requirement. As financial stewards, AHW is required to monitor all sub-recipients, including those community organizations receiving AHW funds. Therefore, community organizations listed on the Funding Agreement may be selected for a sub-recipient audit.</p>
	<p>Invoicing: Project activities are funded through an expense-reimbursement process. Payment requests must be submitted using the AHW Invoice Form. Invoices must be submitted to the appointed MCW academic partner who will facilitate payment through the MCW Accounts Payable department via the MCW academic partner’s department administrator. Requests should be made for approved, direct, allowable costs incurred by the community organization not more often than monthly nor less than quarterly (e.g. not more than one invoice per month, but at least one invoice per quarter). A final invoice must be signed, marked as “Final,” and be submitted within 60 days of the end of the award period. MCW reserves the right to request and review additional documentation for any payment requests submitted.</p>
	<p>Supplanting: AHW has the extraordinary responsibility to steward the endowment on behalf of Wisconsin residents. As such, AHW adheres to requirements as defined in a March 28, 2000 Order of the Commissioner of Insurance which requires that AHW funds “may not be used to supplant funds or resources otherwise available.” AHW, via MCW, must report annually on its determination that the Funds do not supplant other resources that may be available to accomplish the same purposes. Supplanting criteria can be found on the AHW website.</p> <p>Prior to recommending funding AHW’s oversight bodies will assess whether other financial resources exist or are available for the project, including an assessment of whether the applicants have other financial resources available for the project. Applicants must certify that no financial resources will be supplanted and provide a complete listing of current funding sources for the project or similar other projects.</p>

MCW-Led Awards	<p>Responsibility: The MCW PI is solely responsible for ensuring compliance with fiduciary requirements throughout the award period.</p>
	<p>Orientation: Upon funding approval, the MCW PI, along with any staff with administrative responsibility on the award, will be required to attend an orientation session with AHW staff to discuss award and financial compliance requirements.</p>
	<p>Supplanting: AHW funds may not be used to supplant funds or resources that are available from other sources. If an MCW PI receiving AHW funding is awarded a new grant that is for the same or similar research, they should notify AHW staff so that a supplanting review can be conducted. If it is determined that supplanting exists, the affected portion of the AHW funding will either be rescinded or reallocated, in accordance with MCW Corporate Policy BF.SP.060.</p>

Financial Conditions

The amount awarded is the maximum funding available from AHW for the approved project. MCW reserves the right to reduce unspent funding and/or funding duration, if needed, to comply with state and/or federal law



(including but not limited to law governing endowment fund management), or to address MCW financial constraints which negatively impact AHW.

Legal Compliance

Human Research Protection

Following award announcements, MCW or CHW IRB and/or IACUC staff must review all successful proposals that involve human subjects for any purpose. Documentation of this IRB review will be required before an executed Funding Agreement is approved. Other community organizations may also have IRB requirements that must be completed before funding will be awarded. This process can be time consuming and should be factored into considerations for project start dates.

Health Insurance Portability and Accountability Act (HIPAA)

The HIPAA privacy rules are federal regulations protecting the confidentiality of information used in clinical practice, research, and operations of health care facilities. The privacy rules apply to the use or disclosure of protected health information for research purposes and require a number of actions and documentation. Funded projects must comply with all HIPAA requirements.

Proposal Protection/Intellectual Property

AHW operates in accordance with standards consistent with Wisconsin's Open Meetings and Open Records Laws. Documents are generally considered by AHW governing bodies in open public meetings and become public record that may be subject to release. Prior to funding decisions being made, information contained in your proposal will not be shared outside the established RFA review process and the governing body. If your project is funded, information contained in the proposal is subject to release. An Intellectual Property Agreement may be required for inventions, discoveries, or copyrightable material developed as a result of a project.

Lobbying

AHW funds may not be used for lobbying efforts. Successful applicants will ensure that descriptions of the intended use of all AHW funds abide by the nonlobbying requirement. Lobbying includes communication with a legislator or agency official regarding a specific piece of legislation and your view on it, including any attempt to influence local, state, or federal legislation or administrative action. Advocacy is allowable and includes taking part in efforts to create or effect change in policies or systems, and can take many forms including education, media, etc.

Marketing & Publicity Requirements

Award Announcement

All announcements related to the award of AHW funds are embargoed until the date set by AHW. In most cases, AHW will prepare its own press release announcing funding awards and announce awards on its own dissemination channels, which may include the AHW website, electronic newsletter, and/or additional avenues such as social media.

Press Releases and/or Media Opportunities

News releases regarding the receipt of your AHW funding award are embargoed until the date set by AHW (see Award Announcement details above). Subsequent news releases about your project's activities do not need to

adhere to an embargo or be reviewed by AHW. Exceptions to this guideline include announcements or press releases related to major events, information releases, or other announcements in which you seek AHW's collaboration on the announcement. Please contact your Program Manager with any questions.

If you are contacted by a reporter during the period of your award, AHW encourages you to share the news and impact of your work! If reporters have specific questions about AHW or why your project was funded, please direct those inquiries to AHW Communications at sdeering@mcw.edu or (414) 955-4753.

In press releases and/or other media opportunities, acknowledge AHW as the project funder with the following clause:

"This [project, program, conference, research, report, etc. (choose one)] is funded [in part or wholly (choose one)] by the Advancing a Healthier Wisconsin Endowment."