

**FREQUENTLY ASKED QUESTIONS RELATED TO ADAPTIVE SPORTS GRANT  
PROGRAM FUNDING OPPORTUNITY NUMBER: VA-ASP-2018-01**

**VA**



U.S. Department  
of Veterans Affairs

### **ADAPTIVE SPORT ENTITIES IN THE UNITED STATES COMMONWEALTHS AND TERRITORIES**

**Q:** In regards to the Adaptive Sports Grant (ASG) Program, are adaptive sports entities in the United States Commonwealths and Territories eligible for grants?

**A:** Yes. As defined in 38 CFR Part 77.2, adaptive sports entities in American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the United States Virgin Islands are eligible to receive grants under the ASG Program. For Paralympic sports, there are different jurisdictions in the Commonwealths and Territories. Applicants pursuing a grant for a Paralympic sport activity in the Commonwealths and Territories should include their respective Paralympic organization.

### **ADMINISTRATIVE COSTS**

**Q:** Our organization will be applying for an ASG Program grant. Are there limitations on indirect cost/F&A rates or can we use our federally negotiated rates?

**A:** The ASG Program has a legislated mandatory indirect cost rate. In development of the VA ASG Program, indirect costs were included under the Administrative Costs provision under 38 U.S.C. 521A. 38 CFR 77.14(c) identifies Administrative Costs are limited to 5.0% after FY2015. Also, 38 CFR 77.14(c)(2) links some Personnel Costs to Administrative Costs. Personnel Costs that involve direct coaching and/or direct instruction of disabled Veterans and disabled members of the Armed Forces are classified as operational costs. By law, all personnel costs that do not involve coaching and/or instruction of disabled Veterans and disabled members of the Armed Forces are classified as administrative costs and will be included among administrative costs in consideration of 38 CFR 77.14(c) allowable administrative costs.

### **ALLOWABLE COSTS**

**Q:** We are a 501c3 non-profit adaptive sports team with disabled Veteran participants and also annually host a tournament in which we bring in teams from around the world and the United States to compete. Can we apply for the ASG Program grant to help with team expenses or help cover the costs of hosting our tournament?

**A:** As a 501c3 non-profit adaptive sports entity that meets the eligibility criteria defined in 38 CFR 77.2, this adaptive sports organization is eligible to apply for an ASG Program grant. However, the ASG Program is authorized to provide adaptive sports activities for disabled Veterans and disabled members of the Armed Forces. Therefore, an applicant would have to determine what costs would be considered allowable costs for inclusion in the grant application. Expenses incurred for participants who are not disabled Veterans or disabled members of the Armed Forces are not allowable costs. Applicants need to comply with 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl)), and 38 CFR Part 77.

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Q: We are thinking of allocating percentages of the grant to [Project X] to achieve [Result X], [Project Y] to achieve [Result Y], and subgrants to our centers for [Project Z] to achieve [Result Z]. What are our chances of receiving a grant?

A: During the open competitive grant application period, VA is allowed to provide information to clarify items related to the ASG Program grant, application, and technical issues, but not discuss substantive items that may influence the results of the competitive grant process. In addition, any ASG Program subgrants may only be awarded for Paralympic sport-related activities as specified in Public Law 113-59 and further described in 38 CFR 77.15.

Q: We had three record catastrophic floods at our location in a 2-year period and our only publicly accessible location was made unusable. Is this something that you could help us with through the adaptive sports grant?

A: The ASG Program is not a construction grant and acquisition and development of grounds and facilities is not listed among the authorized activities in 38 U.S.C. 521A. However, among the authorized and allowable expenses are program development (including programs at the local level), sports equipment, supplies, and other activities related to the implementation and operation of the program. Therefore, there may be elements such as acquisition and installation of equipment items that may be allowable and constitute part of an overall effort to create or recreate adaptive sport capabilities.

## **AUDITS**

Q: We understand a grant could trigger a requirement for an A-133 audit (Single Audit Act), which will incur a significant expense that it looks like the grant won't cover. What options can we use to meet the audit costs?

A: The Office of Management and Budget released 2 CFR 200 (<http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf>) in December 2013 and among its changes, 2 CFR 200.501 Audit Requirements raised the Single Audit threshold to \$750,000 in Federal awards per year. Therefore, with a \$500,000 maximum limit, no single ASG Program award would trigger the requirement for an A-133 equivalent audit. To require such an audit, the grant recipient would have to have an additional \$250,000 in Federal awards beyond the proposed \$500,000 ASG Program grant to reach the threshold.

## **BUY AMERICAN AND HIRE AMERICAN**

Q: If my application includes acquiring specialized equipment that isn't made in the United States, am I allowed to buy it?

A: Executive Order 13788 on Buy American and Hire American of April 18, 2017 (<https://www.whitehouse.gov/the-press-office/2017/04/18/presidential-executive-order-buy-american-and-hire-american>) supplemented the Buy American Laws "to ensure that, to the extent permitted by law, Federal financial assistance awards and Federal procurements maximize the use of materials produced in the United States, including manufactured products; components of manufactured projects; and materials such as steel, iron, aluminum, and cement." However, some Paralympic and adaptive sport equipment and/or supplies are not manufactured in the United States due to market

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conditions of limited demand to support a competitive market environment and other factors. Therefore, Adaptive Sports Grant recipients must comply with Buy American Laws, but may submit for acquisition from non-domestic sources when conditions for buying non-American products warrant it.

**CHANGES TO ACTIVE GRANTS**

Q: If my application for an FY2017 ASG Program grant is selected, can any aspects of the grant be changed or must I implement exactly in accordance with the grant application?

A: As cited in 2 CFR 200.308, changes to grants are authorized and grant recipients are authorized to enact certain changes within the scope authorized. For requesting changes to a grant, VA requires a formal grant change request to provide the data in order to assess validity of a change request. Changes may be submitted as determined necessary and can be submitted either as an individual action or if there is sufficient lead time, the change request can be included as part of the quarterly report. However, there is no guarantee a change request will be approved and grant applications should be based on implementing the program proposed in the application.

**CROSSFLOW OF INFORMATION**

Q: Can VA provide information on a concept (adaptive sport, technology, equipment ...) to potential applicants to the ASG Program for incorporation in their grant applications?

A: No. To maintain the integrity of the grant application and award processes, VA will not transfer concepts that might compromise the integrity of the ASG Program.

**ELIGIBILITY OF NON-FEDERAL AND TRIBAL GOVERNMENT ENTITIES**

Q: Are state agencies appropriate to apply for the ASG Program?

A: Eligible entities are defined in 38 U.S.C. 521A(a)(2) and 38 CFR Part 77.2. Although adaptive sports grant recipients have primarily included the United States Olympic Committee (USOC), National Governing Bodies, colleges and universities, Paralympic Sports Clubs, Parks and Recreation Departments, non-federal hospitals and healthcare systems, and Veterans Services Organizations, the basic eligibility criteria is defined as Non-Federal adaptive sports entities “with significant experience in managing a large-scale adaptive sports program”. Therefore, state, regional and community-based governmental agencies that meet the overall eligibility requirements in 38 U.S.C. 521A and 77 CFR Part 77 to receive an ASG Program grant would be an eligible entity.

Q: Are tribal governments eligible to apply for the ASG Program?

A: For the ASG Program, eligibility factors applicable to state agencies presented above are also applicable to tribal governments. Therefore, a tribal government that meets the overall eligibility requirements in 38 U.S.C. 521A and 38 CFR Part 77 to receive an ASG Program grant would be an eligible entity.

**ELIGIBLE PARTICIPANTS**

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Q: Who are Veterans barred from qualifying and how is this defined?

A: 38 CFR 77.14(e) restricts participation of certain Veterans and former Servicemembers. The grant agreement will prohibit grant funds from being used to support or provide services (including adaptive sports activities) to Veterans or former Servicemembers who are barred from receiving VA benefits based on their service (see 38 U.S.C. 5303-5303A <http://www.gpo.gov/fdsys/granule/USCODE-2011-title38/USCODE-2011-title38-partIV-chap53-sec5303A>) and to Veterans or former Servicemembers who, if otherwise eligible, would be barred from receiving VA pension, compensation or dependency and indemnity compensation based on the character of their discharge from military service (see 38 CFR 3.12 Character of discharge. <http://www.gpo.gov/fdsys/pkg/CFR-2011-title38-vol1/pdf/CFR-2011-title38-vol1-sec3-12.pdf>). (Authority: 38 U.S.C. 521A(d)(4))

Q: Many of our branches have adaptive sports and athletic programming for veterans, but I wanted to clarify one item. Is the ASG program inclusive of Combat Stress or is the intent of this application for physical disabilities only?

A: The authorizing legislation for the ASG Program states that the program is for disabled Veterans and disabled members of the Armed Forces, but does not define specific disabilities. Therefore, Post Traumatic Stress is classified as a disability and adaptive sport programs for Veterans with PTS is authorized.

Q: Can individuals who are not disabled Veterans participate in ASG Program grant-funded adaptive sport activities?

A: Yes ASG funds may be expended indirectly for participation individuals in adaptive sports activities if those individuals are not disabled Veterans. ASG Program grants are awarded in order to provide adaptive sports activities for disabled Veterans and disabled members of the Armed Forces. ASG Program grant application selection, performance metrics, and performance reporting are based on provision of adaptive sports activities for disabled Veterans and disabled members of the Armed Forces. However, disabled individuals may participate in ASG Programs under the condition that no additional ASG Program funds are expended as a result of their participation; because using grant funds for individuals who are not eligible disabled Veterans or disabled members of the Armed Forces is not an allowable cost.

Q: Can individuals who are not disabled Veterans participate in ASG Program grant-funded training activities for development of adaptive sport activities for disabled Veterans and disabled members of the Armed Forces?

A: Yes. As identified in 38 U.S.C. 521A, ASG Program funding may be expended for adaptive sports activities such as:

- (1) instruction, participation, and competition in adaptive sports;
- (2) training and technical assistance to program administrators, coaches, recreation therapists, instructors, VA employees, and other appropriate individuals; and
- (3) coordination, Paralympic classification of athletes, athlete assessment, sport-specific training techniques, program development (including programs at the local level), sports equipment,

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supplies, program evaluation, and other activities related to the implementation and operation of the program.

Therefore, not only training and technical assistance to enable individuals to conduct adaptive sport activities, but also instruction and coaching in adaptive sports activities and for conducting program enablers such as classification clinics and adaptive sport program development, ASG Program funding may be expended for participation of individuals who are not disabled Veterans. However, the activities must be assessed to identify if expenses fall under the classification of Administrative expenses (both Administrative and Personnel (Administrative) in the budget) and if these expenses are classified as Administrative, they must be included in calculations related to Administrative expense constraints for the ASG Program.

Q: Do Veterans have to be recent Veterans having served in the Post 9/11 World Trade Center attack timeframe to qualify as a participant?

A: No. The VA Paralympic and adaptive sports programs are open to eligible disabled Veterans and disabled members of the Armed Forces, regardless of age. In fact, there are many initiatives to enhance adaptive sports opportunities for older Veterans, because many Veterans become disabled after their discharge from the Armed Forces due to factors such as aging, disease, and accidents. For example, diabetes-related amputations are a significant cause of disabilities.

Q: Do Veterans have to be combat Veterans to qualify as a participant?

A: No. All disabled Veterans are equally eligible to participate in and receive benefits related to the VA adaptive sports programs. Combat status is not a factor in eligibility.

Q: Do Veterans have to be registered with VA Healthcare to qualify as a participant?

A: No. Veterans do not have to be registered for VA Healthcare to qualify as a participant. For example, a Veteran may have only served on active duty 2 years during peacetime and separated honorably in perfect health after their brief active duty career; therefore, the Veteran would not be considered for VA Healthcare. However, later in life, the Veteran may experience a disease, accident, or other agent that causes a disability. As a disabled Veteran, this individual is eligible to participate in Adaptive Sport Grant activities, the monthly assistance allowance for disabled Veterans training in Paralympic sports, and other VA adaptive sports programs applicable to their situation

## **FOOD**

Q: Is food an allowable expense?

A: It depends on the circumstances. Any food-related expense (including meals, snacks, light refreshments, etc.) charged to a federal award must satisfy BOTH criteria below:

1. Fit into one

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- a. All food expenses will be categorized as Direct Costs, not Indirect Costs. Food expenses fit into one of five 2 CFR 200 direct cost categories or one of the two other circumstances listed below:
    - i. Participant Support: Food-related expenses associated with Participant Support costs are allowable only if the project includes an authorized adaptive sport activity, and the food-related expenses are explicitly listed in the proposed budget and justified as part of the adaptive sport activity components.
    - ii. Travel: Food-related expenses incurred by authorized grant participants are allowable provided that such expenses are reasonable and necessary for carrying out the scope of work or are specifically tied to the grant's programmatic requirements.
    - iii. Entertainment: Food-related expenses associated with entertainment are always unallowable except when food-related costs that might be considered entertainment have a programmatic purpose and are authorized either in the budget or approved by the VA.
    - iv. Lobbying: Food-related expenses associated with lobbying are always unallowable under the Adaptive Sports Grant program. (2 CFR 200.450)
    - v. Conference: Food-related expenses associated with a conference may be allowable when:
      1. The event at which food expenses are incurred meets the definition of "conference" in 2 CFR 200.432; and
      2. The expenses are paid by the grantee as the sponsor or host of the event; and
      3. The meals must be integral and necessary as part of the conference (i.e., business is transacted during the meal).
  - b. Other Circumstance: If a cost doesn't fit into one of the above five direct cost categories, the food-related expense must:
    - i. Be fundamental to the adaptive sport activity and crucial, necessary and indispensable for carrying out the scope of the activity, or
    - ii. Be specifically approved in writing by the VA in response to a written prior approval request that was reviewed, approved and submitted to the VA by the Adaptive Sports Grant applicant.
2. Be allowable under 2-CFR 200, the grant award terms and conditions, VA policy, and any related policies of the grant recipient.

**FORMS AND FORMAT**

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Q: Is a Pre-Application required for the ASG Program grant and what forms are required in the Pre-Application?

A: No. There is no requirement for a Pre-Application for ASG Program.

Q: On the SF-424, how do we get the State Award Identifier?

A: There are no requirements for State involvement in the ASG application process. Therefore, SF-424 Blocks 6 and 7 should be left blank. In addition, the ASG is not subject to State review under Executive Order 12372. Therefore, Block 19c should be checked for "Program is not covered by E.O. 12372."

Q: What is the ASG Program grant's Competition Identification Number (CEI) for filling out Block 13 on Form SF-424?

A: The CEI is an optional number and there is no assigned CEI for ASG Program grant. Therefore, leave Block 13 blank on SF-424.

Q: How do you fill out [section/block X] of Standard Form 424A?

A: The SF-424 Instructions are located on the Grants.Gov website at <http://www.grants.gov/web/grants/form-instructions.html>. Please review the instructions before filling out the SF-424, SF-424A, and SF-424B and also before calling with questions.

Q: We're trying to navigate SF-424A using the online form-instructions/sf-424a. We're unclear if Section A, Budget Summary Lines 1-4 Columns (a) and (b) requires a breakout of our proposed functions or can be aggregated.

A: For the ASG application, breaking out the functions is allowable, but aggregating the proposal in the SF-424A is a proper approach. If you have an ASG application that has very distinct elements, it is possible to distinguish them, but not required. Because the VA Form 10096 also has the specific financials with a grant-specific breakdown per expense category and quarter, the VA Form 10096 should have a clear support of the spend plan.

Q: On the SF-424A, are we supposed to include info on non-federal (f) side of the budget? Our organization receives periodic donations from private sources, such as manufacturers of equipment, so we're not sure if that's to be included.

A: As far as inclusion on non-federal funds in the SF-424A, that is the option of the ASG applicant to determine what level of non-federal funding to include. Because the ASG Program has no requirement for matching funds, there is no requirement to provide alternate funding sources in the application. However, if the proposal is for an adaptive sport program that will not be fully funded by the ASG, the question of how the remaining balance will be funded exists. Therefore, inclusion of non-federal funding provides data to the Review Board that allows the reviewers to better understand the status of the applicant and resources related to the program. Because grant applicants often have unknown

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factors related to funding sources and resources available during the ASG implementation period, there may be difficulties in developing non-federal funding data.

Q: Since it doesn't include adaptive sports information, why does the VA need the VA Form 10091 for assessing ASG Programs?

A: There are multiple processes involved in receiving, vetting, reviewing, and processing ASG applications prior to award of an ASG and obligation of funds in support of an ASG. These include vendorization of a non-Federal organization for authorization to enter into contract, grants, and other financial agreements with VA. In addition, ancillary actions such as establishment of IFCAP (Integrated Funds, Distribution, Control Point Activity, Accounting and Procurement) codes for non-Federal entities is required for entering data in the VA Financial Management System and other systems necessary for ASG implementation and management. The VA Form 10091 provides data for these processes and facilitates ASG award and implementation.

Q: On the VA Form 10091, what do I put in the VA Facility Information blocks?

A: The VA Facility Information Blocks are for internal VA documentation as part of processing the VA Form 10091. Therefore, other than the "New" Block for new submissions of the VA Form 10091, the ASG applicant does not fill any of the blocks under VA Facility Information in the left-hand side of the VA Form 10091. The ASG applicant will fill in the applicable blocks under Payee/Vendor Information on the right-hand side of the VA Form 10091.

Q: On the VA Form 10091, what is my NPI number?

A: A National Provider Identifier (NPI) is a healthcare provider identifier required by the Health Insurance Portability and Accountability Act (HIPAA) and is used for identification purposes in standard transactions by covered entities. Because many adaptive sport entities are not involved in standard transactions covered by HIPAA, your organization may not have a NPI. The NPI Lookup from the NPI Registry is located at the following webpage: <https://npidb.org/npi-lookup/>.

Q: I searched the internet and can't find a copy of 38 CFR Part 49 for filling out the VA's Administrative and Financial Review Questionnaire for Grantees; where is it?

A: Do not consider the references to 38 CFR Part 49 when filling out the VA Administrative and Financial Review Questionnaire for Grantees. VA rescinded 38 CFR Part 49 in late 2015, because all relevant items were included in the most recent updates to 2 CFR 200. Therefore, the 2 CFR 200 references are those to consider. An updated version of the VA Questionnaire is being developed, but it will not be ready in time for the FY2017 ASG application cycle.

Q: I've been unable to find any instructions for the formatting, page length, topics, etc. for the narrative. Can you point me to instructions for producing the narrative?

A: The SF-424 requires a 1-page Project Abstract and although listed under STEP 3 of the Instructions for the FY2017 ASG Application, the Project Abstract does not have a form for download, but guidance on items such as font and font size are included in the Instructions. In addition to the Abstract, there are

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instructions for additional supportive inputs in the instructions on the VA Form 10096 that include topics and page length. Also, STEP 4 in the Instructions for the FY2017 ASG Application provides information on font and some other formatting items. Working within these parameters, the ASG applicant must evaluate what additional standards the applicant should employ to make the best justification to support the ASG application.

Q: I'm working on the VA Form 10096 and inputting data. When I go to save it - only partially done - and it downloads when I call it back up the windows are empty. Can you help please?

A: Applicants who are running an outdated version of Adobe have experienced this problem. One technique is to save a blank document in/on whatever drive you are using and work from that lone copy. However, first you should verify you have a current version of Adobe software and if not, update your Adobe software.

Q: In the past, both the SF-1199A Direct Deposit Sign-up Form and the PMS User Access Form were required in past ASG Applications, but now they're not listed. Are they still required?

A: During the previous cycle, the Department of Health and Human Services' (HHS) Division of Payment Management (DPM) changed its processes for establishing accounts applicable to ASG recipients. VA and HHS DPM conducted a review of the new processes and determined that it was no longer necessary to receive the SF-1199A and PMS User Access Form as part of the ASG Application in order to meet the objective of timely implementation. To reduce administrative burden on the ASG applicant and enhance information security, VA eliminated the requirement to submit the SF-1199A and PMS User Access Form as part of the grant application.

### **GEOGRAPHICAL FOOTPRINT**

Q: Our organization is located in Colorado, but we have programs in other states. Will our ASG Program grant proposal be evaluated for occurring in Colorado?

A: The ASG Program grant is evaluated based on the geographic footprint of the eligible participants affected by the adaptive sports activities delivered in the grant application. The information provided in the grant application in relation to the location of adaptive sports activities and eligible participants affected will determine how it is evaluated. In contrast, Federal award reporting requirements such as USAspending.com are normally based on the business address of the recipient organization. Therefore, the geographic footprint of the grant recipient and adaptive sports activities delivered by the grant may be completely separate locations.

Q: Our organization is considering proposing adaptive sports activities at several sites. Do we have to submit a grant application for each site?

A: No. The ASG Program grant application includes the applicant's plan of adaptive sports activities that may occur at one site or at multiples sites. There is no requirement for an applicant to submit multiple grant applications for a comprehensive adaptive sports activities plan with a budget of \$500,000 or less.

### **GEOGRAPHIC REGIONS WITH LIMITED SPORTS OPPORTUNITIES**

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Q: In the criteria under V.A.2(g) of the NOFA, it references geographic regions with limited sports opportunities, but I did not find a list of regions the VA considers to be underserved. Can you provide more specific guidance?

A: Yes, it's the lack of representation per population base that signifies an underserved area in the database. The Paralympic Sport Club Finder has a geographic display, but it is a limited database. The Sports Abilities website that is linked to the VA Adaptive Sports webpage also provides insight into adaptive sports regionally. In addition, the listings of the FY2015 and FY2016 ASG recipients on the VA Adaptive Sport webpage lists locations of adaptive sport programs involved in providing adaptive sports for Veterans. VA reviews these databases and compares with the Veteran population to determine opportunities in a geographic area and the ratio of opportunities to population. Because of the many factors involved in assessing underserved areas, the VA Office of General Counsel confirmed this method was valid for this use. Therefore, there is no specific list, but ASG applicants may review these databases to identify opportunities in geographic regions as part of ASG planning.

### **GOALS AND OBJECTIVES**

Q: Can I find a document that describes VA's policy described in the NOFA under section "Federal Award Administration Information" (VI.B) and VA's goals and objectives as described under section "Other Information" (VIII.A)?

A: The NOFA for the FY2017 ASG Program was developed closely with 38 CFR Part 77 and as a result these sections were identified as reflecting both VA's goals and objectives in accordance with 38 CFR Part 77. The Department of Veterans Affairs' FY2014-2020 Strategic Plan provides the VA's Strategic Goals and Objectives and is available at the following webpage: <http://www.va.gov/op3/docs/StrategicPlanning/VA2014-2020strategicPlan.PDF>.

### **GRANTS.GOV FUNCTIONS**

Q: The grant application and submission process seems very complex. Can you provide training to help me understand how to apply?

A: Grants.gov understands the grant registration, application, and submission processes are complex and many applicants are not familiar with the process or tools. Therefore, Grants.gov Grants Learning Center (<https://www.grants.gov/web/grants/learn-grants.html>) provides a series of training modules such as Grants 101 (<https://www.grants.gov/web/grants/learn-grants/grants-101.html>) which provides training on not only the stages of the grant application process, but also many other aspects, such as policies, terminology, reporting, and fraud. These training programs includes video modules such as Applicant Registration for Grants.gov that walks you through the registration process for DUNS, SAM, and Grants.gov.

Q: My organization has applied before--so would we already have a person designated as EBIZ POC or can I establish myself as this?

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A: The E-Business Point of Contact (EBIZ POC) is established by the grant applicant as the official representative of the organization and is the only authorized individual who may submit a grant application until the registered organization officially updates the EBIZ POC. Therefore, a person must have an authorized representative (normally the established EBIZ POC) update the EBIZ POC. Failure of an organization to maintain a current EBIZ POC or of an organization having an authorized EBIZ POC available to submit the grant application before the application deadline is not a valid excuse for extending the deadline for submission. The only identifiable time when not having a current EBIZ POC registered may justify application submission is if the applying organization has submitted all required data to authorize an available EBIZ POC update prior to the application deadline and there are Grants.gov technical problems that prevent that update. However, an existing record of working with the Grants.gov Help Desk and support must exist that proves the applying organization conducted all actions necessary to meet the deadline, but Grants.gov technical problems prevented EBIZ POC update.

**KEY PERSONNEL**

Q: I haven't seen a spot where I can include [key personnel] references and don't see how those should be listed. Any help there?

A: In the VA Form 10096, data on key personnel and their qualifications is documented on the second page under Qualifications of Personnel. Although the Qualifications block is small, it may be sufficient to reflect the qualifying experience of some or all key personnel. If additional information on key personnel is determined appropriate, this data may be included on an attached continuation sheet that includes references and other key personnel data.

Q: Are all key personnel required to be experts in their adaptive sport?

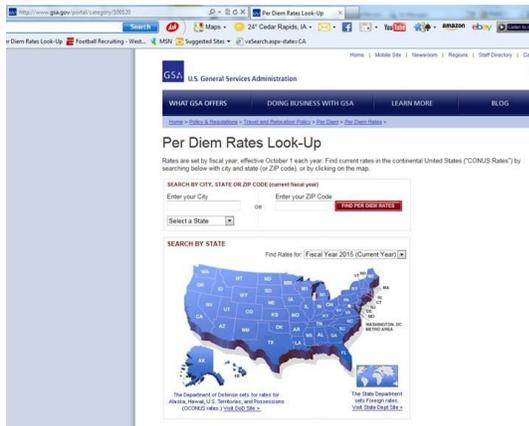
A: No, key personnel need to be competent in the role they are performing relative to the adaptive sports activity that is proposed in the Adaptive Sports Grant application. Therefore, an adaptive sport coach should have qualifications in the adaptive sport and coaching skills; however, key personnel managing administrative and financial activities for the grant would be expected to have relevant qualifications for those activities. Overall, the key personnel should include a combined skill set that reflects capability to implement the adaptive sports activities proposed to be provided under the grant.

**LODGING AND SUBSISTENCE EXPENSES**

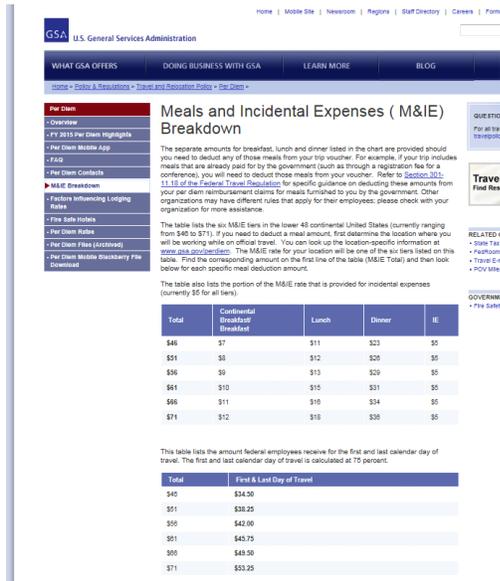
Q: Can I provide lodging and subsistence expenses as part of an ASG Program grant?

A: Lodging and subsistence expenses are allowable costs under travel costs and 2 CFR 200.474 Travel Costs includes explanation of travel costs. Under 2 CFR 200.474(b), the guidance indicates subsistence costs do not exceed charges normally allowed by the non-Federal entity in its regular operations as the result of non-Federal entity's written travel policy. Without superseding justification, event costs should not exceed the lodging and/or subsistence rates for the designated location established by the Administrator of General Services cited in 2 CFR 200.474. The rates for all locations in the United States are available at: <http://www.gsa.gov/portal/category/100120>

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When determining the Per Diem Rates for any site in the United States, for example Tallahassee FL, the website gives the specific Per Diem Rates for Lodging, as well as a breakdown for all meals, as well as Incidental Expenses, as reflected in the following two screenshots:



In considering lodging and subsistence costs, 2 CFR 200.474(b) does provide for grantees to establish rates that are “reasonable and allowable to the extent such costs do not exceed charges normally allowed by the non-Federal entity in its regular operations as the result of the non-Federal entity’s written travel policy.” If policies don’t exist, the GSA rates apply. Therefore, if a subsistence rate is

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projected that exceeds the GSA rate, the grant recipient must submit travel policies and data relating to costs in order to allow assessment of this request. Without proper justification of rates in excess of the GSA rates, costs that exceed the GSA rates will be assessed as unallowable costs.

In addition, travel costs are an expense that facilitates conducting adaptive sports activities, but is not an adaptive sports activity. There is no requirement under either ASG legislation or regulation to provide full or partial travel costs.

**MONTHLY ASSISTANCE ALLOWANCE FOR DISABLED VETERANS TRAINING IN PARALYMPIC [AND OLYMPIC] SPORTS (VMAA) PROGRAM**

Q: Although the VMAA Program had only been for Paralympic sports in the past, last fall the law changed to allow disabled Veterans to receive the training allowance in Olympic sports as well. Can the ASG now be used for Olympic sports?

A: The Adaptive Sports Grant and VMAA are two completely separate programs with distinct authorizations and criteria. The ASG program can fund diverse adaptive sports and most Olympic sports have Paralympic and/or adaptive variants developed. However, if an Olympic or other sport is designed for participants without disabilities and this sport does not meet the criteria of an adaptive sport, the sport does not qualify for the ASG Program.

**NONCOMPETITIVE GRANTS**

Q: We're the only adaptive sport organization of our kind in the Commonwealth. Please accept our Adaptive Sports Grant application as for noncompetitive grant consideration.

A: VA partners with Paralympic and adaptive sports programs throughout the United States at the national, regional, and community-based levels. As outlined in 38 CFR 77.13, some adaptive sport entities may qualify for noncompetitive grant consideration. Because the International Paralympic Committee (IPC) has established five jurisdictions applicable to the United States (the United States of America that includes the 50 States and the District of Columbia, American Samoa, Guam, Puerto Rico, and the United States Virgin Islands) and one jurisdiction unassigned (the Commonwealth of the Northern Mariana Islands), there is a legal precedent established for recognizing the IPC-certified representative bodies for Paralympic sports under their jurisdiction; this is reflected in the evolution of 38 U.S.C. 322(d) & 521A. The recognized representative bodies for Paralympic sports meet the criteria for noncompetitive status under 38 CFR 77.13, as well as the definitions under 38 CFR 77.2. However, this only applies to ASG activities specific to their functioning as the governing body of their Paralympic sport(s). For non-IPC certified adaptive sports, there is no equivalent jurisdictional system or authorizing entity. As a result, for non-IPC certified adaptive sports, the normal national jurisdiction includes the entire United States including Commonwealths, Territories, and the District of Columbia. It is possible that an adaptive sport organization representing a portion of the United States could qualify for noncompetitive status; however, it would have to meet the criteria of 38 CFR 77.13. Simply because an adaptive sport entity is the only organization offering an adaptive sport in their region is not a qualifying factor for noncompetitive ASG consideration. If national or other organizations can provide similar ASG activities in their region, the adaptive sports organization would not qualify for noncompetitive ASG consideration.

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**OUTREACH PROGRAMS**

Q: As described in the purpose section of the NOFA, applicants are required to establish outreach programs. The scoring criteria do not reference this expectation. In which section of the narrative do you plan to evaluate the outreach plan?

A: There are three scoring criteria that reflect assessment of the outreach plan. First, the outreach plan is a mandatory element and if not included, will result in failure to meet NOFA V.A(2)(i) standards. Also, like other elements of the applicant's adaptive sports activities plan, the outreach plan will be assessed for clarity under Section V.A(2)(a). Because the outreach plan is an enabler that links the program elements with applicable national, regional and community-based entities and disabled Veterans and disabled members of the Armed Forces, outreach programs are most significantly aligned with V.A(2)(c) for program design based on facts, good reasoning, sound judgment, and logic, and program elements directly linked to the achievement of program objectives.

Q: As described in 38 CFR 77.11, grantees are expected to offer outreach programs. In addition, the NOFA states grantees are expected to participate in VA's adaptive sports outreach programs. What are these?

A: The VA supports multiple outreach programs to enhance achieving the goals and objectives of adaptive sports programs to provide adaptive sports activities for disabled Veterans and disabled members of the Armed Forces. As appropriate, ASG Program grant-funded adaptive sports activities would be incorporated into the following VA adaptive sports outreach programs:

Adaptive Sports Club Finder: ([http://www.va.gov/adaptivesports/va\\_clubFinder.asp](http://www.va.gov/adaptivesports/va_clubFinder.asp)) is a USOC-VA database where adaptive sports entities register their organizational information and adaptive sports activities to enable disabled Veterans and members of the Armed Forces to identify adaptive sports opportunities by sport type and region.

Facebook: The VA's releases diverse information on VA and partnered adaptive sports activities through the VA Adaptive Sports Facebook page (<https://www.facebook.com/vaadaptivesports>).

Instagram: VA posts pictures highlighting and helping understand adaptive sports activities on its Instagram account: @VAAdaptiveSport.

Twitter: VA releases information on adaptive sports opportunities and other news on adaptive sports through Twitter at <https://twitter.com/VAdaptiveSport>.

Interagency Coordination: The VA coordinates ASG Program adaptive sports activities with Department of Defense's adaptive sports programs for disabled Veterans and disabled members of the Armed Forces including the Services and Special Operations Command, as well as with the Department of State's Bureau of Educational and Cultural Affairs.

Public Private Partnership: The VA achieves many of its goals and objectives in servicing through Public Private Partnerships. Where applicable and appropriate, VA coordinates ASG Program information with

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non-Federal organizations in support of providing adaptive sport opportunities for disabled Veterans and disabled members of the Armed Forces. For example, the VA has a contract with the Amputee Coalition of America for mentoring, visit support, and peer support groups for Veterans with an amputation or pending an amputation. VA provides the Amputee Coalition with information on ASG and other VA adaptive sports programs to facilitate and enhance these Veteran support activities.

**PARTNERSHIP**

Q: How many letters of support are required?

A: There is no specific number of partnership documents required; the number of documents is determined by the number of partnerships and other interactive relationships cited in the ASG Program grant applicant's grant proposal. As identified in the section titled "Approach" in the NOFA, applicants will provide letters of support from any partners which will deliver services that reflect the applicant's engagement in providing adaptive sports activities. Also in Section title "Application and Submission Information" (IV.B), the NOFA, states that if the adaptive sports activities will be implemented through partnerships as described in 77.5(a)(5) and 77.8(b), signed documentation of the partners confirming a partnership must be submitted in Grants.Gov. Therefore, adequate documentation must be submitted to meet these requirements in order to verify a partnership exists. Besides letters of support, existing memorandums of agreement, contracts, status of one entity as a registered subordinate unit/chapter of the parent entity/organization and other equivalent documents that verify a formal partnership relationship exists may be used.

Q: Do I have to include letters of recommendation?

A: There is no requirement to submit letters of recommendation and other statements of support from individuals or organizations if the individual or organization will not have a direct role in implementing or supporting the ASG activities in the application.

Q: Does my organization need to get letters of partnership support if we have a contract or memorandum of agreement already signed with a partner?

A: The answer is "it depends on the agreement". If an organization has established contracts, memorandums of agreement, and other formal documents that establish an official synergistic relationship with external organization(s) that will help provide support for implementing a FY2017 ASG deliverable, that formal document may be submitted to verify that a partnership relationship exists for assessment of the FY2017 ASG application. Use of such an agreement also would ease the administrative burden on the ASG applicant, which is a VA goal. However, if the details of the document do not identify that the partnership relationship in the agreement would apply to the ASG program proposed, then the document would not be considered as equivalent to a letter of support for the FY2017 ASG application.

**PAYMENT OF FY2017 ASG FUNDS**

Q: How will our organization receive the funds for the FY2017 ASG?

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A: All ASG recipients receive grant funds through establishment of a Payment Management System (PMS) account managed by the Department of Health and Human Services' (HHS) Division of Payment Management (<http://www.dpm.psc.gov/>). Therefore, if selected for a FY2017 ASG, an applicant must submit all mandatory forms for creation of a HHS PMS account prior to transfer of any funding. Because HHS requires establishment of unique HHS PMS accounts for VA grants, even if an ASG recipient already has a HHS PMS account, the grantee would still need to create a new PMS account if the current account is not specifically for VA grants.

Q: When do ASG recipients begin to receive funding?

A: The VA obligates funds for the FY2017 ASG Program during early 4<sup>th</sup> Quarter of FY2017 (July – September 2017) with the intent for implementation of the FY2017 ASG during the 1 September 2017 – 30 September 2018. In order for FY2017 ASG funds to be transferred, the ASG recipient must complete acceptance of the FY2017 ASG Agreement offered and complete all actions to create a HHS PMS account for the ASG Program. If both of these are completed by 1 September 2017, FY2017 ASG funds can be transferred via PMS immediately at the beginning of the implementation period. If these are not completed by 1 September 2017 but the organization intends to accept and implement the FY2017 ASG Agreement offered, the organization may implement the program submitted in the FY2017 ASG Agreement, but funding cannot be transferred until completion of the FY2017 ASG Agreement and establishment of the PMS account. Therefore, although ASG recipients are authorized to request funding on a just-in-time basis in advance of expenditures, ASG expenditures occurring between 1 September 2017 and completion of the means of authorizing transfer of funds will be accomplished on a reimbursement basis. In addition, all expenditures must be in compliance with the established ASG Agreement's programs in the grant application, otherwise these expenditures may not be authorized for reimbursement.

Q: How does PMS provide payment to grant recipients?

A: The HHS Division of Payment Management provides PMS information on the Grant Recipient Section webpage ([http://www.dpm.psc.gov/grant\\_recipient/grant\\_recipient.aspx?explorer.event=true](http://www.dpm.psc.gov/grant_recipient/grant_recipient.aspx?explorer.event=true)) including Access Information. To establish a PMS account, the required SF-1199A and PMS Access Forms are available on the PMS Access Procedure webpage ([http://www.dpm.psc.gov/grant\\_recipient/access\\_procedure/access\\_procedure.aspx?explorer.event=true](http://www.dpm.psc.gov/grant_recipient/access_procedure/access_procedure.aspx?explorer.event=true)). Once a PMS account is established, the ASG funds are loaded in a grantee's account. To receive payment, the grantee submits a PMS payment request through PMS and also submits supporting documentation to VA. VA reviews the PMS payment request and support information. If approved, the transfer of funds occurs normally within 24-48 hours, except when extended due to weekends and holidays. If there is cause for not approving the PMS payment request, VA will contact the requestor with guidance.

## **PERIOD OF AWARD**

Q: Our organization has a 5-year plan for developing adaptive sports activities for disabled Veterans. Can it receive a multi-year grant?

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A: No. ASG Program grant VA-ASP-2018-01 is a 13-month grant for adaptive sports activities occurring during the period of September 1, 2017 through September 30, 2018. An ASG Program grant for adaptive sports activities occurring after September 30, 2018, is planned to be available for application during FY2018 and should include the renewal grant option authorized by 38 CFR 77.4(b). The renewal grant allows for funding in subsequent fiscal years with little or no interruption in the provision of adaptive sports activities. Therefore, an applicant may apply for an ASG Program grant with intent for long-term development of adaptive sports activities for disabled Veterans and disabled members of the Armed Forces, but there is no guarantee of funding subsequent to an award period for an ASG Program grant received.

Q: Our organization is considering including an adaptive sports activity that will occur in conjunction with another adaptive sports event that is occurring during the first week of September 2017. Is it possible to include an event that soon?

A: Yes. Upon closure of the ASG Program grant submission period, all processes involved in grant selection and award will commence immediately. Since this grant was appropriated with one-year FY2017 funding, all award actions and finalization of grant agreements must be completed by September 30, 2017 or funding can no longer be obligated. However, all elements of the evaluation, selection and award process are scheduled to occur prior to the end of August 2017. Therefore, adaptive sports activities scheduled to occur during the first week of September 2017 can be including in grant proposals. If factors occur that prevent award of the FY2017 ASGs until after September 1, 2017, those FY2017 ASG recipients who schedule and conduct adaptive sports activities during September 2017 that were included in the FY2017 ASG application, may be reimbursed for those expenses. However, if a FY2017 ASG applicant conducts adaptive sports activities that were included in the FY2017 ASG application and is not selected for award of an ASG, there is no funding option for reimbursement of those expenses.

Q: What happens if our organization experiences delays in completing the planned FY2017 ASG activities?

A: The FY2017 ASG term of performance was established as 1 September 2017 - 30 September 2018. As such, the FY2017 ASG funds are designated for payment of programmed deliverables as established in the FY2017 ASG agreements and only administrative expenses associated with closeout processing of the FY2017 ASG agreements are authorized for expenses that occur from 1 October to 29 November 2018. However, if there is a reason why a FY2017 ASG should have its schedule altered to allow expenses after 30 September 2018, the FY2017 ASG recipient may submit a change request for a "No Cost to Government" extension during the period of performance. In order to receive the extension, VA must review and approve the change request. As stated in 2 CFR 200.308, changes to grants are authorized and grant recipients are authorized to enact certain changes within the scope authorized. To request change, VA provides a Grant Change Request Template. Changes may be submitted as determined necessary and can be submitted either as an individual action or if there is sufficient lead time, the change request can be included as part of the reporting process. Change requests can include changes to deliverables, adjustments to budget expense code sums, changes in key personnel, and "No Cost to Government" extension requests. Therefore, if any FY2017 ASG recipients have circumstances that may require submission of a change request, the means are available; however, there is no

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guarantee a change request will be awarded and all decisions related to vetting, selection, and award of ASG grants will be based on the data provided in the FY2017 ASG application.

**POLICIES AND PROCEDURES**

Q: Not having received federal funds before, the organization does not currently have in place a number of the policies and procedures referenced in the application. Many of these policies could be put in place, but the threshold question I have is, does the absence of those policies at this time disqualify our organization?

A: Based on your description of the situation, the lack of the policies and procedures is not an immediate disqualifier. The VA Administrative and Financial Review Questionnaire for Grantees is more of an evaluation of status and this form provides a guide for understanding an applicant's status in order to facilitate improvements if a grant is awarded. Therefore, it is a consideration, but not a disqualifier. The key considerations should be mandatory items in the NOFA and 38 CFR Part 77.

**PREVIOUS ADAPTIVE SPORTS GRANTS**

Q: Our organization received an ASG grant under the FY2016 ASG Program. Can we receive a renewal and use the same name?

A: An ASG Program grant applicant can submit a grant proposal that essentially duplicates the adaptive sports activities that were performed as part of a grant under the FY2016 ASG Program. However, for the FY2017 ASG Program, the grant application must include the mandatory SF-424 Series Forms and a new VA Form 10096 Adaptive Sports Grant Application. Because the applicant already has an active FY2016, there is no requirement to submit a VA Form 10091 or a VA Administrative and Financial Review Questionnaire for Grantees, if those forms are current. Therefore, a FY2016 ASG recipient is eligible to be considered for a FY2017 ASG Program renewal grant, because both application and reporting data related to the applicant's FY2016 ASG program grant can be referenced in the application to reduce administrative burden in the FY2017 ASG application. However, renewal grant applications are evaluated equivalently to initial grant applications. Also, as part of evaluation processes including risk assessment, VA reviews the Do Not Pay, System for Award Management, Federal Audit Clearinghouse, USASpending, and other applicable databases. Therefore, any previous FY2016 ASG Program participation is included in these databases and will be part of the assessment of the adaptive sports entity. As for use of the previously used program name, the ASG Program grant applicant can use any appropriate name as long as it is not prevented from use due to trademark, copyright or other restrictions.

Q: Can our organization apply for a continuation grant?

A: No; continuation grants are not applicable to the VA ASG Program. ASG Program grants may be applied for as a "Renewal Grant", but these grants are not a "Continuation Grant". A continuation grant has completely different administrative, financial and legal considerations. Therefore, do not be confused by reading information about Continuation Grants on non-ASG Program related sources and assuming that information applies to the VA ASG Program. When filling out the application, the ASG Program is a "New" grant on the SF-424, Block 2, and never a "Continuation" grant.

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**RESEARCH**

Q: Can the ASG Program fund research in adaptive sports?

A: No. Research is not an authorized activity as defined in 38 U.S.C. 521A(d) and 38 CFR Part 77.2.

Q: Can ASG Program activities be involved in research?

A: The ASG Program is not authorized to fund adaptive sports research. There is no prohibition against ASG Program adaptive sports activities being associated with research projects. However, any research activities and costs that may be linked with an ASG Program-funded adaptive sports activity would have to be authorized separately from the ASG Program through the applicable authorizing authority. In addition, the research must not negatively affect implementation and accomplishment of the goals and objectives of the ASG Program-funded adaptive sports activity.

**SCORING CRITERIA**

Q: Is there a metric you are using to evaluate cost versus benefit in either the number of participants served or cost per participant that is leading to fewer programs in some adaptive sports being able to be selected for grants?

A: There is no single metric, but a relative cornucopia of considerations. Both 38 CFR Part 77 and the FY2017 ASG Notice of Funding Availability provide the scoring criteria for ASG applications. In considering ASG applications, the full spectrum of adaptive sports, disability groups as defined by 38 CFR 77.2, geographic considerations, levels of participation (recreational through elite competition and community-based through national programs), diversity of authorized programs (adaptive sports activities, training of diverse communities, and enablers such as equipping, program development, classification, etc.), the frequency of activities (one-time events through long term recurring activities), and many more considerations are involved. Therefore, the Review Board members must select among incredibly diverse programs with cost-benefit considerations that involve many factors, such as immediate through long term effects. In addition, the level of experience, resources and cooperation among different adaptive sport communities often affects qualitative aspects of ASG applications and therefore may impact the results.

**SUBORDINATE ORGANIZATIONS**

Q: Can subordinate adaptive sports entities apply for the ASG Program?

A: Yes. Subordinate adaptive sports entities that have an independent legal status to enter grants and meet the criteria for an eligible adaptive sports entity may apply for a grant through the ASG Program. However, the ASG Program grant applications of the parent and subordinate adaptive sport entities must identify adaptive sports activities and costs with sufficient clarity to ensure duplicative expenses would not be charged in order for both ASG Program grant applications to be awarded.

**TELEPHONE ACCESS**

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Q: The telephone number (202-632-7136) listed is no longer in service. Is there an alternate number?

A: No. The 202-632-7136 number listed is an operational number; however, VA Central Office uses a computer-based system where the individual has to be logged into their computer and the phone for the system to function. Therefore, if the 202-632-7136 is not functioning, please call back. The [Michael.Welch5@va.gov](mailto:Michael.Welch5@va.gov) and [vacoadaptiveSP@va.gov](mailto:vacoadaptiveSP@va.gov) email addresses are functional on a continuous basis and if you experience difficulty making telephone contact, please submit an email.

### **TRACKING AND REPORTING OF UNIQUE VETERANS**

Q: If we receive an ASG Grant, will our organization be responsible for maintaining sensitive personal data on participating Veterans?

A: No. One of the factors in considering ASG Program participants is documentation of participation. As 38 CFR 77.2 Definitions states “Participant means a disabled Veteran or disabled member of the Armed Forces who is receiving adaptive sport activities from a grantee.” After reviewing legal and other considerations related to collection of data on individuals, the VA Office of General Counsel (OGC) determined that to track disabled Veterans’ participation in ASG Programs in order to determine unique Veteran participants, the Veteran’s first and last names combined with the Veteran’s zip code would be sufficient to track unique Veterans. Because of sensitivity of personal data, OGC determined collection and reporting of additional disabled Veterans’ personal data was neither required nor advisable. Therefore, for tracking participating disabled Veterans and disabled members of the Armed Forces for ASG Program reporting, tracking of Veterans’ names and zip codes are required to verify participants.

### **UNALLOWABLE QUESTIONS**

Q: EXAMPLE: If we partner with another group is it best to have the veterans group write the grant and the nonprofit or other partners be the sub-contractor for the disabled veteran sport program?

A: During the ASG application period, VA is restricted from providing subjective guidance that is not specific technical information, as outlined in 38 CFR Part 77. This legal restriction is to prevent compromise of the competitive grant process. There are myriad subjective questions that are inappropriate, such as amount of funds, partnership relationships, and selection of sites. For the these types of questions, the best approach is for the applicant(s) to carefully assess all instructions and guidance provided by the VA ASG Program, carefully consider key information such as selection criteria, conduct a thorough assessment of the applicant(s) capabilities to provide adaptive sport programs for disabled Veterans and disabled members of the Armed Forces, also consider the levels of need in geographic regions considered, and develop their ASG application that maximizes the perceived potential. This approach should carefully consider not only the capacity, but the will of each organization involved.