Attachment B: Behavioral Health Integration – Medications for Opioid and Alcohol Use Disorders Subrecipient Responsibilities

Document Purpose

This document provides a high-level overview of the responsibilities that come with receiving Behavior Health Integration – Medications for Opioid and Alcohol Use Disorders program funds as a subrecipient under a federal award. It is intended to help potential subrecipients understand what to expect after award and the basic organizational capacity needed to manage the funds responsibly. Federal grants can be complex to navigate; OSDH's intent is to streamline the process and provide technical assistance to support subrecipients and ensure the program remains compliant with applicable federal requirements, including, but not limited to, H.R. 1, 2 CFR Part 200, and the CMS Notice of Funding Opportunity. Subrecipients are also required to review the full requirements as detailed within **Attachment D** and request any exceptions to the OSDH Subrecipient Terms and Conditions (incorporated within Attachment D) with their application.

Instructions

Please review this form carefully and attest within the application that you have reviewed.

Key terms

- *Subrecipient*: Your organization, if awarded funds, will receive Behavior Health Integration – Medications for Opioid and Alcohol Use Disorders funds as a subrecipient to carry out approved activities under the program.

Expectations and responsibilities of OSDH

- Share clear reporting requirements, due dates, and performance expectations, consistent with RHTP guidance.
- Review deliverables, supporting documentation, and progress reports to confirm required activities are completed and consistent with the subrecipient agreement.
- Provide guidance and technical assistance as needed, including clarifications and feedback to support timely implementation.
- Coordinate required meetings, routine communications, and key implementation touchpoints with the subrecipient and participating entities.
- Review and approve invoices and supporting documentation to confirm costs are allowable, reasonable, and consistent with the approved budget and scope.
- Monitor budget performance over time (including forecasting) to ensure spending remains aligned with the approved budget and to identify when amendments or budget modifications may be needed.
- Conduct subrecipient monitoring as appropriate (e.g., desk reviews and periodic onsite or virtual monitoring) to validate performance and compliance with the subrecipient agreement.

More detail on what to expect from OSDH on monitoring and oversight

OSDH is required to monitor subrecipients. Monitoring is generally risk-based and may include desk reviews, invoice validation, and site visits.

- Risk assessment as part of Attachment D (based on program requirements, contract specifications, and a subrecipient questionnaire).
- A monitoring plan and contract administration plan may be developed and shared with you.
- Typical activities: review of required reports, invoice review/validation, verification of licensure/insurance, and site visits as needed.

What is expected of you as a potential subrecipient

- Spend funds only on approved activities or items within the approved budget and period of performance.
- Maintain basic financial controls and documentation to show funds were used properly.
- Follow procurement and contracting requirements when purchasing goods or services.
- Report spending and progress to OSDH on or before the required deadlines and in a format specified by OSDH.
- Be prepared for monitoring (e.g., desk reviews, invoice validation, and possible site visits).
- Retain records and cooperate with audits or reviews by any authorized state or federal authority.

Before you spend: set up the basics

- Designate a program lead and a finance lead for the funding regardless of award amount.
- Confirm your entity has adequate accounting systems to track use of the funds separate from other day-to-day operational expenses for your entity (e.g., unique cost center, project code, or spreadsheet ledger.
- Confirm internal approval steps for purchases and reimbursements.
- Confirm how your entity will document price reasonableness and vendor selection for any purchases not included in your submitted Attachment C, or for any modifications to the estimates provided in the attachment.
- Coordinate with OSDH to receive written approval for the use of subcontractors or subrecipients. Written approval is required prior to their work beginning.

Communicating about projects funded by the Behavior Health Integration – Medications for Opioid and Alcohol Use Disorders NOFO

- Provide OSDH with advanced written notice of any planned external communications that reference the activities/purchases that result from this funding. All communication must include language regarding the project being funded by a federal grant as is specified in the OSDH Subrecipient Terms and Conditions within **Attachment D.**

Invoices and reimbursement requests

OSDH will specify the invoice template and submission process after awards are issued. In general:

- Submit invoices within the required timeframe after the month in which costs were incurred.
- Invoice amounts should reflect actual costs incurred and paid, not estimates.
- Invoices must be supported by documentation (e.g., paid invoices, receipts, payroll records/time documentation, etc.).

Procurement and contracting: (buying goods or services)

Federal funds require fair and open procurement practices and documentation of how you selected a vendor and determined the price was reasonable.

Minimum expectations

These funds are subject to the Oklahoma Purchasing Act and the federal procurement standards in 2 CFR Part 200.

- Use your organization's written purchasing policies, as long as they meet federal standards. If your organization does not have written purchasing policies, OSDH can help develop a written policy.
- Conflicts of interest, such as purchasing decisions that benefit employees, board members, or family members, are prohibited.
- Purchases between $15,000 and $350,000 require three price or rate quotes from qualified vendors. Keep documentation that justifies what you bought, why you needed it, how you chose the vendor, and how you determined the price was reasonable.
- Purchases greater than $350,000 require formal procurement methods, including sealed bids or proposals, that provide public notice and are competitive.

Equipment, supplies, and property

Domestic preference and Buy America requirements may apply to certain purchases, such as infrastructure-related purchases. If subcontractors or subrecipients are used, procurement requirements must be flowed-down to contracts and purchase orders (2 CFR 200.322 and 2 CFR Part 184).

- Keep an inventory list for equipment purchased with Behavior Health Integration – Medications for Opioid and Alcohol Use Disorders funds (description, serial number, purchase date, cost, location, and condition).
- Tag or otherwise identify equipment as purchased with grant funds when feasible.

Reporting and performance

- Provide progress updates as required (activities completed, milestones, challenges, and next steps).
- Reports must align with the approved work plan and budget.
- If issues arise, such as delays, changes in scope, or budget shifts, your entity must notify OSDH as soon as reasonably practical. Changes may require prior approval from OSDH.

Records, audits, and access to information

- Maintain complete records for all Behavior Health Integration – Medications for Opioid and Alcohol Use Disorders transactions, such as purchases, contracts, invoices, payroll/time, and deliverables.
- Record retention requirements are detailed in the contractual agreement and must be adhered to.
- Cooperate with audits and provide access to records for OSDH and authorized federal/state reviewers.
- If a non-Federal entity expends $1,000,000 or more in Federal awards during its fiscal year, it is subject to a Single Audit (or program-specific audit) for that year and must submit the audit reporting package to the Federal Audit Clearinghouse (FAC) within nine months after the end of its fiscal year.

Quick checklist for subrecipients

- ☐ Assigned program and finance contacts
- ☐ Have written financial and procurement policies
- ☐ Set accounting measures to track expenses separately
- ☐ Have purchasing documentation process (quotes/price comparisons)
- ☐ Have a process to collect receipts, paid invoices, and proof of payment
- ☐ Have time-keeping documentation process (if charging staff time)
- ☐ Maintain equipment list (if purchasing equipment)
- ☐ Know invoice due dates and required format
- ☐ Know reporting schedule and deliverables
- ☐ Know who to contact at OSDH with questions or for approvals

Sources

- OSDH Subrecipient Terms and Conditions
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 CFR Part 200).
- HHS Grants Policy Statement (GPS) Version 2.0, effective Oct 1, 2025.
- CMS Rural Health Transformation Program (RHTP) NOFO: CMS-RHT-26-001.
- CMS RHTP Notice of Award (NOA) RHTCMS332048-01-00. Award documents/terms and conditions incorporated into the federal award;
- RHTP FAQ (Oct 31, 2025).