Expanding Care: Doulas Program Prepared FAQs

Updated: 7.13.26

Spenddown Timelines & Reimbursement

NOTE: Timeline for subrecipient spending and invoicing

Budget Period One (BP1) = December 28, 2025 – October 30, 2026

- All BP1 funds for Personnel, Fringe and Travel must be spent by October 30, 2026.
- All other BP1 funds carry over and must be fully spent and invoiced by subrecipients by July 31, 2027.
- All BP1 funds must be drawn down by OSDH by September 30, 2027.

1. Why must personnel, fringe and travel costs be expended by October 30, 2026? If grants are awarded in August that give us less than 60 days to spend in those categories?
    a. This is a CMS requirement. Personnel, fringe and travel costs must be spent by 10/30/26. All other budget line items must be fully expended and invoiced by 7/31/27 in order to meet the CMS drawdown deadline of 9/30/27 (subrecipient timeline subject to change based on internal OSDH deadlines).
    b. Per the NOFO, OSDH anticipates renewing subawards for Budget Period 2 in October 2026 with a start date of October 31st, 2026, to allow for Personnel, Fringe, and Travel spend through October 30th, 2027. Renewal amounts are dependent upon CMS awarded funds, subrecipient performance and funding needs, and OSDH RHTP programmatic priorities.
2. Do I have to spend all the funds by the end of Year 1?
    a. To ensure OSDH compliance with federal deadlines, all funds need to be **fully spent and invoiced by subrecipients by July 31, 2027.**
        i. Personnel, Fringe, and Travel must be fully spent by October 30, 2026.
    b. All BP1 funds must be drawn down by OSDH by September 30, 2027.
3. When are funds considered expended / spent?
    a. Funds are considered expended / spent when the recipient can provide proof of payment (a receipt, fulfilled purchase order, etc.).
4. We cannot afford to do a reimbursement-based grant. Can we still apply?
    a. If there are extenuating circumstances that would prevent the applicant from participating in a reimbursement-based program, please specify them in the

body of the application. These circumstances will be taken into consideration with the application.

5. Is this a multi-year grant?
    a. This is a one-year award. Per the NOFO, OSDH anticipates renewing subawards for Budget Period 2 in October 2026 with a start date of October 31st, 2026, to allow for Personnel, Fringe, and Travel spend through October 30th, 2027. Renewal amounts are dependent upon CMS awarded funds, subrecipient performance and funding needs, and OSDH RHTP programmatic priorities.
6. What is the typical turnaround time between invoice submission and reimbursement payment to subrecipients? We are planning our cash flow accordingly.
    a. Invoices will be due by the 30th of the following month (i.e. June's invoice is due by July 30th). RHTP's goal is to have all submissions approved and sent for payment within 30 days – subject to change. However, if corrections or additional supporting documentation is requested, this process can be prolonged. It is important that all documentation is submitted timely, correctly, and legible upon invoice submission.
7. The Component 1, 2, 3, and 4 narrative sections in the Smartsheet application each include a text-entry field labeled 'Please upload your Program Proposal with the information above.' The cursor allows typing, suggesting this is a text-entry field rather than a file upload field. Could you clarify whether applicants are expected to paste narrative content directly into this field, or whether this field is a placeholder and all narrative documents should instead be submitted as files in the master File Upload section at the bottom of the form (alongside Attachment C, D, F, and G materials)? If text entry is expected, are there character limits for these fields?
    a. Applicants are expected to upload all narrative documents in the Master File Upload section. The text box is a placeholder as a reminder to upload your Program Proposal with the items mentioned above, in the SmartSheet, that are required pieces for each component.
8. As a for-profit LLC without audited financial statements, what is acceptable for the Attachment D financial statement requirement?
    a. If an applicant cannot provide audited financial statements, unaudited statements are acceptable. OSDH reserves the right to request additional documentation if the applicant is awarded.
9. The SRQ asks about audit history. For a small for-profit LLC not subject to audit requirements, how should those fields be completed?
    a. Please complete the question(s) as they best represent your organization.

    b. If an applicant cannot provide audited financial statements, unaudited statements are acceptable. OSDH reserves the right to request additional documentation if the applicant is awarded.
10. Can letters of support from partner organizations be submitted as supplemental documents in the master file upload section, and will they be considered during merit review?
    a. Letters of support may be uploaded but are not required per the NOFO and will not be included in scoring.
11. If an organization is interested in applying for multiple project areas, should a separate proposal be submitted for each project area, or may all proposed activities be included within a single comprehensive proposal?
    a. Applicants are required to submit a separate application with separate attachments for each component and adhere to the budget caps outlined on Page 4. Each application will be scored separately.
12. If an organization's 501(c)(3) tax-exempt status is currently pending, is the organization still eligible to apply, or would a pending status disqualify the application?
    a. An applicant is not required to hold 501c3 status in order to apply or be awarded funding. However, all applicants are required to have a UEI number at time of application and a Supplier ID if awarded.
13. For the Community-Based Doula Training component, is it acceptable to use a self-developed curriculum, provided it aligns with the goals and requirements of the project, or is there a required or preferred curriculum that applicants must use?
    a. Any training curriculum used must align with the qualifications linked here. The curriculum must result in a recognized certification that includes the ability to bill Medicaid for services.
14. Is this a multi-year grant?
    a. OSDH anticipates renewing subawards for Budget Period 2 in October 2026 with a start date of October 31st, 2026, to allow for Personnel, Fringe, and Travel spend through October 30th, 2027. Renewal amounts are dependent upon CMS awarded funds, subrecipient performance and funding needs, and OSDH RHTP programmatic priorities.
15. Regarding Q11 of the Expanding Care: Doulas Program FAQs (updated 6.30.26) and the corresponding Restrictions language in the NOFO: our organization charges tuition only, with no separate certification fee, and trainees certify through our own program directly rather than through an external body. Does the five-year service commitment trigger for "individual certification fees" extend to other individual, per-trainee costs required for SoonerCare Medicaid enrollment, such as liability

insurance premiums or CPR certification fees paid on behalf of each trainee? We want to budget these items correctly and avoid inadvertently triggering a five-year commitment where none is intended.

    a. OSDH recently received guidance from CMS that classifies doulas as nonclinical workforce. Consequently, tuition charged would not trigger the five-year service commitment. Please include all necessary costs in the proposed budget, and if awarded, OSDH will ensure the budget is in alignment with CMS rules and expectations.

Allowable Costs & Budget

16. Are Personnel and Fringe allowable expenses under this NOFO?
    a. Yes, Personnel and Fringe are allowable expenses for this opportunity. Please refer to **Attachment E** for a full list of allowable and unallowable funding uses under broader RHTP or federal guidelines.
17. What is the budget maximum for this opportunity?
    a. Applicants may apply for up to $1,000,000 per component. Applicants are encouraged to build their budgets based on actual need and feasibility, and will be evaluated on budget reasonableness and timeline to spend
18. Can I submit a budget for more than the limit listed in the NOFO?
    a. No, applicants may only submit budgets up to $1,000,000 per component.
19. Our organization is both the applicant and the training provider for this program. Trainee scholarship funds would cover tuition charged by our own organization to program participants. Where should these costs be entered in the budget template: as a Contractual line item with our organization as subrecipient, or as an Other Expenditure under program costs? We want to ensure correct categorization and full transparency about this arrangement.
    a. Please list these costs under “Other” for training fees (training program implementation). As a reminder, “funds can be used to provide training for doulas, but paying for individual certification fees (e.g., DONA processing fee) will trigger a five-year service commitment through the RHTP. As such, RHTP funds should not be used pay for these fees.”
20. Can you confirm the definition of modified total direct costs for purposes of calculating the 15% de minimis indirect cost rate? Specifically, should subcontractor costs above $25,000 per subcontractor be excluded from the base per 2 CFR 200.68?
    a. Per 2 CFR 200: The Modified Total Direct Costs (MTDC) can include most direct salaries, wages, fringe benefits, materials, supplies, services, travel,

and the first $50,000 of each subaward. The MTDC excludes equipment, capital expenditures, and certain other costs.

        i. Entities using their federally negotiated rate will need to follow the MTDC guidelines listed within their NICRA.

21. The program director is the sole owner of the applicant LLC and will bill time to the grant at an hourly rate. Should this be entered in the Personnel tab or the Contractual tab?
    a. If the Program Director is employed as a W-2 employee, please use the Personnel tab. If the Program Director is a contractor (1099), please use the Contractual tab. Please consult with your accountant or financial advisor if you need further guidance on tax classifications for staff.
22. Can personnel costs for work performed between December 28, 2025 and the award notification date be included in Budget Period 1 if documented and directly related to program activities?
    a. Any Personnel costs for work performed prior to the award date should not be included in BP 1. No costs incurred prior to the award date can be reimbursed.
23. Is there a minimum threshold for grant request?
    a. Applicants may apply for up to $1,000,000 per component; there is no minimum threshold.
24. We will have personnel needs for October 2026-July 2027 timeframe for continuance of programs. How should we reflect this on budgets and work plans? The October-July blackout period for personnel is confusing.
    a. OSDH anticipates renewing subawards for Budget Period 2 in October 2026 with a start date of October 31st, 2026, to allow for Personnel, Fringe, and Travel spend through October 30th, 2027. Renewal amounts are dependent upon CMS awarded funds, subrecipient performance and funding needs, and OSDH RHTP programmatic priorities.
    b. Personnel, Fringe, and Travel needed past October 30, 2026, should not be reflected in the application budget template submitted for Budget Period 1. Dependent on CMS awarded funds, subrecipient performance and funding needs and OSDH RHTP Programmatic priorities, these will be included in renewal funding for Budget Period 2. CMS will not allow Personnel, Fringe and Travel to overlap budget periods.

Program Eligibility & Requirements

25. Do we have to be based in a rural area to apply?

    a. Applicants must demonstrate a track record of successful doula programming and partnerships in rural communities.
26. If a company or organization is headquartered outside of Oklahoma, are we eligible to apply?
    a. While preference will be given to entities based in Oklahoma, out-of-state entities are eligible to apply. Out-of-state entities will be expected to clearly demonstrate the success of their program outside of Oklahoma, rationale for building a presence in Oklahoma, and commitment to supporting doula expansion in Oklahoma beyond the five-year RHTP period.
27. If my fiscal sponsor is not located in Oklahoma, can we still apply?
    b. Fiscally sponsored organizations with fiscal sponsors located outside of Oklahoma may apply if the fiscally sponsored organization meets all criteria outlined in the NOFO.
28. What is a UEI number?
    a. A UEI number is a Unique Entity Identifier and is required to receive federal funds, including subawards. All applicants must have a UEI number at time of application and can obtain a number at www.SAM.gov.
29. What kind of insurance do we need to have? What if we cannot afford that much insurance?
    a. Applicants must an active Certificate of Insurance (see the Subrecipient Terms and Conditions linked in Attachment D for a detailed list of required insurance types, coverage limits, and other insurance-related requirements).
    b. If applicants cannot obtain the level of insurance detailed in Attachment D, they should fill out the "Request for Exceptions to the Contract Terms" form and submit it with the application.
30. If I applied for another RHTP opportunity, can I still apply for the Expanding Care: Doulas Program?
    a. Yes, there is no limitation on applying for multiple RHTP opportunities, even if awarded.
31. What types of entities can apply for this opportunity?
    a. The opportunity is open to community-based organizations, health care provider, tribal entities, higher education institutions, municipalities, state agencies, for profit/non-profit entities (c3 and c4), and others as applicable.
    b. Individuals may apply if meet all eligibility requirements outlined in the NOFO, including a UEI number.
32. Can we co-apply with another entity?

    a. One entity must apply as the sole applicant and will be responsible for receiving and administering the award. Applicants may work with other organizations through subawards, contracts, or other formal agreements, as appropriate.

33. Can I apply for only one component?
    a. Yes, applicants can apply for one or more components. Applicants must submit separate Smartsheet applications for each component. Each Smartsheet application must include its own project plan, work plan, and budget.
34. Our organization is interested in starting a Doula initiative but currently does not have one. Are we eligible to apply?
    a. Per the NOFO, this funding opportunity is for applicants who can "demonstrate a track record of successful doula programming and partnerships in rural communities."
35. The Doula NOFO states that out-of-state entities are eligible and should demonstrate rationale for building a presence in Oklahoma. Can you confirm that having an Oklahoma-based subcontractor satisfies the in-state presence requirement for program delivery purposes?
    a. Per the NOFO "While preference will be given to entities based in Oklahoma, out-of-state entities are eligible to apply. Out-of-state entities will be expected to clearly demonstrate the success of their program outside of Oklahoma, rationale for building a presence in Oklahoma, and commitment to supporting doula expansion in Oklahoma beyond the five-year RHTP period." The burden of proof is on the applicant to demonstrate projected in-state presence and sustainability of planned programming.
36. Could you clarify whether grant funding may be used to support both doula workforce development and comprehensive perinatal doula services for residents of rural Oklahoma, including prenatal, labor and delivery, and postpartum support delivered both virtually and in person?
    a. This NOFO supports doula workforce development through "expand[ed] training opportunities to prospective doulas". However, the NOFO does not support comprehensive doula service delivery and cannot be used to pay doulas for services rendered.
37. Our organization operates a rural maternal home-visiting program that provides prenatal and postpartum education, care coordination, and family support, but we do not currently operate a formal doula program. The NOFO states that applicants must "demonstrate a track record of successful doula programming and partnerships in rural communities." Could you please clarify whether this is a

minimum eligibility requirement, or whether organizations with established maternal health programming that are seeking to expand into doula services are still eligible to apply? Thak you for your time and clarification.

a. Per the NOFO, applicants are required to “demonstrate a track record of successful doula programming and partnerships in rural communities”. This track record may include “demonstrated experience working with doulas (e.g., through training, awareness-building)”. As a reminder, “OSDH welcomes collaborative approaches across organizations and rural areas”. This NOFO is not intended for entities with no previous doula experience – whether via direct programming or partnership.