# Presentation to the Legislative Federal Economic Stimulus Program Oversight Commission

Hawaii Department of Health
November 24, 2009
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Development

#### **DOH Summary**

- \$57,091,209 awarded as of September 30, 2009
- 10 Notifications of Award
- 93% of dollars awarded for environmental health, mostly for EPA Revolving Funds
- No applications denied
- 3 applications in development, all competitive
  - Community prevention and health information technology
- 1 application submitted and under review
  - Workforce development

## Most Common Funding Agencies

- US Department of Health and Human Services
  - Health Resources and Services Administration
  - Centers for Disease Control and Prevention
  - Office of the National Coordinator for Health Information Technology
- Environmental Protection Agency
- US Department of Agriculture

#### **Award Purposes**

- Most are supplemental funds to existing programs
  - Sustain ongoing services like home-delivered meals to seniors
  - Finance new project sites like sewer upgrades or school bus retro-fits
- Fewer are for new programs or projects
  - Women, Infants, and Children MIS planning (awarded November 2009)
  - Healthcare acquired infections

# Sub-recipients

- Counties are the biggest beneficiaries of DOH funds
  - Generally passed along from the counties to subcontractors and vendors such as social service agencies or engineering and construction firms
- Private sector firms such as social service or clinical service delivery agencies received a much smaller proportion of DOH ARRA funds
- DOH is a sub-recipient of a DOE award for IDEA Part C supplemental funding for early intervention services
- DOH is absorbing the administrative overhead for ARRA grants management to maximize the funds available to the community

#### **Internal Controls**

- ARRA Coordinator
  - Reports to the Director of Health
  - Single point of contact for all ARRA-related issues
  - Provides internal technical support
- DOH ARRA Oversight Workgroup
  - ARRA Coordinator, Grants Manager, Fiscal Officer, Contracts
     Specialist, Procurement Specialist, and Accounting Specialist
  - Will convene monthly or as needed
  - Approves guidelines, recommends corrective actions, identifies best practices, escalates issues, and randomly audits
  - Developing draft guidance document on procurement, reporting, regulatory compliance, and contracting

## Internal Controls, cont'

- ARRA-related expenses are internally "fast tracked"
  - Identified for special handling via stamp
  - Processed by procurement supervisor personally
  - Record-keeping is segregated
  - Account balancing performed against data warehouse

## **DOH Inter-agency Collaborations**

- Workforce development
  - Coalition led by DLIR
  - Interest in funds to train certified substance abuse counselors (CSACs) and laboratory technologists
  - Status: Applied
- Health information exchange planning and implementation
  - Part of State Coordinating Committee with DBEDT, DHS, DAGS, and DCCA
  - Interest in funds for public health surveillance
  - Status: Applied
- Health information technology Regional Extension Centers
  - Support for rural areas, critical access hospitals, and Oceania
- Broadband infrastructure
  - Led by DCCA
  - Interest in developing rural broadband infrastructure to facilitate telehealth applications
  - Status: Pending Funding Opportunity Announcement, Round 2

#### Missed Opportunities

- State Loan Repayment Program
  - Addresses health professions workforce shortages
  - \$10 million through 16 awards
  - Coordination with JABSOM, etc.
  - No application submitted
    - Insufficient application time with a July 30, 2009 announcement date and an August 7, 2009 due date
    - 1:1 non-federal matching requirement was questionable
  - Highlighted barriers in federal grant system, i.e. grants.gov is not always up to date

## Missed Opportunities, cont'

- Licensure Portability Special Initiative
  - Support to state professional licensing boards to reduce statutory and regulatory barriers to telemedicine
  - \$1,500,000 through 3 awards
  - Coordination with DCCA, Telehealth Policy Group, etc.
  - No application submitted
    - Insufficient mainland contacts
    - Underdeveloped policy for multi-state licensure schemes

#### **Lessons Learned**

#### Federal

- Grants.gov not 100% reliable for timely information
- Subject-matter expert areas need to continually review federal agency communications

#### State

- Implementation of early awards delayed due to evolution of requirements
- Potential efficiencies from shared common resources, e.g. contract language
- Ensure registration with Federal grants system well in advance to facilitate reporting and application

## Public Input Models

- Intended Use Plan: newspaper publication with 30 day comment period
  - Clean Water
  - Safe Drinking Water
- Advisory Board: lay-person or community representative
  - Healthcare Acquired Infections
  - Immunizations
- Federal prior approval: supplemental funds for an existing project
  - Diesel Retrofit
  - Water Quality Management Planning
  - Congregate Meals
  - Home-Delivered Meals
  - Leaking Underground Storage Tanks
  - Early Intervention for Infants and Toddlers

#### Status Update

- Environmental Health Administration (\$53 million)
  - Clean Water: Pending feedback from counties, projects selected, contractor agreements finalized
  - Drinking Water: Finalizing contracts with counties, projects selected
  - Water Quality Management Planning: Finalizing contract with C&C Honolulu
  - Clean Air: Vehicles identified, contract under review with Hawaii DOE and UH
  - Leaky Underground Storage Tanks: Planning phase

## Status Update, cont'

- Disease Outbreak and Control Division (\$1 million)
  - Healthcare Acquired Infections: Special project status in process, Advisory Board convened
  - Immunizations: 1 FTE created and filled, ongoing contract modifications with flu clinic vendors
- Family Health Services Division (\$2.4 million)
  - Early Intervention for Infants and Toddlers:
     Pending contract modifications with vendors

## Status Updates, cont'

- Executive Office on Aging (\$0.5 million)
  - Congregate and Home-Delivered Meals for Seniors: Counties and their sub-contractors ramping up operations due to approval to expend funds
- New award: Family Health Services Division (\$0.25 million)
  - Women, Infants, and Children MIS Upgrade
     Planning, late October notification

#### Questions and Follow-up

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#### **DEPARTMENT OF HEALTH, Health Resources Administration**

**Program: Healthcare-Acquired Infection** 

Award: \$429,587

Project contact: Ms. Nancy Bartter, Ms. Betty Wood

- 1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:
  - a. A brief summary of the program/project, including goals

Funded through the CDC's Epidemiology and Laboratory Capacity for Infectious Disease grant assist, this award allows public health agencies to improve surveillance for, and response to, infectious disease by 1) strengthen epidemiologic capacity; 2) enhance laboratory practice; 3) improve information systems; and 4) develop and implement prevention and control strategies.

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Environmental Protection Agency on a competitive basis.

- c. Whether matching funds are required, and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A
- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 – 2010 or FFY 2009 – 2010);

The award total was \$429,587 for a 28 month project beginning September 30, 2009 (FFY 2009- 2010) and ending December 31, 2011 (SFY 2011-2012).

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

An advisory council comprised of public and private sector subject-matter experts and stakeholders convened to prioritize goals and identify processes to achieve them. Funding will directly support planning and implementation activities, administrative coordination, and epidemiological/scientific support.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

DOH collaborated closely federal (CDC) and state (other DOH programs and HHSC) agencies as part of the advisory council to assure support for an application and subsequent project.

h. The criteria used to select activities for the program/project;

The advisory council's criteria were based on a needs assessment.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

The project is targeted at improving hospital care through providing education and technical assistance to health care workers. Broad public input is not appropriate; however, there are two healthcare consumers on the advisory board.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

No ARRA funds have been expended to date. Normal state and county procurement practices will be followed and duly documented.

k. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the

Department of Business, Economic Development and Tourism also provide oversight and guidance.

 Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed;

Authorization to establish a special project, including grant-funded positions, is in process. The filling of positions and formal project work is expected to be well underway prior to the end of 2009.

m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

The project anticipates creation of two positions (2 FTE), plus limited work for contractual trainers (less than one (1) FTE). The long-term public benefit of the projects is reductions in healthcare-acquired infections, which reduce unnecessary medical resource expenditure and increase patient quality of life and health outcomes.

#### **DEPARTMENT OF HEALTH, Disease Outbreak Control Division**

**Program: Immunization Branch** 

Award: \$572,428

Project contact: Ms. Nancy Bartter, Ms. Lisa Mendez

1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:

a. A brief summary of the program/project, including goals

Supplemental operational funds for immunization, associated with the Centers for Disease Control and Prevention, will be used to support the 2009-2010 and 2010-2011 statewide school-based flu vaccination program, for the prevention of influenza among a key population:

- Acquiring contractual nursing services to provide vaccine administration in Stop Flu at School clinics;
- Establishing four temporary positions to assist with clinic staffing and scheduling, collecting and organizing completed vaccine administration consent forms, planning and monitoring Stop Flu at School operational activities, preparing required ARRA reports, and other essential tasks;
- Acquiring contractual support services to package, deploy, and return medical supplies and vaccine to and from Stop Flu at School clinics island-wide on Oahu; and
- Acquiring contractual data entry services to input all completed vaccine administration consent form data into an electronic database for evaluation.
- Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the US Department of Health and Human Services, Centers for Disease Control and Prevention as a grant to the State of Hawaii Department of Health.

- c. Whether matching funds are required, and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A

- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 2010 or FFY 2009 2010);

The award total was \$572,428 and must be expended within FFY 2009 – 2012.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Offering influenza vaccine in the school setting provides an effective and feasible approach to increase the immunization coverage of school-age children. Such an increase would be expected to reduce the spread of influenza and decrease the burden of seasonal influenza among households and communities.

The Stop Flu at School program demonstrates a sustainable school-based mass vaccination model that can be utilized to efficiently provide seasonal influenza vaccine annually as recommended by the Advisory Committee on Immunization Practices (ACIP) for the prevention and control of influenza among schoolchildren in Hawaii ages 5-13 years, while at the same time, preparing our state's ability/resources to respond to potential pandemic events.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

Critical to the operational success of the Stop Flu at School program are the following key partners: State of Hawaii Department of Education, Hawaii Association of Independent Schools, Hawaii Catholic Schools, American Academy of Pediatrics – Hawaii Chapter, Hawaii Medical Service Association, Kaiser Foundation Health Plan, Hawaii Pacific University School of Nursing, University of Hawaii Schools of Nursing, and Hawaii Medical Reserve Corps.

h. The criteria used to select activities for the program/project;

In the 2007-2008 flu seasons, the Hawaii State Department of Health (HDOH) initiated its first Stop Flu at School program by offering free influenza vaccination through school-based clinics statewide. Due to the program's overall success and continued support, this program was continued in the 2008-2009 flu season. Through this statewide program and with the support of many vital collaborating partnerships, over 60,000 of Hawaii's schoolchildren and 9,300 faculty and staff were vaccinated each flu season in

over 330 school settings. HDOH remains ambitious in continuing the Stop Flu at School program for upcoming flu seasons.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

The Department of Health collaborates in an on-going manner with many partners, including those mentioned in section g above, in order to plan for and implement this program.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

Normal state procurement practices were followed and duly documented.

k. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARRA Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight and guidance.

I. Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and

Contract modifications and encumbrance of funds are still in progress. The grant award was received too late to be useful to pay vendors for work at the fall 2009 clinics. Most funds that will be encumbered for vendors will be used for the fall 2010 clinics.

m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

One full-time position has been established and will be filled November 19, 2009. Other positions are still pending establishment.

As evidenced by the 2008-2009 Stop Flu at School Program, partnering with schools and school systems as well as other community partners is vital to enhancing and expanding the State of Hawaii's efforts in seasonal influenza vaccination coverage amongst schoolchildren. With each subsequent influenza season that we directly invest towards influenza prevention, we gain valuable experience with mass vaccination strategies, improve vaccination coverage in target populations, and potentially reveal indirect beneficial effects on persons having close contact with children, therefore positively impacting our communities. We also augment our state's capacity to respond to pandemic events.

With the possible exception of nutrition and sanitation, immunizations are the most cost-effective public health intervention available. Well-designed studies have repeatedly demonstrated that immunizations reduce illness and save lives and money.

As individuals, the public directly benefits from our efforts because immunizations reduce the incidence of vaccine-preventable diseases, which otherwise would cause significant morbidity, disability, and mortality. On a societal level, the population benefits from reduced medical expenditures for treatment of illnesses that are prevented via our efforts. In addition, this immunization effort mitigates the economic impact of vaccine-preventable diseases by reducing the years of potential life lost that would otherwise occur without this immunization program.

**DEPARTMENT OF HEALTH, Environmental Health Administration** 

**Program: Clean Diesel School Bus Retrofit** 

Award: \$1,730,000

Project contact: Mr. Robert Tam, Mr. Wilfred Nagamine

1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:

a. A brief summary of the program/project, including goals

Funds associated with the EPA's Clean Diesel Grant funds a replacement program targeting school buses and heavy duty diesel vehicles in the state of Hawaii. The general purpose of the grant is to reduce diesel emissions and improve air quality.

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Environmental Protection Agency as a formula/block grant to the State of Hawaii.

- c. Whether matching funds are required, and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A
- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 2010 or FFY 2009 2010);

The award total was \$1,730,000 and must be expended within FFY 2009 – 2010.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Funds were intended to provide supplemental funding for clean diesel programs. Negotiations are ongoing with the Hawaii Department of Education, University of Hawaii-Manoa, and private sector vendors in identifying districts and specific diesel vehicles for replacement.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

Department of Health is collaborating with the Hawaii Department of Education and the University of Hawaii-Manoa to expend funds most appropriately.

h. The criteria used to select activities for the program/project;

EPA provided the guidelines and criteria on the applicable diesel projects and the types of diesel vehicles that would qualify under the clean diesel program.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

Public comment/input was not sought since EPA had stated its preference for projects that would reduce diesel emissions from school buses and its exposure to students. Due to legal issues, limited funds, and tight timeframe to complete the project, the best approach was to partner with other state agencies that dealt with students.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

Normal state procurement practices will be followed and duly documented.

k. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight and guidance.

 Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and

No funds have been expended at this time, although the specific diesel vehicles to be replaced under the project have been identified and prescreened by EPA. Currently, the Department of Health is in the process of drafting a Memorandum of Agreement with the Department of Education and also with the University of Hawaii-Manoa. Project work is expected to begin 1Q 2010.

m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefit of the project will be cleaner air and improved health outcomes, as well as cost savings due to energy efficiencies. For the participating agencies, the replacement of the existing, older, dirtier diesel vehicles with new cleaner vehicles also equates to lower maintenance cost and future turnover savings of the vehicles.

#### **DEPARTMENT OF HEALTH, Environmental Health Administration**

**Program: Clean Water Revolving Fund** 

Award: \$30,352,300

Project contact: Ms. April Matsumura

- 1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:
  - a. A brief summary of the program/project, including goals

Funds associated with the EPA's Clean Water Revolving Fund support projects that help achieve compliance with federal and state water quality standards, protect public health from point and non-point water pollution sources, conserve water by safely recycling and reusing wastewater effluent, and promote green infrastructure, sustainable infrastructure, water and energy efficiency, reduction of greenhouse gas emissions, or other environmentally innovative activities. Specifically being addressed are sewer line replacement, large capacity cesspool conversion, pump replacement, treatment plant upgrades to increase capacity and provide for reuse, and tsunami barrier repair. The required 20% earmarked for green projects is being met by replacing of pumps with energy efficient ones and incorporating solar panels in one of the treatment plants.

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Environmental Protection Agency as a formula/block grant to the State of Hawaii.

- c. Whether matching funds are required, No. and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A
- d. If there additional requirements to receive funds, what are they;

At least 20% of funds must be earmarked for projects meeting Green Project Reserve criteria. Requirement met. At least 50% of funds must provided additional financial

assistance in the form of principal forgiveness, negative interest rates, grants, or any combination of these types of additional assistance. Requirement met.

e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 – 2010 or FFY 2009 – 2010);

The award total was \$30,352,300 and must be committed to final binding agreements by

Feb 17, 2010.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

The highest priority was a project's readiness to proceed. Priority was also given to projects being done to comply with enforcement issues and projects meeting Green Project Reserve criteria. In the interest of fairness, funds were equally divided among the four counties. Critical deadlines for eligible projects were established and counties were required to meet all critical deadlines in order for each county project to remain eligible. Project selection was approved by the Department of Health and the EPA.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

DOH collaborated closely with county officials on to discuss program requirements and expectations. Reports on status of submittals were sent to counties on a regular basis.

h. The criteria used to select activities for the program/project;

Individuals counties were allowed to select the appropriate project based on local needs' however the criteria listed under paragraph f were also relevant.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

Public notice of the ARRA projects was made by posting of the "Amendment 2 to the Intended Use Plan (IUP) for SFY 2009" and having the document available for public review. Public notice of the IUP published in five newspapers on the various islands to allow public participation and comment. During the thirty-day public comment period, no inquiries, information requests, or comments were received.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

Normal state and county procurement practices were followed and duly documented.

k. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse.

Office policies are streamlined to maximize efficiency. Requirements for ARRA projects were carefully reviewed. Inspections and county oversight are done to prevent fraud, abuse, etc.

 Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed.

Contracts are being revised to accommodate recent changes to accounting procedures. All ARRA projects are under construction.

m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefit of the projects is greater assurance of quality, safety, and reliability of public works infrastructure as they relate to water.

#### **DEPARTMENT OF HEALTH, Environmental Health Administration**

Program: Leaking Underground Storage Tanks (LUST)

Award: \$1,317,000

Project contact: Mr. Darren Park, Ms. Roxanne Kwan

- 1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:
  - a. A brief summary of the program/project, including goals

Funds associated with the EPA's Leaking Underground Storage Tanks efforts to assess and cleanup petroleum releases from leaking underground storage tanks (LUST) sites in Hawaii; in particular, orphan or abandoned sites, where the owners/operators of the sites are unknown or unable to pay, of which there are approximately 200,000 in the U.S., and staff management and oversight activities that will leverage additional cleanups. The overall purpose is to clean up contaminated LUST sites effectively, maximize job creation/retention, and provide economic and environmental benefits to the citizens of Hawaii.

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Environmental Protection Agency as a cooperative agreement to the State of Hawaii.

- c. Whether matching funds are required, and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A
- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 2010 or FFY 2009 2010);

The award total was \$1,317,000 and must be expended by the end of FFY 2011.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Funds were intended to assess and cleanup petroleum releases from leaking underground storage tanks (LUST) sites in Hawaii; in particular, orphan or abandoned sites, where the owners/operators of the sites are unknown or unable to pay.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

N/A

h. The criteria used to select activities for the program/project;

Sites that have been orphaned or abandoned sites with leaking USTs and where there are no responsible parties or owners/operators.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

ARRA money is earmarked for assessment and cleanup of sites with leaking underground storage tanks.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

Normal state and county procurement practices were followed and duly documented.

k. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse:

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight and guidance.

- Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and None
- m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefit of the project will reduce environmental contamination to the groundwater and soil, due to abandoned and degradation of these storage tanks (gasoline, oils, chemicals, etc.).

#### **DEPARTMENT OF HEALTH, Environmental Health Administration**

**Program: Safe Drinking Water Revolving Fund** 

Award: \$19,500,000

**Project contact: Mr. Alain Carey** 

- 1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:
  - a. A brief summary of the program/project, including goals

Funds associated with the EPA's Drinking Water Revolving Fund support infrastructure improvements to drinking water systems. The program also emphasizes providing funds to small and disadvantaged communities and to programs that encourage pollution prevention as a tool for ensuring safe drinking water. Specific projects include replacement and upgrade of water mains, and water tank and reservoir improvements across all counties.

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Environmental Protection Agency as a formula/block grant to the State of Hawaii.

- c. Whether matching funds are required, and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A
- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 2010 or FFY 2009 2010);

The award total was \$19,500,000 and must be spent prior to 1Q 2010.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Preference was given to shovel-ready projects. Projects that were under contract or started construction by June 17, 2009 received priority funding.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies.

DOH collaborated closely with county officials on to discuss program requirements and expectations.

h. The criteria used to select activities for the program/project;

Individual counties were allowed to select the appropriate project based on local needs and readiness to proceed.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

The Intended Use Plan (IUP) for SFY 2009 was revised to include the ARRA grant and projects proposed to be funded by ARRA. A public notice for the revised IUP was published on March 27, 2009 with a 30 day public comment period ending on April 27, 2009. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner. Additionally, normal state and county procurement practices were followed and duly documented.

j. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight and guidance.

k. Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and Contracts are being revised to accommodate recent changes to accounting procedures. All ARRA projects are under construction.

 Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefits of the projects include greater assurance of drinking water quality, public health and safety, and reliability of public works infrastructure as they relate to drinking water.

#### **DEPARTMENT OF HEALTH, Environmental Health Administration**

**Program: Water Quality Management Planning** 

Award: \$306,600

Project contact: Mr. Glenn Haae

- 1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:
  - a. A brief summary of the program/project, including goals

Funds associated with the EPA's Water Quality Management Planning are being used to provide support to Hawaii Department of Health water programs. Specifically, two positions were created to support the Water Quality Assessment Project: a Water Quality Standards Administrative Associate (WQSAA) to provide administrative support to water program functions including revision and recordkeeping of the State's Water Quality Standards, development of water body Total Maximum Daily Loads (TMDLs), and contract and grant management, and a Geospatial Information Specialist (GIS) to edit multi-agency state water body spatial data to conform to a standard water body map for the USGS National Hydrography Dataset (NHD).

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Environmental Protection Agency as a formula/block grant to the State of Hawaii.

- c. Whether matching funds are required, and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A
- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 – 2010 or FFY 2009 – 2010);

The award total was \$306,600 and must be expended within FFY 2009 - 2010.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Funds were intended to provide supplemental funding for existing water quality management planning programs.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

DOH is collaborating with the City and County of Honolulu to allocate 40% of the total award as a pass-through to support a "How-To" handbook for organizations to plan for green infrastructure alternatives in their development or renovation projects.

h. The criteria used to select activities for the program/project;

Projects are following and established and approved trajectory based on the fact that they are supplemental funds for existing programs.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

Not applicable.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

Normal state and county procurement practices were followed and duly documented.

k. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight and guidance.

 Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and

Project proposals are under review with the EPA, and contract modifications are in process with vendors and the City and County of Honolulu.

m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefit of the project will be improved administrative rules for water quality standards, more sophisticated green infrastructure planning and projects, expanded geological and hydrological datasets through GIS mapping to support planning across the state on each island; all of which contribute to more efficient, economical, and fair use of water for drinking, industrial, and agricultural use.

## **DEPARTMENT OF HEALTH, Executive Office on Aging**

**Program: Congregate Nutrition Services** 

Award: \$325,000

Project contact: Ms. Nancy Moser, Ms. Noemi Pendleton

- 1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:
  - a. A brief summary of the program/project, including goals

Funds associated with the DHHS's Administration on Aging (AoA) support existing nutrition services established by the Older Americans Act of 1965 as amended, including nutritious meals, nutrition education and other appropriate nutrition services for older Americans in order to maintain health, independence and quality of life. Meals will be served in a congregate setting. Specifically, ARRA funding for Congregate Nutrition Services will augment existing resources, replace revenue lost from local sources due to the economic downturn, and support the continued delivery of meals to vulnerable older Americans. Congregate meals help seniors to maintain their health and avoid hospitalization and nursing home placement.

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Administration on Aging as a formula-grant to the State of Hawaii, Executive office on Aging (EOA). Grant No: 09AAHIC1RR

c. Whether matching funds are required, and, if so:

"Federal participation cannot exceed 85% of the total service costs." Therefore the required match is 15%.

- i. Are they available; Yes. County funds and program income.
- ii. Have they been secured; Yes
- iii. If they have not been secured, why not; and N/A
- iv. Will the State be required to continue that match or provide increased/full funding in the future; No
- d. If there additional requirements to receive funds, what are they; N/A The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 – 2010 or FFY 2009 – 2010);

The award total was \$325,000 and must be expended within FFY 2009 - 2010.

e. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Funds were intended to provide supplemental funding for existing congregate nutrition programs for the elderly, in this case, managed through Area Agencies on Aging of the counties (AAAs). The project meets program goals by ensuring continued services, providing meals to currently eligible seniors and expanding services to the newly eligible. Area Agencies on Aging and congregate meal providers in the State of Hawaii will use ARRA funding to hire or retain cooks, dishwashers, food servers, and administrative personnel.

f. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

EOA received funds through AoA the same as with Title III Nutrition Services coordinated with county agencies to ensure existing programs met the ARR requirements, and to execute contract to reflect that fact.

g. The criteria used to select activities for the program/project;

The activities under this grant conform to the Nutrition Service Standards for the Congregate and Home-Delivered Meals Program, Title III-C of the Older American Act, as revised and issued by the Executive Office on Aging May, 2000.

h. Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

Activities are identical to and extend the resources for concurrent federally funded nutrition services offered through EOA and AAAs. Services have had waitlists or reduced hours before this grant award. No prior public comment was sought.

 Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

Normal state and county procurement practices were followed and duly documented.

j. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight and guidance. The grant funds were awarded by EOA to AAAs in separate contracts for ARRA funds only, and these include all the ARRA Terms and Conditions. These contracts and services are monitored by EOA which also provides technical assistance to the AAAs.

k. Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and

Authorization to expend funds was sought and approved. The counties and their sub-contractors have already begun operations in light of additional funding, i.e. staff retained, more meals delivered, etc.

 Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefit of the project is greater gainful employment and maintenance and improvement in the quality of life and health of seniors in need.

## **DEPARTMENT OF HEALTH, Executive Office on Aging**

**Program: Home-Delivered Nutrition Services** 

Award: \$160,000

Project contact: Ms. Nancy Moser, Ms. Noemi Pendleton

1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:

a. A brief summary of the program/project, including goals

Funds associated with the DHHS's Administration on Aging (AoA) support existing nutrition services established by the Older Americans Act of 1965 as amended, including nutritious meals, nutrition education and other appropriate nutrition services for older Americans in order to maintain health, independence and quality of life. Meals will be served in a home-delivery setting. Specifically, ARRA funding for home-delivered Nutrition Services will augment existing resources, replace revenue lost from local sources due to the economic downturn, and support the continued delivery of meals to vulnerable older Americans. Home-delivered meals help seniors to maintain their health and avoid hospitalization and nursing home placement.

b. Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the Administration on Aging as a formula grant to the State of Hawaii, Executive office on Aging (EOA). Grant No: 09AAHIC2RR.

c. Whether matching funds are required, and, if so:

"Federal participation cannot exceed 85% of the total service costs." Therefore the required match is 15%.

- i. Are they available; Yes. County funds and program income.
- ii. Have they been secured; Yes
- iii. If they have not been secured, why not; and N/A
- iv. Will the State be required to continue that match or provide increased/full funding in the future; No
- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 2010 or FFY 2009 2010);

The award total was \$160,000 and must be expended within FFY 2009 - 2010.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Funds were intended to provide supplemental funding for existing home-delivery nutrition programs for the elderly, in this case, managed through Area Agencies on Aging of the counties (AAAs). The project meets program goals by ensuring continued services, providing meals to currently eligible seniors and expanding services to the newly eligible. Area Agencies on Aging and home-delivery meal providers in the State of Hawaii will use ARRA funding to hire or retain cooks, dishwashers, food servers, and administrative personnel.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

EOA received funds through AoA the same as with Title III Nutrition Services coordinated with county agencies to ensure existing programs met the ARR requirements, and to execute contract to reflect that fact.

h. The criteria used to select activities for the program/project;

The activities under this grant conform to the Nutrition Service Standards for the Congregate and Home-Delivered Meals Program, Title III-C of the Older American Act, as revised and issued by the Executive Office on Aging May, 2000.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

Activities are identical to and extend the resources for concurrent federally funded nutrition services offered through EOA and AAAs. Services have had waitlists or reduced hours before this grant award. No prior public comment was sought.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

Normal state and county procurement practices were followed and duly documented.

k. Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight

- and guidance. The grant funds were awarded by EOA to AAAs in separate contracts for ARRA funds only, and these include all the ARRA Terms and Conditions. These contracts and services are monitored by EOA which also provides technical assistance to the AAAs.
- I. Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and
  - Authorization to expend funds was sought and approved. The counties and their sub-contractors have already begun operations in light of additional funding, i.e. staff retained, more meals delivered, etc.
- m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefit of the project is greater gainful employment and maintenance and improvement in the quality of life and health of seniors in need.

**DEPARTMENT OF HEALTH, Family Health Services Division** 

Program: Early Intervention Section, Children with Special Health Needs Branch

Award: \$2,398,294

Project contact: Mr. Paul Takishita, Ms. Susan Brown

- 1. For each group/category or program/project for which ARRA funds have been obtained, please provide the following information:
  - a. A brief summary of the program/project, including goals

Funds associated with the US Department of Education's Early Intervention Program for Infants and Toddlers with Disabilities support the implementation of a statewide, comprehensive, coordinated, multidisciplinary, interagency system of early intervention services for infants and toddlers with disabilities and their families.

 Whether funds were appropriated for expenditure by a federal agency, were awarded as a formula/block grant to a State or country agency, or were awarded on a competitive grant basis;

Funds were appropriated by the US Department of Education as a cooperative agreement to the State of Hawaii.

- c. Whether matching funds are required, and, if so:
  - i. Are they available; N/A
  - ii. Have they been secured; N/A
  - iii. If they have not been secured, why not; and N/A
  - iv. Will the State be required to continue that match or provide increased/full funding in the future in the future; N/A
- d. If there additional requirements to receive funds, what are they; N/A
- e. The amount of funds involved and the state/federal fiscal year within which the funds must be expended (e.g. SFY 2009 2010 or FFY 2009 2010);

The award total was \$2,398,294 and must be expended by September 30, 2010. Information was shared that it might be possible to extend the end date until September 30, 2011, but this is not yet confirmed.

f. What criteria were used to identify the program/project as a priority and how does the program/project meet them;

Funds were intended to provide supplemental funding to both existing and new early intervention programs that provide services to IDEA Part C eligible children through the Early Intervention Section. These additional funds are needed due to the economic downturn.

g. Efforts undertaken to coordinate application for funds and administration of the program/project, including expenditure of funds, with other federal, state, and county agencies;

DOH is collaborating with the Hawaii Department of Education, who is the prime recipient of Early Intervention Program for Infants and Toddlers with Disabilities funds.

h. The criteria used to select activities for the program/project;

The funds will be used to support the on-going activities of the Early Intervention Section; no new activities will be selected.

 Efforts made to provide public notice and seek public comment/input or, if public comment/input was not sought, why;

There is no requirement to provide public notice or seek public comment or input, as the funds will be used to support the on-going activities of the Early Intervention Section; no new activities will be selected.

j. Efforts made during the bidding/award process to ensure that it was transparent and that the funds were awarded based on merit and in a prompt, fair, and reasonable manner;

As noted above, the funds will support current programs/activities, therefore there was no bidding/award process for the expenditure of these funds.

 Measures employed to 1) reduce duplication of efforts, 2) ensure that funds were used for authorized purposes, and 3) prevent cost overruns, fraud, waste, error, and abuse;

The Department of Health has published draft guidance for internal programs as well as an internal ARR Oversight Committee to assure timeliness and accuracy, and to scrutinize for waste, fraud, error, and abuse. This Committee convenes monthly or as needed. In turn, the Department of Accounting and General Services and the Department of Business, Economic Development and Tourism also provide oversight and guidance.

 Current status of the program/project, including percentage of awarded funds that have been obtained, percentage of awarded funds encumbered and/or expended, and what part(s) of program/project have been completed; and

The DOH has received most of the awarded funds to support the Early Intervention Section. To date, none of the funds have been encumbered and/or expended. The Early Intervention Section is in the process of completing mandatory contract modifications which is required in order to expend the funds.

m. Actual or anticipated economic impact to the State of the program/project, including the number of jobs saved/created and the long-term public benefits of the program/project.

Jobs retained/created cannot be calculated at this time. The long-term public benefit of the project will be sustaining and expanding services for children with special needs.

November 18, 2009

**Hawaii Department of Health** 

Response to the Legislative Federal Economic Stimulus Program Oversight Commission

Prepared by Lorrin Kim, Office of Planning, Policy, and Program Development, 586-4189

NOTE: Questions 2 and 3 of the Oversight Commission's questionnaire are answered for all Department of Health ARRA projects.

2. For other program/projects, if ARRA funds, such as competitive grants, were available for a program/project but were not sought or were denied, please briefly describe why the funds were not sought or why they were denied.

As of September 30, 2009, no ARRA grant request submitted by the Department of Health has been denied. No applications are pending, and one more is in development. The department has collaborated on one other large grant with the Department of Labor, who is the lead agency, regarding healthcare workforce development; that application is pending.

With regard to opportunities deliberately missed there were two. The first related to the Telehealth Licensure Portability Special Initiative for which an application was not submitted due to difficulties forming a tri-state coalition and subsequently producing consensus. The department would have been a primary participant, but not necessarily the lead agency. Discussions with the Department of Commerce and Consumer Affairs, the University of Hawaii, and private sector interests concluded that the application could not be prepared in the six week window allowed by the federal Health Resources and Services Administration, and that this award likely targeted those systems with more developed cross-jurisdictional licensing programs. The maximum value of an individual award was \$500,000 over two years.

The second program not sought after was State Loan Repayment Program, for which the department would have been the lead agency through its Primary Care Office (PCO). This goal of this program was to provide supplemental funding for the National Health Service Corps' program of medical school loan forgiveness in exchange for residency or practice in underserved areas. While the PCO was the sole agency who could submit an application per grant guidelines, it could not meet the unusually short turn-around time. The grant was announced to the public on July 30, 2009 and due August 15, 2009; the department was also unaware of the grant due to late posting on grants.gov. The range of awards for this grant was from \$26,000 to \$150,000.

#### 3. Please describe:

a) Any legal/operational barriers/constraints encountered in the award, receipt, encumbrance, or expenditure of funds, including procurement, late/delayed federal guidance, and reporting requirements;

The Department of Health has encountered at last two difficulties with the backend and internal processes relating to procurement and the accounting and encumbrance of funds.

With regard to procurement, the department has been unable to train staff as quickly as preferred on the state procurement system. Several programs that received awards have traditionally not had to engage in direct procurement activities so did not possess the knowledge to do so.

Relating to the second general issue of accounting and encumbrance, some awards were announced within several weeks of ARRA's promulgation, without the benefit of general federal guidance to inform state policies and procedures. As time progressed, federal guidance evolved and experience was shared resulting in early working assumptions being revised and resulting in recent delays to the procurement and contracting process, specifically relating to appropriation and accounting codes.

# b) The effect of those barriers/constraints; and

The effect of barriers relating to both procurement and accounting resulted in project implementation delays as internal processes and sub-recipient and vendor contracts were modified.

## c) If and how they were mitigated.

The barriers and constraints were not mitigated for those early awards. The department took steps to comply due to the unprecedented expectations for transparency, which pushed back the procurement process by a period of several weeks. Director-level intervention has produced more frequent procurement training.