

State of Tennessee American
Rescue Plan (ARP)
COVID-19 Nursing Facilities/Assisted
Care Living Facilities
Frequently Asked Questions
Last updated December 1, 2022

General

1. What Nursing Facilities (NFs)/Assisted Care Living Facilities (ACLFs) are eligible for Assistance under this program?

Answer

Eligibility was determined based on data from a 2020 Joint Annual Report on the NFs and ACLFs in the State of Tennessee. If your organization received an email inviting you to register for this program, your organization is eligible for this program.

2. Are recipients required to apply for funds?

Answer

No, the maximum grant award for each grantee has already been determined based on number of FTEs. Funds will be disbursed based on actual expenses incurred, documented, and submitted by each grantee, up to the maximum grant award for that grantee.

3. How much funding will each grantee receive?

Answer

It will vary depending on the number of FTEs as reported on the 2020 JAR.

4. Will my organization be able to receive an advance of funds?

Answer

There will be no advancement of funds. All funds will be issued on a reimbursement-basis once supporting documentation is provided.

5. How will Grantees receive reimbursement?

Answer

Once a grantee has fully registered in the Nursing Home Portal, the grantee will be able to submit a Request for Reimbursement. The grantee will need to complete a Claim Summary Template which itemizes their claim and submit the requisite supporting documentation. The claim and supporting documentation will be reviewed. Substantiated costs will be reimbursed to the Grantee via check. The Grantees must be registered in Edison to receive funds. Please be sure you have registered here: [FormStack](#)

6. What documentation will I need to substantiate claims related to costs incurred for staff?

Answer

In order to receive reimbursement for costs related to existing staff, please provide the following:

- Completed claim summary template form itemizing the request for reimbursement
- Completed Grant Budget Form
- Approved timesheets for each employee for each day claimed
- Redacted payroll documentation dealing with claimed employee's wages and benefits,

including pay stubs and payroll registers showing names (but not social security numbers)

- Relevant payroll policies (regular, overtime, compensatory, exempt, and/or comp time payroll policies)
- Proof of Payment for each claimed employee for each claimed pay period. Proof of payment may be:
 - Cancelled checks
 - Front and back of check with back of checking showing third party verification of processing; or
 - Front of check with corresponding bank statement showing payment from Grantee’s bank account to employee, typically through a payroll register; or
 - Bank statement(s) showing funds being disbursed from Grantee’s bank account to employee via ACH with corresponding employee listing showing disbursement of fund(s)

7. What documentation will I need to substantiate claims related to costs incurred for contractors?

Answer

In order to receive reimbursement for costs related to contracted staff, please provide the following:

- Completed claim summary template form itemizing the request for reimbursement
- Completed Grant Budget Form
- The Grantee’s contract procurement policy
- Signed and executed copy of contract with rate sheet and any contract amendments
- Procurement documentation for each claimed contract or a memo on your organization’s letterhead explaining why the contractor had to be procured without bids/quotes
- Detailed contractor invoices. The invoice charges should tie back to the contract
- Third-party proof of payment
 - *Cancelled check or bank statement with payroll register*
- Check detail/general ledger
 - *If check is covering more than one invoice*

8. What kind of “procurement documentation” is required?

Answer

Required procurement documentation for contracted costs depends on the size of the contract provided. Below are the types of required documentation:

- Contracts less than \$10,000: No procurement documentation required
- Contracts between \$10,000-\$250,000: Minimum of 3 quotes for contracted work
- Contracts over \$250,000: Full procurement documentation (solicitation, scoring, responses, etc.)

If your organization procured a contract of \$10,000 or more and used a non-competitive procurement, you will be required to submit a memorandum on your organization's letterhead explaining whether the service provider was the only source available in your area and/or whether the public exigency or emergency for the requirement would not permit a delay resulting from publicizing a competitive solicitation. See 2 CFR § 200.320(c).

9. Is there additional information that will be needed prior to reimbursement?

Answer

Grantees will need to provide a completed Claim Summary Template which itemizes their claim and to provide supporting documentation for claimed costs, as explained above.

10. What is the deadline to request reimbursement?

Answer

Eligible costs incurred during the time of March 4, 2021 through December 31, 2021 are eligible for reimbursement. A deadline for reimbursement requests will be announced at a later date.

11. How will I know if my request for reimbursement has been granted?

Answer

You will receive emails at key points in the reimbursement process, including when the request for reimbursement is ultimately substantiated or not substantiated.

1. What expenses are eligible under the Nursing Home/ACLF Assistance Program?

Answer

Only staffing costs are considered eligible expenses under this program. Tennessee Department of Health (TDH) will reimburse staffing costs associated with the COVID-19. Eligible costs include:

- Hazard pay for staff (i.e., additional pay for performing hazardous duty or work related to COVID-19)
- Overtime pay for critical staff
- Payments to a supplemental staffing agency
- Housing and travel costs for staff to the extent such is not already covered by the staffing contract
- Pay differentials for staff willing to work shifts beyond their normal schedule

2. Can any of the funds be used for administrative expenses under this program?

Answer

No, administrative expenses are not eligible under this program.

3. Are bonuses and incentives for staff an eligible cost under this program?

Answer

No. These costs are not eligible due to federal funding restrictions.

4. Can Grantees use the funds to reimburse eligible expenses incurred outside the Period of Performance?

Answer

No. Grant funds must be used to reimburse eligible costs incurred from March 4, 2021 – December 31, 2021.

5. Are regular salaries considered eligible expenses if they are used for COVID-19 patients?

Answer

No, regular salaries and regular time are not eligible, even if used for COVID-19 patients. This program allows for the reimbursement of:

- Hazard pay for staff (i.e., additional pay for performing hazardous duty or work related to COVID-19)
- Overtime pay for critical staff
- Payments to a supplemental staffing agency
- Housing and travel costs for staff to the extent such is not already covered by the staffing contract
- Pay differentials for staff willing to work shifts beyond their normal schedule

6. Are clinical contract employee expenses eligible if they were not budgeted for prior to the COVID-19 Pandemic?

Answer

Only overtime pay, hazard pay, and contract staffing costs incurred as a result of COVID-19 and related treatment of COVID-19 patients/residents are eligible under this program. Contract staffing to meet your staffing requirements for normal operations is not eligible, but contracted labor that is higher than budgeted due to COVID-19 care (actual minus budgeted) is eligible.

7. Would an increase in base pay for PRN RNs and LPNs be an eligible expense?

Answer

Yes. If the grantee can demonstrate increased reliance on PRN staff as a result of COVID-19, that cost (actual minus budgeted or baseline pay) would be eligible. Hazard pay, under an approved hazard pay policy in response to COVID-19, is an eligible expense.

8. If I received an Employee Retention Tax Credit for an employee, can I still claim that employee's overtime, hazard pay, and/or pay differentials during the eligible time period?

Answer

Yes. An Employee Retention Tax Credit your organization received for retaining an employee is not a duplication of benefits for an employee's overtime, hazard pay, and/or pay differentials.

Post-Payment

1. Is this a grant, or a loan that I will later have to pay back?

Answer

Funds from this program are provided in the form of grants. As such, recipients who properly allocate the reimbursements will not be required to pay the money back.

2. How long must I retain documents related to this grant?

Answer

Under federal rules, you must retain documentation for at least 3 years from the date of the submission of the final expenditure report or as otherwise required under 2 CFR § 200.334.