

ADVANCING EQUITABLE HARM REDUCTION OUTREACH

Release Date: November 8, 2023

Applications Due: December 8, 2023 at 11:59 PM ET

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Summary Information

Project Title: Advancing Equitable Harm Reduction Outreach (AEHRO, pronounced “arrow”)

Source of Funding: Centers for Disease Control and Prevention, NOA Award Nos.: 5NU38OT000306-03-00, 6 NU38OT000306-04-01, and 6 NU38OT000306-05-01

Funding Available: Up to \$85,000 for up to 15 awardees

Direct Questions to: ivp@naccho.org with subject line “AEHRO Question”

Key Dates and Links

Event	Dates and Link
RFP Release	November 8, 2023
Informational Webinar	November 17, 2023 at 1:00 PM ET – register here Recording available after this date by registering
Application Submission Deadline	December 8, 2023 at 11:59 PM ET via online application
Award Notification By	January 5, 2024
Contract Effective Date	February 1, 2024
Contract End Date	July 31, 2024

About NACCHO

The National Association of County and City Health Officials (NACCHO) is the voice of the nearly 3,000 local health departments (LHDs) across the country. These city, county, metropolitan, district, and tribal departments work to protect and improve the health of all people and all communities. NACCHO provides capacity-building resources that support LHD leaders in developing and implementing public health policies and practices to ensure communities have access to the vital programs and services that protect them from disease and disaster. Additionally, NACCHO engages with federal policymakers on behalf of LHDs to ensure adequate resources, appropriate public health legislation, and sensible policies are in place to address the myriad of public health challenges facing communities.

Overview

In partnership with the Centers for Disease Control and Prevention (CDC), NACCHO is pleased to announce the Advancing Equitable Harm Reduction Outreach (AEHRO) program. AEHRO (pronounced “arrow”) offers **a six-month funding opportunity to organizations sustaining or expanding harm reduction services to Black, Indigenous, and People of Color who use drugs**. Through this funding opportunity, NACCHO will provide up to \$85,000 to up to 15 organizations that currently distribute safer use supplies (this must include syringes or pipes in states where this is legal) to support their efforts to reduce drug-related health inequities at the local level.

Please note that **funds for this opportunity may not be used to purchase naloxone, syringes, or pipes**. While we recognize these are critical harm reduction tools, they are not allowable under the terms and conditions of NACCHO’s federal award. Examples of potentially allowable costs include (*but are not limited to*)

- Materials for participants such as injection and smoking supplies other than syringes and pipes, wound care kits, test strips, store gift cards and snacks for participants (requires additional approval);

- Services such as holistic wellness programs and transportation; and
- Staff time for non-clinical services.

Please see Section V, Step Four, of this Request for Proposals (RFP) for further details on budget constraints.

The project period will begin February 1st, 2024, and run through July 31st, 2024. Applications must be submitted using NACCHO's [online application portal](#) **no later than Friday, December 8th at 11:59 PM ET** and selections will be made on or around Friday, January 5th, 2024. See application Instructions (Section V) for further details.

NACCHO invites interested applicants to participate in an **optional informational webinar on Friday, November 17th at 1:00 PM ET** to review the RFP and respond to questions. Interested participants can register for the live webinar or access the recording [here](#). Please note that no new information will be shared during the webinar and applicants do not need to wait for this optional webinar to begin or submit applications. Applicants may pose individual questions to NACCHO at any point during the application process by emailing the Injury Violence and Prevention Team at ivp@naccho.org with subject line "AEHRO RFP Question."

I. Purpose and Background

The purpose of this funding opportunity is to support organizations in sustaining or expanding harm reduction services to Black, Indigenous, and People of Color who use drugs with the goal of reducing drug-related health inequities at the local level. The number of people dying from an overdose exceeded 110,000 between April 2022 and May 2023, with thousands more surviving an overdose, living with a substance use disorder, or experiencing drug-related injury or harm.¹ Between 2019 and 2020, drug overdose deaths rose 30% across all people in the United States but rose 44% among Black people and 39% among Indigenous people.² These and other health inequities are the results of long-standing racism toward Black, Indigenous, and People of Color, operationalized through discrimination, disinvestment, the "war on drugs," and other structural forces.^{3,4,5} Notably, the "war on drugs" in the United States has its roots in racism and xenophobia, designed to inequitably and negatively impact Black, Indigenous, and People of Color who use drugs through mass incarceration and its consequences, including loss of autonomy and access to resources.^{3,4,5}

Harm reduction is an evidence-based approach to addressing the rising numbers of drug-related death and injury.⁵ According to the National Harm Reduction Coalition, "harm reduction is a set of practical strategies and ideas aimed at reducing negative consequences associated with drug use."⁶ Examples of harm reduction practices include, but are not limited to, syringe services programs (SSPs); the distribution of smoking and other substance use equipment; naloxone distribution, training, and education; drug checking services; and overdose prevention sites.⁷ A complete harm reduction approach requires not only practical strategies, but respect for the dignity, autonomy, and rights of people who use drugs.^{6,8} Such a harm reduction approach has played a critical role in the prevention of HIV and viral hepatitis for more than 30 years.^{7,9} Over that time, harm reduction has been shown to prevent drug-related death, injury, disease, overdose, and substance use while promoting the health and well-being of people who use drugs and increasing access to a range of healthcare and supportive services.⁵ For example, SSPs reduce HIV and HCV incidence by 50%, and people who inject drugs who regularly use an SSP are five times as likely to access substance use treatment and three times as likely to reduce or stop

injection drug use than PWID who have never used an SSP.^{7,10,11} Evidence also suggests that safer smoking services decrease the health risks of smoking drugs and present an opportunity for providing broader harm reduction services to new populations given the historical focus on injection drug use.¹²

Given the drug-related health inequities for Black, Indigenous, and People of Color driven by the “war on drugs,” including incarceration and its attendant stripping of rights and autonomy, and harm reduction’s ability not only to reduce drug-related health harms, but also to affirm the dignity and autonomy of people who use drugs, NACCHO releases this funding opportunity for organizations experienced in harm reduction to expand or sustain services to Black, Indigenous, and People of Color.

II. Eligibility and Contract Terms

Applicants must meet **each** of the following requirements to be eligible for this funding opportunity.

- Be a county, city, state, or tribal health department; healthcare facility; or community-based organization that currently distributes safer use supplies. These supplies must include syringes and/or pipes. An exception may be made for organizations operating in states where syringe and pipe distribution are illegal.
 - Note that **fiscal agents are allowed**. For example, an LHD or other entity that does not distribute safer use supplies may apply for the funding on behalf of and serve as a fiscal agent for an organization that does distribute syringes and/or pipes.
- Be able to agree to NACCHO’s [standard contract language](#).
 - Please note this is a deliverables-based contract. To receive payment, applicants will not be required to submit receipts for their costs, but will be paid upon satisfactory completion of the contract deliverables (see Section III for further details).
- Have an active registration with [SAM.gov](#) that will remain active through the duration of the contracting and project period (December 2023 – July 31, 2024).
 - If you do not have an active SAM.gov registration or if your registration will expire before December 31, 2023, it is recommended that you start the registration/renewal immediately.

III. Project Goals, Activities, and Requirements

The purpose of this funding opportunity is to support organizations in sustaining or expanding harm reduction services to Black, Indigenous, and People of Color who use drugs with the goal of reducing drug-related health inequities at the local level. Applicants should be able to demonstrate they serve a specific population of Black, Indigenous, and People of Color who use drugs with jurisdiction-level and/or program-level data and qualitatively describe how they meaningfully include and engage this population in their work (see Section V, Step Four for more details). The proposal should identify a population of focus more specific than “Black, Indigenous, and People of Color” based on community need (e.g., Indigenous people who use drugs). Please note that the funds for this project do not need to be used only for services for the population(s) of focus and may be used for harm reduction program-wide operational costs, as long as the organization designs and implements a workplan to expand or sustain access to services for the population(s) of focus.

Funds may be used for a new initiative or to continue existing work reaching the population(s) of focus. Examples of eligible activities *include, but are not limited to*:

- Distributing harm reduction supplies to the population(s) of focus including at hours and in locations the population(s) of focus identify as important and including items or services requested by the populations(s) of focus
 - Distribution of safer smoking and sniff kits (note this funding cannot be used for purchase of pipes, but may fund staff time to distribute these supplies and may fund purchase of other supplies included in safer smoking and sniff kits)
 - Paid secondary distribution of harm reduction supplies by program participants from the population(s) of focus
 - Installing boxes or vending machines for 24/7 access to harm reduction supplies
- Providing access to education, trainings, or materials for and with the population(s) of focus on topics such as harm reduction, legal rights, wound care, skill-building, etc.
- Hosting community harm reduction supplies distribution events in partnership with the population(s) of focus
- Providing services to facilitate access to services such as childcare, transportation, non-clinical support, and advocacy during medical visits
- Providing holistic harm reduction support services delivered by, tailored to, and/or identified as a need by the population(s) of focus (e.g., yoga, acupuncture, case management, art, peer support groups, etc.)
- Paying participants from the population(s) of focus to create art for a harm reduction drop-in space, posters to advertise events, or other relevant project activities or spaces
- Developing or sustaining an appropriately compensated community ambassadors, advisory board, or community consultants, or similar program to include the population(s) of focus in organizational decisions and governance
 - While appropriate compensation may vary based on participant activities and organizational constraints, consider the [MIT Living Wage Calculator](#) when developing rates for community consultants
- Hiring or sustaining staff or community-based consultants (e.g., a paid advisory board) from the population(s) of focus
- Funding professional development for staff related to harm reduction within Black, Indigenous, and People of Color (e.g., conferences and paid trainings)

Please see Section V, Step Three for detailed information on how proposed activities and applications will be evaluated.

This is a deliverables-based contract. To receive payment, **applicants will not submit receipts for their costs, but will be paid upon satisfactory completion of the contract deliverables.** The required deliverables will be finalized as part of the contracting process, but will likely include:

- A project workplan
- Participation in six (once monthly) all-cohort check-in calls (~1.5 hours)
- Three project update reports (every two months) with bullet points summarizing your work to date
- One public-facing, site-specific deliverable describing key successes, challenges, and suggestions for other harm reduction organizations seeking to serve and meaningfully engage with Black, Indigenous, and People of Color who use drugs. This may take the form of a blog, webinar

presentation, 2–3-page summary report, or other deliverable mutually agreed upon by individual awardees and NACCHO. NACCHO will provide opportunities for publishing blogs and speaking on webinars, though applicants may propose other public facing forums.

- Completion of NACCHO-administered end of project survey or interview evaluating the impact of the funding opportunity

IV. Project Support

In addition to funding, NACCHO will support the cohort of awarded applications in the following ways:

- Assist with budgets, contracts, and invoicing
- Provide templates for completing deliverables (e.g., workplan, project updates reports) as well as feedback on drafts as requested or needed
- Facilitate connection with and peer technical assistance from the cohort of other awardees (up to 15) through a monthly cohort call
- Identify opportunities for additional, optional, technical assistance to support your work

V. Application Instructions

STEP ONE – PREWORK

Before beginning your application, we recommend the following pre-work:

- Read this RFP in its entirety.
- Submit NACCHO’s standard [contract language](#) to your legal team to ensure you will be able to agree to it.
 - Please note that submission of a proposal is a statement of acceptance of NACCHO’s standard form contract. If any items cannot be accepted, these issues should be noted in track changes/comments on the standard contract language as an attachment to your proposal.
- Ensure you will have an active [SAM.gov](#) registration for the duration of the contracting and project period (December 2023 – July 2024). If you do not have an active SAM.gov registration or if your registration will expire before December 31, 2023, it is recommended that you start the registration/renewal immediately.
- Identify partners and request letters of support if needed.
- Create an account to access the application [online submission portal](#).

STEP TWO – GATHER CONTRACT DOCUMENTS

Complete all documents required for a complete contracting package:

- [Vendor Information Form](#)
- [Certification of Non-Debarment](#)
- [W-9](#)
- [FFATA form](#) (if you are not able to complete this by the application deadline, you may submit it one week after you have been selected).
- Proof of active registration with [SAM.gov](#).
- [Budget](#), [budget narrative](#), and supporting documentation – see Step Four.

- If applicable, documentation of indirect costs (if higher than 10%) in the budget – see Step Five.

STEP THREE – DEVELOP APPLICATION NARRATIVE

See the next page for the application narrative and information about how each section will be evaluated. The [online application](#) includes additional short answer responses for basic applicant information such as organization name, address, and primary point of contact.

APPLICATION PROMPT	RESPONSE TYPE	NOTES	SCORING INFORMATION (SEE SECTION VI FOR MORE)
Background – 0%			
Does your organization currently distribute syringes?	YES/NO	These sections should be completed about the primary organization that will be implementing the project (not the fiscal agent, if different).	This section is unscored.
Does your organization currently distribute pipes?	YES/NO		
If your organization does not distribute syringes or pipes, please provide justification for your eligibility for this funding opportunity.	25 – 150 words	Syringe or pipe distribution is required to be eligible for this opportunity. An exception may be made for organizations operating in states where this is illegal.	
Provide a proposal abstract (short summary of application narrative). Include a brief overview of your community/location, the harm reduction (HR) services your program currently offers, your population of focus for this project, and no more than three main objectives.	100 – 250 words		
Organization and Services Description – 28%			
Summarize the organization’s mission (two to three sentences).	50 – 150 words	These sections should be completed about the primary organization that will be implementing the project (not the fiscal agent, if different).	Points are awarded for centering the Harm Reduction Principles .
Characterize the structure (e.g., standalone HR program; HR supplies distributed within broader program/clinic) and briefly summarize the history of the organization and HR program.	100 – 200 words		Points are awarded for offering low-barrier and comprehensive HR services.
Describe the HR services your program currently offers, including supplies distribution and other harm reduction services, modality (e.g., fixed site, mobile, outreach), hours of your HR program, and eligibility requirements to receive services.	150– 300 words		Points are awarded for serving communities including Black, Indigenous, and People of Color who use drugs.
Describe the demographics and/or social determinants of health of your community and participants using jurisdiction and/or program-level data.	100 – 200 words		Points are awarded for meaningful inclusion of program participants and the population(s) of focus in
Describe the work you have done in the past to meaningfully serve and engage Black, Indigenous, or People of Color and how you include participants in program direction and	200 –300		

governance, including the development of this project proposal.			program direction and governance.
If required, describe the applicant/fiscal agent's goals for the project; why a fiscal agent is needed and why it proposes to subcontract the work; and the nature of the contract between the fiscal agent and subcontractor, including key contractual provisions required of the subcontractor separate from the NACCHO contractual requirements.	100 – 300 words	Required if the applicant will be subcontracting with another organization to complete the workplan. This section should be completed about the applicant/fiscal agent.	Points are awarded for clear articulation of the need for a fiscal agent for this project (e.g., why the subcontractor did not apply directly), demonstrated grounding in the Harm Reduction Principles , and when the subcontract does not impose excessively burdensome requirements on the subcontractor.
Organizational and Community Need – 28%			
State your population of focus.	5 – 50 words	This is a short answer response – there is space for further description in the following application prompt. This opportunity is limited to organizations expanding or sustaining services to Black, Indigenous, and People of Color, but the proposal should name a more specific population than “Black, Indigenous, and People of Color” based on community need (e.g., Indigenous people who use drugs).	Points are awarded for clear demonstration of the needs of the organization, community, and population(s) of focus that this funding opportunity can help address.
Describe the population(s) of focus for the proposed project; how these population(s) is/are inequitably impacted and/or historically underserved within your community; the need for additional, modified, or continued services for and with that population; and how this funding opportunity can help meet some of these needs.	200 – 300 words	Please note the funding opportunity is not expected to solve all challenges – include as comprehensive an overview of the need as possible and identify specific areas the funding opportunity can support. Description of need could include quantitative or qualitative public health or program data and anecdotal information related to drug use (e.g., which drugs are used, how they're used), health outcomes (e.g., overdose, HIV, hepatitis C, wounds),	

		service availability (gaps in community resources or services accessible to the population(s) of focus), etc.	
Describe barriers or challenges the organization/program faces to serving the population(s) of focus and how this funding opportunity could help address some of these challenges.	150 – 250 words	Please note the funding opportunity is not expected to solve all challenges. Please include as comprehensive an overview of the need as possible and identify specific areas the funding opportunity can support. Challenges could include geographic isolation, funding restrictions, lack of community support and services, lack of staff or partner organizations from the population(s) of focus, etc.	
Proposed Project – 28%			
Complete and attach a workplan using this template	N/A – use template	Please see Section III for example activities. Remember these are examples, not an exhaustive list of options.	Points are awarded for proposals that are feasible within the project period, directly address the needs and/or barriers described in the Organizational and Community Needs sections, are tailored to the population(s) of focus, are evidence-based or evidence-informed, and that include meaningful involvement of participants and the population(s) of focus.
Capacity – 16%			
Provide a staffing plan for this project that lists the position; qualifications; and percent time dedicated to the project for each critical function of the project, including both activities proposed in the workplan and contracting, invoicing, and deliverables management.	200 – 700 words	Staff time estimates do not need to match those in the budget proposal if another funding source covers this time. You may use bullet points.	Points are awarded for demonstrating an ability to complete the proposed workplan, deliverables and administrative processes; employing qualified staff (especially people with lived
Describe how you will sustain efforts after the project period.	100 – 200 words	This could include funding, relationship and trust building with the	

		population(s) of focus, and other sustainability considerations.	and living experience of drug use and from the population(s) of focus); planning to sustain the work after the project period; and demonstrating strong support from project partners.
If required, provide a letter of support from the partner organization that clearly outlines their role on, commitment to, and staffing plan for the project.	N/A	A letter of support is required if the workplan relies on an entity other than the applicant. For example, if an LHD proposes to subcontract with a CBO that offers harm reductions services, the application must include a letter of support from the harm reduction organization; if a CBO plans to partner with another CBO to develop education materials, the application should include a letter of support from the partnering CBO.	
Other – 0%			
(Optional) Is there anything else you would like reviewers to know?	Max 150 words		This section is unscored.

STEP FOUR – DEVELOP BUDGET

Please note that the budget will not be included in the scoring criteria but is required for complete application submissions. NACCHO will work with accepted applicants to ensure compliance with the terms of NACCHO’s award from CDC. The purpose of the budget submission is to demonstrate that the applicant has considered appropriate funding needed to accomplish the proposed work and to expedite the contract process in the case of selection. The budget should span the six months from February 1, 2024 to July 31, 2024 (please note the contract will be retroactively effective, but may not be fully executed by, the start of the period of performance on February 1, 2024).

- Applicants must provide a [line-item budget](#) and [budget narrative](#). **Please review the detailed instructions in the linked templates before developing your budget proposal.**
- Additional documentation may be required:
 - [Indirect rates](#): If you have budgeted for indirect costs using a rate that is higher than 10%, you must provide documentation/proof of your organization’s approved indirect cost rate or calculation. Acceptable documentation includes:
 - An approval letter issued by a relevant federal or state agency (e.g., HHS) and signed by the agency and your organization that authorizes your organization’s indirect cost rate
 - An excerpt from a financial audit report that outlines your organization’s indirect cost rate calculation
 - A letter (on your organization’s letterhead) signed by a financial official that lists the indirect cost rate used by the organization
 - A copy of your accounting procedures or policy that outlines how you calculate your indirect costs
 - A cost allocation plan, signed by a financial official, that shows a breakdown of indirect costs and their allocation to the project
 - [Incentives/gift cards](#): If you wish to include incentives in your budget, provide a justification for how they support the project and specify the number, amount per incentive, and type (e.g., gift card to a specific store). Cash-equivalents (e.g., Visa or Amex) require additional justification and approval that may delay contract execution compared to store-based gift cards. You must also complete the [incentive approval form](#) and attach it to this budget narrative.
 - [Food](#) - If you wish to include food in your budget, please include a cost breakdown (number of participants x cost per snack/meal) in your budget narrative. You must also complete the [food approval form](#) and attach it to this budget narrative. In some cases, snacks for outreach and hot meals for participants may be allowable.
- Awardees must comply with all federal regulations under 45 CFR 75 and 2 CFR 200. Key unallowable costs are listed in Appendix A.
- The below table provides **non-exhaustive** examples of unallowable costs and **potentially** allowable costs relevant to this RFP. Please note this document does not guarantee the approval of an awardee's budget or any specific budget line items. All budget approvals are made on a case-by-case basis and are contingent on review and approval of detailed budget and budget narratives. Please see the budget and budget narrative templates linked in the RFP for instructions for drafting these documents. This table was developed to help applicants create a

draft budget of potentially allowable costs. NACCHO will work with selected applicants to make budget revisions as needed to ensure compliance with the terms of NACCHO's award from CDC.

Cost Type	Potentially Allowable Cost Examples	Unallowable Costs
Incentives (requires additional approval form)	<ul style="list-style-type: none"> • Gift cards as compensation or incentive for participating in data collection, feedback, media campaigns, etc • Gift cards as incentives for participating in grant-related services (e.g., harm reduction services) 	<ul style="list-style-type: none"> • Contingency management
Harm reduction supplies	<ul style="list-style-type: none"> • Test strips (fentanyl, xylazine, etc) • Filters • Straws • Wound care supplies • Safe injection kit (cookers, cottons, ties, alcohol wipes, water - no syringes) • Smoke kits (rubber bands, steel wool, alcohol wipes, hand wipes, gum - no pipes) • Hygiene kits • Safe sex kits • Sharps container • Pregnancy tests • Plan B contraceptive 	<ul style="list-style-type: none"> • Syringes • Pipes • Naloxone and other overdose reversal medications • Methadone, buprenorphine, and other prescription medications
Services	<ul style="list-style-type: none"> • Peer support • Case management • Yoga and wellness services as an evidence-based support for clients • Childcare during service delivery • Transportation for participants (e.g., bus tokens and ride share services) • Staff time for outreach, coordination, administrative work, education, etc. 	<ul style="list-style-type: none"> • Clinical services
Naloxone distribution	<ul style="list-style-type: none"> • Naloxboxes/other naloxone distribution boxes (if under \$5k per unit) • Vending machines (if under \$5k per unit) • Costs associated with naloxone distribution devices (e.g., insurance, installation, service plan, shipping, etc) 	<ul style="list-style-type: none"> • Vending machines/other distribution mechanisms over \$5k per unit
Food (requires additional approval form)	<ul style="list-style-type: none"> • Food for harm reduction outreach • Food for grant-related meetings and events 	<ul style="list-style-type: none"> • Food for non-grant-related purposes
Other	<ul style="list-style-type: none"> • Promotional items for participants (e.g., T-shirts and mugs) • Commemorative artwork related to workplan • Toys or games for programs or projects serving children • Mileage and other travel reimbursement for project-related professional development or activities • Laptops, cell phones from NDAA compliant manufacturers (see Appendix B) 	<ul style="list-style-type: none"> • Equipment with a per unit cost of over \$5k and a usable life of more than one year

STEP FIVE – SUBMIT ONLINE APPLICATION FORM

Complete the [online submission form](#) by Friday, December 8th at 11:59 PM ET, including uploading all required documents. Applicants will need to make a free MyNACCHO account to access the application. Applicants will be able to save responses in the online form and return to them as needed during the submission process, as long as it is accessed through the same device and browser and the cache has not been cleared.

VI. Award Selection and Notification Process

The Organization and Services Description, Organizational and Community Need, Proposed Project, and Capacity sections of eligible applications will be scored on a scale of zero to ten and weighted according to scoring information provided in the Section V, Step Three table.

Applicants will be notified of their selection status by e-mail to the project point of contact listed on the online application form **by January 5, 2024**. Selected applicants will be required to confirm participation and agreement with the contract scope of work after receiving a notification. The designated point of contact for selection must be available to receive and respond to the notification and any necessary budget revisions within five business days.

Citations

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3. Cohen, A., Vakharia, S. P., Netherland, J., & Frederique, K. (2022). How the war on drugs impacts social determinants of health beyond the criminal legal system. *Annals of Medicine*, 54(1), 2024–2038. <https://doi.org/10.1080/07853890.2022.2100926>
4. Provine DM. Race and Inequality in the War on Drugs. *Annu Rev Law Soc Sci*. 2011;7(1):41-60. doi:[10.1146/annurev-lawsocsci-102510-105445](https://doi.org/10.1146/annurev-lawsocsci-102510-105445)
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6. *Harm Reduction*. Substance Abuse and Mental Health Services Administration (SAMHSA). (2023, April 24). <https://www.samhsa.gov/find-help/harm-reduction>
7. *Principles of Harm Reduction*. National Harm Reduction Coalition. (2022, December 20). <https://harmreduction.org/about-us/principles-of-harm-reduction/>
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10. Wodak, A., & McLeod, L. (2008). The role of harm reduction in controlling HIV among injecting drug users. *AIDS*, 22(Suppl 2). <https://doi.org/10.1097/01.aids.0000327439.20914.33>
11. *Summary of information on the safety and effectiveness of Syringe Services Programs (SSPs)*. Centers for Disease Control and Prevention. (2023, January 11). <https://www.cdc.gov/ssp/syringe-services-programs-summary.html>
12. Tapper, A., Ahern, C., Graveline-Long, Z. *et al*. The utilization and delivery of safer smoking practices and services: a narrative synthesis of the literature. *Harm Reduct J* 20, 160 (2023). <https://doi.org/10.1186/s12954-023-00875-x>

Appendix A – Unallowable Costs

The following are unallowable costs under 2 CFR 200. Please note this is not an exhaustive list, please see Standard unallowable costs are identified in 2 CFR 200, Subpart E—Cost Principles.

- Alcoholic Beverages; 2 CFR 200.423; Costs of alcoholic beverages are unallowable.
- Bad Debts; 2 CFR 200.426; Bad debts (debts which have been determined to be uncollectable), including losses (whether actual or estimated) arising from uncollectable accounts and other claims, are unallowable. Related collection costs, and related legal costs, arising from such debts after they have been determined to be uncollectable are also unallowable. See also [§ 200.428](#).
- Contributions and donations; 2 CFR 200.434; Costs of contributions and donations, including cash, property, and services, from the non-Federal entity to other entities, are unallowable.
- Entertainment Costs; 2 CFR 200.438; Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.
- Equipment and other capital expenditures; 2 CFR 200.439
- Fines and Penalties; 2 CFR 200.441; Costs resulting from non-Federal entity violations of, alleged violations of, or failure to comply with, Federal, state, tribal, local or foreign laws and regulations are unallowable, except when incurred as a result of compliance with specific provisions of the Federal award, or with prior written approval of the Federal awarding agency. See also [§ 200.435](#).
- Fund raising and investment management costs; 2 CFR 200.442
- Goods or services for personal use; 2 CFR 200.445; Costs of goods or services for personal use of the non-Federal entity's employees are unallowable regardless of whether the cost is reported as taxable income to the employees.
- Independent Research & Development, 45 CFR 75.476
- Interest; 2 CFR 200.449; Costs incurred for interest on borrowed capital, temporary use of endowment funds, or the use of the non-Federal entity's own funds, however represented, are unallowable. Financing costs (including interest) to acquire, construct, or replace capital assets are allowable, subject to the conditions in this section.
- Lobbying; 2 CFR 200.450; The cost of certain influencing activities associated with obtaining grants, contracts, or cooperative agreements, or loans is an unallowable cost.
- Prohibition on certain telecommunications and video surveillance services or equipment (Pub. L. 115-232, section 889): Recipients and subrecipients are prohibited from obligating or expending grant funds (to include direct and indirect expenditures as well as cost share and program funds) to:
 - Procure or obtain, Extend or renew a contract to procure or obtain; or
 - Enter into contract (or extend or renew contract) to procure or obtain equipment, services, or systems that use covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system. As described in Pub. L. 115-232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).
- For the purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou

Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities).

- Telecommunications or video surveillance services provided by such entities or using such equipment. iii. Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of the National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise, connected to the government of a covered foreign country. President's Emergency Plan for AIDS Relief (PEPFAR) funding is exempt from the prohibition under Pub. L. 115-232, section 889 until September 30, 2022. During the exemption period, PEPFAR recipients are expected to work toward implementation of the requirements

The following costs are not listed in the CFR, but are unallowable under this funding award:

- Naloxone
- Syringes and pipes
- Clinical services

Appendix B – NDAA Compliance

Per section 899(b) of the National Defense Authorization Act (NDAA), there is currently a [ban](#) on the use of federal funding—which is the source of NACCHO’s funding for this project—for the purchase of certain telecommunications and video surveillance services or equipment from Chinese companies. This includes equipment such as computers, laptops, tablets, cellphones (including cellphone plans), and other products but does not include hotspots or Zoom subscriptions.

For reference, a list of entities and companies that are not subject to this ban (i.e., common US-based telecoms companies) is included below:

Computers, smart phones, tablets

- Apple
- Dell
- Google
- HP
- Lenovo
- Microsoft
- Motorola Mobility / Motorola Solutions
- Samsung
- Toshiba

Internet and cell phone providers

- AT&T
- Comcast
- T-Mobile/Sprint
- Verizon

Software

- Adobe
- Apricot360
- Canva
- McAfee
- Microsoft
- Quickbooks
- Tableau
- Windows
- Zoom