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Standardized RFR submission review and approval procedure

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This procedure was written to create a standardized process for handling Requests for Reimbursement (RFRs) within the Bureau of Behavioral Health Wellness and Prevention (BBHWP). This document is meant to be shared with Bureau staff and subrecipients and was based off the DHHS Grant instructions and Requirements (GIR). All fonts in blue reflect Bureau-specific language while black fonts reflect language from the GIR.

Information within this document is subject to change. Please ensure you're using the most updated version with the most recent date.

Upon subaward execution the following items must be sent to each subrecipient:

- 1) Executed copy of subaward
- 2) Copy of DHHS GIR (current updated version)
- 3) Copy of Bureau RFR procedure
- 4) Request for Reimbursement (RFR) workbook
- 5) Monthly Reporting Template
- 6) Time and Effort policy and template (if needed)
- 7) Smartsheet submission policy and help guides
 - a) How to upload and see submitted RFRs
 - b) SmartSheets Account Creation Guide for Subawardees

RFRs may not be paid unless quarterly reports are up to date.

- Delays in payment of RFRs for this reason are at the discretion of the Bureau with the Bureau Chief's permission.
- If quarterly reports are not submitted on time, it is the Bureau's responsibility to proactively communicate with the subrecipient regarding this requirement.

GIR -25-9 Requests for Reimbursement (RFR) Instructions

Definitions:

Requests for Reimbursement (RFR): Formal submission by subrecipient requesting payment for eligible expenses that have already been incurred and paid, in accordance with the terms and conditions of the grant or service agreement and applicable funding requirements.

Reimbursement Submission form: All RFRs must be submitted via the SmartSheets dynamic dashboard form. This form can be found on the Bureau's website located here: [Request for Reimbursement Submission Form](#).

Subrecipient: Partner of the BBHWP who is working alongside the Bureau to manage part or all of the respective program.

RFR Workbook: Pre-filled, formatted, multi-tabbed Excel workbook the Bureau's provides subrecipient to fill out to and submit to seek reimbursement for the previous month's expenditures.

- 1) The information provided on this report must reconcile with the Year-to-Date and Transaction List/Source Documentation Reports. The worksheet contains the same information that is within the subaward. All documents must reconcile to each other. If they do not reconcile, the RFR will be rejected for the subrecipient to determine the variance. This workbook is for subrecipient use and is their responsibility to verify formulas and information being submitted. Each RFR must be signed by the organization's authorized representative.
 - a. Upon execution of the subaward, the workbook should be provided to the subrecipient
 - i. The workbook should not be locked, if it is locked, please reach out to Bureau contact to have it unlocked.
 - ii. The appropriate tabs within the RFR workbook will be prepared by the Bureau fiscal staff.
 - iii. The RFR workbook should be maintained by the subrecipient and replaced with updated versions as appropriate.
- 2) All Requests for Reimbursement must be submitted using the documents contained in the Request for Reimbursement excel workbook format by the 15th of the month for the previous month, unless otherwise specified in the Notice of Subgrant Award (NOSA).
 - a. RFRs must be submitted each month of the subaward period.
 - i. If the subaward is 12 months, there should be 12 RFRs submitted.
 - ii. A 13th RFR is allowed as final RFR at the end of the state fiscal year (SFY) but must be labeled "June Final" and submitted by the deadline to prevent the stale claim.
 - iii. Any RFRs submitted after the end of state fiscal year deadline will be processed as stale claim and could take 6 months or more for reimbursement to be paid.
 - iv. June RFRs are always due on July 7th or the following Monday if July 7th falls on the weekend.
 - v. For subawards that expire in the same month as the federal funding award, Requests for Reimbursement (RFRs) must be submitted by the 15th of the month following the award's expiration.
 - b. RFRs must be submitted via the SmartSheets portal using the [Reimbursement Submission Form](#).
 - c. If no funds were expended in a month, a zero-dollar RFR must be submitted to the Bureau by the deadline.
- 3) Request for Reimbursement – PDF Cover Page with Signature
 - a. Approved Budget - Approved Budget amounts must be populated based on the proposal and scope of work for the performance period of the subgrant. Any change to this amount must be approved in writing by the DHHS and requires a budget modification request form (BMR) (10% or less of total award) or an amendment (above 10% of the total award). The approved budget categories cannot be altered and are compliant with federal and state budgeting.
 - i. All amounts in the RFR workbook must be based on the executed subaward.
 - ii. A budget modification of less than 10% if the total award can be done via email with your Bureau program/fiscal contact. *Expenditures must not occur prior to BMR approval*

1. A budget modification request (BMR) form must be completed regardless of amount.
 2. Emails indicating approved budget modifications should be saved in program files
 - iii. Once a BMR is approved, the Bureau fiscal staff will update the RFR workbook and resend it to the subrecipients.
 1. This new workbook must be used from that date forward for all future RFRs.
 - iv. If the subrecipients wishes/needs to redirect funds to a category/line item that does not currently have any funds approved, a subaward amendment is required regardless of the amount.
 1. This is due to a larger, more comprehensive change to the subaward.
 2. Example: If there is not a line item approved for Operating but the subrecipient needs to redirect 3% of the budget from Personnel to Operating an amendment is required.
 - v. *Any change in budget line for Indirect requires an amendment.*
- b. Total Prior Requests - List the total expenditures for all previous reimbursement periods in this column, for each category, by entering the numbers found on Lines 1- 8, Column D on the previous Reimbursement/Advance form. If this is the first request for the contract period, the amount in this column equals zero. This amount should reconcile to the total of the amounts on the year-to-date report, sans the current month request.
 - i. [Column B should equal Column D from the previous month's RFR.](#)
 - c. Current Request: The current expenditures requested for the month for reimbursement in this column, for each category. Only current expenditures should be included as back up. The expenditures should be for the current month identified on the form. There should be only one PDF document with all the expenditures attached, in order, and documented as to what category they belong as part of the attachment.
 - i. [Column C should match the year-to-date report, and the transaction log.](#)
 - d. Year to Date Total: Adds Column B and Column C for each category.
 - i. [Column D on Reimbursement cover page](#)
 - e. Budget Balance: Subtracts Column D from Column A for each category.
 - i. [Column E on Reimbursement cover page](#)
 - f. Percent Expended: Divides Column D by Column A for each category and total. Monitor this column; it will help to determine if/when an amendment is necessary. Amendments MUST be completed (including all approving signatures) no later than 30 days prior to the end of the subgrant period.
 - i. [Column F on Reimbursement cover page](#)
 - ii. The Amount determined in Column E cannot exceed 100% for a single line item or category
 1. If percentage is more than 100% a BMR or amendment is needed (Refer to 3A).
 2. BMRs cannot be submitted less than 30 days prior to ending of subaward period without prior approval or extenuating circumstances
 - iii. [Bureau of Behavioral Health Wellness and Prevention does NOT allow advanced payments.](#)
- 4) Year-to-Date Report - The information to be completed in this report must reconcile with the Request for Reimbursement (RFR) cover sheet. Starting with Section I, enter the information from the approved budget into this worksheet. Within the personnel category, please use one line per employee. For example, if you have five (5) Counselors, do not total them together. Use one line for each staff member, providing their last name, position title, and the amount for which you are

budgeted annually. Expenditures in categories that are broken into sub-categories in the subaward document must be listed individually. In Section II, for each month, enter the total for the sub-category in each line. These dollar amounts must reconcile with the individual expenses listed on the Transaction List/Source Documentation. (2nd tab in RFR workbook)

- a. Year-to-Date report must be in PDF format and included in the back-up documentation behind the signed cover page.
 - i. If this comes in Excel, Bureau staff should provide technical assistance to the subrecipient about monthly RFR submissions correctly.
- b. The Section 1 Budget must match the executed subaward and the RFR cover page.
- c. Any staffing changes should be included in the Year-to-Date Report line items by adding a line showing where one staff person leaves and the next incumbent begins
 - i. This can be done for other budget/section line items, as well, such as travel, contractual, etc.

- 5) Transaction List and Source Documentation - To be reimbursed for allowable expenses, the subrecipient must list each expenditure being requested in the appropriate category on the Transaction List monthly. Expenditures that are cost allocated to other funding streams must also include the funding allocation in columns to the right of the Total Cost. Upon submission of this document, the requester certifies that all source documentation is being maintained appropriately as required by [2 CFR 200.302](#). The source documentation must be specific to provide the documentation as required by 2 CFR 200.302. Subrecipients are not permitted to request reimbursement of expenditures on federal or state awards for any individual or contractor that has been debarred or suspended by a federal agency. To ensure no funds are paid to individuals or organizations that are on the Suspended and Debarred list, the subrecipient is required to search the Exclusions Database, Office of Inspector General, US Department of Health and Human Service for all contractors and employees, print the page that returns from the search, and maintain copy with grant file and/or contract for audit purposes. Subrecipients will be responsible to refund any monies paid to any individual or contractor who is included in the Exclusion Database. For access to the database: <https://exclusions.oig.hhs.gov/>.

Source Documentation to be Maintained by Subrecipient: (3rd tab in RFR workbook)

- a. **Personnel:** Includes activity-based timesheets and/or the actual pay stubs that show all the deductions and hours worked by the employee. If the employee is not a 100% funded position, the notations must identify what other funds are paying the additional hours. Documentation must identify employer paid expenses. The Department reserves the right to request proof of payment of employer paid expenses.
 - i. Bureau of Behavioral Health Wellness and Prevention (BBHWP) requires documentation for all time and effort allocated to our subgrants where personnel is a funded category. Personnel expenses, including salaries, wages, and benefits, charged to a federal award are required to be accurate and supported by source documentation
 1. Bureau staff must ensure that all subrecipients with personnel funded are working with the executed subaward scope of work and applying the correct amount of time and effort to the appropriate funding source.
 - a. Subrecipients must ensure that all personnel that are paid with funds awarded from BBHWP must submit time and effort tracking documents
 - i. Approved template for Time and effort tracking or similar tracking documents with prior approval from Bureau program contact
 - ii. Time and effort tracking documents
 1. Time worked per project/subaward,
 2. Time off
 3. Provides short narrative justification of tasks/activities

- b. Time and effort tracking documentation are to be submitted by the subrecipient with monthly RFRs
 - i. RFRs will be rejected if time and effort tracking sheets are missing from personnel
 - ii. Time and effort tracking documentation should be retained and maintained following subrecipients policies and procedures.
 - c. Bureau (BBHWP) staff should review all time and effort tracking or similar for the following:
 - i. Review all time and effort tracking documents to ensure the correct amount of time (percentage etc.) is applied to the funding source appropriately
 - ii. Total time worked does not exceed 1 FTE or 100% of the staff working time
 - iii. Review justifications for each member of staff to ensure that activities are appropriate and align with the executed subaward scope of work
 - iv. Ensure that supervisor signatures are provided on all pay stubs and/or time and effort tracking sheets (*confirm supervisors through org charts on site monitoring*)
 - v. If an RFR is submitted without time and effort tracking documents for staff working on grant activities the RFR must be rejected
- b. Travel/Training: Documentation includes mileage logs, invoices, training description, registration, agendas, receipts, and State Travel Reimbursement Form, or equivalent. In many instances travel and training expenditures require prior approval – see subaward and/or Program Manager for specifics.
- i. The RFR workbook has tab within that needs to be PDF for travel claims. Only this travel claim will be accepted with monthly RFRs
 - ii. Please see section 7 below for Travel Claims for additional information
- c. Operating: Documentation includes all procurement material, purchase order, invoices, receipts, etc. For expenses paid through a revolving credit account, the Department reserves the right to request proof of payment to that account.
- i. Receipts must show proof of operating expenses
 - ii. There must be cost allocation, based on executed subaward reflected
 - iii. If subrecipient is cost allocating expenses, this must be documented on the budget, and RFR very clearly.
- d. Equipment: Documentation includes all procurement material, inventory and disposition, purchase order, invoices, receipts, etc.
- i. All computers purchased with funds must be assigned to a staff person funded with the same award. When a purchase is made the staff person that is assigned the computer must be indicated on the computer receipt.
 - ii. All costs must be appropriate. Reimbursement of equipment over \$4,999.99 and all computer purchases must include three quotes from appropriate vendors.
 - iii. RFRs for equipment will not be reimbursed at a higher rate than what is budgeted in the executed subaward.
 - 1. If a higher rate is unavoidable, a proper justification must be included with the RFR.
 - 2. Items that should be reimbursed as equipment:
 - a. Computers
 - b. Laptops
 - c. File servers
 - d. Telephone systems

- e. Other computer-related items are deemed equipment
- e. Contractual: Documentation includes all procurement material, licensing, insurance requirements, invoices, etc.
 - i. Proof of payment f invoices must be included with RFR.
 - ii. Brief description of activities provided must be included with invoice.
 - iii. Contractual line items in the RFR must be indicated in the executed subaward budget.
- f. Other: Documentation includes all procurement material, purchase order, invoices, receipts, etc.
 - i. Proof of funds spent and payment for other expenses must be included with RFR.
 - ii. Subrecipients that have an executed subaward for Fee-for-Service must comply with the Divisions Utilization Management policy and the following billing and eligibility rules for claims processing.
 - iii. Fee-for-Service requires spreadsheets with back-up documentation with detailed encounters data. Payment is only allowed for uninsured and uncovered benefits.
 - 1. For substance use services:
 - a. The service must be delivered at a division certified facility.
 - b. The certifications must cover the services levels under which the qualified service was delivered.
 - c. The rate of reimbursement will be based on the Division approved rates (available upon request)
 - 2. For all Fee-for-service:
 - a. If an established rate study isn't in place within the Division, Nevada Medicaid rates must be utilized for fee-for-service reimbursement.
 - b. 2. The service must be provided by an appropriately licensed/certified staff member.
 - c. 3. The service delivered must be a division-qualified service which is NOT reimbursable by Medicaid or other third-party insurance carriers.
 - d. 4. The subrecipient agrees to accept the Division reimbursement rate as full payment for any program eligible services provided.
 - e. 5. The subrecipient is responsible for ensuring that all third-party liabilities are billed and collected from the third-party payers and are NOT billed to the Division.
 - f. 6. Division funds will NOT be used to fund the services for self-paid clients or clients who elect not to use their insurance coverages. This includes clients that elect not to sign up for insurance under the ACA [Affordable Care Act] or clients that have existing insurance and choose not to use their insurance for treatment services. In certain circumstances and upon written request to the Division, some services may be covered if an undue barrier to treatment exists.
 - g. 7. Division funds will NOT be used to reimburse Medicare claims.
 - h. 8. Division funds will NOT be used to reimburse claims for which the client is pending eligibility for insurance coverage.
 - i. 9. Division funds will NOT be used to reimburse claims denied by Medicaid or other insurance
 - j. a. carriers unless the claim was denied as "not a covered benefit".
 - k. Claims not a covered benefit" and billed to the Division must have the
 - l. a. accompanying denial attached in order to guarantee payment.
 - m. 11. Division funds will NOT be used to cover any unpaid costs that Medicaid and/or other insurance carriers may not reimburse (i.e., copayments, deductibles).
 - n. 12. The subrecipient agrees to use Division funds as the absolute "payer of last resort" for all services provided to clients. If an undue barrier to

- ii. A justification statement must include why travel is necessary during those dates/times, why the less expensive option cannot/was not chosen, etc.
 - c. Travel should be included in the executed subaward. If planned travel is not included in executed subaward, the Bureau needs to sign off prior to travel occurring.
 - d. If travel needs are urgent, and subrecipient feels it is within the scope of work of the subaward, the subrecipient may travel at their own discretion as far as funding allows.
 - i. A justification is required explaining the critical and urgent need for travel. This statement of justification should be included with the subrecipients travel reimbursement request within the monthly RFR submission.
 - ii. Bureau staff can approve urgent travel expenses at their discretion if it is within the approved travel budget and within the approved scope of work.
 - e. Travel request back-up documentation must support the travel claim. Required source documentation for each travel claim:
 - i. Receipts for:
 1. Lodging / Hotel
 2. Ground Transportation, rental cars, fuel in rental vehicles
 3. Baggage
 4. Parking
 5. Flights
 - ii. Google maps (or equivalent) indicate mileage driven by the subrecipient or personal car.
 - iii. Tips should be covered by the \$5 per day incidental, and commercial transportation tips can be reimbursed up to 20% gratuity (SAM 0218). Additional tips will not be reimbursed. This includes tips for meals, bell hops, etc.
 - iv. Receipts for meals and incidentals are not needed.
 - v. If indicated on event agenda or hotel reservation that breakfast (NOT including continental breakfast) is served, breakfast cannot be reimbursed and should be deducted from daily meals request total.
 1. Justification is needed for food allergies, religious exemptions, or exceptions.
 - f. Mileage reimbursement must be from the duty station (subrecipient address or out-stationed location) to the place of travel.
 - i. Out-stationed locations can only be considered for permanent out stationed employees of the subrecipients. The subrecipient is required to report this to the Bureau upon subaward negotiations and should maintain this documentation with the Bureau upon staffing changes.
- 8) **In-Kind Match** - This form must be used when reporting required Match. Complete the Reported Match column for each month, additionally, complete the Match column (with months) to provide a total overview of match-to-date. Reported match may not include unallowable expenses, expenditures that have been reimbursed by a federal grant, expenditures that have previously been used for match or maintenance of effort purposes.
- a. Based on the original funding source, some entities are required to report “match”. This tab in the RFR workbook is required completed for those entities.
 - i. The PATH federal grant requires subrecipients to report match within their subaward. If not, this tab can be omitted or hidden.
- 9) **Budget Modification Form (BMR)** - The Budget Modification Form is a form used to request approval to redirect/modify the awarded budget that is less than 10% of the total awarded budget. All transfers between budget categories requires notification and approval. Complete the fields to depict the original or amended budget, the amount of change and the revised budget. The subrecipient must justify requested modifications and explain how it impacts associated objectives and goals of the award. The justification must be specific by category to provide the Department with the information as to why the subgrantee is requesting the change and how it will ensure compliance with the funding purpose and support the performance metrics and goals defined. No action can be taken regarding the budget modification until the state approves the modification.

- a. The BMR is required prior to the monthly RFR submission and is not a required document within the monthly RFR submission
- b. The BMR must be completed and submitted by the subrecipient to the Bureau program/fiscal staff to request budget modifications prior to expenditures. This includes moving money within and in between categories.
 - i. If a category was executed with dollars associated to it, and modification is being requested to add money into that category, an amendment is required. Bureau staff must approve or deny this request for an amendment.
 - ii. If money is being requested to be moved around categories that have dollars associated with it, and it doesn't change the scope of work, and is under 10% of full award, this can be approved by Staff without an amendment.
 - 1. Bureau staff must approve or deny this request for budget modification.
 - iii. Staff must make decisions on whether to accept budget modifications from the subrecipient.
 - 1. Things to consider timing, appropriateness, scope of work alignment, intent etc.
 - iv. Staff must review and work with their supervisor (if needed) to approve or deny the request
 - v. Expenditures cannot be made prior to receiving approval from Bureau staff on BMR.
 - vi. If approved, Bureau staff must update all fiscal documents to reflect the approved modifications:
 - 1. Declining balance sheet (DBS)
 - 2. Reconciliation
 - 3. RFR PDF Coversheet and RFR Workbook
 - vii. Any amendments are processed by the Bureau through a similar procedure as used in original subaward execution.
- c. Helpful Tips:
 - i. Food, including water cannot be purchased with federal funds
 - 1. Exceptions if federal award specifically states it is allowed
 - ii. Reimbursement for firearms is not allowed
 - iii. Reimbursement for vehicle purchases is not allowed
 - 1. Mileage as described above can be reimbursed