

Approved By:	Board of Directors	Adopted Date:	08/21/18
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PURPOSE:

To outline how Open Door Community Health Centers (ODCHC) will meet the requirement set forth in Public Law 115-31, Section 202 - Salary Limitation.

POLICY:

ODCHC will not use any Department of Health and Human Services (HHS) funds, in whole or in part, for the salary of an individual at a rate in excess of Executive Level II. The current Executive Level II salary (as of January 2017) is set at \$189,600 annually. This amount reflects an individual's base salary exclusive of fringe benefits and any income that an individual may be permitted to earn outside of duties to the applicant organization. This salary limitation also applies to subawards/subcontracts under a Health Resources and Services Administration (HRSA) grant or cooperative agreement.

ODCHC does not use any HRSA grants or any other federal funding for salaries and wages, nor are they included in the budget. Salaries and wages are covered by the retained earnings of ODCHC.

REFERENCES:

Public Law 115-31, Section 202

NACHC Sample Policy and Procedure on Legislative Mandates Restricting the Use of Federal Grant Funds, May 2018

Feldsman, Tucker, Liefer and Fidell LLC

Office of Federal Assistance Management, Bulletin Number 2018-04

Mission Neighborhood Health Center, Policy and Procedure, Salary Limitation, February 2018

ASSOCIATED DOCUMENTS:

AG_HRSA Grant Limitations

KEYWORD TAGS:

None