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[CHC]

**Mandatory Disclosures Policy**

**Date Last Updated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Board Approved: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

1. **Policy**

It is the policy of [CHC] to comply with all applicable terms and conditions related to each federal funding stream including the public policy requirements applicable to all Department of Health and Human Services grantees (i.e., Civil Rights Act of 1964 (Title VI), human trafficking, etc).

We acknowledge these policies exist (see table below) and we follow them. The HHS Grants Policy Statement contains these requirements and can be accessed at the link below:

<https://www.hhs.gov/sites/default/files/grants/grants/policies-regulations/hhsgps107.pdf>

1. **Accountability**

The following [CHC] staff are responsible for ensuring compliance with and overseeing the following aspects of this board approved policy:

* Chief Financial Officer

1. **Procedures**

<insert procedures if applicable>

1. **Public Policy Requirements**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Requirement | Applicability | Recipient | Subrecipient (including consortium participant) | Contractor under grant (routine goods/services) |
| Acknowledgment of Federal Funding | All types of awards | Y | Y | NA |
| Activities Abroad | All types of awards | Y | Y | Y |
| Age Discrimination Act of 1975 | All applications from and awards to domestic entities | Y  (NA to foreign and international organizations) | Y  (NA to foreign and international organizations) | Y  (NA to foreign and international organizations) |
| Animal Welfare | Applications and awards for activities involving warm-blooded animals | Y | Y | Y |
| Certificates of Confidentiality | Research awards (includes research training in each case specified as “research”) | Y | Y | Y |
| Civil Rights Act of 1964 (Title VI) | All applications from and awards to domestic entities | Y  (NA to foreign and international organizations) | Y  (NA to foreign and international organizations) | Y  (NA to foreign and international organizations) |
| Clean Air and Clean Water Act | Construction grants | Y | Y | Y |
| Confidentiality of Patient/Client Records | All research awards and awards to substance abuse programs | Y | Y | Y |
| Controlled Substances | All types of awards | Y | Y | Y |
| Drug-Free Workplace | All covered applications and awards | Y | NA | NA |
| Education Amendments of 1972 (Title IX) | All applications from and awards to domestic entities | Y (NA to foreign and international organizations | Y (NA to foreign and international organizations) | Y (NA to foreign and international organizations) |
| Elimination of Architectural Barriers to the Handicapped | All awards involving construction or major alteration and renovation | Y | Y | Y |
| Financial Conflict of Interest | All applications and awards for research except those for Phase I of the SBIR/STTR program and awards to Federal institutions/PHS OPDIVsa | Y (NA to Phase I of the SBIR/STTR programs and to Federal institutions) | Y | NA |
| Flood Insurance | Construction awards | Y | NA | NA |
| Hatch Act | Awards to State or local governments | Y | Y | NA |
| Health Insurance Portability and Accountability Act (HIPAA) | All awards to covered entities | Y (if a covered entity) | Y (if a covered entity) | Y (if a covered entity) |
| Historic Properties/ Archaeological Sites | All awards that include major or minor A&R, construction, or any work that will result in physical changes to real property | Y | Y | Y |
| Human Embryonic Stem Cell Research | Research awards | Y | Y | Y |
| Human Subjects | Research applications and awards | Y | Y | Y |
| Investigational New Drug Applications/ Investigational Device Exceptions | Research awards | Y | Y | Y |
| Limited English Proficiency | All types of awards | Y | Y | NA |
| National Environmental Policy Act (including Public Disclosure) | Applications and awards for construction and major alteration and renovation | Y | Y | NA |
| Pro-Children Act | All awards performed in facilities where children are served | Y | Y | Y |
| Protection of Research Subjects’ Identity | All research awards/PHS OPDIVs | Y | Y | Y |
| Protection of Wetlands | Construction awards | Y | Y | Y |
| Public Health Security and Bioterrorism Preparedness and Response Act | All types of awards | Y | Y | Y |
| Recombinant DNA Molecules and Human Gene Transfer Research | Applications and awards for research | Y | Y | Y |
| Rehabilitation Act of 1973 (Section 504) | All applications from and awards to domestic organizations | Y (NA to foreign and international organizations) | Y (NA to foreign and international organizations) | Y (NA to foreign and international organizations) |
| Research Misconduct | Applications and awards for research and research training/PHS OPDIVs | Y | N | NA |
| Research on Human Fetal Tissue | Research awards | Y | Y | Y |
| Research on Transplantation of Fetal Tissue | Research awards | Y | Y | Y |
| Resource Conservation and Recovery Act | All awards to States or agency of a political subdivision of a State (which for this purpose includes State and local institutions of higher education or hospitals) | Y | Y | Y |
| Restriction on Abortions | All types of awards | Y | Y | Y |
| Restriction on Distribution of Sterile Needles | All types of awards | Y | Y | Y |
| Safe Drinking Water Act | Construction awards | Y | Y | Y |
| Seat Belt Use | All types of awards | Y | NA | NA |
| Smoke-Free Workplace | All awards | Y | NA | NA |
| Standards of Conduct | All types of awards | Y | NA | NA |
| Uniform Relocation Assistance and Real Property Acquisition Policies Act | All awards | Y | Y | NA |
| U.S. Flag Air Carriers | All types of awards | Y | Y | Y |
| USA PATRIOT Act | All types of awards | Y | Y | Y |

*Trafficking Victims Protection Act of 2000, as amended (22 USC 7104)*

[CHC] will not (i) engage in severe forms of trafficking in persons during the period of time that the award is in effect; (ii) procure a commercial sex act during the period of time that the award is in effect; or (iii) use forced labor in the performance of the award or subawards under the award.

[CHC] will inform HHS immediately of any information received from any source alleging a violation of a prohibition in the above paragraph of this policy.