

**ADVERTISING COSTS AND PROMOTIONAL MATERIALS POLICY-STANDARD
PROCEDURE**

Title: Governor’s Office of Early Childhood Development (GOECD): Use of Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) Funds on Advertising Costs and Promotional Materials in Home Visiting Programs and Services, including Coordinated Intake	Date Effective: July 1, 2018	Number:
Area: Use of MIECHV Funds on Advertising Costs and Promotional Materials	Date Issued: May 17, 2018	Page:

• **POLICY:**

Local implementing agencies (LIAs) implementing home visiting, including MIECHV Coordinated Intake staff (“CI Staff”), shall only use MIECHV funds on allowable advertising costs and promotional materials as described herein.

Given that MIECHV funds used by LIAs and CI Staff derive from a grant from the federal Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS), there are federal requirements as to how such funds *can and cannot* be used. According to federal requirements, **allowable advertising costs** are related to “*program outreach and other specific purposes necessary to meet the requirements of the Federal award*”.¹ “Advertising costs” mean the costs of advertising media and corollary administrative costs, including magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.² However, “program outreach” **cannot** consist of

- 1) Costs of promotional items and memorabilia, including models, gifts, and souvenirs;
- 2) Costs of advertising and public relations designed solely to promote the non-Federal entity (e.g. the LIA); and
 - The meaning of “*designed solely to promote the non-Federal entity*” (above) are items, which solely promote the non-Federal entity and its accomplishments and/or initiatives.³
- 3) Costs of displays, demonstrations and exhibits.⁴

¹ 45 Code of Federal Regulations (CFR) 75.421

² 45 CFR 75.421

³ Guidance from HRSA (Janene Dyson) via electronic communication on April 5, 2018.

⁴ 45 CFR 75.421

Not Allowable:

Items 1-3 listed above are **not** allowable charges to HHS and HRSA grants and are considered promotional items. Accordingly, an LIA and CI Staff cannot use MIECHV funds or other federal funds (as applicable) to purchase any of the items listed in 1-3 above.

Examples:

- A display to use at community events for program outreach **cannot** be purchased with or reimbursed from MIECHV funds.
- Souvenirs and gifts used to promote home visiting within your MIECHV Community, such as pens, bags, baby cups or gift cards, **cannot** be purchased with or reimbursed from MIECHV funds.
- Shirts for home visiting staff that are only designed to be worn at health fairs or other special events **cannot** be purchased with or reimbursed from MIECHV funds. (See below under “Allowable” for an example of shirts that are allowed to be funded under this policy.)

Please note that the federal requirement described above only addresses what MIECHV funds (or other applicable federal funds) can be used for. Therefore, it may be permissible for an LIA or CI Staff to use its **non-MIECHV funds** (or other non-federal funds) to purchase Items 1-3 above, as long as such purchase is in compliance with the agency’s internal requirements and applicable state law.

Allowable:

Allowable advertising costs pertaining to program outreach are activities or items, which solely focus on encouraging mothers, or families to participate in HRSA approved grant project activities (i.e. safe sleep, breastfeeding, etc.).⁵ Brochures or printed materials (e.g. written handouts) for program outreach and to encourage families’ or mothers’ participation in HRSA approved grant project activities are **allowable costs**.

Please note for brochures or printed materials funded with HRSA grant funds, a written acknowledgement of HRSA support (the “HRSA Acknowledgement”) **must be included** on all publications funded with HRSA funds. Accordingly, LIAs and CI Staff that want to design and print brochures and materials for community outreach to promote MIECHV in their community (but not their specific entity) are allowed to do so using MIECHV funds, as long as the following HRSA Acknowledgement (updated 3/6/19) is included within such brochures and written handouts:

This project is supported by the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS) under Grant Number X10MC31139 and Grant Number X10MC32189 in the total award amounts of \$8,618,833 and \$8,744,850, respectively, for the Maternal, Infant and Early Childhood Home Visiting Program, and 0% financed with nongovernmental sources. This information or content and conclusions are those of the author and should not be construed as the official position or policy of, nor should any endorsements be inferred by HRSA, HHS or the U.S. Government.

⁵ Guidance from HRSA (Janene Dyson) via electronic communication on April 5, 2018.

Examples:

- The costs of printing the “Igrow” brochure – using either the template provided by GOECD staff or your local MIECHV Community’s Igrow brochure as approved by GOECD staff – can be paid for or reimbursed from MIECHV funds.
 - Shirts that are solely designed to serve as uniforms (e.g. assist families being served to identify home visiting staff) for home visitors that are visiting families in the field or at a family’s home on a daily basis is allowable. (See above under “Not Allowable” for some shirts that are not allowed to be funded under this policy.)
 - The costs of printing community resource guides.
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- **PURPOSE:** The purpose of this policy is to establish what advertising costs and promotional materials can be funded with funds from MIECHV by LIAs and CI Staff.

SCOPE: MIECHV Home Visiting Programs and Services, including Coordinated Intake