

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

<p>Title: Illinois Department of Human Services Home Visiting (DHS-HV) Use of Funds on Advertising Costs and Promotional Materials in DHS Home Visiting Programs and MIECHV Coordinated Intake Programs</p>	<p>Date updated: July 16, 2021</p>
<p>Area: Use of Funds on Advertising Costs and Promotional Materials</p>	

PURPOSE. The purpose of this policy is to provide guidance on allowable costs and how to budget for items related to Advertising Costs and Promotional Materials.

SCOPE. MIECHV and HFI Home Visiting Programs (Herein referred to as DHS-HV) and MIECHV Coordinated Intake Programs (CI programs).

POLICY. DHS-HV programs and CI programs, shall only use DHS-HV funds on allowable advertising costs and promotional materials as described herein.

Under the Grant Accountability and Transparency Act (GATA), the federal requirements in the Uniform Guidance apply to the DHS-HV programs.,

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 the following:

- 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 (eg, the DHS-HV grantee or CI program); and
 - o 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.

Not Allowable

Items 1-3 listed above are **not** allowable charges to DHS-HV grants and are considered promotional items. Accordingly, a DHS-HV program and CI program cannot use DHS-HV funds 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 DHS-HV funds.
- Souvenirs and gifts/swag used to promote home visiting within a DHS-HV community, such as pens, bags, baby cups, onesies, or gift cards, **cannot** be purchased with or reimbursed from DHS-HV funds. Small token items that are used for communication and education as part of an outreach effort to enroll families into the program may be allowable. These items could include things such as pacifiers (to promote safe sleep), books, or crayons (to promote parent child interaction and child development) if the context in which they are distributed serves to promote program objectives and encourage enrollment of families. Note: Refer to the DHS-HV Participants Incentive Policy for guidance regarding the allowability of items (incentives) for participants enrolled in the program.
- Shirts for home visiting or coordinated intake staff that are only designed to be worn at health fairs or other special events **cannot** be purchased with or reimbursed from DHS-HV funds. (See below under “Allowable” for an example of shirts that **are** allowed to be purchased with or reimbursed under this policy.)

Note that the federal requirement described above only addresses what DHS-HV funds can be used for. Therefore, it may be permissible for a DHS-HV or CI programs to use its **non-MIECHV or non-HFI 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 DHS-approved grant project activities (ie, safe sleep, breastfeeding, etc).⁵ Brochures or printed materials (eg, written handouts) for program outreach and to encourage families’ or mothers’ participation in DHS-approved grant project activities are **allowable costs**.

Examples

- Printing costs for the “igrow” brochure.
- Shirts that are solely designed to serve as uniforms (eg, assist families being served to identify home visiting staff) for home visitors that are interacting with families in the field or at a family’s home. (See above under “Not Allowable” for some shirts that are not allowed to be funded under this policy.)
- Printing costs for community resource guides.

The following highlighted sections apply to MIECHV providers only: Note that for brochures or printed materials funded with Federal HHS (MIECHV) grant funds, a written acknowledgement of HHS support (the “HHS Acknowledgement”) **must be included** on all publications funded with HHS funds.

Accordingly, MIECHV home visiting and/or CI programs that design and print brochures and materials for community outreach to promote MIECHV in a community (but not their specific entity) are allowed to do so using MIECHV funds, as long as the following HHS Acknowledgement is included within such brochures and written handouts:

*This project is supported by the Health Resources and Services Administration (HRSA) of the United States Department of Health and Human Services (HHS) under Grant Number X10MC33578 and Grant Number X10MC39684 and Grant Number X10MC33578 in the total award amounts of \$8,345,310 and \$8,257,262, 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 United States Government.**

***NOTE:** This language is updated on October 1 of every year; please ensure you are using the most recent language. Contact DHS MIECHV staff if you need the updated language or to review the language your program plans to use for accuracy. Home Visiting and/or CI programs can continue to use documents or materials with the previous year’s language until supplies are depleted, however, any new materials need to use the current HHS Acknowledgement.

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