



Questions and Answers

FY2024 Residential Substance Abuse Treatment (RSAT)

Responses to questions will be posted to this document within 7 calendar days of receipt.

The deadline for receipt of written questions is **Tuesday, July 25, 2023 at 5:00 p.m.**

Please submit your questions to mbcc@mt.gov.

Q1: For Aftercare programs, can MOUD (Medications for Opioid Use Disorder) be started while in the facility and include transition?

A1: According to the RSAT Federal Guidelines:

SAT for State Prisoners Program funds must be used to support the provision of SUD treatment to adult and juvenile populations during detention or incarceration and recovery support and aftercare services post release. Treatment for co-occurring substance use and mental health disorders may also be provided using RSAT for State Prisoners Program funds. Treatment programs and their associated requirements include:

Residential SUD treatment programs in prisons and juvenile detention centers must meet all of the following criteria:

- (1) Engage individuals with SUD or co-occurring substance use and mental health disorders for a period of between 6 and 12 months.
- (2) Require periodic/random drug testing of individuals while they are in the program and under community supervision.
- (3) Establish a therapeutic community (i.e. program participants are set apart from the general population).
- (4) Provide aftercare services.

Residential SUD treatment programs in jails must meet all of the following criteria:

- (1) Engage individuals with SUD or co-occurring substance use and serious mental health disorders for at least 3 months.
- (2) Require periodic/random drug testing of individuals while they are in the program and under community supervision.
- (3) Make every effort to establish a therapeutic community.
- (4) Provide aftercare services.



Jail-based SUD treatment programs that initiate or continue evidence-based SUD treatment programs, including medication-assisted treatment, in pretrial populations and/ or foster connections to SUD treatment in the community upon pretrial release.

Aftercare services include case management and the full continuum of recovery and aftercare services, which may include human service and rehabilitation programs such as educational and job training, parole supervision, half-way house, self-help, and peer group programs.

What is a residential program? Prison, juvenile, and jail programs that provide SUD treatment for 6–12 months (for prisons and juvenile programs) or at least 3 (for jail programs) to participants in a therapeutic community.

What does “therapeutic community” mean? This refers to use of residential treatment facilities that are set apart from the general correctional population in either a separate facility or a dedicated housing unit that is used exclusively for RSAT and/or other SUD treatment programs. Jails that do not have the capacity to establish a therapeutic community are encouraged to group RSAT program participants within the general correctional setting.

Is the purchase of overdose reversal drugs or use of RSAT for State Prisoners Program funds to support medication-assisted treatment for addiction permissible?

Medications, including overdose reversal drugs (e.g., naloxone), that are approved by the Food and Drug Administration may be purchased with RSAT for State Prisoners Program funds. However, any expenditure must have a clear nexus to the RSAT for State Prisoners Program’s objectives. *Medications able to be covered by other entities such as private insurance, Medicaid or other available financial resources must not be charged to the grant.

Q2: For In-kind match, does this have to come directly from the applicant or can community partners provide match activities?

A2: Per DOJ Grants Financial Guide:

Types of Match:

Match requirements are typically stated as a percentage of the total project costs for an award. For example, a 20 percent (20%) match on a \$100,000 project would be \$20,000, where \$80,000 is provided by the Federal Government and \$20,000 is provided by the recipient.

There are two kinds of match:

- Cash match (hard) includes cash spent for project-related costs. An allowable cash match must include costs which are allowable with Federal funds, except acquisition of land, when applicable.



- Third party in-kind match (soft) includes, but is not limited to, the valuation of non-cash contributions. “In-kind” may be in the form of services, supplies, real property, and equipment. For example, if in-kind match is permitted by law, then the value of donated services can be used to comply with the match requirement. Also, third party in-kind contributions may count toward satisfying match requirements, provided the recipient of the contributions expends them as allowable costs.

3.3 MATCHING OR COST SHARING REQUIREMENTS

Documentation supporting the market value of in-kind match must be maintained in the award recipient files. Valuation of in-kind match may take one of the following forms:

- Valuation of donated services. Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program.
 - Volunteer services. Recipient or subrecipient rates for third-party volunteer services must be consistent with those rates ordinarily paid for similar work in the recipient’s or subrecipient’s organization. If the recipient or subrecipient does not have employees performing similar work, the rates will be consistent with those ordinarily paid by other employers for similar work in the same labor market. In either case, a reasonable amount for fringe benefits may be included in the valuation.
 - Employees of other organizations. When an employer other than a recipient or subrecipient furnishes free of charge the services of an employee in the employee’s normal line of work, the services will be valued at the employee’s regular rate of pay plus an amount of fringe benefits, but exclusive of overhead costs. For additional guidance on cost sharing or matching, please review 2 C.F.R. § 200.306.
- Valuation of third party donated supplies, equipment, or space.
 - If a third party donates supplies, equipment, or space, the value must not exceed the fair market value of the property at the time of donation.
- Valuation of third party donated equipment, buildings, and land.
 - If a third party donates equipment, buildings, or land, and title passes to a recipient or subrecipient, the treatment of the donated property will depend upon the purpose of the Federal award.
 - Awards for capital expenditures. If the purpose of the award is to assist the recipient or subrecipient in the acquisition of equipment, buildings or land, the aggregate value of the donated property may be counted as cost sharing or matching.
 - If the purpose of the award is to support activities that require the use of the property, normally only depreciation can be charged. However, the fair market value may be allowed, provided that the grantmaking component has approved the charges. Please refer to 2 C.F.R. § 200.306 for more information about types of match and match requirements.



Please refer to 2 C.F.R. § 200.306 for more information about types of match and match requirements.

Q3. Would this funding be available for us to use in all the types of community correctional facilities? Those are Treatment centers, Assessment Centers, and Prerelease Centers.

A3. Any treatment, assessment or prerelease centers that are a part of the granted to entity would be allowed to use RSAT grant funding to set up, maintain or expand existing allowable drug treatment services to clients. These entities would be required to adhere to the allowable expenditures and reporting requirements of the grant. Any treatment, assessment or prerelease centers NOT a part of the granted to entity would be required to have signed, detailed contracts with the granted to agency in order to provide treatment services on their behalf. The contracted services would be subject to MBCC approval whether the service provided, amount requested and personnel providing the services adhered to Federal/State allowable fee rates, required qualifications and required documentation/reporting information mandated by the grant.

Q4. Could these funds be used to pay for extra UA monitoring/drug testing above and beyond what facilities are already providing?

A4. The RSAT grant requires (at a minimum) monthly drug testing for individuals being assisted with grant funds. This testing is paid for by grant funding. Individuals that require additional testing that qualify for Medicaid or other insurances that will cover drug testing should be paid for by those providers. Any individuals who require additional testing that do not have insurance coverage or whose insurance will not cover the costs may charge the grant for these additional tests with the documented reasons additional testing was needed to support their continued participation in treatment.

Q5. Are travel costs for trainings an eligible use of these funds?

A5. The grant will allow for travel expenses that would adhere to federal/state maximums and allowances as long as the training is determined by MBCC to be grant related and necessary. Any out of state travel must be approved ahead of time by MBCC. Sending employees to become trained on how to use the MAT medication dispensing equipment would be one example of an allowed training expense.

Q6. Can grant funds be used for trainings offered for employees and people in the community that teach about the issues of substance abuse? The training are geared towards teaching people what to look out for and how to work with people who are on MAT, but also how to navigate the different scenarios/issues the facilities might face when implementing MAT.

A6. Community outreach is not an allowable use of grant funds. Teaching staff/personnel who do the direct services to SUD clients funded by the grant on how to use MAT-specific equipment, supplies, procedures (i.e. how to administer Narcan) are allowable.