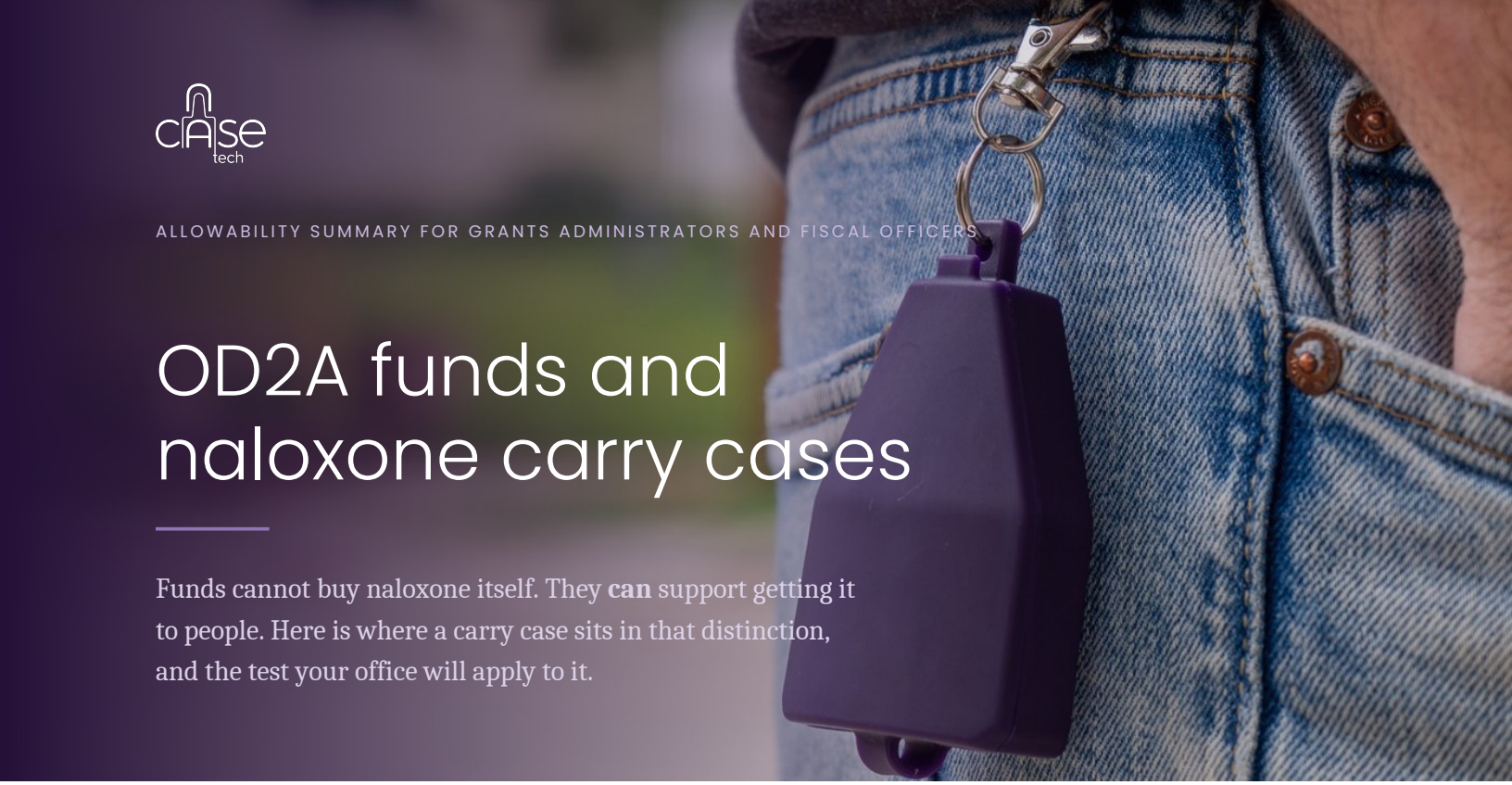

ALLOWABILITY SUMMARY FOR GRANTS ADMINISTRATORS AND FISCAL OFFICERS

OD2A funds and naloxone carry cases

Funds cannot buy naloxone itself. They **can** support getting it to people. Here is where a carry case sits in that distinction, and the test your office will apply to it.

NOT ALLOWABLE

Purchasing naloxone itself.

Stated directly in the program FAQs for both OD2A-S and OD2A: LOCAL.

SUPPORTED

Getting naloxone to people.

The guidance names distribution, storage, staffing, education and vending machines. A carry case is a distribution supply.

What you would be buying

nCase Lite is a silicone case that holds a naloxone nasal spray on a keychain, bag or belt loop, so the dose stays with the person it was issued to instead of in a drawer. It protects the device from the wear of everyday carry.

- Ships with a QR sticker linking to instructions for administering naloxone.
- Can carry your organization's branding or a QR code pointing to local resources.
- An accessory, not a medical device and not a drug. It makes no medical claims.

THE PRODUCT

NCASE LITE

What the CDC guidance says

THE GUIDANCE
CDC PROGRAM FAQS

Two answers in the OD2A-S FAQs draw the line, and the OD2A: LOCAL FAQs draw it the same way. All three are quoted in full.

> *OD2A-S funds may be used to support naloxone access (distribution, vending machines, etc.) and to purchase syringes for administering injectable naloxone. However, funds may not be used to purchase naloxone at this time.*

OD2A-S PROGRAM FAQ
QUESTION 88

> *Although naloxone cannot be purchased using OD2A-S funds, there are no restrictions around its distribution.*

That answer goes on to confirm that recipients may distribute directly to community members or work through partner organizations.

OD2A-S PROGRAM FAQ
QUESTION 100

> *[N]aloxone purchase is NOT allowable with OD2A: LOCAL funds. Funds can be used to distribute naloxone, store it, provide staffing, support, education, etc.*

OD2A: LOCAL PROGRAM FAQ
QUESTION 54

Sources: CDC OD2A and OD2A: LOCAL Funding Announcement FAQs, archived at archive.cdc.gov.

How your office will evaluate it

THE TEST
2 CFR 200.403

Under the federal cost principles at 2 CFR 200.403, a cost charged to a federal award must be necessary and reasonable for the award, allocable to it, adequately documented, and consistent with any limitations or exclusions in the cost principles or in your award terms.

01 **Necessary and reasonable**
Does the case support a distribution activity already in your approved workplan, at a cost proportionate to that activity?

02 **Allocable**
Are the cases going to people served by the OD2A-funded program, rather than spread across unrelated purposes?

03 **Documented**
Is there a record connecting the purchase to the distribution activity it supports?

What “obligated by August 31” means

TIMING
CURRENT BUDGET PERIOD

To charge a cost to the current budget period, the obligation generally has to be established within that period. For a purchase like this, that ordinarily means a purchase order issued or an invoice approved, dated on or before August 31.

Delivery can follow later. Your own grants office and award terms govern how obligation is defined for your program; we are describing the mechanics we can support on our side, not interpreting your award.

How the purchase can be structured

PURCHASING
TERMS WE CAN MEET

PURCHASE ORDERS	Government purchase orders accepted. Vendor registration completed where required. Net 60 terms available.
PRICING AND QUOTES	Volume pricing from 50 units through 50,000. Formal, itemized quotes within one business day.
INVOICING	Orders can be invoiced to a fiscal sponsor or parent organization where that is how a program’s funding runs.

Moving on it

01 Tell us the quantity and whether you want your branding or a QR code on the case.

02 We send an itemized quote the next business day, with unit price and a written description of the distribution use.

03 You issue the purchase order or approve the invoice, dated on or before August 31. Delivery follows.

NEXT STEP
IF IT CLEARS YOUR REVIEW

If your review needs anything beyond the quote, ask. We can put it in writing.

PLEASE NOTE

The determination is yours. Whether a specific purchase qualifies under a specific award is a decision for your program officer and your organization’s grants administration. This summary is informational. It is not grant guidance, legal advice, or an accounting opinion, and it does not commit CDC or your awarding office to any position.

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