Grants Policy Committee Implementation Plan Fiscal Years 2008 – 2013

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This preliminary draft has not yet been approved by any federal agency or interagency body. The purpose of this draft is to solicit public comment. A final plan will not be drafted until federal agency and community input is gathered.

Purpose

The purpose of this Implementation Plan is to provide federal and non-federal stakeholder communities, including the Office of Management and Budget (OMB), with the Grants Policy Committee's (GPC) approach to executing the Strategic Plan between Fiscal Year (FY) 2008 through FY 2013.

Background

The GPC is a committee of the Chief Financial Officers Council (CFOC) and is charged with improving the management of federal financial assistance government-wide. The GPC recommends financial assistance policies and practices to OMB and coordinates related interagency activities. All government-wide grants policy recommendations to OMB are coordinated through the GPC.

The GPC collaborates with other federal initiatives for grants management, including the Grants Executive Board (GEB) and the Federal Funding Accountability and Transparency Act (Transparency Act) Taskforce. GPC membership consists of grants policy officials from across the Federal Government

The GPC served as the interagency oversight body for policy development related to the Federal Financial Management Assistance Act of 1999 (P.L. 106-107, "the Act"). The Act was established to improve the effectiveness and performance of federal financial assistance programs; simplify federal financial assistance application and reporting requirements; and improve the delivery of services to the public. The Act expired in November 2007.

The P.L.106-107 Initial Plan, submitted to Congress in May 2001, detailed the streamlining plans of the 26 grant-making agencies. Efforts to improve the effectiveness and performance of federal financial assistance programs that began with P.L. 106-107 have been captured in and will continue through the GPC's Strategic and Implementation Plans.

During FY 2007, the GPC Executive Committee (Executive Committee) prepared a draft Strategic Plan for federal and non-federal consideration. The public had the opportunity to comment on the Strategic Plan through notification in the Federal Register and during a Stakeholders' webcast. The draft Strategic Plan became final in June 2008 after approval by the GPC and review by the CFOC.

Introduction

This Implementation Plan documents how the GPC plans to achieve the vision, goals, and objectives outlined in the <u>Strategic Plan</u>. Specific products and initiatives are described by goal and objective. The Implementation Plan is a living document that will be reviewed and updated periodically, with regular assessment of the GPC's progress towards achieving its strategic objectives. The products and timelines identified in the Plan may be revised based on community feedback or changes in the broader statutory and policy context for management of federal financial assistance.

Implementation Plan

Planned activities categorized by strategic goal and objective are outlined in Tables 1-6 below. The tables contain the name, description, and timeframe of the products that will be developed. Products developed collaboratively with other federal grants committees or initiatives and products that fulfill multiple objectives are noted in the product description. Additionally, the GPC will undertake outreach initiatives to ensure grants management community input in establishing federal financial assistance policies and processes. These activities are described in Table 7.0, Outreach Initiatives.

Products and initiatives have also been organized into three completion categories: near-term (completed in FY 2008), mid-term (completed between FY 2009-FY 2011), and long-term (completed between FY 2012-FY 2013). Product organization is influenced by priority, estimated development time, and relationship to other products. Additionally, the GPC develops one product on an annual basis, which is noted in the timeframe column of Table 6.0. (See Appendix A for a complete list of products organized by completion timeframes.)

Goal 1: Streamlining

Simplify federal financial assistance processes to make them more uniform across agencies and eliminate unnecessary burdens on applicants, grantees, and federal agencies.

Streamlining Objective 1: Establish and maintain consolidated and consistent OMB guidance.

	Table 1.0: Streamlining Objective 1			
Product Name	Description	Work Group or Owner	Timeframe	
Trafficking in Persons (Title Two of the Code of Federal Regulations (2 CFR) Part 175)	Revises the Office of Management and Budget's Government-wide guidance with an award term for agencies to include in grants and cooperative agreements as part of their implementation of paragraph (g) of section 106 of the Trafficking Victims Protection Act of 2000, as amended (22 U.S.C. 7104). In each award under which funding is provided to a private entity, the statute requires the awarding agency to include a condition authorizing termination of the award if the recipient or a subrecipient engages in certain activities related to trafficking in persons.	Pre-Award	Near-Term	

	Table 1.0: Streamlining Objective 1		
Product Name	Description	Work Group or Owner	Timeframe
Advanced Payments (31 Code of Federal Regulations (CFR) Part 205, Subpart B)	Revises an existing regulation being developed by the Department of the Treasury, in collaboration with the Post-Award Work Group. When finalized, these requirements will be incorporated by reference in Title 2, Subtitle A, Chapter I, Subchapter C, of the CFR, which the Pre-Award Work Group is developing.	Pre-Award	Near-term
Implementation of Transparency Act subaward reporting requirement (2 CFR Part 33)	Establishes requirements for federal financial assistance applicants, recipients and subrecipients that are necessary for implementation of the Transparency Act.	Pre-Award	Near-term
Grants Government Payment Policy	Establishes government-wide guidance for grants payments standards.	Post-Award	Near-term
Drug-Free Workplace (2 CFR, Subtitle A, Chapter I, Subchapter G)	Establishes OMB guidance implementing the Drug-Free Workplace Act. The guidance will be in a form adoptable by short agency parts in 2 CFR, Subtitle B, thereby permitting replacement of agencies' current full-text codifications of a Drug-Free Workplace common rule.	Pre-Award	Mid-term
Standard award content and format (2 CFR, Chapter I, Subchapter C)	Establishes government-wide standards for format and content of grant and cooperative agreement awards, to include: (1) format of award notices; (2) wording and placement of award terms and conditions, including both national policy and administrative requirements (thereby superseding the current OMB Circular A-110 and the common rule implementing OMB Circular A-102); and (3) OMB guidance to agencies on the use of the formats and standard terms and conditions.	Pre-Award	Mid-term
A-133 Report	Sets forth standards for obtaining consistency and uniformity among federal agencies for the audit of States, local governments, and non-profit organizations expending federal awards. Note: Timeframe may vary because a of a related 2 CFR decision.	Audit	Mid-term

Table 1.0: Streamlining Objective 1			
Product Name	Description	Work Group or Owner	Timeframe
Policy on use of Grants.gov for mandatory grants	Establishes policy requiring agencies to post a description of funding opportunities for mandatory grants on Grants.gov FIND.	Mandatory	Mid-term
	This product also fulfills Strategic Goal 1 Objective 2.		
OMB guidance on general matters (2 CFR, Subtitle A, Chapter I, Subchapter A)	Establishes OMB guidance on general matters related to the award and administration of federal grants and cooperative agreements.	Pre-Award	Long-term
OMB guidance on pre- award responsibilities (2 CFR, Subtitle A, Chapter I, Subchapter B)	Establishes standard OMB guidance to agencies related to matters that pertain to the pre-award phase for federal grants and cooperative agreements.	Pre-Award	Long-term
OMB guidance on lobbying (2 CFR, Subtitle A, Chapter I, Subchapter G)	Establishes OMB guidance implementing the anti-lobbying provisions in 31 U.S.C. §1352. The guidance will be in a form adoptable by short agency parts in 2 CFR, Subtitle B, thereby permitting replacement of agencies' current full-text codifications of a lobbying common rule.	Pre-Award	Long-term
Announcement Format Phase 2 (2 CFR, Subtitle A)	Establishes OMB guidance in Title 2, Subtitle A, of the CFR for use of an update of the Phase 1 grants announcement format that OMB established in 2003 as the government standard. The Phase 2 format will incorporate revisions for lessons learned in the use of the Phase 1 format, as well as guidance on additional policy matters that were deferred during development of the Phase 1 format. This product also fulfills Strategic Goal 1: Streamlining Objective 3.	Pre-Award	Long-term
Cost Principles	Relocation of cost principles from Chapter 2 to Chapter 1 of 2 CFR Subtitle A. They were published in Chapter 2 on an interim basis, pending Work Groups' consideration of all streamlining proposals related to them. The cost principles now are ready for relocation to Chapter 1 with other OMB guidance for which streamlining has been completed.	Pre/Post- Award	Long-term

Streamlining Objective 2: Recommend uniform forms and formats for applications and post-award reports.

Table 2.0: Streamlining Objective 2			
Product Name	Description	Work Group or Owner	Timeframe
Research Performance Progress Report	Establishes a uniform format for reporting performance on federally-funded research projects.	Post-Award	Near-term
	This product is being developed in conjunction with the Research Business Models (RBM) Subcommittee, a subcommittee of the National Science and Technology Council's Committee on Science.		
Tangible Personal Property Report	Creates a new standard format for reporting tangible personal property status and requesting disposition of tangible personal property.	Post-Award	Near-term
Real Property Status Report	Establishes a new standard format for recipients to report real property status, submit requests, acquire, improve, or furnish real property, or request disposition of real property.	Post-Award	Near-term
Federal Financial Report	Creates a new standard format for recipients to report the financial status of their grants and cooperative agreements. The form will replace the following standard forms (SF): SF–269, SF–269A, SF–272A.	Post-Award	Near-term
Standard Data Elements for Electronic Summary Reports of Inventions	Establishes a standard set of data elements for a government-wide summary report of inventions.	Post-Award	Near-term
SF-424: Site Location Form	Establishes a new form that is based on the SF-424 Research & Related Project/Performance Site Location(s) form. The new form will be used to meet the requirements of the Transparency Act. This form will assist agencies in collecting required Transparency Act information regarding the Performance Site location, including the organization name, unique recipient entity identification number, and associated congressional district. In addition, the form will be implemented as a required form within the following SF–424 4040 collections: Research & Related; Mandatory; Short Organizational; and (Core).	Post-Award (Ad hoc SF-424 Team)	Near-term

	Table 2.0: Streamlining Objective 2		
Product Name	Description	Work Group or Owner	Timeframe
SF-424: Revised Cover Form for Mandatory Grants	Updates the cover form of the SF-424 Form for mandatory grants to comply with Transparency Act requirements.	Mandatory	Near-term
Policy on use of Grants.gov for mandatory grants	Establishes policy requiring agencies to post a description of funding opportunities for mandatory grants on Grants.gov FIND.	Mandatory	Mid-term
	This product also fulfills Goal 1: Streamlining Objectives 1.		

Streamlining Objective 3: Recommend standard and streamlined federal-to-grantee business processes.

	Table 3.0: Streamlining Objective 3		
Product Name	Description	Work Group or Owner	Timeframe
Standard Payment Request Data Elements and Terms	Establishes baseline common payment request elements as the standard for all Shared Service Centers (SSCs) and other stand alone grant payment systems.	Post-Award	Near-term
Announcement Format Phase 2 (2 CFR, Subtitle A)	Establishes OMB guidance in Title 2, Subtitle A, of the CFR for use of an update of the Phase 1 grants announcement format that OMB established in 2003 as the government-standard. The Phase 2 format will incorporate revisions for lessons learned in the use of the Phase 1 format, as well as guidance on additional policy matters that were deferred during development of the Phase 1 format. This product also fulfills Strategic Goal 1: Streamlining Objective 1.	Pre-Award	Long-term

Goal 2: Stewardship

Improve stewardship by ensuring federal dollars are used appropriately.

Stewardship Objective 1: Continually assess how the GPC is performing against the Strategic Plan and make changes to improve performance.

Table 4.0: Stewardship Objective 1			
Product Name	Description	Work Group or Owner	Timeframe

Stewardship Objective 2: Support the professional development of a federal workforce for awarding and administering assistance awards.

	Table 5.0: Stewardship Objective 2		
Product Name	Description	Work Group or Owner	Timeframe
Competencies	Establishes technical competencies to serve as basis for standard training content.	Training and Certification	Mid-term
Training Curriculum	Establishes an outline of a standard core set of training content across federal agencies for individuals responsible for assistance agreement award and administration. The GPC is collaborating with the Office of Personnel Management (OPM) on this product.	Training and Certification	Long-term
Grants Profession Document	Develops options for formally establishing assistance management as a federal profession (e.g., occupational series, perhaps with associated training and certification requirements). The GPC is collaborating with OPM.	Training and Certification	Long-term
Certification Program	Develops Government-wide Grants Management Certification Program. The GPC is collaborating with OPM.	Training and Certification	Long-term
Government-wide Database Tracking Training	Establishes a Government-wide Grants Management Workforce Database which captures and tracks each federal grants professional's training experience; highlights individuals who are certified grants managers. The GPC is collaborating with OPM.	Training and Certification	Long-term

Stewardship Objective 3: Make recommendations to improve audit and oversight policies and procedures.

Table 6.0: Stewardship Objective 3			
Product Name	Description	Work Group or Owner	Timeframe
A-133 Compliance Supplement	Identifies annual compliance revisions to OMB Circular A-133, to assist auditors in performing the required audits.	Audit	Annual
Training for Auditors conducting A-133's	Establishes standard requirements for training auditors to conduct the A-133 single audit.	Audit	Near-term
A-133 Process Review	Creates recommendations for the components that should remain in the A-133 single audit.	Audit	Mid-term

Outreach Initiatives: To increase outreach and community input in streamlining federal financial assistance processes.

Table 7.0 Outreach Initiatives			
Initiative Name	Initiative Name Description		
Improve public engagement	Defines the parameters for public engagement in the product development process and engages the public accordingly.	Near-term	
Expand the GPC community	Develops outreach initiatives within the Federal Government to expand the representation of grants professionals of all levels in the Work Groups.	Near-term	
Website	Provides easy access to GPC information and updates while enhancing usability of and streamlining GPC content.	Near-term	
Grantee outreach	Improves mechanisms for the stakeholder community to comment on GPC activities.	Near-term	

Maintenance

To ensure that the Implementation Plan continues to represent the grants community's needs, the GPC will collaborate with internal and external stakeholder communities to develop, revise, and maintain this Plan through FY 2013. Stakeholders may comment on this Plan as appropriate via www.GPC.gov, webcasts, and other correspondence. The Executive Committee will revisit this Plan on an annual basis.

Conclusion

Through collaboration with federal and non-federal stakeholder communities in the development of the products and initiatives detailed in this Plan, the GPC will realize its vision and achieve its goals and objectives. As a living document, this Implementation Plan is designed to serve as a roadmap for the GPC to increase the effectiveness of federal financial assistance between FY 2008 through FY 2013.

Appendix A:

The following tables represent the GPC's annual, near, mid, and long-term priorities:

	Annual Priorities	
Strategic Objective	Product	Importance
Goal 2: Stewardship Objective 3: Audit and Oversight	A-133 Compliance Supplement (ongoing GPC activity)	Responds to OMB requirements

	Near-term Priorities	
Strategic Objective	Product	Importance
Goal 1: Streamlining Objective 1: Consolidated and consistent guidance	Trafficking in Persons (2 CFR Part 175 Subchapter C) Advanced Payments (31 CFR part 205 Subpart B) Implementation of Transparency Act subaward reporting requirement (2 CFR Part 33) Grants Government Payment Policy	Maintains consolidated and consistent OMB guidance
Goal 1: Streamlining Objective 2: Uniform forms and format	Research Performance Progress Report Tangible Personal Property Report Real Property Status Report Federal Financial Report Standard Data Elements for Electronic Summary Reports of Inventions SF-424: Site Location Form SF-424: Revised Cover Form for Mandatory Grants	Recommends uniform forms and formats for applications and postaward reports
Goal 1: Streamlining Objective 3: Standard business processes	Standard Payment Request Data Elements and Terms	Recommends standard and streamlined federal-to-grantee business processes; affects implementation of Financial Management Line of Business and Grants Management Line of Business
Goal 2: Stewardship Objective 3: Audit and Oversight	Training for Auditors conducting A-133's	Responds to OMB requirements
Outreach Initiatives	Improve public engagement Expand the GPC community Website Grantee outreach	Facilitates greater community input

Mid-term Priorities				
Strategic Objective	Product	Importance		
Goal 1: Streamlining Objective 1: Consolidated and consistent guidance	Drug-Free Workforce Policy (2 CFR Subtitle A, Subchapter G) Standard award content and format (2 CFR, Chapter 1, Subchapter C)	Maintains consolidated and consistent OMB guidance		
	A-133 Report	Maintains consolidated and consistent OMB guidance (Note: Timeframe may vary because a of a related 2 CFR decision.)		
Goal 1: Streamlining Objectives 1 and 2: Consolidated and consistent guidance and Uniform forms and format	Policy on use of Grants.gov for mandatory grants	Maintains consolidated and consistent OMB guidance and provides uniform forms and formats for applications and postaward reports		
Goal 2: Stewardship Objectives 1 and 3: GPC organizational performance and Audit and Oversight	A-133 Process Review	Evaluates effectiveness of A-133 Audits		
Goal 2: Stewardship Objective 2: Training	Competencies	Supports professional development of grants workforce		

Long-term Priorities				
Strategic Objective	Product	Importance		
Goal 1: Streamlining Objective 1: Consolidated and consistent guidance	OMB guidance on general matters (2 CFR, Subtitle A, Chapter 1, Subchapter A)			
	OMB guidance on pre-award responsibilities (2 CFR, Subtitle A, Chapter 1, Subchapter B)	Maintains consolidated and consistent OMB guidance		
	OMB guidance on lobbying (2 CFR, Subtitle A, Chapter 1, Subchapter G)			
	Cost Principles			
Goal 1: Streamlining Objectives 1 and 3: Consolidated and consistent guidance and standard business processes	Announcement Format Phase 2 (2 CFR, Subtitle A)	Responds to comments from the public and federal community		
	Training Curriculum	Supports professional		
Goal 2: Stewardship Objective 2: Training	Grants Profession Document	development of grants workforce (Note: Working with OPM)		
	Certification Program	Standardizes workforce training (Note: Working with OPM)		
	Government-wide Database Tracking Training	Tracks who is trained and certified (Note: Timeframe is dependent on training competencies development)		