

There is a maddening and inexplicable inconsistency between Federal Agencies regarding whether quarterly or annual financial reports are required. Several very minor grants from the Department of Agriculture and the Environmental Protection Agency require complex and very time consuming quarterly reports, while very important grants from Federal Department of Health and Human Services make do very nicely with only the annual FSR 269 report.

And, of course, Agriculture and the EPA have their own byzantine forms, and have steadfastly refused to utilize the standard FSR report form from OMB. The spirit of grant reporting within the Common Rule and A-133 is that there should be an annual audit and annual financial report. Quarterly reports should be done away with unless the awarding federal agency can prove a compelling need for the information, and only then on a case by case basis. "Well, we've always gotten quarterly reports and we like to get them." And "But we like our non-standard forms" shouldn't serve as adequate justification.

And don't get me started on the federal agencies who stubbornly cling to the idiotic old "draw down" method of grant payments. They will refuse until the day they die to implement the vastly better, more economical, more efficient single letter of credit, or a similar system. OMB ought to get this mess, cleaned up, pronto!

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