

IAEGC INTERSTATE ADVISORY GROUP
c/o 444 N. Capitol Street #332
Washington, DC 20001

March 19,2001

ATTN: PL 106-107 Comments
Department of Health and Human Services
Room 517-D
200 Independence Avenue, SW
Washington, DC 20201

RE: Comments to All Participating Federal Agencies

Ladies and Gentlemen:

Representatives of more than a dozen states have met regularly in Washington, DC for about six months to discuss, exchange views, audit IAEGC meetings and to develop multistate comments on the Interim/Draft Plan of Action to Implement Public Law 106-107, published January 17, 2001 in the *Federal Register*. We are advised that individual states and departments and agencies in many states will comment separately.

At the outset we wish to say generally how pleased states are that Congress and the Administration have seen fit to pursue this initiative. The problems to be overcome - including agency cultures - are formidable. But, we are convinced not only that e-Grant processing is the wave of the future, but also that it is highly desirable and will produce a variety of efficiencies, savings and satisfaction for all participants.

This exchange should be formalized by officially establishing the IAEGC Interstate Advisory Group as an Advisory Committee to the IAEGC.

Together, we are persuaded that:

1. The Federal Government should vigorously solicit and welcome additional public input into the planning process. To achieve this, we recommend 3 methods:

(A) Trading-partners should be included as active members on the Pre-Award, PostAward and Audit/Oversight Workgroups.

(B) Potential users (including users across the digital divide) should be pro-

actively recruited and involved throughout the implementation process, including but not limited to the use of focus groups.

(C) Federal agencies should pro-actively recruit and involve representatives from their respective state-level constituents and community-based organizations in the implementation process.

2. The Federal Government should adequately fund IAEGC and its State Advisory Committee (and its advisory bodies and work groups) to enable them to be fully effective, including the following:

(A) Provide adequate funding and dedicated personnel to staff the federal streamlining effort.

(B) Provide the IAEGC Interstate Advisory Group with travel and subsistence reimbursement.

3. The entire grant process needs re-engineering for all requirements and regulations, including focusing on standardization and consistency as the e-Grant System is developed, not merely transferring the stifling volume of current forms and processes to the Internet. Some of the changes needed include the following:

(A) Reduce the number of required forms, consolidating those forms that duplicate previously provided information.

(B) Routinize dates within programs, agencies and across agency lines. Allow a minimum of 120 days from the date of announcement in the *Federal Register*.

(C) Standardize submission guidelines, such as size of font and methods for meeting submission (e.g., whether "postmarked" or "received by" dates apply).

(D) Make federal web sites available 24-7-365.

(E) Provide error checking in any new system.

(F) Provide detailed instructions and guidance in plain language and make knowledgeable staff available to answer questions.

(G) Provide on-line tracking grants tracking capability for users.

(H) Enable collaboration among appropriate officials within a single agency or among partnering agencies, while preserving confidentiality and protecting authorization issues.

(I) Enable appropriate monitors (e.g., designated members of a Governor's policy staff) to access the system with respect to grants involving agencies under a Governor's control.

(Q) Incorporate timesaving features that enable standard data to be retained

in the system and carried over to the next grant cycle.

(K) Streamline and routinize action time-lines, including those related to applications, reporting and draw down.

(L) Provide one-time data entry for each grant so that data that must be used at each stage of the process is retained and accessed without re-entry.

(M) Include universal design features in all e-Grant systems.

(N) Fully test any system before implementation.

(O) Provide an online forms and regulations library.

(P) Allow for links and/or data sharing with other federal registration systems, such as the IRS.

(Q) Provide for registrants to obtain file downloads of e-Grant systems data for their own analysis/manipulation.

4. Assure that federal agencies work together to integrate and assimilate existing e-Grant systems into the Federal Commons.

5. The Federal Government should also provide funding to assist states with the start-up costs of becoming electronically compatible with the Federal Commons and/or other web sites through which the e-Grants System will operate, including but not limited to the following:

(A) Provide incentive funds to states for participation in pilot projects to test and practice interfacing with the federal system.

(B) Provide seed funds to assist states with the development and implementation of electronic grant systems.

(C) Review and recommend policies and legislative and regulatory changes that would provide greater flexibility in the use of administrative funds by states for electronic grants systems.

(D) Amend Cost Principles A-87 and all other documents that would prohibit flexibility in the use of federal administrative dollars that flow to the states.

We eagerly look forward to continuing the collaboration among federal, state and local governments and community-based organizations in order to make the Federal e-Grants System a user-friendly success story for all trading-partners.

Cordially,

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