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OVERVIEW

In response to the Federal Financial Assistance Management Improvement Act (Public Law 106-107), the Texas State Auditor's Office surveyed 65 state agencies and universities that receive direct federal grants. The survey focused on ways to streamline and simplify the federal grant process, with the ultimate goal of improving the delivery of services to citizens. Overall, Texas state grant recipients reported the need for:

- Increased standardization of procedures and forms for applying for and reporting on grants.
- On-line/electronic submission of applications and grant reports.
- Improved access to grant-related information.
- Prompt responses from federal agencies.
- Enhanced, up-to-date federal grant websites.
- A single system to draw federal funds for all grants.

Sections 1-14 following this overview contain the agencies' and universities' responses to the Texas State Auditor's Office Federal Financial Assistance Management Improvement Act Survey. The sections also contain agency and university comments received in letters separate from their survey responses. The Texas State Auditor's Office did not edit the responses.

GRANT SIMPLIFICATION

Common recommendations for grant simplification are standard, on-line grant application and reporting forms; timely, electronic award notifications; quicker response to technical questions; and a single system for drawing federal cash. Better coordination between federal agencies and sub-agencies is recommended for improving the Payment Management System 272 (PMS-272) Report. The U.S. Department of Education's Grant Administration and Payment System (GAPS) is also mentioned as a recommended system. (See Section 1, Grant Simplification Recommendations.)

MOST BURDENSOME GRANTS

Survey respondents listed the most administratively burdensome grants and reasons why they were burdensome. Common reasons are complex regulations, late grant award notification, poor federal agency support, and excessive reporting requirements. Although some large grants were mentioned, several small grants were also mentioned. This indicates that the degree of administrative burden is not necessarily proportionate to the size of a grant. It may be relatively more costly to administer a small grant than to administer a large federal grant. (See Section 2, Most Burdensome Grants.)

In addition to comments received from survey respondents, we identified the following:

- Improve consistency among the federal cost principle circulars or consolidate them. Currently there are three separate federal cost principle circulars that apply to different organization types. Differences among these circulars confusing to pass-through entities and subrecipients.
- Improve consistency among the federal grant administration circulars or consolidate them. Currently there are two federal grant administration circulars that apply to different organization types. Differences among these circulars confusing to pass-through entities and subrecipients.
- Simplify the maintenance of effort (MOE) provisions for the Temporary Assistance for Needy Families (TANF) program to ease the budgeting, accounting, reporting, and cash management burdens these provisions cause. Intricate rules govern which state expenditures can and cannot be counted toward meeting the MOE requirement. Work participation performance measures can change the amount of state MOE expenditures that are required. The intricate rules and potentially changing required state expenditure amounts, coupled with changing case loads and separate federal rules for drawing federal cash, cause budgeting, accounting, and cash management problems.

The TANF program MOE rules allow state expenditures in the state's TANF program and other separate state programs to count toward the MOE requirement. To take advantage of the variety of expenditures in various state programs that may be counted, the state must budget for them in several state agencies. Budgeting challenges are intensified by the possibility that the performance outcomes will change the amount of state expenditures required. The state agencies must account for and report their expenditures to one state agency that summarizes and reports to the federal government.

The Cash Management Improvement Act rules further prohibit states from drawing federal funds "in any time period" in an amount that exceeds the final ratio of the federal portion to the state MOE portion for the fiscal year. Since caseloads change continuously, expenditure levels and the ratio change continuously. Therefore, federal fund draws must be re-estimated and re-adjusted throughout the year to keep federal fund draws from exceeding the changing ratio.

The burden stated here is from the state-agency perspective. If simplification of the MOE provisions is not feasible, perhaps some reporting and cash management relief for the program could be allowed instead.

APPLICATION PROCESS

Respondents favor shorter, simpler, and standard application processes across all federal agencies. Ninety percent also favor a system in which standard applicant information is submitted only once to the federal government, rather than submitting the same information with each grant application. (See Section 3, Application Process Modifications.) The responding

agencies and universities prefer to submit their applications online or via e-mail rather than by regular mail or fax. (See Section 4, Application Submittal Methods.)

Respondents recommended the grant application mechanisms of approximately 39 different grants for various efficiency reasons. Along with on-line access, common efficiencies mentioned are uncomplicated forms, policies, and guidelines. (See Section 5, Recommended Federal Grant Application Mechanisms.) Common complaints regarding inefficient existing grant application mechanisms include excessive details, conflicting guidelines, and repetitive information. (See Section 6, Federal Grant Application Mechanisms Not Recommended.)

AWARDING PROCESS

The majority of respondents state that one of the main problems encountered is receiving grant award notifications after the grant period beginning date. Twenty-five percent of respondents reported that they receive grant award notification after the grant period beginning date more than 50 percent of the time. E-mail was the most preferred method for receiving award notification. Notification by regular mail was the second most preferred method, with fax and telephone being the least preferred methods. (See Section 7, Awarding Process.)

INFORMATION ACCESS

Respondents overwhelmingly want federal agencies to improve the timeliness of grant-related guidance. Respondents also want improved guidance in many grant areas. More than 50 percent of respondents want improved federal guidance regarding grant rules and regulations, grant availability, or financial reporting.

Internet and e-mail are the two most popular methods through which respondents prefer to receive grant guidance from the federal government. (All respondents have Internet access.) Some respondents commented that telephone assistance would be more useful if the federal agencies answered voice mail in a more timely manner.

Eighty-two percent of the respondents experienced difficulties accessing federal agencies' websites, either sometimes or often. Access difficulties were attributed to the websites. (See Section 8, Information Access.)

REPORTING PROCESS

(Note: For this survey only, financial reports were defined as the SF-269/SF-269A, SF-272/272A, and PMS-272 reports. Performance reports were defined as all others.)

Survey respondents provided information on financial and performance reports that they find problematic (also see Section 9, Problematic Financial Reports):

- Common difficulties cited with the Department of Health and Human Services' PMS-272 Report appear to stem from late award adjustments on the Payment Management

System (PMS). Because grantees are not allowed to report expenditures on the PMS-272 in excess of the available adjusted award, grantees sometimes must report fewer expenditures than they actually had. Reporting fewer expenditures causes a distortion against cash advances, making it appear that there is excess cash on hand, which causes the PMS to place a hold on cash advances.

- Problems with the SF-269 include the following: it requires too much detail; it lacks a functioning on-line submission site; the award is received after the end of the first quarter; and the end of the liquidation period coincides with the final report due date.
- Respondents point out that the amount of required detail makes it difficult to manage performance reporting requirements. (See Section 10, Problematic Performance Reports.)

The state agencies and universities also provided feedback about submitting grant reports (See Section 11, Submitting Grant Reports.):

- Respondents reported that it is problematic for them when federal agencies have reporting deadlines that differ from those in the Federal Office of Management and Budget (OMB) Grants Management Common Rule and Circular A-110.
- The majority of respondents agree that the OMB-prescribed reporting deadlines are reasonable.
- On-line and e-mail report submissions are the most popular methods.

The most frequent recommendations for changes to grant reports, other than to the 269 and 272 reports, were to reduce the number of data elements reported and to reduce the frequency of changes to data elements reported. (See Section 12, Recommended Changes to Grant Reports.)

17 percent of the respondents stated that they are required to report information that is duplicated in other reports. (See Section 13, Duplicate Reporting.)

DRAWING FEDERAL FUNDS

Seventy-three percent of respondents want only one system for drawing federal funds, regardless of the federal agency. On-line cash drawing methods and information appear to be the most popular.

OTHER CONCERNS

Respondents identified conflicting requirements related to a U.S. Department of Education grant. The conflicting requirements are listed in Section 14, Conflicting Requirements Identified.

In addition to comments received from survey respondents, we identified conflicting federal grant requirements related to the Food Stamp Program.

The non-expendable personal property regulations at Title 7 of the Code of Federal Regulations, Part 277, conflict with administrative regulations recently made applicable to the Program at Title 7 of the Code of Federal Regulations, Part 3016. The non-expendable personal property requirements at Part 277 also conflict with corresponding requirements of other federal programs.

The non-expendable personal property threshold required at Title 7 of the Code of Federal Regulations, Section 277.2, is \$300 cost per unit. However, the threshold allowed at Title 7 of the Code of Federal Regulations, Section 3016.3, may be as much as \$5,000 cost per unit as determined by the grantee. Further, Section 277.13 requires physical inventories to be taken at least once every two years. However, Section 3016.32 allows states to perform physical inventories at the intervals established by state laws and procedures. The regulations at Title 7 of the Code of Federal Regulations, Part 3016, are applicable to most other U.S. Department of Agriculture programs granted to states and were recently made applicable to the Food Stamp Program.

**SECTION 1:
GRANT SIMPLIFICATION RECOMMENDATIONS**

Common recommendations for grant simplification are standard, on-line grant application and reporting forms; timely, electronic award notifications; quicker response to technical questions; and a single system for drawing federal cash. Better coordination between federal agencies and sub-agencies is recommended for improving the PMS-272 Report. The U.S. Department of Education's Grant Administration and Payment System (GAPS) is also mentioned as a recommended system for other federal agencies.

Table 1 lists all respondents' suggestions for simplifying the grant process. Except in few cases, recommended changes do not address any agency or grant in particular. Recommendations are grouped by Application Process, Awarding Process, Information Access, Reporting, Drawing Federal Cash, and Other. Recommendations applicable to more than one grant area are repeated in each area.

Table 1

Grant Simplification	
Area	Respondents' Recommended Changes
Application Process	Standardize application forms.
	Standardize all forms for all agencies.
	Standardize on-line submission tools including software and hardware needed.
	On-line application for all agencies.
	Standardization of forms
	Standardization of due dates; receipt or postmark
	Standardization of compliance reporting
	All applications be electronic
	Consistency across agencies in the application process
	Ease of request for proposal (user-friendly)
	Make application process simpler
	NIH non-competing awards should be issued like NSF issues their awards.
	NSF does not require submittal of non-competing continuation applications.
	Less agency specific requirements
	Improve instructions for narrative as they relate to the scoring criteria – sometimes requires very complex cross-reference.
	Standardized grant alerts/notification
	More understandable language
	Submit applications in a standard format across all agencies, e.g., Cover page, narrative in similar format arranged according to scoring criteria, budget, special provisions and assurances applicable just to the grant program.
	Utilizing current technology to simplify the process
	Grantor keep info e.g. EIN # in data base
	Keep SF-424 information so there would be no need to submit annually
	Standard application process across all agencies
	Submit via internet
Ease of availability	
Be consistent.	
Adequate Timeframes for Notification and Application	

Grant Simplification	
Area	Respondents' Recommended Changes
Application Process - Continued	One set of forms for all agencies
	Standardized Forms
	Include clean, usable copies of standard forms in packets
	Retain common required information electronically
	Identify common required information
	Simplify the application process.
	Standardize more of the forms
	Permit on-line submission/ expand capacity to answer questions on-line
	Regarding budget justification, be very specific about amount/type of narrative justification required in budget – also consistent among all agencies.
	Reduce duplication and repetition
	Notices should be timelier.
	Electronic submission
	Faster turnaround
	Online application process
	Shorter continuation grant application
	Suggest using NIH application process including new modular application.
	Forms like "debarment," "lobbying" and "certifications" should be done only once
	Need application kit earlier
	Standardized applications
	Streamline the application negotiation process for programs where funding is distributed to states by formula. (example-CFDA 84.332 – Comprehensive School Reform Program)
	Electronic forms
	Simplification
	Standardization of application
	Elimination of cost-sharing requirements
	Application via web access
	On-line submission for all federal funds
	Standardize electronic filing with accessibility by both Research Administration Staff and PI/PD
	Approve award document early enough before grant's effective date
	Single submission point
	Agency on line assistance for application questions
	On line application process & tracking.
	Standardization across agencies regarding application formats and systems
Electronic application process	
Centralize contractor information so you don't have to provide boiler plate info each time	

Grant Simplification	
Area	Respondents' Recommended Changes
Application Process - Continued	File all certification standardized forms once - annually
	Update SF-424 standardized application for federal domestic assistance, make the form widely available online, and implement an online application process. Online grant applications should be stored for federal agency electronic access as needed, reducing the need for multiple paper copies of an application.
	If a federal agency provides restrictions on the number of pages for a response to a solicitation, the federal agency should be prohibited from requesting additional, follow-up information that exceeds the originally required page limit. In submitting our state plan for the Workforce Investment Act, we were limited to a set number of pages. However, we continued over the next year to receive requests for expanded information which created a document that was considerably lengthier than the original required submission.
	Limit on the number of requests a federal agency may make of an applicant for additional information. All supplemental information requests should be identified in a single transmission to the application. Again, with the Workforce Investment Act state plan, one had the impression that reviewers read pieces of the plan and then additional readers read other pieces of the plan and there was an endless barrage of requests for more information.
	Develop one standard application kit to be completed at the beginning of each fiscal year to be submitted to the federal cognizant agency for review, approval, and retention. The federal agency would then notify the respective state agency of approval. At that time each individual grant applied for by the state agency would only need to contain specific project information; such as the 424 form, budget and narrative.
	The paper work required and the process in general for applying for federal funds is too cumbersome and time consuming, especially when compared to the process for applying to foundations. Some attempt to streamline the process should be made.
	Automate process using standardized forms that can be easily typed on
	Establish cordial communication link between the grantor and grantee
	Make the application process electronic
	Allow grants to be sent in via e-mail attachment
	Allow for there to be FAQ's over the web for grant applications
	Send information on grants over the web
	Related assurances such as compliance with EEOC, Disbarment and Suspension, etc. We should just be able to file annually and all federal agencies should have access to this information as needed.

Grant Simplification	
Area	Respondents' Recommended Changes
Application Process – Concluded	<p>We recommend that any agency using electronic proposal submission develop a comprehensive "electronic proposal preparation guide" that addresses the additional considerations that arise when submitting electronically. To be more specific, we will use the National Science Foundation as an example, although the recommendation most likely applies to other agencies who are also testing electronic proposal submission.</p> <p>The National Science Foundation publishes the "Grant Proposal Guide," which explains the basic procedure for preparing hard copy applications to any NSF program. Then, various programs add or alter the guidelines to fit their own program needs. To add to the confusion that arises over whether the program guidelines are meant to be comprehensive or whether the NSF-wide requirements also still apply in some situation, many programs require or recommend that Fastlane (the electronic system) be used for submission. Questions related to the correct preparation of electronic proposals naturally arise, but there is no basic resource for preparing electronic proposals. Although NSF has a Fastlane web page that explains the use of the system, a comprehensive guide to actually preparing proposals electronically is needed.</p> <p>In other words, there appears to be two sets of guidelines, and those which apply to electronic submission are incomplete and sometimes inconsistent with the guidelines which are distributed for "hard copy" applications.</p> <p>Federal agencies should explicitly state both in specific program announcements and in their general policies on unsolicited proposals, whether or not cost sharing by applicants will be a factor in decisions to make awards. If cost sharing will be a consideration in decisions to make awards, then agencies should state precisely how much cost sharing is expected. In addition, all federal agencies should be consistent about items to be allowed as cost share. An approved list of cost-share items could be published, and cost-share reporting should be required only once - at the end of the project.</p> <p>To as great an extent as possible, all federal agencies should use the same, standardized grant terms and conditions; the same, standardized grant application form; and the same certifications and assurances. As it stands now, most federal agencies have their own versions of all these documents. The use of standardized forms by all federal agencies would streamline the grant application and administration process greatly.</p> <p>The federal government should simplify the requirements for certifications and assurances, preferably by having the institution submit the documents electronically on an annual basis. The present process of submitting the documents with every proposal is very cumbersome. The annual electronic submission could be made either to a clearinghouse or to each federal funding agency.</p> <p>Federal agencies should eliminate their existing "hard-copy" proposal and award systems in favor of a standardized, all-electronic system. Such a standardized system is the aim of the Federal Commons project, which is being spearheaded by NIH. NSF has made great strides with its FastLane electronic system, but that system remains unique to NSF; it is not used by any other federal agency. In addition to having a standardized electronic system, all agencies should use, wherever possible, the same standardized forms on the system. A wide variety of agency-specific forms on the system would repeat the problems encountered with the current hard-copy forms.</p> <p>We would also like to comment on enhancements in the federal student assistance applications and Title IV aid programs. We suggest that the federal Department of Education be encouraged to develop a policy for digital or electronic signatures that would greatly assist applicants (students and parents) and University financial aid officers in submission of applications. The Department of Education has done a good job at embracing the electronic world in the form of the use of the Web and the improvement of personal computer product. We commend them for their efforts.</p>

Grant Simplification	
Area	Respondents' Recommended Changes
Awarding Process	Reduce too much paper work
	Standardized award forms
	Be consistent in the awarding format to all grants
	Approve award document on time
	Less time delay in award/denial notification
	Standard award documents
	Electronic notification
	Timeliness of award
	Online notification
	Speedier award process
	Send status information on the award process
	Electronic or email notification of award
	Clear terms & conditions
	Email notification
	All federal agencies adopt email award notification process.
	Provide CFDA number with all awards
	On-line notification and award documents to authorized Univ. Person with a copy to the PI.
	Uniform format
	More prompt notification of awards.
	Full grant award at the beginning of the year.
	Keep web sites updated
	Forward Notice of Grant Award to grantee agency before project beginning date.
	Centralize contractor information so it doesn't have to be duplicated
	Include all reporting requirements within text of award
	Put all awards on web with e-mail notification
	Use standard (as much as possible) forms and terms
	Standardization of method for notification
	Earlier notification of award, that allows cost to be incurred.
	Earlier notification of award
	Reduce turnaround time between application and award
Be consistent.	
Immediate notice of award via electronically	
Sufficient lead time for project start-up	
Be timely with award notification	
Easy availability-Capable of getting grant notice instantly once on Smartlink.	
Reduce delay time	

Grant Simplification	
Area	Respondents' Recommended Changes
Awarding Process - Continued	Review and consider following the streamlined guidelines already established during the Federal Demonstration Project.
	Several federal grantor agencies augment the authorized spending level under various grant awards by funding increases from other grant award documents. However, no actual transfer of funds between documents ever takes place. This creates confusion in reporting expenditures on the PMS-272 Report, as well as, creates cash management drawing confusion. Two examples of this issue occur in the Refugee Resettlement Program and the TANF Program. We recommend that where expenditure authority is increased under a grant award using funds from another award, an actual transfer of funding be made between federal grant award documents.
	Grant awards issued by DHHS are often posted to the 'Smartlink" system prior to receipt of award authorization notification by the State. We recommend that grant award notification be issued by the federal grantor agency via E-mail, or posted to an Internet website. This electronic notification could then be followed by the grant notification letter via mail.
	Grant awards issued by the United States Department of Agriculture (USDA) are currently posted to the 'ASAP' System which is only accessible by direct modem. This creates delays when there are connection problems. We recommend that USDA make the 'ASAP' System available on an Internet website to facilitate access.
	The status of applications should be available on the Internet. We have an application on file with DOL for funding to support the automation of elements of our Workforce Investment Act training provider certification system. There is no notice available as to when decisions will be made on awards. We check on the status every two weeks through the Regional DOL office and every two weeks we are told that a decision will be made in the next two weeks.
	Grant awards issued by the United States Department of Agriculture (USDA) are currently posted to the 'ASAP' System which is only accessible by direct modem. This creates delays when there are connection problems. We recommend that USDA make the 'ASAP' System available on an Internet website to facilitate access.
	Federal agencies should establish expedited review procedures for state-requested waivers if the agency has previously authorized a similar waiver for another state.
	Develop a method to expedite the award process. Sometimes a grant will be awarded months after the federal appropriations process, which in turn causes financial planning and administrative difficulty. These grants still expire on the same date as originally submitted even through the actual award dates are sometimes six (6) months into the grant period.

Grant Simplification	
Area	Respondents' Recommended Changes
Awarding Process - Concluded	Under discretionary funding, allow one (1) year from the date of award as the ending date of the grant, rather than the end of the federal fiscal year. Discretionary funds are often not awarded until late in the year, leaving too little time to effectively implement the grant program.
	It would be helpful if the Universities' Office of Sponsored Programs would be informed about award decision, instead of only notifying the PI.
	Federal agencies should be more accommodating with implementation timelines after funded programs receive Notice of Award (NOA). There is always a very small window between the NOA and implementation during the first year of the grant. Most of our programs do not meet performance outcomes due to late hires (usually not complete until late spring), giving grant staff very few months to recruit and select participants and implement activities.
	Give expanded authority to account managers that would provide greater flexibility in the use of budget without prior grantor agency approval (an option currently available in Department of Education)
	Simplification of the procedure for requesting approval for grant period extensions. Waiting until the extension document is received takes time and slows down grant progress and expenditure of funds.
	<u>Problem.</u> There is often an inordinate delay between the announcement of an award and the actual reception of the authorizing paperwork on campus. The initial announcement generally does not obligate funds or authorize expenditures; thereby creating a conflict for the institutional administrator, i.e. there is an award announcement but no obligation for funding. At times, these delays clash with the academic cadence, thereby negatively impacting faculty and staff commitments, as well as the recruitment of student researchers. These delays also apply to renewal authorizations and approvals of no-cost extensions. It has literally taken months for this type of paperwork to arrive on campus after the initial notification.
	<u>Recommendation.</u> If the initial award announcement could also be an instrument for the obligation of funds, then institutional concerns would be alleviated. This change would eliminate the delay in the initiation of a project pending the receipt of additional paperwork.
	When a prime contract goes to an industrial sponsor, the awarding federal agency should include an authorization of FAR/DFAR clauses to be flowed down to educational institutions. The FAR/DFAR clauses applicable to educational institutions should be identified separately and be consistent from one federal agency to the next.
Federal agencies should eliminate their existing "hard-copy" proposal and award systems in favor of a standardized, all-electronic system. Such a standardized system is the aim of the Federal Commons project, which is being spearheaded by NIH. NSF has made great strides with its FastLane electronic system, but that system remains unique to NSF; it is not used by any other federal agency. In addition to having a standardized electronic system, all agencies should use, wherever possible, the same standardized forms on the system. A wide variety of agency-specific forms on the system would repeat the problems encountered with the current hard-copy forms.	

Grant Simplification	
Area	Respondents' Recommended Changes
Information Access	Clearer definitions of report categories
	Enhance websites with more detailed information. This may reduce phone calls.
	Agencies should return phone calls more timely or be there to answer the phone.
	Quick response to questions especially when implementing a new program.
	Easily accessible interpretive guidance.
	Access to the agency's award transaction history
	Smart forms on website
	Guidelines via web access
	Internet access
	Email help desks
	General grant information available on-line
	Federal register should be more user friendly.
	Online
	Ability to obtain status of quarterly grant award authorizations through a web site.
	Seminars provided for clarification
	Locate in an easily publishable (written and web-based) format all regulations and requirements pertaining to grants from one agency, i.e., Education, that includes EDGAR, GEPA, Americans with Disabilities Act, Civil Rights Act, Age Discrimination Act, etc. It is extremely difficult to keep up with all of the requirements and to know which requirements need to be passed down to subgrantees. It often requires a very educated, experienced person to be able to determine this and to keep up with all the requirements. Grantee agencies need readily available assistance in receiving this information and in being able to disseminate it in readily accessible format to their subgrantees. For example, if a state agency receives a grant from a federal agency, here is everything, and I mean everything, you need to know to properly manage and administer your grant.
	Provide consolidated information available in one location
	Keep web sites updated
	Standardization across agencies regarding application formats and systems
	Combine all cost principles into one set of cost principles similar to the way OMB Circular A-133 was doing.
	Earlier/immediate notice of changes in federal regulations/requirements from the federal agency. Sometimes receive notice 18 or more months after change was in effect.
	On line application tracking
	Agency on line assistance for grant administration
	Response on request for clarification
	User friendly websites
	Increase provision of information via internet.

Grant Simplification	
Area	Respondents' Recommended Changes
Information Access - Continued	Communicate more on a regular basis
	Maintain current information on available grants on the internet.
	Timeliness of answers
	Reduce volume of needless information on Fed agency websites.
	Availability on internet access to regs, rfp, etc
	Make internet access easy & available to grantee
	Update awards status of grants.
	Updated information
	Adequate Timeframes for Notification and Application
	Ease of availability-Easy access to federal contacts.
	Reduce use of voice mail; grantees need contact with people
	Taking more proactive steps in notifying applicants of grant status
	Centralizing grant information/solicitations into one website publication
	Be consistent-Send out Terms and Conditions with each award.
	Put previously submitted successful applications on website
	On-line Information readily available, printable and up-dated frequently
	Standardize across departments
	Ability to download into a PDF or other file.
	Ability to e-mail information to others.
	Make e-mail address available to grantee
	Questions and answers from agencies/ bidders conferences should be prominently posted on the Internet in proximity to other solicitation information.
	In addition to simplifying reporting procedures, an annual review and update of the instructions as they pertain to the reporting mechanism would be helpful. Sometimes the instructions are so general that we are uncertain as to which information to capture for submission.
	When there are significant proposed rule changes that would influence how a program is administered allow state agencies more of an opportunity to comment other than just the <i>Federal Register</i> , such as a mass mail out or a mass email.
Some web sites announcing federal funding opportunities are not as clear or easy to access as others (e.g., The Department of Health web site, requires multiple links before obtaining the desired information).	
Consolidation of OMB Circulars	
There is need for more on-going technical assistance throughout the grant's cycle. While the federal agencies have begun to ask more from programs regarding interim and end of year performance reports, there is very little communication during the year between grant staff and the federal liaison.	

Grant Simplification	
Area	Respondents' Recommended Changes
Information Access - Concluded	<p>We recommend that any agency using electronic proposal submission develop a comprehensive "electronic proposal preparation guide" that addresses the additional considerations that arise when submitting electronically. To be more specific, we will use the National Science Foundation as an example, although the recommendation most likely applies to other agencies who are also testing electronic proposal submission.</p> <p>The National Science Foundation publishes the "Grant Proposal Guide," which explains the basic procedure for preparing hard copy applications to any NSF program. Then, various programs add or alter the guidelines to fit their own program needs. To add to the confusion that arises over whether the program guidelines are meant to be comprehensive or whether the NSF-wide requirements also still apply in some situation, may programs require or recommend that Fastlane (the electronic system) be used for submission. Questions related to the correct preparation of electronic proposals naturally arise, but there is no basic resource for preparing electronic proposals. Although NSF has a Fastlane web page that explains the use of the system, a comprehensive guide to actually preparing proposals electronically is needed.</p> <p>In other words, there appears to be two sets of guidelines, and those which apply to electronic submission are incomplete and sometimes inconsistent with the guidelines which are distributed for "hard copy" applications.</p> <p><u>Problem.</u> Our experience has shown that too often Federal grant administrators are disinclined to provide guidance to institutional grant managers. It is not uncommon for a phone call, e-mail or letter to go unanswered for several months; and yet, institutional grant manager must enforce a variety of rules that are often conflicting or vague. The lack of a timely response may interfere with programmatic goals.</p> <p><u>Recommendation.</u> An information clearing house, which could process specific requests for rule interpretations and/or clarifications in a timely manner, would assist institutional grant managers in the compliance aspects of grant administration.</p>
	All federal agencies should require electronic submission of all grant-related reports, and agency websites should have clear instructions regarding both reporting requirements and the procedures for submitting reports electronically.
	All federal agencies should have up-to-date award information on their websites. Having this information posted on the web would save a multitude of phone calls for both university personnel and their counterparts at the federal agencies.
	Federal agencies should explicitly state both in specific program announcements and in their general policies on unsolicited proposals, whether or not cost sharing by applicants will be a factor in decisions to make awards. If cost sharing will be a consideration in decisions to make awards, then agencies should state precisely how much cost sharing is expected. In addition, all federal agencies should be consistent about items to be allowed as cost share. An approved list of cost-share items could be published, and cost-share reporting should be required only once - at the end of the project.
	When a prime contract goes to an industrial sponsor, the awarding federal agency should include an authorization of FAR/DFAR clauses to be flowed down to educational institutions. The FAR/DFAR clauses applicable to educational institutions should be identified separately and be consistent from one federal agency to the next.

Grant Simplification	
Area	Respondents' Recommended Changes
Reporting Process	Reconcile federal and state funding years if possible
	Standardize throughout departments
	Internet reporting availability
	Establish a common format in reporting all federal grants
	Financial Reports - All standard data set information should be available electronically.
	Reporting should not be req'd if the agency had not yet gotten the grant
	Reporting should not be required before the time period actually ends.
	If problems or errors are detected, grantees should be notified immediately.
	Electronic submittal
	Establish a common format in closing out all federal grants
	Better instructions
	Single point for submission of Technical Report
	Maintain on on-line list on the internet of contact names and phone numbers for all federal grants.
	Submit via internet
	Ability for faculty to submit technical reports on-line with an automatic copy to the Grants Administration Office.
	All federal agencies adopt a uniform reporting process.
	Timeliness of answers
	Ease of availability-Easy access to federal contacts.
	Submit 272 reports semi-annually instead of quarterly.
	Submit all reports electronically.
	Clear instructions
	With many different agencies, there is confusion with which mailing address to use when submitting reports.
	Be consistent-Many reports associated with small grants (Spec Projects) are interpreted differently by the federal contacts, as to what they need.
	Eliminate the expenditure information required on the PMS-272 Report. This information duplicates much of the information reported on the SF-269 and other grant specific financial reporting forms. In many instances, the financial information reported on the PMS-272 Report is artificially understated and incorrect due to authorization limits caused by award timing issues. The CMIA legislation requirements eliminate the need to calculate the balance of federal cash on hand on the PMS-272.
	Provide system to file reports electronically
	Performance Reports - Need electronic format.
Electronic reporting on-line via the internet.	

Grant Simplification	
Area	Respondents' Recommended Changes
Reporting Process - Continued	Have all grant reports submitted though the internet and eliminate the SF-269 reports if the grant is on EDCAPS or PMS272. Concerning the PMS272 quarterly report, perhaps a more detailed cash draw down report will eliminate any confusion as to which grant to apply the money. Could also assign each grant it's own PIN number to keep the grants separate. Redesign the report so that it is more reader friendly.
	Give indication of how reports are going to be used
	Availability of prior year grant information on line.
	Annual Reporting for all grants.
	Make this function available electronically
	Electronic submittal of reports
	Allow states several mechanisms to provide the information to federal agencies. Often the federal software and the state's computer systems are incompatible. This would give states more flexibility and less difficulty in meeting federal reporting deadlines.
	Automate financial and other reports and provide a spreadsheet in commonly used software such as Excel for states to complete and submit. Often, states have to enter data into a separate system, which allows for error. Or, each state has to create its own facsimile of the OMB report if they are an automated state, or type in the report on the OMB approved paper form.
	Standardized reporting
	Online
	No more than 4 required reports per year.
	In addition to simplifying reporting procedures, an annual review and update of the instructions as they pertain to the reporting mechanism would be helpful. Sometimes the instructions are so general that we are uncertain as to which information to capture for submission.
	The GAPS financial reporting system implemented by the U.S. Department of Education is very efficient and user friendly. We recommend it as a model for state and federal agencies.
	The Office of Management and Budget (OMB) has promulgated various 'standard' financial reporting forms, procedures, and filing deadlines in its published circulars (e.g. A-87, A-102, etc.). In actual practice, many grant programs require submission of custom designed financial forms, and prescribe reporting timeframes, which vary widely from the requirements of the OMB circulars. We recommend that, to the greatest extent possible, all federal grantor agencies standardize reporting in compliance with OMB circulars to minimize duplication and confusion related to financial reporting formats and deadlines.

Grant Simplification	
Area	Respondents' Recommended Changes
Reporting Process - Concluded	<p>Various grant awards stipulate differing methods for report recognition of costs. Some awards allow cash basis reporting, while others require obligation date or a modified accrual basis for reporting grants costs. In addition, various grant awards stipulate differing limitations on time allowed for liquidating outstanding obligations. We recommend that grantees be allowed to report on the recognition basis that best follows the grantee's established accounting system, provided that the reporting basis is consistent within grants and reporting periods. We also suggest more standardization of obligation liquidation time limits.</p>
	<p>The 'Federal Cash Transaction Report' (PMS-272 Report) required for submission by recipients of grants from the U.S. Department of Health and Human Services (DHHS) requires duplicate reporting of grant expenditures which are already submitted on grant financial status reports. However, since the PMS-272 Report is based on cash transactions, and because of additional timing issues, the expenditures reflected on this report do not match actual periodic expenditures reflected on the grant financial status report. In addition, because the PMS-272 and the financial status reports are submitted to different Federal agencies (within DHHS), much confusion and consumption of time and effort result from state personnel clearing up Federal Payment Management System concerns related to timing issues. We recommend that the expenditure information required on the PMS-272 Report be deleted from the report, and that the Federal Division of Payment Management coordinate with the various DHHS grantor agencies to obtain expenditure information already submitted to the grantor agencies on required grant financial status reports.</p>
	<p>Several federal grantor agencies augment the authorized spending level under various grant awards by funding increases from other grant award documents. However, no actual transfer of funds between documents ever takes place. This creates confusion in reporting expenditures on the PMS-272 Report, as well as, creates cash management drawing confusion. Two examples of this issue occur in the Refugee Resettlement Program and the TANF Program. We recommend that where expenditure authority is increased under a grant award using funds from another award, an actual transfer of funding be made between federal grant award documents.</p>
	<p>All federal agencies should require electronic submission of all grant-related reports, and agency websites should have clear instructions regarding both reporting requirements and the procedures for submitting reports electronically.</p>
	<p>Problem. Federal granting agencies have different financial reporting requirements and cash request procedures. These requirements may include monthly cash requests via a paper format, quarterly expenditure reports, either in an electronic or paper format, annual paper expenditure reports and both electronic and paper letter of credit procedures.</p> <p>Recommendation. A common electronic format for the reporting of expenditures and the drawing of funds would be a significant improvement. The Department of Education has initiated a combined system for the reporting of expenditures and the drawing of funds. This electronic system is known as the Grant Administration and Payment System (GAPS). GAPS has greatly reduce the institutional burden for reporting and has simplified communication with the agency. The Department of Education GAPS system could provide a model for all agencies.</p>
	<p>Federal agencies should eliminate requirements for duplicate reporting of subcontracts, patents and inventions, and release-of-claims forms.</p>

Grant Simplification	
Area	Respondents' Recommended Changes
Drawing Federal Cash	Centralized
	Online
	Better identification of reimbursed amount (IE. Invoice # on wire)
	Have the same method for drawing federal cash across grants
	Ability to draw down all funds from all agencies for not only grants but also for contracts.
	Standardize the electronic tools needed for drawdown of funds.
	Too many different federal cash withdrawal systems. Standardize systems.
	Have one system to draw down funds. Currently, federal agencies are not consistent.
	One-stop electronic submittal of requests for reimbursement for all awards
	Use a standardized application across all federal agencies, preferably not PMS
	One system for all grants
	Too many user ID and passwords. Develop consistency throughout systems.
	Quicker turn around
	Abolish reimbursement method of payment only if possible
	The need to get money from the fed on time after report has been sent is important.
	Apply one common method of drawing federal money such as PMS letter of credit in all grants.
	Prefer internet rather than electronic modem
	Standardize format amongst all agencies. Go to an accrual basis.
	Single point of access - web based
	Reconciliation process on draw system
	Ease of availability-Maintain other options while Smartlink is down
	One System Regardless of Awarding Agency
	Should be available on-line through secure link
	One system for all draws
	Time availability-3pm max availability could be approved.
	Provide detail information of cash draws on-line.
	Draw on a cumulative basis per agency
Development of a standardized reimbursement process and forms that would be used by all federal agencies.	
The GAPS financial reporting system implemented by the U.S. Department of Education is very efficient and user friendly. We recommend it as a model for state and federal agencies.	

Grant Simplification	
Area	Respondents' Recommended Changes
Drawing Federal Cash - Concluded	Several federal grantor agencies augment the authorized spending level under various grant awards by funding increases from other grant award documents. However, no actual transfer of funds between documents ever takes place. This creates confusion in reporting expenditures on the PMS-272 Report, as well as, creates cash management drawing confusion. Two examples of this issue occur in the Refugee Resettlement Program and the TANF Program. We recommend that where expenditure authority is increased under a grant award using funds from another award, an actual transfer of funding be made between federal grant award documents.
	Grant awards issued by the United States Department of Agriculture (USDA) are currently posted to the 'ASAP' System which is only accessible by direct modem. This creates delays when there are connection problems. We recommend that USDA make the 'ASAP' System available on an Internet website to facilitate access.
	<u>Problem.</u> Federal granting agencies have different financial reporting requirements and cash request procedures. These requirements may include monthly cash requests via a paper format, quarterly expenditure reports, either in an electronic or paper format, annual paper expenditure reports and both electronic and paper letter of credit procedures.
	<u>Recommendation.</u> A common electronic format for the reporting of expenditures and the drawing of funds would be a significant improvement. The Department of Education has initiated a combined system for the reporting of expenditures and the drawing of funds. This electronic system is known as the Grant Administration and Payment System (GAPS). GAPS has greatly reduce the institutional burden for reporting and has simplified communication with the agency. The Department of Education GAPS system could provide a model for all agencies.

Grant Simplification	
Area	Respondents' Recommended Changes
Other	Equalize recognition of matching sources
	Provide better timelines for applying for grants.
	Allow for revisions
	Reduce PMS-272 to information use only
	Allow more flexibility in budget amendments.
	Produce final federal rules and regulations before a program is released. It becomes impossible and clean-up is something else when this happens.
	Streamline or eliminate subgrant award reports
	Streamline close-out process
	Grant transfers between universities need to be completed more timely and accurately.
	Eliminate reporting requirements under Section 424 of General Education Provisions Act (GEPA). Performance reporting requirements should encompass all necessary data of this type.
	Get all agency forms on-line; standardize the forms and electronic tools to be used.
	When a grant program is to be administered at the state level as a discretionary grant, the grant cycle should end before another grant cycle with new grantees begins. For example, if a grant cycle is for three years, then the next cycle begins at the end of the three-year program. This allows time to work with the grantees, learn from them, and plan for ensuring that the next grant cycle is successful. This is better than conducting a new program cycle each year, all with different starting and ending dates. There needs to be a focus with one group of grantees to ensure success with discretionary funds.
	Train or coach peer reviewers to get more consistency.
	We receive numerous refunds from subgrantees for old grants that have already been closed. It would be much simpler and more efficient to process those refunds against the most current grant instead of having to reopen and adjust older closed grants. Over time, it tends to be immaterial and a wash.
	Establish a dollar threshold for the Minority Business Enterprise/Woman-Owned Business Enterprise reporting and require annual reporting. The administrative costs incurred in the preparation of this information are extremely high in comparison to the benefits that the federal agencies may receive.

SECTION 2: MOST BURDENSOME GRANTS

Although respondents reported that several large grants are administratively burdensome, more small grants were mentioned. It appears that the degree of administrative burden is not necessarily indicated by the size of a grant. It may be relatively more costly to administer a small grant with complicated/conflicting regulations, intricate budgets, poor federal agency support, late award notification, or voluminous application or reporting requirements than to administer a large federal grant.

Respondents cite complex regulations, late grant award notification, excessively detailed reporting, intricate maintenance of effort requirements, multi-year grants with annual continuation, intricate budgets, and poor federal agency support as common reasons some grants are difficult to manage. Table 2 lists the most burdensome grants identified by respondents and the specific reasons they are burdensome.

Table 2

Burdensome Grants		
Federal Agency	CFDA No.	Respondents' Reasons
Agency for International Development	02.000	Simplify regulations.
Office of National Drug Control Policy	07.000	There is not a CFDA # for these program (Office of National Drug Control Policy). For state reporting purposes, it makes it very difficult to report on. Several initiatives require different things, lose documentation and slow funding process.
Department of Agriculture	10.000	All quarterly and reporting for the U. S. Department of Agriculture is a problem. Cash draws for USDA is a problem.
	10.553 10.555	National School Breakfast and School Lunch Programs. Whenever a subgrantee submits a meal count correction for a prior period, states are required to process that adjustment against the original grant even if has already ended and the final reports have been filed. This requires reopening the grant with the feds and amending the final grant financial report as well as the FNS10 meal count reports. These adjustments are usually immaterial and it's not worth the states' or federal's time and effort to adjust already closed grants. These adjustments should be allowed to be offset against the current year grant. Over a number of years, it tends to be a wash anyway.
	10.561	The reporting and program requirements for the Food Stamp Employment and Training program are disproportionately burdensome to maintain for the amount of funding provided.

Burdensome Grants		
Federal Agency	CFDA No.	Respondents' Reasons
Department of Commerce	11.000	National Oceanic and Atmospheric Administration - Grants office doesn't notify financial office of new awards. We can't get our money.
Department of Defense	12.000	Individual quarterly report w/ interest payment. Better to have drawdown for cost reimbursement.
	12.000 Office of Naval Research	<ul style="list-style-type: none"> Multi-year grants with annual continuation - it would be simpler to award entire project amount and reduce number of actions required. You have to deal with ONR and also other branches of DOD depending on which one funded your grant. They often ask for the same information a multitude of times because they have misplaced it. I would like to be able to charge them for each additional copy I am required to send because they have lost documents. This is especially true of invoices and requests for payment.
Department of Justice	16.607	Timeliness of award; successive years overlap, pre-award period too long.
Department of Labor	17.255	<ul style="list-style-type: none"> If a federal agency provides restrictions on the number of pages for a response to a solicitation, the federal agency should be prohibited from requesting additional, follow-up information that exceeds the originally required page limit. In submitting our state plan for the Workforce Investment Act, we were limited to a set number of pages. However, we continued over the next year to receive requests for expanded information which created a document that was considerably lengthier than the original required submission. Limit on the number of requests a federal agency may make of an applicant for additional information. All supplemental information requests should be identified in a single transmission to the application. Again, with the Workforce Investment Act state plan, one had the impression that reviewers read pieces of the plan and then additional readers read other pieces of the plan and there was an endless barrage of requests for more information. The status of applications should be available on the Internet. We have an application on file with DOL for funding to support the automation of elements of our Workforce Investment Act training provider certification system. There is no notice available as to when decisions will be made on awards. We check on the status every two weeks through the Regional DOL office and every two weeks we are told that a decision will be made in the next two weeks.
National Aeronautics and Space Administration	43.000	Forecasting on training grants should be eliminated.
National Science Foundation	47.000	Multi-year grants with annual continuation - it would be simpler to award entire project amount and reduce number of actions required, complicated application process.
Department of Energy	81.000	Multi-year grants with annual continuation - it would be simpler to award entire project amount and reduce number of actions required.
	81.111	Required to send 269A 270 to three different addresses.

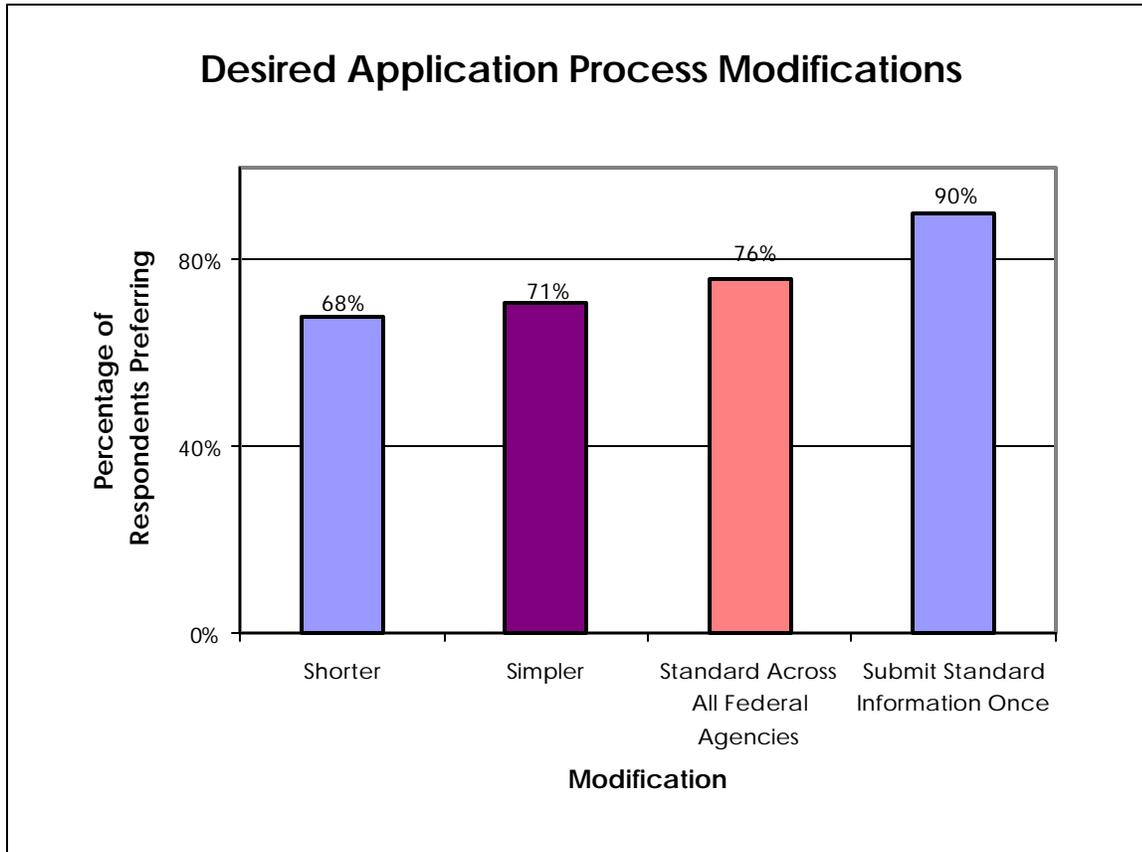
Burdensome Grants			
Federal Agency	CFDA No.	Respondents' Reasons	
Department of Education	84.000	<ul style="list-style-type: none"> Confusing regulations. Agency personnel will not return phone calls, or provide clarification of regulations. They request too many intermittent reports, and they do not have a standardized format. Multi-year grants with annual continuation – it would be simpler to award entire project amount and reduce number of actions required. 	
	84.010 84.013 84.011 84.332 84.276 84.298 84.186 84.281	Public Law 103-382 allowed the consolidation of administrative funds for these eight grants. However, when drawing down funds or reporting expenditures, these consolidated funds must be allocated back to the original CFDA number. Recommend that the law be changed to allow these grants to be combined into a new CFDA number for cash drawdowns and expenditure reporting.	
	84.116A	Conflicting sets of guidelines issued	
	84.339	Conflicting sets of guidelines issued	
	Department of Health and Human Services	93.113	Budgets too intricate; too limited to permit easy budget revisions.
		93.217	Tracking program income
93.558		<ul style="list-style-type: none"> Requires extremely detailed reporting on a quarterly basis. State must collect some information solely for federal reporting. Also, MOE requirements (rather than a stated matching percentage) create tremendous budgeting, accounting, and cash management problems. Rules/Regs/Reporting too complex, also state report makes it like comparing apples and oranges. Several federal grantor agencies augment the authorized spending level under various grant awards by funding increases from other grant award documents. However, no actual transfer of funds between documents ever takes place. This creates confusion in reporting expenditures on the PMS-272 Report, as well as, creates cash management drawing confusion. Two examples of this issue occur in the Refugee Resettlement Program and the TANF Program. We recommend that where expenditure authority is increased under a grant award using funds from another award, an actual transfer of funding be made between federal grant award documents. 	
93.566 93.576 93.584		Several federal grantor agencies augment the authorized spending level under various grant awards by funding increases from other grant award documents. However, no actual transfer of funds between documents ever takes place. This creates confusion in reporting expenditures on the PMS-272 Report, as well as, creates cash management drawing confusion. Two examples of this issue occur in the Refugee Resettlement Program and the TANF Program. We recommend that where expenditure authority is increased under a grant award using funds from another award, an actual transfer of funding be made between federal grant award documents.	
93.777		Financial reporting on the PMS 272. The format of this report does not allow states to report true actual expenditures on grant programs in cases where Federal grantor agencies have not issued timely grant award authorizations. Artificially understating expenses so as not to exceed the authorized amounts distorts the state agency's true cash position.	

Burdensome Grants		
Federal Agency	CFDA No.	Respondents' Reasons
Department of Health and Human Services – Concluded	93.865	Capitalization grants are very hard to fiscally manage because the agency has not provided definitive information to all individuals (PI and contract and grant office) regarding capitalization requirements (e.g. reporting). PI and contract and grant office needs to have the same understanding. It would be very helpful if the agency identified a website to get more information or provided this information in their terms and conditions of the award.
	93.917	<ul style="list-style-type: none"> Required subcontractor data is very difficult to obtain and compile, and is not apparently used by HRSA Tracking matching and caps on Adm. and planning
	93.919	Tracking matching and maintenance of effort.
	93.940	Expenditure data is required in artificial categories that have no link to funding allocations.
	93.959	Large volume of information requested on annual application.
	93.988	The matching percentage is not known until the grant award is received. It is unclear what can be counted for matching in this program.
	93.994	Tracking component caps by activity and budget location.
National Institutes of Health	93.000	Multi-year grants with annual continuation - it would be simpler to award entire project amount and reduce number of actions required.
<p>Bullets denote comments by different respondents or separate comments by the same respondent on the same CFDA Number.</p> <p>If a CFDA number has three zeros, then the respondent identified the federal agency only, not a particular CFDA number. The federal sub-agency is shown when the respondent indicated it.</p>		

SECTION 3: APPLICATION PROCESS MODIFICATIONS

Respondents favor shorter, simpler, and standard application processes across all federal agencies. Ninety percent also favor a system in which they submit standard applicant information only once to the federal government, rather than submitting the same information with each grant application. (See Figure 1.)

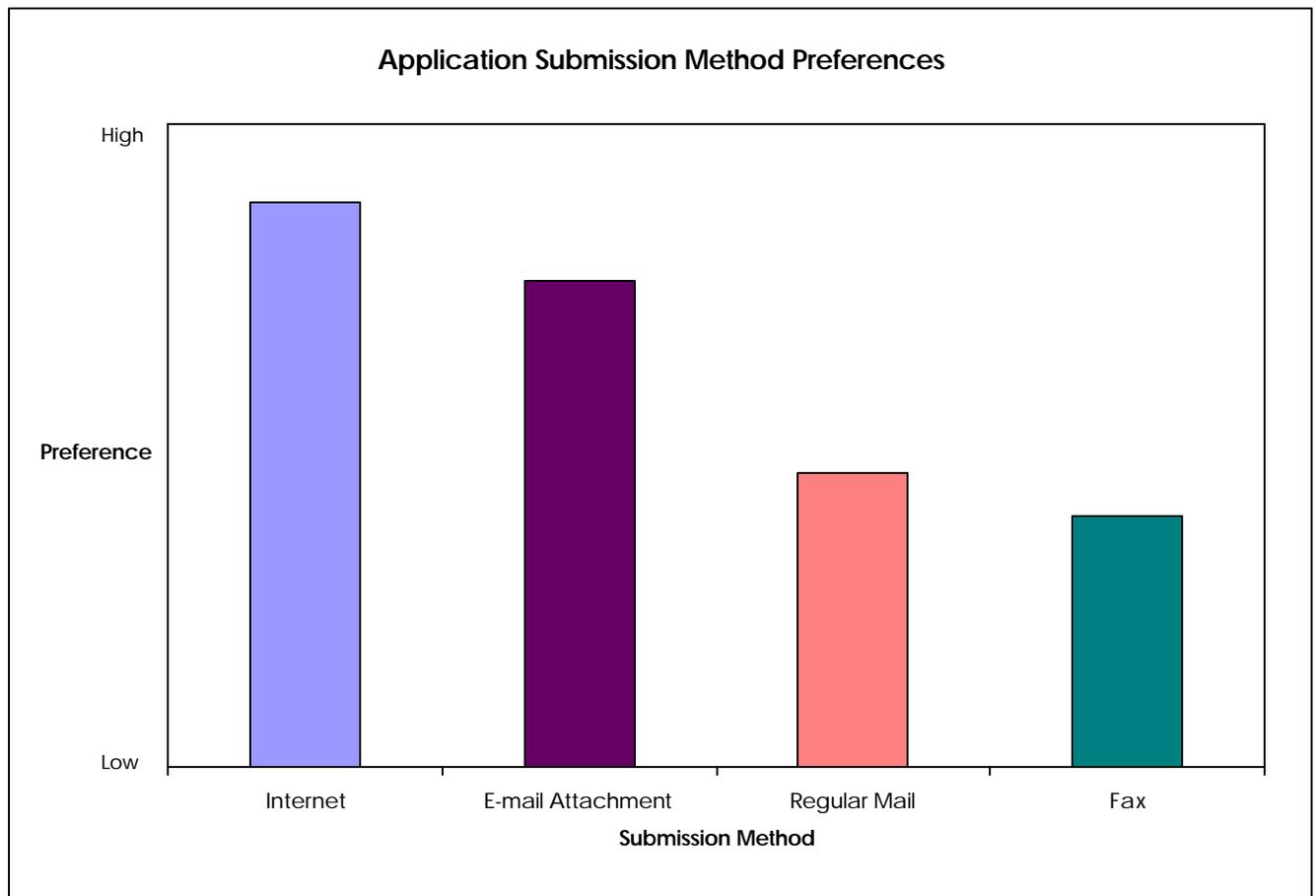
Figure 1



SECTION 4: APPLICATION SUBMISSION METHODS

Respondents were asked to rank the methods they preferred for submitting grant applications. On-line and e-mail application submissions were preferred over regular mail or fax submissions. Figure 2 depicts the relative average preferences for all respondents.

Figure 2



SECTION 5: RECOMMENDED FEDERAL GRANT APPLICATION MECHANISMS

Respondents recommended the grant application mechanisms of approximately 39 different grants for various efficiency reasons. Along with on-line access, common efficiencies mentioned are uncomplicated forms, policies, and guidelines. The majority of the grants are from the Department of Health and Human Services, the National Science Foundation, and the Department of Education.

Specific comments on grant application mechanism efficiencies are provided in Table 3.

Table 3

Grant Application Mechanisms Recommended		
Federal Agency	CFDA No.	Respondents' Comments
Department of Agriculture	10.000	Cooperative State Research, Education, and Extension Service –Ease of use of forms, thorough guidelines
	10.570	This is a grant award based on meals served in the state.
Department of Housing and Urban Development	14.228	Consolidated Planning
	14.231	Consolidated Planning
	14.239	Consolidated Planning
Department of Justice	16.579	This grant provides requesting funds and reporting on line
	16.591	Application via internet
	16.607	Simplified proposal packet
Department of Labor	17.005	Lots of national support. Large source of funding and necessary information
National Aeronautics and Space Administration	43.000	Uncomplicated process
National Foundation on the Arts and the Humanities	45.310	Rules are flexible and simplified
National Science Foundation	47.000	<ul style="list-style-type: none"> • Automated proposals – Fast Lane • Electronic proposal system/consistency • On-line and User Friendly, Great technical help if needed • Standardized and very efficient • National Science Foundation Fast lane in general is particularly efficient • Easy/Fast lane submittal; Award made for entire segment of project • Internet accessible apps & reports

Grant Application Mechanisms Recommended		
Federal Agency	CFDA No.	Respondents' Comments
National Science Foundation – Concluded	47.049	<ul style="list-style-type: none"> National Science Foundation Chemistry Fast lane is very efficient, easy to use National Science Foundation Fast lane is very efficient & easy to use
	47.070	Electronic and standardized (National Science Foundation Fast Lane)
	47.074	Clear and unambiguous
Department of Veterans Affairs	64.000	Easily understood guidelines & Award easily maintained
Environmental Protection Agency	66.700	Consistent from year to year
Federal Emergency Management Administration	83.552	Drawing funds are performed online.
Department of Education	84.000	Ease of Instructions, uncomplicated process
	84.184H	RFP is straight forward with little redundancy
	84.281B	Layout is easy to follow
	84.342A	Uses drawdown of funds - No financial reports to submit
Department of Health and Human Services	93.000	<ul style="list-style-type: none"> Web forms at various sites; E-mail award notification National Institutes of Health - Ease of use of forms, guidelines very thorough
	93.044	This is a formula grant - no application is required.
	93.045	This is a formula grant - no application is required.
	93.104	The grant application was efficient and was a learning experience for the applicant. The application was written in a way that required the applicant to collaborate and cooperate with other entities, including consumers of service in order to respond to the grant requirements.
	93.217	Left blank by respondent
	93.283	100% grant, lot of support, not too many restrictions/requirements
	93.358	Easily understood guidelines & Award easily maintained
	93.398	Clear and unambiguous
	93.556	Annual Report/flexible Format
	93.645	Annual Report/flexible Format
	93.667	Free Form Block Grant Request
	93.778	<ul style="list-style-type: none"> Completed over the Internet Annual Report/flexible Format
	93.837	Easily understood guidelines & Awards easily maintained

Grant Application Mechanisms Recommended		
Federal Agency	CFDA No.	Respondents' Comments
Department of Health and Human Services - Concluded	93.856	Clear and unambiguous
	93.900	Center for Disease Control - standard forms easy to use; E-mail award notification
	93.919	Left blank by respondent
	93.000	National Institutes of Health - Format consistent, Limitation in pages
<p>Bullets denote comments by different respondents or separate comments by the same respondent on the same CFDA number.</p> <p>If a CFDA number has three zeros, then the respondent identified the federal agency only, not a particular CFDA number. The federal sub-agency is shown when the respondent indicated it.</p>		

**SECTION 6:
FEDERAL GRANT APPLICATION MECHANISMS NOT
RECOMMENDED**

Respondents were asked which federal grant application mechanisms they would not recommend to other federal agencies because of the mechanism's inefficiency. Respondents were also asked why they would not recommend these application mechanisms. Common complaints are excessive details, conflicting guidelines, and repetitive information.

The two federal agencies mentioned the most frequently by respondents for grant application mechanisms they would not recommend are the Department of Health and Human Services and the Department of Education. These two federal agencies were also mentioned the most frequently for having efficient grant application processes.

Specific comments on application mechanism inefficiencies are presented in Table 4.

Table 4

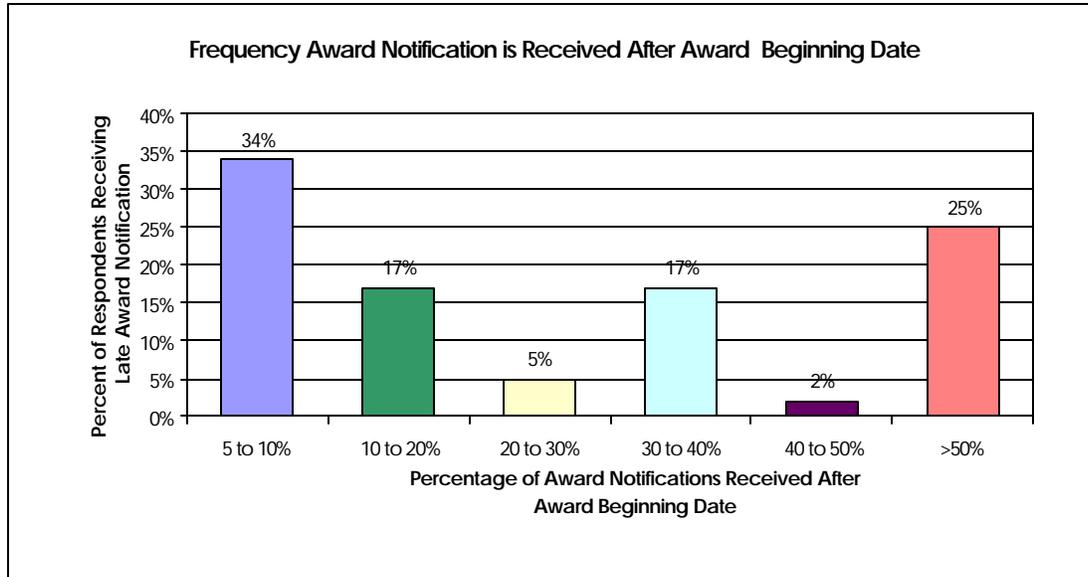
Grant Application Processes Not Recommended		
Federal Agency	CFDA No.	Respondents' Comments
National Endowment for the Humanities	06.000	Complicated forms that are geared for Non-profit agencies rather than for higher education applicants.
Office of National Drug Control Policy	07.000	Time consuming and relies heavily on documentation. Too many authorized approvals. Inconsistent requirements among initiatives.
Department of Agriculture	10.163	Unable to complete application usually until after start date usually due to notification issues
	10.206	Excessive information requested about University that can be found elsewhere
	10.551	Request, 269, and State Plan Must All Match
Department of Defense	12.000	Not uniform among agencies, not electronic and format changes from year to year.
	12.420	Amount of paperwork
Department of Housing and Urban Development	14.000	Criteria is lengthy and obscure
	14.228	The rules were not finalized before awards were made.
National Foundation on the Arts and the Humanities	45.100	<ul style="list-style-type: none"> • NEH-Forms cumbersome, difficult to fill out • Forms are cumbersome, difficult to fill out.

Grant Application Processes Not Recommended		
Federal Agency	CFDA No.	Respondents' Comments
National Science Foundation	47.000	<ul style="list-style-type: none"> • Electronic submissions problematic • Fast lane is cumbersome and inefficient
Environmental Protection Agency	66.606	Needs paperwork reduction, review process too slow
Department of Education	84.000	Cumbersome, difficult to read, inconsistent, and information is frequently missing from the application package.
	84.031A	Budget forms require the same information in many different formats. This greatly increases the amount of effort and paper.
	84.033	confusing and financial practices are contradictory to other federal programs
	84.116A	Conflicting guidelines make application difficult
	84.268	Confusing. Financial practices are contradictory to other federal programs
	84.339	<ul style="list-style-type: none"> • Confusing. Financial practices are contradictory to other federal programs • Conflicting guidelines make application difficult
Department of Health and Human Services	93.000	<ul style="list-style-type: none"> • Not electronic, repetitive information. • National Institutes of Health – Block/Flatline/non-electronic
	93.268	Worksheets too burdensome for information that isn't necessary in determining how to award the federal dollars.
	93.603	Requires Annual Re-Application
	93.777	Excessive Level of Detail Required
	93.959	Large volume of requested details.
	93.994	Level and volume of detailed data.
<p>Bullets denote comments by different respondents or separate comments by the same respondent on the same CFDA number.</p> <p>If a CFDA number has three zeros, then the respondent identified the federal agency only, not a particular CFDA number. The federal sub-agency is shown when the respondent indicated it.</p>		

SECTION 7: AWARDING PROCESS

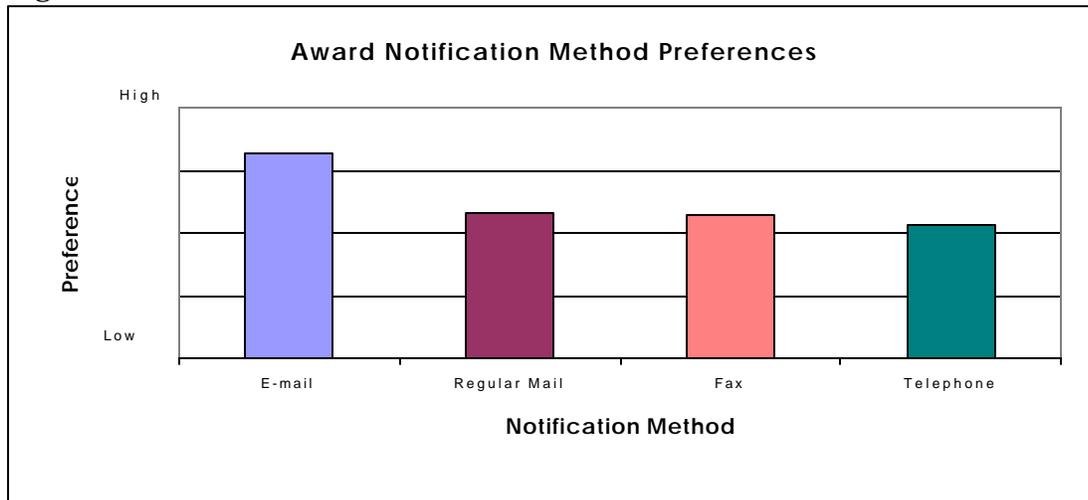
25 percent of the respondents reported that in the last two years, at least 50 percent of their grant award notifications were received after the award beginning date. (See Figure 3.)

Figure 3



E-mail is the respondents' first choice for grant award notification. Their second choice is by regular mail, followed by fax and telephone. (See Figure 4.)

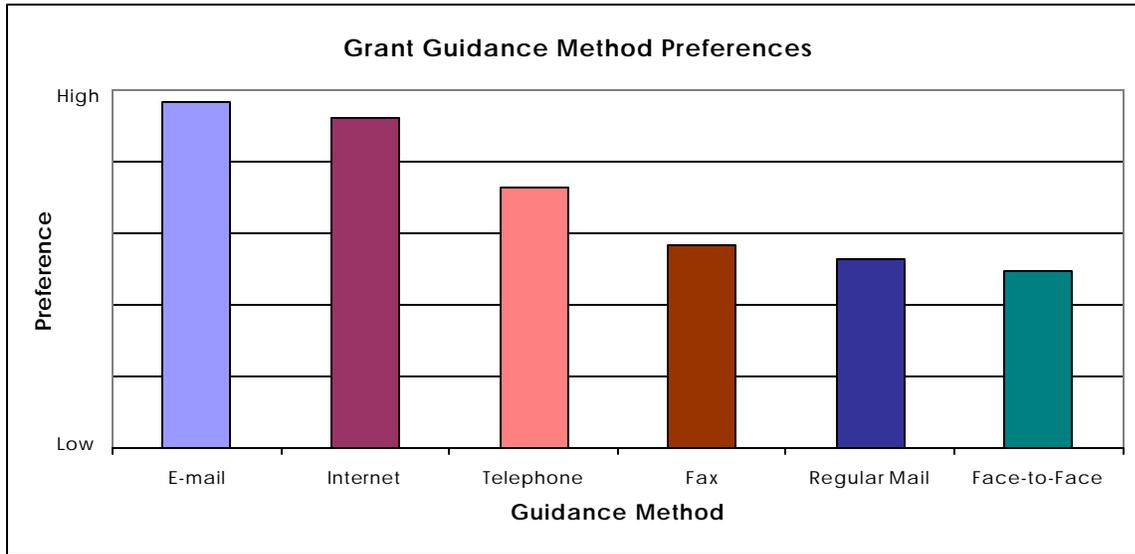
Figure 4



SECTION 8: INFORMATION ACCESS

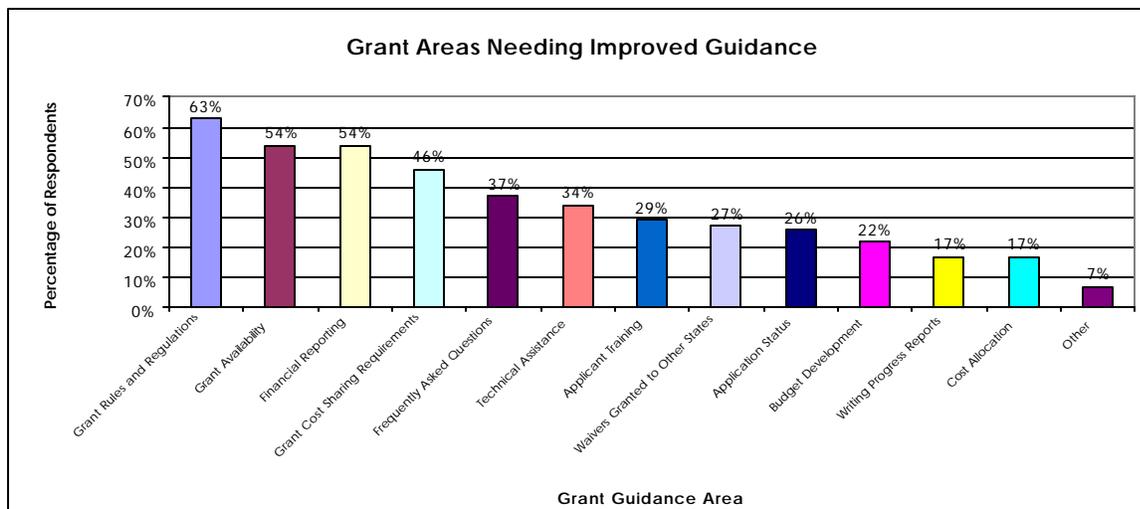
Internet and e-mail are the methods through which respondents prefer to receive grant guidance from the federal government. Some respondents commented that telephone assistance would be more useful if voice mail were answered in a more timely manner. See Figure 5.

Figure 5



At least 50 percent of the respondents want better guidance from the federal government regarding Grant Rules and Regulations, Grant Availability, and Financial Reporting. Other areas in which at least one-third of the respondents need improved guidance/information are Grant Cost Sharing Requirements, Frequently Asked Questions, and Technical Assistance. See Figure 6.

Figure 6



SECTION 9: PROBLEMATIC FINANCIAL REPORTS

(Note: For this survey only, financial reports were defined as the SF-269/SF-269A, SF-272/272A, and PMS-272 reports. Performance reports were defined as all others.)

Common difficulties cited with the Department of Health and Human Services' Payment Management System (PMS) 272 Report appear to stem from late award adjustments on the system. Since grantees are not allowed to report expenditures on the PMS-272 in excess of the available adjusted award, grantees sometimes must report fewer expenditures than they actually had. Reporting fewer expenditures causes a distortion against cash advances, making it appear that there is excess cash on hand, which causes the PMS to place a hold on cash advances. This and other reporting problems with the PSM 272 are detailed in Table 5.

Common difficulties reported with the SF-269 are the amount of required detail, the lack of a functioning on-line submission site, award notification after the end of the first quarter, and the end of the liquidation period coinciding with the final report due date.

See Table 5 for detailed comments about financial reports for individual grants.

Table 5

PMS-272 Report		
Federal Agency	CFDA No.	Respondents' Comments
Department of Agriculture	10.000	USDA either does not update the totals or does so incorrectly
Department of Health and Human Services	93.000	Overall
	93.658	Does not allow for actual expenses; therefore amounts are meaningless. The PMS-272 is viewed by most to be time consuming and meaningless. The grant information can be helpful. The completion of the report is duplication of effort.
	93.777	Grant award authorizations are continuously late for this CFDA. Expenditures against the grant are forced to be understated on the PMS report so as not to exceed total cumulative grant dollars authorized. This causes a distortion against cash advances, making it appear that we have excess cash on hand since we cannot fully report true expenditures within a quarter. The Feds in turn will place a hold on all cash advances against this grant. This has a great negative impact on the operation of programs funded by this grant. Charging the FEDS interest under the CMIA act due to the continuous late awards has failed to rectify the problem.
Corporation for National Service	94.004	This particular grant includes all grant year information on one form going back from 1993 to the current date. Because of this, there is more room for error when reporting the program draws and expenditures.

SF-272/272A Report		
Federal Agency	CFDA No.	Respondents' Comments
Department of Agriculture	10.210	Cannot submit report via internet
Department of Defense	12.000	Quarterly for each and every grant.
SF-269/269A Report		
Federal Agency	CFDA No.	Respondents' Comments
Department of Agriculture	10.664	Lines 10a through 10i are difficult to understand
Department of Commerce	11.611	Cumulative carry-over from previous year. High complexity re: subrecipient match. New award should be issued each year.
Department of Justice	16.000 Office of Justice Programs	The SF-269 electronic system has been down for over a year. In addition, OJP does not provide paper copies of reports. I have to make copies every quarter of old reports that are over a year old to submit by FAX. It usually takes 2 days to get through on the FAX.
National Foundation on the Arts and the Humanities	45.310	Instructions are not clear
Department of Education	84.002	An excessive amount of detailed categories are required on these reports that cannot be pulled directly from our accounting system. Requires obtaining amounts from grant managers maintained externally that can not be verified by the financial report preparer.
	84.048	An excessive amount of detailed categories are required on these reports that cannot be pulled directly from our accounting system. Requires obtaining amounts from grant managers maintained externally that can not be verified by the financial report preparer.
Department of Health and Human Services	93.110	Submit hard copy rather than electronic
	93.278	too much detail
	93.393	Hard copy required (not electronic); cannot report encumbrances; not cumulative
	93.566	Final Report due date is on last day of liquidation period.
	93.584	Final Report due date is on last day of liquidation period.
	93.645	Receives Award after the end of Qtr 1
	93.917	Matching and Cap on Adm. and Planning
	93.919	Matching and Maintenance of Effort
Other - Financial Report Not Specified by Respondent		
Federal Agency	CFDA No.	Respondents' Comments
Department of Defense	12.000 Office of Naval Research	They do not always forward the submitted reports to the proper personnel. Also, we have to submit three copies of the same information to three different branches of the Office. This is unacceptable.
If a CFDA number has three zeros, then the respondent identified the federal agency only, not a particular CFDA number. The federal sub-agency is shown when the respondent indicated it.		

SECTION 10: PROBLEMATIC PERFORMANCE REPORTS

(Note: For this survey only, financial reports were defined as the SF-269/SF-269A, SF-272/272A, and PMS-272 reports. Performance reports were defined as all others.)

Respondents point out that the amount of required detail makes it difficult to manage performance reporting requirements. See Table 6 for detailed comments about performance reports for individual grants.

Table 6

Federal Agency	CFDA No.	Report	Respondents' Comments
Department of Agriculture	10.551	FNS-366A	Report is a request for funds. However, we are required to match it at year-end with funds actually expended. This means that annually, we have to submit at least one amendment in order to balance the request for funds with funds actually expended.
Department of Defense	12.000 Office of Naval Research	Not Specified	This office has trouble coordinating with other DOD agencies and often requires multiple copies of the same report. It also loses reports and we must submit them 2-5 times.
Department of Justice	16.540	Performance Report	Software not user friendly
	16.588	N/A	No standard form and unclear instructions
National Aeronautics and Space Administration	43.000	Inventory	Inventory reports are inconsistently applied
Department of Education	84.186A	Consolidated State Performance Report No. 1810-0614	It is difficult to gather information on program effectiveness because there is such a wide range of programs funded by SDFSC. This is subjective information. Information is also requested on the Youth Risk Behavior Survey and Texas does not currently administer this survey.
	84.186	Performance Report	Electronic submission not available
Department of Health and Human Services	93.556	Not Specified	Too complex/detail required.
	93.558	ACF-196 TANF Data Report	Too detailed. Requires the state to keep track of detail of little or no use to administration of the state.
	93.645	Not Specified	Too complex/detail required.
	93.674	Not Specified	Too complex/detail required.
	93.778	HCFA-21E HCFA-64.21E HCFA-64EC	Too detailed. Categories overlap over the time period being reported causes confusion and inconsistent information across states.
If a CFDA number has three zeros, then the respondent identified the federal agency only, not a particular CFDA number. The federal sub-agency is shown when the respondent indicated it.			

SECTION 11: GRANT REPORT SUBMISSION

PROBLEMS ARE CAUSED WHEN FEDERAL AGENCIES' DEADLINES DIFFER FROM THE PRESCRIBED REPORTING DEADLINES

Respondents reported that it is problematic for them when federal agencies have different reporting deadlines than those in the Federal Office of Management and Budget (OMB) Grants Management Common Rule (Common Rule) and Circular A-110 (A-110).

Although only 22 percent of the respondents stated that federal agencies vary from the financial reporting deadlines prescribed in the Common Rule and A-110, 44 percent stated that when federal agencies vary, such variances are problematic.

Although only 10 percent of the respondents stated that federal agencies vary from the performance reporting deadlines prescribed in the Common Rule and A-110, 25 percent stated that when federal agencies vary, such variances are problematic.

MOST RESPONDENTS AGREE THAT THE OMB PRESCRIBED REPORTING DEADLINES ARE REASONABLE

Seventy-six percent of the respondents concurred with the reasonableness of reporting deadlines prescribed in the Common Rule and A-110. Twenty-four percent believed the deadlines were too short.

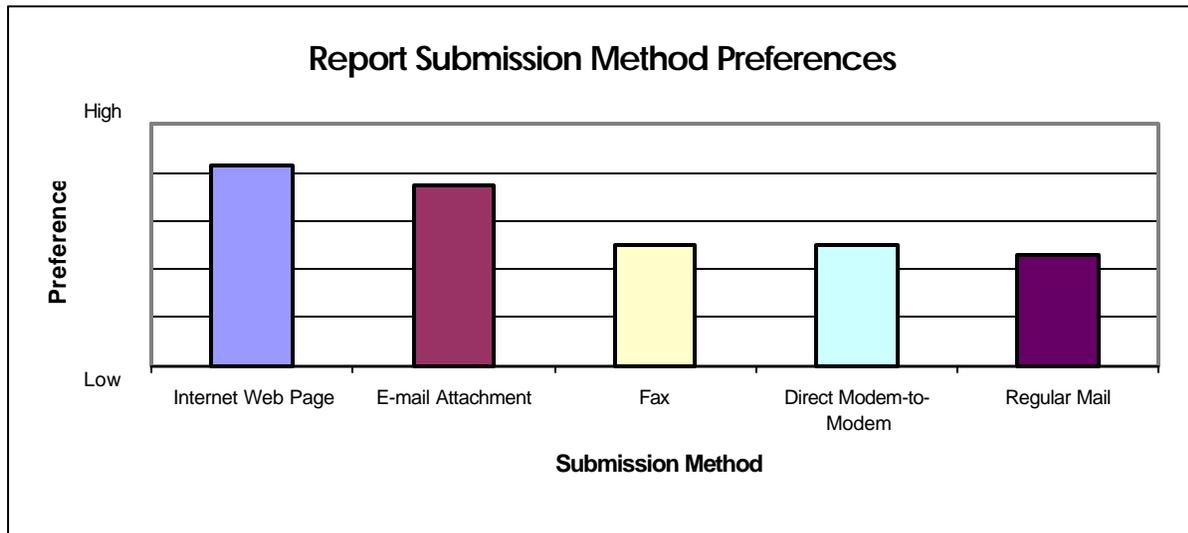
THERE IS POTENTIAL FOR MORE GRANT REPORTS TO BE SUBMITTED ELECTRONICALLY

- Survey results on financial reports reveal that 69 percent of respondents are provided an option by federal agencies to submit reports electronically for less than 25 percent of the grants.
- Survey results on performance reports reveal that 73 percent of respondents are provided an option by federal agencies to submit reports electronically for less than 25 percent of the grants.

RESPONDENTS PREFER SUBMITTING GRANT REPORTS ELECTRONICALLY

On-line and e-mail report submissions are the most popular methods. Regular mail and direct modem-to-modem submissions are the least popular methods. (See Figure 7.)

Figure 7



SECTION 12: RECOMMENDED CHANGES TO GRANT REPORTS

The most frequent recommendations for changes to grant reports, other than to the 269 and 272 reports, were to reduce the number of data elements reported and to reduce the frequency of changes to data elements reported. Recommendations for changes are detailed in Table 7.

Table 7

Report Changes			
Federal Agency	CFDA No.	Report Name And Number	Respondents' Recommendations
Department of Agriculture	10.551	Financial Report FNS-366A	Do not require that this report match the end-of-year FNS-366 report because these reports are for different purposes and should not have to match. Having to make it match creates extra work unnecessarily.
Department of Justice	16.575	VOCA performance report	<ul style="list-style-type: none"> Reduce Frequency of Changes to Data Elements Reported Clarification of definitions
	16.588	VAWA performance report	Reduce Number of Data Elements Reported
Department of Labor	17.255	WIA Standard Report (SR)	<ul style="list-style-type: none"> Reduce Number of Data Elements Reported Reduce Frequency of Changes to Data Elements Reported Clearer, more timely definition of data elements is needed.
National Aeronautics and Space Administration	43.000	Not stated by respondent	Forecasting on NASA grants
Environmental Protection Agency	66.700	Not stated by respondent	Standardization or uniformity of data elements for all states
Department of Education	84.000	Not stated by respondent	Reduce Number of Data Elements Reported
	84.141	Year-end report	Reduce Number of Data Elements Reported
	84.177	IL Services for Older Blind ED (RSA) FOB	The survey of consumer satisfaction is a duplicate of our internal survey. It would be more efficient to have a statistical sample survey conducted by a third party.

Report Changes			
Federal Agency	CFDA No.	Report Name And Number	Respondents' Recommendations
Department of Education – concluded	84.186	Safe and Drug-Free Schools Performance Report	<ul style="list-style-type: none"> • Reduce Number of Data Elements Reported • Electronic submission
Department of Health and Human Services	93.104	Quarterly Report	Do not get feedback from the report so we are not sure how the report is being used or whether it is helpful.
	93.558	TANF Data Report ACF-196	Reduce Number of Data Elements Reported
	93.778	Number of Children Served HCFA-21E, HCFA-64.21E, HCFA-64EC	<ul style="list-style-type: none"> • Reduce Number of Data Elements Reported • We have had problems with the software to get the data to HCFA. In addition, the regulations were not clear enough and modifications had to be made to create a report that captured what HCFA wanted rather than what they put in the report directions.
Not stated by respondent	Not stated by respondent	PMS-272	Just make the PMS-272 an information tool. The entering of expenses is a duplication of financial expense reports, that information is on the federal financial reports.
Not stated by respondent	Not stated by respondent	SF-269A	It should be more logical and understandable
<p>Bullets denote comments by different respondents or separate comments by the same respondent on the same CFDA Number.</p> <p>If a CFDA number has three zeros, then the respondent identified the federal agency only, not a particular CFDA number. The federal sub-agency is shown when the respondent indicated it.</p>			

SECTION 13: DUPLICATE REPORTING

17 percent of the respondents stated that they are required to report information that is duplicated in other reports.

Specific comments by respondents on duplicate reporting are provided in Table 8.

Table 8

Federal Agency	CFDA No.	Financial or Performance Report	Report Name or Number	Duplicate Information Reported
Department of Agriculture	10.064	Performance	Accomplishment Report	It summarizes a year's worth of quarterly reports
	10.664	Performance	Accomplishment Report	It summarizes a year's worth of quarterly reports
Department of Defense	12.000	Performance	Technical	Report Distribution List
	12.000	Financial	All	All standard data set information
Department of Justice	16.540	Performance	Performance Report	Duplicate data on the subgrant award reports and the end-of-grant performance reports
	16.588	Performance	VAWA	VAWA final report and SAPR report require duplicate data
National Aeronautics and Space Administration	43.000	Financial	All	All standard data set information
National Science Foundation	47.000	Financial	All	All standard data set information
Department of Health and Human Services	93.000	Financial	All	All standard data set information
	93.000	Financial	PMS-272	Expenditure information is required on Financial Status Reports (269) and on the PMS-272.
	93.556	Performance		Requires a copy of 93.674.
	93.645	Performance		Requires a copy of 93.674.
If a CFDA number has three zeros, then the respondent identified the federal agency only, not a particular CFDA number. The federal sub-agency is shown when the respondent indicated it.				

**SECTION 14:
CONFLICTING REQUIREMENTS IDENTIFIED**

Respondents identified conflicting requirements related to a U.S. Department of Education grant. The conflicting requirements are identified in Table 9.

Table 9

Conflicting Requirements			
Federal Agency	CFDA No.	Legal Citation Identified	Respondents' Comments
U.S. Department of Education	84.298	P.L. 103-382, Section 6402 and 34 CFR 76.650 - 76.677	Difficult to determine which one applies, or if both apply.