

I. Application and Reporting Forms

A. *Please identify application and reporting forms you believe could be improved or streamlined*

- ◆ Standard Form 424 Application for Federal Assistance – the form is almost impossible to read on 8½ x 11-inch paper due to the small print. Reproducing the form makes it even harder to read. Boxes and lines do not match up to type in information. The BWI has created them on the computer for completion, eliminating the need to type in the information on paper forms.
- ◆ Planned Cumulative Quarterly Expenditures of NRA Grant Funds form – this form has the row for totals across the top of the form – very confusing to local operators who often complete them as part of a grant packet. Move the Total Expenditure row to the bottom of the form – it's much easier adding down than up. Also, the row for Admin of Needs-Related Payments (NRPs) is a sub-category for Administration and the row for NRPs is a sub-category for Supportive Services and Needs-Related Payments – although they are slightly indented, local operators do not always understand they are not to be included when totaling each column. Enclosing them within parentheses would assist people as they add the figures for each row by showing they are already included in the figures.
- ◆ Under JTPA (Adult, Youth and Dislocated Worker), the PA Department of Labor and Industry (DLI) had, on average, six financial reports per fiscal quarter. Under WIA (Adult, Youth and Dislocated Worker), there are anywhere from 22 – 28 reports to submit per fiscal quarter. NOTE: this does not include the department's three demonstration projects; two defense projects; eleven NRA grants; and three NEG projects, for which there are also expenditure reports to submit. Any initiative that would reduce and streamline the volume of reporting would be helpful.

B. *Please identify specific data elements on these forms that you believe could be eliminated or combined to reduce reporting burden while still providing the Federal agency enough information to manage the program*

- ◆ Although there are some matching items on the SF424 and the Project Synopsis sheet, there are not enough to eliminate them.

C. *What programs do you think could share common application and reporting forms that currently do not?*

- ◆ Not aware of any possibilities.

D. *How do you obtain copies of the forms you need for your grant? Are they readily available over the Internet, or are they provided in materials you received from your awarding agency, such as a funding notice or handbook? What forms have been difficult to locate in updated formats?*

- ◆ Forms were originally provided through USDOL and reproduced. To ease the application process, the BWI created identical forms on the computer

to complete, print, and include in the grant application. The necessary forms have not been located on the Internet. To our knowledge, no forms have been updated for WIA use.

II. Terms and Conditions

A. *What terms and conditions are attached to your grants that you believe are not treated consistently from program to program, and across the various Federal agencies?*

- ◆ None, to our knowledge.

B. *How would you suggest the agencies create more uniformity in these terms and conditions?*

- ◆ No suggestions.

III. Payment Systems

A. *What payment systems are you currently required to use to receive grant payments?*

- ◆ DLI uses the Smartlink system managed by Payment Management Services in H&HS to draw down Federal dollars under the JTPA/WIA program. It is the only system used by DLI.

B. *Which of these systems offers on-line services?*

- ◆ The Smartlink system is on-line.

C. *Does the use of multiple payment systems by Federal agencies create a burden on your financial system?*

- ◆ The Smartlink system is not generally burdensome and DLI is pleased with the support offered to operate the system.
- ◆ The Comptroller's Office in DLI responded to a survey on 2/28/01 that was issued by the National Association of State Auditors, Comptrollers, and Treasurers for the Federal Financial Assistance Management Act. The questions in that survey were very similar to the questions in this request for comments relative to the payment systems and electronic processing categories.

IV. Audit Issues

A. *What could the Federal agencies do to improve your understanding of the Single Audit process?*

- ◆ No comments.

B. *Have you used the Single Audit Clearinghouse to obtain information on subrecipient audits?*

- ◆ No comments.

C. *Do you believe that single audits provide appropriate audit coverage for your programs and the programs where you are a pass-through entity?*

- ◆ No comments.

V. Electronic Processing

A. *What electronic processing systems do you currently use for your Federal grants? Please note any systems you use due to Federal agency requirements, as well as any systems or technologies your organization uses for other activities.*

- ◆ The Federal JTPA/WIA reporting database is used to file all expenditure reports for WIA and NRA/NEG projects. The database is on-line, which eliminates the need to submit hard copies. DLI suggests that a specific reporting form be developed for the NRA/NEG projects and be incorporated into the reporting database.

B. *What is the likelihood that your organization would utilize an on-line application or financial reporting system?*

- ◆ DLI would use an on-line application system and financial reporting system – Pennsylvania already has a web-based statewide financial reporting system developed.

C. *How can the agencies best prepare your organization for the future use of electronic processing options for your grants?*

- ◆ No comments.

Additional Comments: There are two customer service issues that have a major impact on L & I's ability to effectively manage NRA/NEG projects that are not addressed in the comment's five focus areas:

- ◆ It would be extremely helpful if USDOL could hold itself to a time frame in replying to states' requests for funding or grant modifications. It would provide positive customer service to states, the local operating entities, and the people we serve through our programs. DOL is attempting to address the issue – L & I gets support from the regional office and the national office staff try to be responsive to phone and e-mail inquiries. Evaluating and improving DOL's process in replying timely to state requests would be a productive initiative.
- ◆ It would also be helpful if the solicitations for demonstration grants DOL issues to states had more complete contact information. Often, the solicitation does not provide a phone number or other means of contact, so states or other applicants do not have a convenient way to request additional information.