



# Tribal Customer Experience Pilot for Post-Award Reporting

In partnership with:

U.S. Department of Health and Human Services  
Executive Office of the President  
U.S. Department of the Treasury  
U.S. Department of the Interior

June 2024



# Executive Summary

## Reporting Roadblocks

The Tribal Customer Experience (CX) Pilot for Post-Award Reporting sought to pilot solutions to reduce the administrative burden of tribal grant recipients. Tribes, especially those in rural and remote areas, struggle to comply with grant reporting requirements. This report begins to answer, “What makes reporting difficult?” and “How can federal agencies help?”



### Digital Divide

Lack of reliable broadband is a widespread vulnerability for tribal communities and rural governments that threatens their ability to comply with the online reporting required for many federal funding opportunities. More than 17% of people in the rural US and 21% of residents on tribal lands lack broadband access<sup>3</sup>.



### High Cost

Many isolated communities charter an airplane or hire external consultants at high cost to submit performance reports.



### Negative Impact

Grant recipients that do not submit timely compliance reports typically receive a high-risk rating, may be required to return funds, and may receive audit findings.

“Today, there are still **too many hoops to jump through**, too many **strings attached**, and too many **inefficiencies** in the process. For example... a remote Alaskan village may receive funds — without roads or internet and has to charter a plane every quarter just to be able to be in compliance with the report.”

Presidential Address at the 2023 White House Tribal Nations Summit

## Federal Partners



U.S. Department of Health and Human Services (HHS)



Executive Office of the President (EOP)



U.S. Department of the Treasury (TREAS.)



U.S. Department of the Interior (DOI)

Federal support is often the dominant source of funding for healthcare, housing, public safety, infrastructure, education, and other essential services for tribes due to their inability to levy property tax and income tax.

574

Federally Recognized Tribes<sup>1</sup>

1,747

Tribal Grant Recipients in FY23<sup>2</sup>

16k

Grants Awarded to Tribal Organizations in FY23<sup>2</sup>

\$40bn

Net Federal Action Obligation to Tribal Entities in FY23<sup>2</sup>

<sup>1</sup> U.S. Department of the Interior Bureau of Indian Affairs (2024, August 1). Tribal Leaders Directory. <https://www.bia.gov/service/tribal-leaders-directory>

<sup>2</sup> USAspending.gov. (2024). USAspending.gov. <https://www.usaspending.gov/>

<sup>3</sup> FCC (2021, January 19). Fourteenth Broadband Deployment Report. <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/fourteenth-broadband-deployment-report>

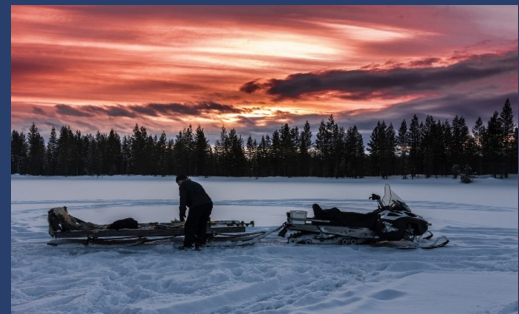
## Recipient Story: The Alaska Native Village of Sleetmute

Like many communities nationwide, tribal nations receive critical federal funding for healthcare, housing, public safety, infrastructure, education, and other essential services. The story of the Alaska Native Village of Sleetmute's struggle to submit post-award reports in the wake of the COVID-19 pandemic is emblematic of the challenges experienced by many remote and underserved grant recipients.

Sleetmute Village received an Emergency Rental Assistance grant, a federal program that allowed tribal governments to provide housing stability for eligible renters during the pandemic. Post-award reporting required access to a stable internet connection, which for Sleetmute required a plane or boat trip to the nearest town, 79 miles away. While Sleetmute had members in need of the emergency assistance, they elected to return their full award due to the burdensome and costly quarterly reporting requirements.



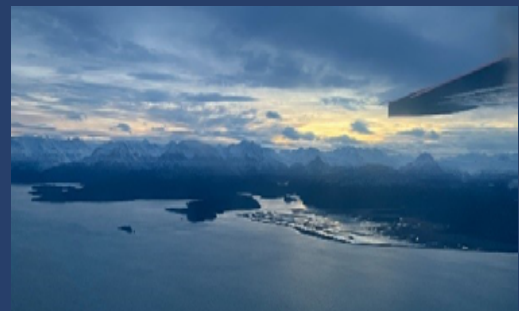
*Many isolated Alaska Native villages require small charter planes and snowmobiles to travel.*



**“[Notices] all go by email, and if you don’t have access to good internet, you’re not getting those noncompliance notices. And if you’re only getting mail once a month, you’re only getting the last letter, which is your last chance, or you’re paying all the money back.”**

After hearing of Sleetmute's experience, the Tribal CX Pilot team collaborated to design and test solutions for an offline reporting tool, then piloted their preferred option, an offline Excel report. Sleetmute was one of the first to utilize the offline report for the U.S. Department of the Treasury's State and Local Fiscal Recovery Funds (SLFRF) program providing the tribal administrator the ability to report on his funds. As he noted, “We want to know where our money is going... We want to know where it's at, where it's been, where it came from.”

**“We had to give that money back because we didn’t have the manpower to administer it.”**



## Recipient Centered Research

The Tribal CX Pilot team went directly to tribal recipients and asked, “What makes reporting difficult?”

Through engagement with a diverse cross-section of tribal members, tribal community-based organizations, and federal and state grant making agencies, the team discovered that addressing the barrier of limited internet access alone would not meaningfully reduce the burden experienced by tribes in post-award reporting.



The Tribal CX Pilot team was continuously reminded of the importance of challenging initial assumptions and speaking directly with recipients throughout the research process.

The Tribal CX Pilot team conducted interviews with tribal recipients, organizations, non-profits, and federal/state agencies:

3

Conferences Attended

3

Prototypes Tested

16

Professions Represented

38

Interviews

80

Workshop Participants

150

Qualitative Data Points

Instead, research pointed to five key needs of tribes that must be addressed in tandem to transform post-award reporting outcomes.

These Key Needs are:

### 1. Skilled Staff

Tribes need to recruit, train, and retain skilled administrators from their own communities.

### 2. Seamless Transitions

Tribes need to transfer knowledge, skills, and system access when staff turnover occurs.

### 3. Offline Accommodations

Tribes need flexible reporting tools and requirements to accommodate situations when their internet access is limited.

### 4. Easy Portal Access

Tribes need to easily access and navigate online portals when managing multiple federal grants.

### 5. Simplified Reporting

Tribes need post-award reporting requirements to be clear and simple enough to complete with available staff and resources.

## Recipient Driven Impact

The Tribal CX Pilot team selected and piloted four solutions based on identified tribal recipient needs, feasibility within the time and resources available, and the potential greater value they could bring to the broader grants community.

### Pilot Solutions

#### FEDERAL GRANT SYSTEMS HUB

**The Need:** There are over 100 public-facing grants management systems, which creates confusion and inefficiency for recipients in the post-award reporting process.

**The Pilot:** The Federal Grant Systems Hub, currently in a beta testing phase, is a searchable public dashboard that simplifies access to hard-to-find grant-related information by centralizing grant data and systems resources tailored to the recipient organization.

**The Impact:** [The Federal Grant Systems Hub](#) is a first of its kind dashboard that will reduce the manual tracking and cognitive load required for grants management by centralizing access to recipient-facing award management systems and support resources, with results tailored to individual recipients. The live beta version of [the Federal Grant Systems Hub](#) can be found on [Grants.gov](#).

#### TREASURY SLFRF OFFLINE EXCEL REPORT

**The Need:** Tribal recipients with limited broadband access require offline accommodations for post-award reporting.

**The Pilot:** The Treasury Offline Report Template is an offline Excel template that can be downloaded and used for State and Local Fiscal Recovery Funds (SLFRF) reporting.

**The Impact:** SLFRF recipients that were previously non-compliant and need extensions in the 2024 annual reporting period are able to immediately take advantage of the offline report, providing direct benefit to recipients that lack strong internet.

#### DIGITAL IDENTITY VERIFICATION SYSTEM IMPROVEMENTS

**The Need:** Appropriate use of digital identity verification can help secure grant systems while promoting broad and equitable access. Tribal recipients require additional guidance and resources to address cybersecurity and identify verification challenges.

**The Pilot:** The Tribal CX Pilot Team engaged with government and private sector identity verification providers to share direct user feedback from tribal partners.

**The Impact:** Single sign-on providers expanded their direct engagement with tribal users, resulting in the development of [tribal-specific guides](#), onsite help at tribal conferences, and significantly expanded in-person identity verification options at more than 18,000 United States Postal Service locations [nationwide](#).

#### HHS REDUCED REPORTING REQUIREMENTS

**The Need:** Balancing recipient experience and burden in post-award reporting with the need for robust data collection on the use of grants funds.

**The Pilot:** Indian Health Service (IHS) Behavioral Health Initiatives (BHI) streamlined their inbound information portal by reducing the number of questions and developing improved data collection and reporting templates.

**The Impact:** IHS reduced recipient reporting burden by 64% and implemented a more robust data collection system for improved data analysis.



## Focus Areas and Opportunities

### Strategies to Reduce Reporting Burden

Federal agencies can build on the successes of the Tribal CX Pilot by utilizing the pilot solutions and strategies outlined in the report.

The Tribal CX Pilot for Post-Award Reporting is aligned with multiple government-wide policies that support improvements to tribal customer experience. To support agencies as they deliver improvements in line with these directives, the Tribal CX Pilot team hopes agencies will encourage recipients to leverage the pilot solutions linked above and consider some of the strategies the team gathered throughout the project and from other agencies. These strategies include flexible requirements and accommodations, strengthening relationships with tribes, community engagement, recipient training and support, and clear reporting expectations communicated in plain language. For additional information and details, see the full report.

#### Policies Supporting Tribal Customer Experience:

- M-24-11
- 2 CFR 200
- EO 14112
- EO 14091
- EO 14058



### Broader Implications:

While these pilot solutions were developed in response to tribal needs, the challenges identified are common across all recipient types. The 50+ federal awarding agencies have the opportunity to use the pilot solutions and associated lessons learned to reduce reporting burden for all recipients.

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# Project Background

## Guiding Principles for the Project

Like many communities nationwide, tribal nations receive critical federal funding for healthcare, housing, public safety, infrastructure, education, and other essential services. Indian Country faces many economic development challenges; over 25 percent of Native Americans live in poverty, which is higher than the poverty rate of any other racial group in the United States<sup>1</sup>. The overarching challenges of the COVID-19 pandemic further exacerbated health and economic disparities in tribal communities. According to the Centers for Disease Control and Prevention (CDC), Native Americans' life expectancy is 9.6 years less<sup>2</sup> than all other U.S. populations and they have the highest COVID-19 mortality rates<sup>3</sup> nationwide, yet make up just 1% of the population<sup>4</sup>.

Tribes reported key staff members passing away during the pandemic, which disrupted the continuation of services to tribal members and tribal government operations – particularly with post-award compliance reporting. Many new financial assistance programs were established to support tribal governments in their pandemic recovery; however, those funds came with reporting requirements that were not clearly outlined due to the speed with which the funds were dispersed. Already strained by the challenges brought on by the pandemic, many tribes lacked the infrastructure and capacity to manage the unforeseen reporting burden that followed.

Infrastructure challenges for many rural recipients present a barrier to tribal governments complying with online post-award compliance reporting. According to a recent Federal Communications Commission (FCC) report<sup>5</sup>, more than 17% of people in the rural U.S. and around 21% of residents on tribal lands lack broadband access. For many rural tribal communities, accessing the internet to complete compliance reports requires travel, often by plane or boat when weather permits.

1 U.S. Commission on Civil Rights. (2018). Broken Promises: Continuing Federal Funding Shortfalls for Native Americans

2 Arias, E., Ph. D., Kochanek, K. D., M. A., Xu, J., M. D., & Tejada-Vera, B., M. S. (2023). Provisional life expectancy estimates for 2022 [Report]. <https://www.cdc.gov/nchs/data/vsrr/vsrr031.pdf>

3 Centers for Disease Control and Prevention. (2022). Distribution of COVID-19 Deaths and Populations, by Jurisdiction, Age, and Race and Hispanic Origin. (NCHS/DVS) [Data set]. <https://data.cdc.gov/NCHS/Distribution-of-COVID-19-Deaths-and-Populations-by/jwta-jxbg>

4 Jones, N., Marks, R., Ramirez, R., Rios-Vargas, M., (2021) 2020 Census Illuminates Racial and Ethnic Composition of the Country.

5 FCC (2021, January 19). Fourteenth Broadband Deployment Report. <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/fourteenth-broadband-deployment-report>

### Native American and Tribal Organization Federal Grants by the Numbers

574

Federally Recognized Tribes\*

1,747

Tribal Grant Recipients in FY23\*\*

16k

Grants Awarded to Tribal Organizations in FY23\*\*

\$40bn

Net Federal Action Obligation to Tribal Entities in FY23\*\*

\*U.S. Department of the Interior Bureau of Indian Affairs (2024, August 1). Tribal Leaders Directory. <https://www.bia.gov/service/tribal-leaders-directory>

\*\*USAspending.gov. (2024). USAspending.gov. <https://www.usaspending.gov/>

“Today, there are still too many hoops to jump through, too many strings attached, and too many inefficiencies in the process. For example... a remote Alaskan village may receive funds — without roads or internet and has to charter a plane every quarter just to be able to be in compliance with the report.”

– President Biden

November 2023 Speech at Tribal Nations Summit



## Project Partners and Objectives

To assist with the burden created from pandemic financial assistance reporting, the government assembled an interagency Tribal CX Pilot team charged with defining barriers to post-award reporting, piloting customer experience improvements, tools, and providing strategies to support tribal compliance in rural and underserved areas. Of note, increasing broadband access and making policy changes was not the focus of this project.

## Initial Hypothesis

Initially, the Tribal CX Pilot team hypothesized that low broadband internet access was the primary barrier preventing some tribal recipients from completing reporting requirements. Further research was needed to determine:

- If and how limited internet access impacts some tribes' ability to complete post-award reports.
- Whether the use of offline reporting tools might support tribes' submission of post-award reports.
- Whether there are other critical barriers to tribes' post-award reporting.

## Early Understanding

Centered on the guiding principle of delivering equitable and effective customer service, the Tribal CX Pilot team recognized that compliance with post-award reporting could not follow a stringent linear course. Rather, the Tribal CX Pilot team sought out alternative solutions in this project to promote more equitable outcomes that focus on the customer experience and take into consideration lack of reliable broadband, COVID-19 impacts in tribal communities, and other adverse conditions.

To accomplish these objectives, the Tribal CX Pilot team consulted with tribal governments and other Native American-led organizations, assessed the current barriers to tribal compliance, learned about external conditions, met with public and private sector partners, and together piloted solutions that were based on tribal recipient feedback.



- U.S. Department of Health and Human Services (HHS)
  - Grants Quality Service Management Office (Grants QSMO)
  - Indian Health Service (IHS)



- Executive Office of the President (EOP)
  - Office of Management and Budget (OMB)
    - Customer Experience Team (CX Team)
  - Office of Federal Financial Management (OFFM)
  - White House Office of Science and Technology Policy (OSTP)



- U.S. Department of the Treasury (TREAS.)
  - Office of Tribal and Native Affairs (OTNA)
  - Office of Capital Access (OCA)



- U.S. Department of the Interior (DOI)
  - Office of Grants Management (PGM)
  - Bureau of Indian Affairs (BIA)

## Project Funding

This project received CX Cross-Agency Priority (CAP) Goal funding, approved for allocation by the Office of Management and Budget (OMB). The funding aims to improve customer experiences that span multiple agencies through human-centered design research and pilot projects.

# Recipient Centered Research

## Tribal Recipient Interviews

**The Bottom Line:** The Tribal CX Pilot team conducted 38 interviews with tribal recipients and related organizations to understand the barriers and key needs related to post-award reporting.

To test the initial hypothesis and establish a baseline understanding of tribal post-award reporting practices, the Tribal CX Pilot team facilitated 22 needs assessment interviews with geographically diverse tribal members, tribal community-based organizations, and federal and state grant-making agencies in the lower 48 states.

The needs assessment interviews improved the Tribal CX Pilot team's understanding of the challenges tribes faced in the post-award reporting process and showed the need for further outreach to additional tribal recipients. These early conversations highlighted that the burden of post-award reporting was not limited to broadband and connectivity issues, but included barriers such as staff capacity, report frequency, and report timing.

### Initial Hypothesis

Pilot partners initially hypothesized that low broadband access was the primary barrier preventing some tribal recipients from completing reporting requirements.

“Most small tribes in the villages, you’re talking about a couple of staff [who are] doing everything, so you’re expecting them to remember all these different special codes and special emails.”

TRIBAL COMMUNITY BASED ORGANIZATION (CBO)  
STAFF MEMBER

To build on the research conducted with tribes and related organizations in the lower 48 states, the Tribal CX Pilot team attended the Bureau of Indian Affairs (BIA) Alaska Tribal Providers Conference. This conference has a distinct audience of Alaska Native tribal administrators from rural villages, a key population that was not directly engaged during earlier interviews.



In partnership with Guidehouse and the non-profit Public Policy Lab (PPL), the Tribal CX Pilot team interviewed tribal recipients to further define the critical barriers to post-award reporting. In preparation for the BIA Alaska Tribal Providers Conference, the Tribal CX Pilot developed three post-award reporting tool prototypes. The team invited conference attendees to test the prototypes and provide feedback that ultimately served to solidify the team's understanding of recipient needs and identify helpful elements to be used in future solution development. The participants interacted with each tool, tested the features, and provided valuable insights into their individual needs and experience.

**OPTION 1 LIMITED INTERNET**  
**Email an offline Excel report**  
This tool allows you to type in your answers into an Excel file, while you are offline, and email the report once you are done.  
  
**KEY FEATURES**

- 1 Pre-populated information
- 2 List of reporting resources and key contacts
- 3 Glossary of key terms and definitions

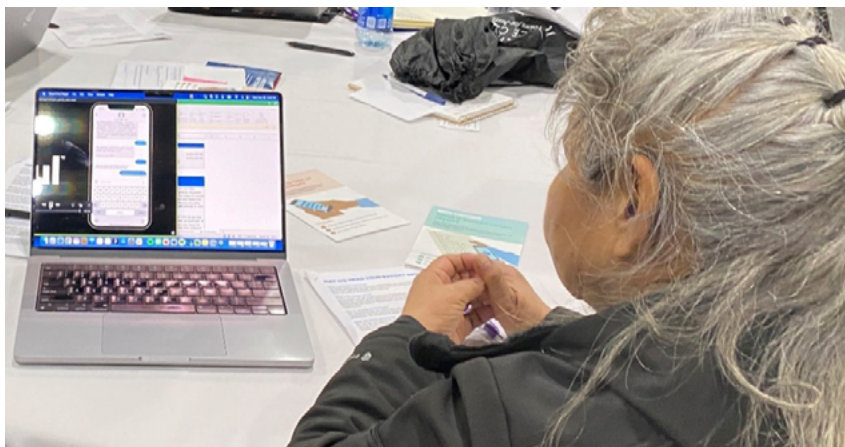
**OPTION 2 CELL SERVICE ONLY**  
**Send a handwritten report**  
This tool allows you to write out your answers on letter-sized paper and text a picture of the handwritten report.  
  
**KEY FEATURES**

- 1 Handwritten text recognition technology
- 2 Images of sample handwritten report
- 3 Only requires letter-sized paper, pen, and cell phone

**OPTION 3 CELL SERVICE ONLY**  
**Respond to text or voice prompts**  
This tool allows you to respond to a series of automated prompts, either by texting your answers or speaking on the phone.  
  
**KEY FEATURES**

- 1 Step-by-step prompts over text/phone call
- 2 Ability to complete over time (no auto time-out)
- 3 Only requires cell phone

The offline Excel report was selected as a pilot solution in response to this feedback. (see Treasury Offline Excel Report on page 22)



In addition to gathering feedback on the prototype reporting tools, the Tribal CX Pilot team interviewed tribal recipients on topics such as tribes' approach to post-award reporting, their biggest challenges and pain points, perceptions of the reporting process, and suggestions for improvement. In total, the team conducted 16 additional interviews and held a workshop with 80 attendees at the BIA Alaska Tribal Providers Conference.

### Why Alaska?

- **Over 180,000** tribal members\*
- **82%** of communities are not accessible by road\*\*
- **40%** of the **574** federally recognized tribes are located in Alaska\*\*\*

The Tribal CX Pilot team decided to interview tribes at the BIA Alaska Tribal Providers Conference. Alaska Native villages represent almost **40%** of the **574** federally recognized tribes\*\*\* and face many of the same issues as rural recipients in the lower 48. However, remote locations, high cost of living, and harsh weather exacerbate broadband access issues in these communities.

\* U.S. Department of the Interior Bureau of Indian Affairs. Alaska Region. (n.d.). <https://www.bia.gov/regional-office/alaska-region>

\*\* Alaska Department of Transportation & Public Facilities. (2023). Department fast facts prepared for legislative session 2023 [Brochure]. ALASKA DOT&PF Fast Facts 2023.

\*\*\*U.S. Department of the Interior Bureau of Indian Affairs (2024, August 1). Tribal Leaders Directory. <https://www.bia.gov/service/tribal-leaders-directory>

“Utilizing the case study of Alaska is great to illustrate the country at large.”

TRIBAL CBO STAFF  
MEMBER



The Tribal CX Pilot team collected and analyzed nearly 150 qualitative data points across all engagements, which yielded the following insights:

1. The initial hypothesis that broadband access posed the greatest challenge to post-award reporting is partially true. Internet access is improving but continues to be unreliable. Tribes require flexibility in reporting options and deadlines to accommodate situations when internet access is limited or unavailable.
2. While preferences for offline tools varied, of the three prototypes tested, the option to submit an offline report via Microsoft Excel was generally considered the best alternative. See the Treasury Offline Report section (page 22) for details on the subsequent pilot.

### Tribal CX Pilot Engagement Metrics

**43** Tribes Engaged (Across CX Pilot)

**80** BIA Conference workshop participants



**Overall, project partners discovered that addressing the issue of limited internet access alone would not meaningfully reduce the burden experienced by tribes in post-award reporting.** Instead, research pointed to five key needs of tribes that must be addressed in tandem to transform post-award reporting outcomes. These Key Needs are:

#### 1. Skilled Staff

Tribes need to recruit, train, and retain skilled administrators from their own communities.

#### 2. Seamless Transitions

Tribes need to transfer knowledge, skills, and system access when staff turnover occurs.

#### 3. Offline Accommodations

Tribes need flexible reporting tools and requirements to accommodate situations when their internet access is limited.

#### 4. Easy Portal Access

Tribes need to easily access and navigate online portals when managing multiple federal grants.

#### 5. Simplified Reporting

Tribes need post-award reporting requirements to be clear and simple enough to complete with available staff and resources.



## Research Findings

### Key Need 1: Skilled Staff

**Tribes need to recruit, train, and retain skilled administrators from their own communities.**

**Finding 1A:** Grant reporting requires significant technical knowledge, time, and manpower—a burden many tribes struggle to overcome.

Tribal grant administrators need strong technical knowledge and skills to navigate various accounting and reporting systems (e.g., Quickbooks). However, many rural and remote tribes do not have access to training for these systems, causing their administrators to be overburdened and ultimately leading some tribes to opt out of grant opportunities.

**Finding 1B:** Due to limited staff capacity, some tribes rely heavily on outside consultants and community-based organizations for help with reporting.

Many tribes depend on outside consultants, regional tribal organizations, tribal non-profits, and other community-based organizations like Alaska Federation of Natives and the Rural Alaska Community Action Program for technical assistance to complete reports. Consultants and community-based staff travel to villages to work directly with tribes, often for weeks at a time. Choosing to pay consultants instead of hiring a grant administrator from within the community causes tension, but the limited or non-existent pool of trained local candidates leaves tribal administrators with few options.

**Finding 1C:** Tribes prefer in-person training and support, but traveling can be cost-prohibitive.

Many tribes prefer in-person training and technical support for reporting due to their limited internet access. Events like the annual BIA Alaska Tribal Providers Conference offer excellent hands-on training and troubleshooting opportunities, as many tribes and federal agencies attend these conferences. However, traveling to these events can be expensive for tribes, with plane tickets to cities like Anchorage or Bethel costing \$600-\$1,000 per person.

“I was the office assistant at the tribal office and then our tribal admin resigned. So I was the next one in the line, so I got the tribal admin job... we only have each other to turn to when we’re stuck on something.”

TRIBAL GRANT  
ADMINISTRATOR

### Tribal Recipient Story

In one Alaska Native Village that was interviewed, the mayor not only holds the responsibility of leading the community, but also takes on the role of the tribal grant administrator.

## Key Need 2: Seamless Transitions

**Tribes need to transfer knowledge, skills, and system access when staff turnover occurs.**

**FINDING 2A:** Due to high turnover and recruiting difficulties, knowledge transfer rarely occurs from one administrator to the next.

Tribal grant administrators experience high turnover, primarily due to declining population, inadequate training, and lack of support. The difficulty of finding qualified candidates results in long gaps between administrators. As a result, tribes often have no transition period for knowledge transfer, including handing over critical account credentials.

**FINDING 2B:** Transferring systems access to a new administrator can be time-consuming and lead to reporting delays.

“[New administrators] get thrown into [the position] without training or education or experience. Usually what happens is that, by the time a year or so turns around, they’re so overwhelmed that they step away.”

TRIBAL CONSULTANT

When tribes lose access to key accounts during the transition between administrators, transferring access becomes a complicated process. Systems like Automated Standard Application for Payments (ASAP) and SAM.gov require tribes to set up accounts linked to specific individuals using personal identity verification details. During staff turnover, tribes go through a lengthy process of closing old accounts, creating new verified accounts, and switching over the administrator role in the system. This process often takes months, especially if the past administrator is unavailable to assist.

### Tribal Recipient Story

A tribe located in a high-poverty community could not draw down any of their funds in the Automated Standard Application for Payments (ASAP) system for over a year because they lost access to the original admin account and therefore could not assign the role to a new administrator. An outside consultant became involved, and it took the tribe an additional five months to finally gain access.

“I would say 70% of [the tribal administrators I work with] were tribal turnovers... they were all like, oh, I’m new. I started last week.”

TRIBAL CBO STAFF MEMBER

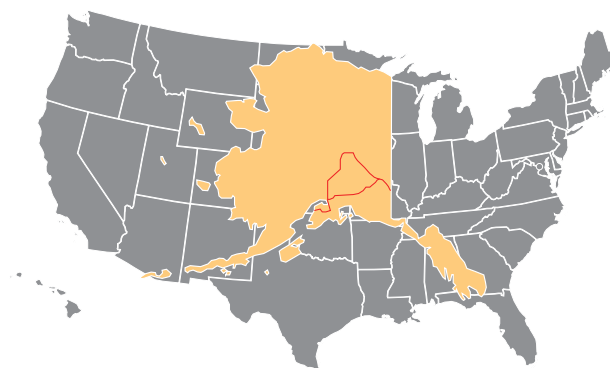


## Key Need 3: Offline Accommodations

**Tribes need flexible reporting tools and requirements to accommodate situations when their internet access is limited.**

**Finding 3A:** Internet access is increasingly available but it can be unreliable—requiring tribes to travel for better internet.

Many tribes are gaining access to better internet and cell services through new advanced technology. Tribes across the country received funding from the National Telecommunications and Information Administration Program to expand broadband connectivity on tribal land<sup>6</sup>. However, access remains inconsistent and unreliable, often requiring administrators to travel to bigger cities for reliable internet to prepare and submit reports. For example, in Alaska, with its limited road access and single major highway system, travel often occurs by snowmobile, boat, or plane which can cost up to \$1,000 dollars or more for a round trip.



Map of Alaska (to scale)  
with interstate highways (in red).

**Finding 3B:** Tribes appreciate having multiple options for submitting reports offline.

With unreliable internet, tribes appreciate having the option to use offline reporting tools to submit their reports. Preferences vary based on what is familiar and comfortable for the individual. When both internet and cell service are down, the most reliable offline solution for tribes is likely to be submitting hard-copy reports via mail, which can be very time-consuming and mail service is prone to delays. Overall, given varying tool preferences and technical infrastructures, tribes appreciate having multiple potential submission avenues for post-award reporting.

“I think for me [the administrator], for him [the bookkeeper], it’s Excel. For her [the secretary], it’s handwritten.”

TRIBAL GRANT ADMINISTRATOR

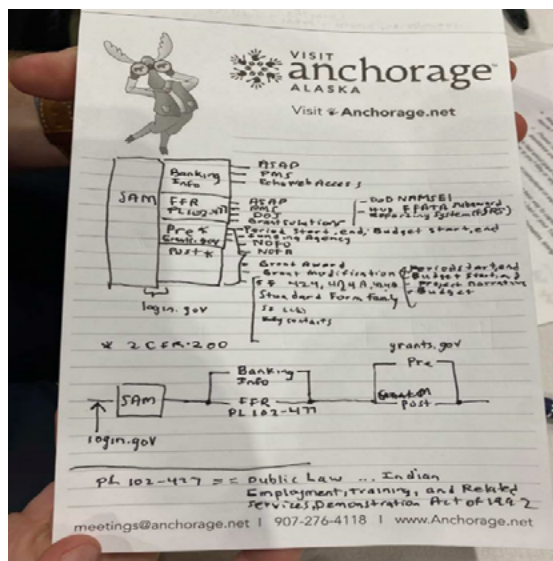
**Finding 3C:** For offline reporting tools, tribes value choice, security, proof of submission, and human assistance.

In addition to being able to choose among tools, tribes seek secure, trustworthy platforms with documentation of submission to provide a record to tribal leaders and agencies. Regardless of the tool, tribes need to feel confident that they are using the latest version of that tool and that they can receive human assistance when needed. This tool also needs to enable collaboration on report preparation.

### Tribal Recipient Story

In one tribe’s office, the internet will go down multiple times a day, forcing administrators to start reports over because submission portals time out and don’t save progress.

6 National Telecommunications and Information Administration & Department of Commerce. (2023, November 29). Tribal Broadband Connectivity Program: Budget Forms and Documents. Retrieved from [https://broadbandusa.ntia.doc.gov/sites/default/files/2023-11/TBCP\\_Round\\_Two\\_Budget\\_Forms\\_and\\_Documents\\_Webinar.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2023-11/TBCP_Round_Two_Budget_Forms_and_Documents_Webinar.pdf)



A tribal grant administrator's sketch of the multiple reporting portals and systems they must use.

## Key Need 4: Easy Portal Access

**Tribes need to easily access and navigate online portals when managing multiple federal grants.**

**Finding 4A:** Tribes may be required to use more than a dozen online portals and systems to complete post-award reports.

Many tribes receive grant funding from multiple federal agencies and interact with various systems and tools from each of these agencies, such as Grants.gov, Transit Award Management System (TRAMS), Grant Solutions, ASAP, Payment Management System, and SAM.gov, among others. They must set up individual accounts, track and manage login credentials, and learn how to navigate each platform, which requires significant time and technical proficiency.

**Finding 4B:** Some tribes face challenges with identity verification requirements, in particular.

Identity verification services provide strong security protections that may complicate the reporting process for some tribes. “Identity verification” is the process of providing information to digitally verify a person interacting with a website is who they say they are—not someone pretending to be them. When used appropriately, identity verification can be an important tool in preventing identity fraud; however, identity verification may also present unique challenges for the tribal community. Applicants can struggle to meet identity documentation and physical address requirements, as many tribal members may only have tribal IDs and P.O. boxes. Additionally, some identity verification systems require individuals to sign up for accounts using personal details, making it harder to open new accounts and transfer access between administrators.

**Finding 4C:** Many portals are not user-friendly and are not designed for users with limited internet access.

Tribal grant administrators often find reporting portals challenging to navigate, especially for those who are not technologically proficient. At the BIA Alaska Tribal Providers Conference, many participants cited issues with the submission portal/system as their top challenge with federal grant reporting. Additionally, portals frequently require large file uploads or have multiple pages, making them unsuitable for users with limited internet access. However, if designed to be more accessible and user-friendly, some tribes would prefer to use online portals over other reporting options.

“I can appreciate that [identity verification] adds a layer of security from fraud and things like that. It also adds a huge mess of inaccessibility. It’s a big problem.”

TRIBAL CONSULTANT

## Key Need 5: Simplified Reporting

**Tribes need post-award reporting requirements to be clear and simple enough to complete with available staff and resources.**

**Finding 5A:** Tribes received millions of dollars during the COVID-19 pandemic, but recipients often found that the guidance from federal agencies lacked clarity.

During the pandemic, the federal government granted tribes nearly \$32 billion through the American Rescue Plan Act (ARPA).<sup>7</sup> This 2021 law represents the largest investment of resources into Indian Country and tribal communities in U.S. history.<sup>8</sup> Federal agencies disbursed funds quickly to meet urgent needs, but tribes found agency guidance lacked clear instructions on usage or post-award reporting. As a result, tribes decided independently the best way to use the awarded funds. Tribes reported that issues later emerged when they did not use or report on these funds according to agency guidance.

“Taking the time or having the time to simplify the verbiage that the federal government uses when they put out guidance would be huge... taking that guidance that is sometimes 25 pages long and making it one page because that’s all [these tribes] need.”

TRIBAL CBO STAFF MEMBER

**Finding 5B:** Tribes struggle to complete post-award reports that do not have plain-language instructions.

Many tribal grant administrators, whether experienced or new, find the language in most post-award reporting instructions highly technical and unnecessarily complex. Since English is a second language for some tribal members, plain language would greatly increase comprehension and make it easier for tribes to complete post-award reports. During the BIA Alaska Tribal Providers Conference, many participants suggested that simplifying the questions and including more visuals to illustrate guidance would be helpful. Additionally, tribes noted the importance of ensuring that language is culturally appropriate, as this impacts how tribal members perceive and answer questions.

**Finding 5C:** Post-award reporting requirements can overwhelm tribes by collecting too much data, too often.

Many tribes find the volume and frequency of data collection burdensome. Some reports require nearly 900 data elements from recipients, and in addition to the number of elements, tribes struggle with redundant or irrelevant questions and requests for data beyond what they have readily available. Many agencies require reports on a quarterly basis, which burdens tribes managing multiple grants. Additionally, many tribes in the Great Plains, Rocky Mountains, and in Alaska rely on a subsistence lifestyle, so during peak hunting seasons they need to prioritize hunting for food over reporting on grant activities<sup>9</sup>.

“Sometimes it feels like the government says, ‘yes, you are a sovereign community, or yes, you should self-govern’, and ‘yes, here is what we can do’... and then five years later, they’re like, ‘if you didn’t report, we’re going to take it back.’”

TRIBAL GRANT ADMINISTRATOR

<sup>7</sup> American Rescue Plan | U.S. Department of the Interior. U.S. Department of The Interior. <https://www.doi.gov/american-rescue-plan>

<sup>8</sup> Bureau of Indian Affairs (BIA). The American Rescue Plan Act | Indian Affairs. [https://www.bia.gov/service/american-rescue-plan-act#:~:text=The%20American%20Rescue%20Plan%20%2C%20signed,Affairs%20\(AS%20DIA\).](https://www.bia.gov/service/american-rescue-plan-act#:~:text=The%20American%20Rescue%20Plan%20%2C%20signed,Affairs%20(AS%20DIA).)

<sup>9</sup> Peak subsistence seasons in Alaska include fishing in May, June, and early July, caribou hunting in late July, August, and September, moose hunting in September and October, and whaling in March and September.

## Recipient Driven Impact

**The Bottom Line:** Through intentional engagement with tribal recipients and an iterative approach to solution development, the Tribal CX Pilot team designed four impactful, recipient-validated solutions to improve tribal recipient experience.

The Tribal CX Pilot team's research findings led to the selection of four feasible, impactful, recipient-validated solutions. These solutions reduce post-award reporting burden and improve grant recipients' ability to deliver support to their communities. Since the initial prototypes tested at the BIA Alaska Tribal Providers Conference did not effectively address all the key needs of tribal recipients, the Tribal CX Pilot team reassessed and redeveloped the solutions to be better aligned with recipients' needs.

### The Federal Grant Systems Hub (beta)

- **The Need:** There are over 100 public-facing grants management systems, which creates confusion and inefficiency for recipients in the post-award reporting process.
- **The Pilot:** The Federal Grant Systems Hub, currently in a beta testing phase, is a searchable public dashboard that simplifies access to hard-to-find grant-related information by centralizing grant data and systems resources tailored to the recipient organization.
- **The Impact:** The Federal Grant Systems Hub is a first of its kind dashboard that will reduce the manual tracking and cognitive load required for grants management by centralizing access to recipient-facing award management systems and support resources, with results tailored to individual recipients. The live beta version of the Federal Grant Systems Hub can be found on [Grants.gov](https://www.grants.gov).

**The Need:** *There are over 100 public-facing grants management systems, which creates confusion and inefficiency for recipients in the post-award reporting process.*

To manage their grants, a recipient may have to interact with any number of over 100 public-facing grants management systems, creating a fragmented, confusing, and inefficient process. Combined with staffing challenges and turnover in tribal administrator positions, this leads to confusion and disorganization related to a tribe's current grants. This may result in funding delays, missed reporting deadlines, and possibly audit findings. The current post-award reporting process presents opportunities for improvement to reduce the administrative burden and cognitive load on applicants, recipients, and awarding agencies.

**The Pilot:** *The Federal Grant Systems Hub, currently in a beta testing phase, is a searchable public dashboard that simplifies access to hard-to-find grant-related information by centralizing grant data and systems resources tailored to the recipient organization.*

"I didn't even realize we had all of these grants."

TRIBAL GRANT MANAGER

This tribe's two-person team has had to manage their 138 federal grants (since FY18) through 14 different systems.\*

\*Source: Federal Grant Systems Hub

## Tribal Customer Experience Pilot for Post-Award Reporting



### Recipient Lookup

Users can search by Recipient Name or UEI to find information about a specific organization's federal awards.



### Grants Information

Users can view and sort federal grants information by awarding agency, awarding sub-agency, assistance listing, award amount, and period of performance.



### System Information

Users can view the grant systems and login links for each awarding sub-agency and assistance listing.



### Help & Training Resources

Users can access help desk information and publicly available trainings for each grants system.



### Summary Reports

Users can see aggregate information by awarding agency, awards, and award amount.



### Data Visualizations

Users can view graphs displaying trends over time and number of awards by each agency.

“I’m new to an organization which is organized very differently than my previous job. They don’t even know the agencies they are receiving grants from. This will be helpful to everyone.”

TRIBAL ACCOUNTANT

The Federal Grant Systems Hub, developed by the Grants Quality Service Management Office (Grants QSMO) within the Department of Health and Human Services’ Office of Grants, is a searchable dashboard that centralizes grant data and grant system links specific to the recipient organization. It is designed to help new and existing grants management staff easily find their organization’s current federal awards and the systems they need to administer them.

The Federal Grant Systems Hub combines [USAspending](#) data with recipient-facing systems information into a user-friendly, searchable dashboard. Along with individual grant data and links to each system, the Federal Grant Systems Hub includes help desk information and links to public trainings for award management and payment management tools.

The Federal Grant Systems Hub is accessed via the “View Your Grant Systems” button on the Grants.gov [Grant Systems page](#). The Grants QSMO collaborated closely with Grants.gov to update the Grant Systems page to include a list of recipient-facing grants management systems and the link to the Federal Grant Systems Hub.

The Federal Grant Systems Hub increases data transparency and provides data insights for previously disparate and hard-to-find information through one centralized resource. It also provides a single source of grant systems information, enabling unprecedented public visibility into grant systems at the agency and sub-agency level.



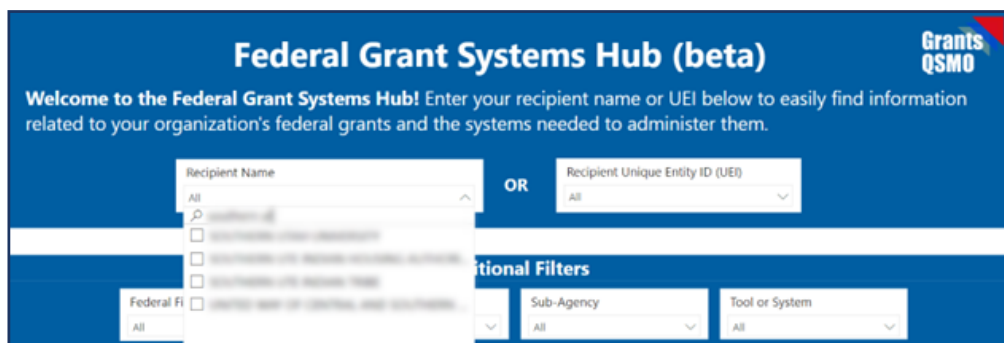
## Tribal Customer Experience Pilot for Post-Award Reporting

### How to Use the Federal Grant Systems Hub

**Step 1:** Access the Federal Grant Systems Hub from the Grants.gov [Grant Systems](#) page



**Step 2:** Search your recipient name or Unique Entity ID (UEI) number to filter for your grants



**Step 3:** View your federal awards

Federal Grants Information							
Data Source: USASpending.gov							
Award ID	AL/CFDA Number	Assistance Listing (AL)	Agency	Sub-Agency	Federal Award Amount	Start Date	End Date
NT23TBC0290038	11.03	TRIBAL BROADBAND CONNECTIVITY PROGRAM	Commerce	National Telecommunications and Information Administration	\$43,704,181	12/1/22	11/30/25
DEF0032164	81.09	FOSSIL ENERGY RESEARCH AND DEVELOPMENT	Energy	Department of Energy	\$2,500,000	5/1/23	4/30/25
97872917	66.61	PERFORMANCE PARTNERSHIP GRANTS	Environmental Protection Agency	Environmental Protection Agency	\$1,967,961	10/1/16	9/30/20
D22AC00127	15.43	FEDERAL OIL AND GAS ROYALTY MANAGEMENT STATE AND TRIBAL COORDINATION	Interior	Departmental Offices	\$1,854,426	10/1/22	9/30/25
D16AC00008	15.43	FEDERAL OIL AND GAS ROYALTY MANAGEMENT STATE AND TRIBAL COORDINATION	Interior	Departmental Offices	\$1,620,203	10/1/16	9/30/22
97872922	66.61	PERFORMANCE PARTNERSHIP GRANTS	Environmental Protection Agency	Environmental Protection Agency	\$1,591,634	10/1/23	9/30/25
90C19825	93.60	HEAD START	Health and Human Services	Administration for Children and Families	\$1,478,437	1/1/14	12/31/18

**Step 4:** View the systems you need to use to manage each award in addition to links to system login pages, trainings, and help desk information

Federal Grant Systems Resources							
Agency	Sub-Agency	Tool or System Name	System Type	Help Desk Link	Help Desk Email Address	Help Desk Phone	Training
Interior	U.S. Fish and Wildlife Service	<a href="#">GrantSolutions</a>	Award Management	<a href="https://home.grantsolutions.gov/home/contact-us/">https://home.grantsolutions.gov/home/contact-us/</a>	help@grantsolutions.gov	1.866.577.0771	
Justice	Office of Justice Programs	Automated Standard Application for Payments (ASAP)	Payment Management	<a href="https://justicegrants.usdoj.gov/sites/g/files/xyckuh296/files/media/document/training-user-guide_asap.pdf">https://justicegrants.usdoj.gov/sites/g/files/xyckuh296/files/media/document/training-user-guide_asap.pdf</a>	asaphelpdesk@fiscal.treasury.gov	855- 868-0151	<a href="https://fiscal.treasury.gov/asap/">https://fiscal.treasury.gov/asap/</a>
Justice	Office of Justice Programs	DOJ Justice Grants System (JustGrants)	Award Management	<a href="https://justicegrants.usdoj.gov/user-support">https://justicegrants.usdoj.gov/user-support</a>	JustGrants.Support@usdoj.gov	833-872-5175	<a href="https://justicegrants.usdoj.gov/training">https://justicegrants.usdoj.gov/training</a>



**The Impact:** *The [Federal Grant Systems Hub](#) is a first of its kind dashboard that will reduce the manual tracking and cognitive load required for grants management by centralizing access to recipient-facing award management systems and support resources, with results tailored to individual recipients. The live beta version of the Federal Grant Systems Hub can be found on [Grants.gov](#).*



Tribal CX Pilot team conducting a user testing session on the Federal Grant Systems Hub with a tribal recipient.

Federal Grant Systems Hub a 4.7/5 rating for helpfulness across 30 Human Centered Design interviews. They shared that it would bring immediate value to help them manage their federal awards, train new staff, and provide high-level insights to track and report information. One participant noted that he had previously spent an entire day trying to find just one data point (Award ID) for his grant, and it was the first thing he saw on the Federal Grant Systems Hub.

Feedback from community-based organizations and state grantees has also been exceedingly positive. This confirmed that the Federal Grant Systems Hub could provide a pathway to creating a seamless recipient customer experience that extends beyond tribal grant recipients. The Federal Grant Systems Hub will immediately reduce the manual tracking and cognitive load required for grants management and reduce burden for all recipients.

As of the publication of this report, the Federal Grant Systems Hub is available publicly in a beta testing version and will continue to be improved based on user feedback. Additional features requested by users included single sign-on, grant applications and status, reporting deadlines, reminder notifications, and program points of contact.

“I think this is great, especially for someone who is actually new. If I were ever to transition away, I would make sure my replacement had this.”

TRIBAL CFO

The Grants QSMO tested the Federal Grant Systems Hub with tribal recipients in-person at the Native American Finance Officers Association Annual Conference in May 2024. Overall, participants gave the

“On a scale of 1-5, I would give it a 10!”

ASSISTANT  
TRIBAL CFO

## The Treasury Offline Report

- **The Need:** Tribal recipients with limited broadband access require offline accommodations for post-award reporting.
- **The Pilot:** The Treasury Offline Report Template is an offline Excel template that can be downloaded and used for State and Local Fiscal Recovery Funds (SLFRF) reporting.
- **The Impact:** SLFRF recipients that were previously non-compliant and need extensions in the 2024 annual reporting period are able to immediately take advantage of the offline report, providing direct benefit to the small rural recipients that lack strong internet.

**The Need:** *Tribal recipients with limited broadband access require offline accommodations for post-award reporting.*

Tribal recipients experience frequent internet outages that impact their ability to submit post-award reports via online reporting portals utilized by federal agencies. In California and Nevada, tribes often lose power and telecommunications services in the summer due to high winds and wildfires. Rural Alaska Native villages can lose internet access for months at a time due to severe winter weather conditions.

### Broadband on the Rise

Broadband access is improving with infrastructure investment, new technologies, and digital equity initiatives; however, recipients still need offline accommodations.

“There was a paper version available which made it still kind of difficult, but it gave another alternate option and that saved a lot of communities... because [they were] locked out of their profile or their portal and they didn’t have access because they couldn’t verify their phone numbers.”

TRIBAL CBO STAFF MEMBER

While the Tribal CX Pilot team’s initial hypothesis that broadband was the primary reason for late or delinquent reports proved to be only partially true, it is clear recipients still have a legitimate need for offline options.

**The Pilot:** *The Treasury Offline Report Template is an offline Excel template that can be downloaded and used for State and Local Fiscal Recovery Funds (SLFRF) reporting.*

Partners at the Office of Tribal and Native Affairs at the U.S. Department of the Treasury embraced the challenge of finding a solution to assist tribes with coming into reporting

compliance. Working with the Tribal CX Pilot team, they researched alternative methods for recipients to report the same data that would typically be collected through an online portal.

Using insightful feedback collected throughout the project, the team developed an offline reporting prototype in Microsoft Excel. The prototype was tested with tribal administrators at the BIA Alaska Tribal Providers Conference (along with the two other prototypes previously mentioned on page 11) to collect feedback on user experience. Testers expressed a strong preference for the lower-tech Excel prototype and requested a simple document that could be downloaded once and stored locally.

In coordination with the Office of Capital Access Data and Reporting team, the Treasury team developed an Excel report template for the ARPA State and Local Fiscal Recovery Funds Project and Expenditure Report. A Project and Expenditure Report for the SLFRF is due annually for tribal government recipients receiving less than \$30 million in SLFRF awards and quarterly for tribes receiving more than \$30 million. The template was designed with useability at the forefront, driven by the customer experience feedback.

### Impact of ARPA and SLFRF

**ARPA** includes **\$350 billion** in financial assistance to state, local, and tribal governments through the creation of the Coronavirus **State and Local Fiscal Recovery Funds (SLFRF)** program for response to and recovery from the COVID-19 public health emergency. This historic fiscal relief administered by the Office of Recovery Programs within the U.S. Department of the Treasury set aside a **\$20 billion** allocation to tribal governments – the largest single infusion of federal funding into Indian Country.

### Features of the Offline Excel Report Template

- ☐ Report instructions
- ☐ Glossary of terms
- ☐ Support contact (help desk email and phone numbers)
- ☐ Self-service manual
- ☐ Conditional formatting and data validation for accurate completion
- ☐ Plain language

**The Impact:** *SLFRF recipients that were previously non-compliant and need extensions in the 2024 annual reporting period are able to immediately take advantage of the offline report, providing direct benefit to the small rural recipients that lack strong internet.*

Treasury tested the offline Excel workbook with five volunteer SLFRF tribal recipients in a pilot. Pilot participants submitted their SLFRF Project and Expenditure Report both through the online portal and the offline Excel template to ensure accuracy. Following submission of the offline and online reports, a comparative analysis was completed to ensure the offline template was inclusive of all the necessary information and to identify any misalignment between documents.

Participants appreciated having the option to report offline and highlighted the helpfulness of the glossary and inclusion of support contacts, specifically noting phone numbers and email addresses for help desk support. Treasury is working to align the Excel workbook with the online portal and incorporate formatting changes to improve the useability and continuity of the report.

In May 2024, the refined SLFRF offline Excel template was approved to be used as an option for submission, expanding access to all SLFRF recipients in the 2025 annual reporting period. Recipients granted extensions during the 2024 annual reporting period also have access to the expanded offline option. Recipients that were previously non-compliant and need extensions will be able to immediately take advantage, providing direct benefit to the small rural entities that lack strong internet.

## Digital Identity Verification System Improvements

- **The Need:** Appropriate use of digital identity verification can help secure grant systems while promoting broad and equitable access. Tribal recipients require additional guidance and resources to address cybersecurity and identity verification challenges.
- **The Pilot:** The Tribal CX Pilot Team engaged with government-operated and private sector identity verification providers to share direct user feedback from tribal partners.
- **The Impact:** Single sign-on providers expanded their direct engagement with tribal users, resulting in the development of [tribal-specific guides](#), onsite help at Tribal conferences, and significantly expanded in-person identity verification options at more than 18,000 United States Postal Service locations [nationwide](#).

**The Need:** *Appropriate use of digital identity verification can help secure grant systems while promoting broad and equitable access. Tribal recipients require additional guidance and resources to address cybersecurity and identity verification challenges.*

With an ever-increasing number of digital transactions performed each year, strong cybersecurity is critical to protecting the trillions of federal dollars being awarded to grant recipients nationwide. Grant recipients now perform a wide variety of tasks using digital systems, including reporting and other grant management activities. To ensure strong security and improve convenience, these systems are increasingly adopting single sign-on solutions that provide both modern multifactor authentication and strong identity verification.

This cybersecurity best practice increases convenience by allowing grantees to use a single account to access a broad array of government services and benefits, while improving security and aligning with the objectives of [Executive Order 14028, Improving the Nation's Cybersecurity](#). When transitioning to more modern and secure systems, agencies must also ensure the customer experience is not adversely impacted.

Tribal recipients have highlighted issues with identity verification as a major pain point. Inconsistent or poor internet connectivity, inability to easily obtain identity documents accepted for identity verification, and proximity to government buildings were three of the difficulties tribal recipients reported when trying to complete identity verification. The verification process may be further complicated in specific use cases, such as an outside consultant who needs to submit reports on behalf of multiple recipients. Additional concerns expressed by recipients include a lack of in-person verification options, challenges with verifying information on identity documents, limited customer support, and concerns about data privacy and security.

“Since we live in the village, we don’t have a DMV, so we’re not always updated with our IDs and [identity verification providers want] current unexpired IDs. And if we use our Tribal ID, they don’t accept it.”

TRIBAL CONSULTANT

**The Pilot:** *The Tribal CX Pilot Team engaged with government-operated and private sector identity verification providers to share direct user feedback from tribal partners.*

The Tribal CX Pilot Team conducted outreach to digital identity verification providers to share the feedback gathered through the project's human-centered design research. As a part of this outreach, the team recommended providers increase their support for tribal identity documents and P.O. boxes, increase in-person verification options, and provide guidance for first time users.

**The Impact:** *Single sign-on providers expanded their direct engagement with tribal users, resulting in the development of tribal-specific guides, onsite help at Tribal conferences, and significantly expanded in-person identity verification options at more than 18,000 United States Postal Service locations nationwide.*

Since starting this engagement, government-operated and private-sector identity verification systems enacted a variety of changes that improve the customer experience for tribal users. These changes vary by provider, but include developing tribal-specific guides, accepting new forms of identity documents (including Tribal IDs), increasing in-person identity verification options to more than 18,000 United States Postal Service locations, offering a live help desk for users experiencing access issues, and making improvements to business profiles within user accounts.

The improvements made by government-operated and private-sector identity verification systems demonstrate that proper implementation of single sign-on solutions can result in secure, accessible digital systems that are broadly accessible to all tribal recipients.

#### Single sign-on provider customer experience improvements include:

- ✓ Tribal-specific guides
- ✓ Additional forms of identity documents (including Tribal IDs)
- ✓ Increasing in-person identity verification options
- ✓ Live help desk
- ✓ Improvements to business profiles within user accounts



## HHS Reduced Reporting Requirements

- **The Need:** Balancing recipient experience and burden in post-award reporting with the need for robust data collection on the use of grants funds.
- **The Pilot:** IHS Behavioral Health Initiatives (BHI) streamlined their inbound information portal by reducing the number of questions and developing improved data collection and reporting templates.
- **The Impact:** IHS reduced recipient reporting burden by 64% and implemented a more robust data collection system for improved data analysis.

**The Need:** *Balancing recipient experience and burden in post-award reporting with the need for robust data collection on the use of grants funds.*

The Tribal CX Pilot team analyzed post-award reports collected by the Indian Health Service (IHS) and U.S. Department of the Treasury to establish a baseline understanding of existing reporting practices. Of the five reports analyzed, the behavioral health programs at IHS had a significantly higher number of data elements on average than the Treasury reports. The Tribal CX Pilot team explored avenues to reduce

reporting requirements and partnered with IHS's Behavioral Health Initiatives (BHI) team to implement improvements.

To deliver on its mission, the Indian Health Service collaborates with tribes and tribal organizations to understand communities' intensified behavioral risk burdens and lead risk mitigation initiatives. Each of IHS's programs has unique goals, such as mitigating the risks associated with substance use disorders, domestic violence, and suicide. IHS is also committed to providing tribes with a reliable and consistent record of their service capacity development and community impacts. These unique goals create a notable challenge to balance data collection and recipient experience.

“The biggest challenge that we have is that there's been an increase in the amount of [data collection] requests. [The agencies say to us]: keep doing the good job you're doing. And then they come and say, we really want more. You're not doing enough. We need more data, more collection. Like, what are you doing with that [all of that data]?”

TRIBAL GRANT ADMINISTRATOR

**The Pilot:** *IHS Behavioral Health Initiatives (BHI) streamlined their inbound information portal by reducing the number of questions and developing improved data collection and reporting templates.*

Prior to the establishment of the Tribal CX Pilot, the IHS BHI team was already committed to improving their post-award reporting process. In anticipation of a new cohort of tribal partners in 2022, the BHI team started the process of replacing their analytically ineffective and administratively daunting data collection system. Through iterative engagements with multiple cohorts of tribal partners, the BHI team developed a HIPPA-compliant data collection system that allowed for full tribal data ownership.

### Engagement Strategies

- ✓ In-person tribal site visits
- ✓ Virtual monthly office hours
- ✓ Stakeholder roundtables



Representatives from the Tribal CX Pilot met with the IHS BHI team to share lessons learned from the project's human-centered design research. These included the benefits of simplified reporting and of offline accommodations for recipients lacking reliable broadband. In addition to user experience improvements made to the online data collection system, the BHI team addressed recipient feedback on the length of the report by limiting the data collected to three primary themes: service capacity, protocols, and volume. These changes were updated in the revised inbound information portal and significantly decreased reporting burden.

**The Impact:** *IHS reduced recipient reporting burden by 64% and implemented a more robust data collection system for improved data analysis.*

Leveraging the Tribal CX Pilot team's research, the interdisciplinary IHS BHI team has made impressive improvements to their inbound information portal and **decreased the reporting burden by 64%, reducing the estimated time for report completion from 8.9 hours (if all questions were applicable to the recipient) to 3.2 hours.**

**In addition to reducing the number of questions, the BHI team made customer experience improvements to their data collection portal:**

- ✓ Added a responsive ticket request system for user support.
- ✓ Created on-demand training videos for users.
- ✓ Developed a post-award report template for offline preparation.
- ✓ Allowed written completion of the report template for tribal recipients with limited portal access.
- ✓ Allowed for additional information and narrative reporting through coordination with Area Project Officers.

These changes also benefited IHS's ability to effectively analyze data at a project and cohort level, leading to a more responsive approach to field changes. For instance, IHS found the Northern Nevada region is facing a heightened risk among youth, providing IHS an opportunity to offer follow-on support as the tribal partners confront complex circumstances. This and other examples point to the need for the BHI team to continue its cross-domain and cross-sector cooperation among federal agencies and to minimize the operational and administrative burdens that tribes face.

## Focus Areas and Opportunities

**The Bottom Line:** To support agencies as they deliver improvements in accordance with multiple government-wide directives, the Tribal CX Pilot team identified five focus areas: 1) Flexible Requirements and Accommodations, 2) Strengthen Relationships with Tribes, 3) Community Engagement, 4) Recipient Training and Support, and 5) Plain Language and Clear Expectations.

The Tribal CX Pilot for Post-Award Reporting aligns with multiple government-wide policies that support improvements to tribal customer experience. The focus areas and opportunities outlined below are the result of the pilot team's research process, solution development, and cross-government collaborative discussions. They are intended to provide actionable information agencies can leverage to meet tribal recipient needs and to bolster policy implementation efforts.



### Broader Implications:

While these pilot solutions were developed in response to tribal needs, the challenges identified are common across all recipient types. The 50+ federal awarding agencies have the opportunity to use the pilot solutions and associated lessons learned to reduce reporting burden for all recipients.

### Government-Wide Policies Supporting Improved Tribal Recipient Experience

#### 2 CFR 200

Uniform Guidance for Federal Financial Assistance: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

#### M-24-11

OMB Memorandum Reducing Burden in the Administration of Federal Financial Assistance

#### Executive Order 14112

Reforming Federal Funding and Support for Tribal Nations To Better Embrace Our Trust Responsibilities and Promote the Next Era of Tribal Self-Determination

#### Executive Order 14058

Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government

#### Executive Order 14091

Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government

## Flexible Requirements and Accommodations

*Use of **flexible requirements and accommodations** gives tribes in unique circumstances additional opportunities to meet compliance requirements.*

Tribal recipients are diverse in infrastructure, geography, size, goals, and resources. Providing flexibility and accommodations is key to adapting to varying recipient needs. During tribal recipient interviews, pilot partners encountered examples of recipients facing compliance penalties such as additional reviews from the Office of the Inspector General. Delinquent reports can also trigger other severe consequences such as audit findings, funds recoupment (and associated debt), and lost opportunities for future federal awards. Interviewees described turning down funding opportunities and electing not to reapply for awards due to the strain of overly burdensome administrative requirements.

Interviewees also shared suggestions to ease the process for fulfilling their post-award reporting obligations. Strengthening the way information is collected and shared expands opportunities for self-correction and can reduce the burden of unnecessary compliance enforcement actions. Making reporting more accessible, program rules more user-friendly, and creating flexibility where possible benefits tribes seeking to meet their obligations.

Strategies to implement **flexible requirements and accommodations** may include:

- ✓ **Provide alternative methods** to submitting reports through online portals and accommodations within portals for low internet speeds to prevent data loss.
- ✓ **Create flexible deadlines** for unique circumstances (like accommodating subsistence seasons) and offer extensions for extenuating circumstances (such as extended power outages due to extreme weather).
- ✓ **Simplify report submission** by making requirements manageable and proportional to the size of the grant and/or capacity of the recipient to better balance administrative burden and risk.
- ✓ **Expand use of the 477 Program** to allow flexible reporting for tribes who request programs be incorporated into their 477 plans.

“If performance reporting is required during peak subsistence season, they have a choice to feed their family for a year or make a paycheck for 1 week.”

TRIBAL ORGANIZATION

“Federal agencies should not require additional information that is not necessary for measuring program performance and evaluation.”

[2 C.F.R. § 200.301](#)

## Flexibility Enabled by ACF and the 477 Program

Public Law 102-477, commonly referred to as “477” or the “477 Program,” is the Indian Employment, Training and Related Services Demonstration Act ([25 U.S.C. 3401 \*et seq.\*](#)), which allows tribes to consolidate grant programs supporting employment, training, and related services into one budget and one annual report. The [annual report](#) for the 477 Program is three parts: a one-page statistical report, a one-page financial report, and an open text narrative report.

The **Administration for Children and Families (ACF)** within HHS has seven federal grant programs eligible for integration under 477,

serving over 70 tribal recipients across 133 programs. ACF collectively makes up 85% of the federal funds flowing through 477.<sup>10</sup> Since 2022, ACF has nearly doubled the number of eligible programs and has made it a tenant of their tribal program. Due to the size of the program, ACF has a designated staff member with responsibility for managing its 477 operations and coordinating with recipients and BIA.

In 2022, the 477 Program expanded to twelve agencies via a revised [Memorandum of Agreement](#), opening the door to additional grant programs to be included. Given that tribes praise the 477 Program as a model federal program for supporting tribal sovereignty and decreasing reporting requirements, it is important to educate agencies on the process of applying for 477 inclusion. Federally recognized tribes drive the process by requesting an eligible program be added to the 477 Program through a proposal and justification sent to BIA. The awarding agency will review the proposal and provide a recommendation to BIA for final approval. More information on the 477 Program can be found [here](#).

## Strengthen Partnerships with Tribes

*Strengthening partnerships with tribes at an individual level, as well as across federal agencies, is critical to successful implementation of federal awards and compliance processes that support tribal self-governance.*

The connection between tribal nations and the United States is a unique nation-to-nation relationship. Responsive federal award management, fairness, and increased transparency in compliance policies promote tribal self-governance and have been emphasized by recent policy directives like [Executive Order 14112](#). Throughout the Tribal CX Pilot team’s engagements, the importance of tribal consultation and of tribal sovereignty and ownership over data, information, and funding were emphasized repeatedly. The uniqueness of the nation-to-nation relationship coupled with tribal reliance on federal funding to support tribal government functions and programs necessitates that federal staff have high levels of cultural awareness and coordinate with subject matter experts to ensure grant programs are meeting obligations to tribal governments.

“If the 44 eligible programs were held outside 477, that would be 153 separate reports down to one three-part report.”

### MARCH 2024 CONGRESSIONAL HEARING\*

\*Advancing Tribal Self-Determination: Examining the opportunities and challenges of the 477 Program | Indian and Insular Affairs Subcommittee | House Committee on Natural Resources. (2024, March 20). [https://naturalresources.house.gov/calendar/](https://naturalresources.house.gov/calendar/eventsingle.aspx?EventID=415717)

[eventsingle.aspx?EventID=415717](https://naturalresources.house.gov/calendar/eventsingle.aspx?EventID=415717)

10 Public Law 102-477: Indian Employment, Training and Related Services. The Administration for Children and Families. <https://www.acf.hhs.gov/tribal-affairs/tribal-initiatives/477>

Strategies to **strengthen relationships** with tribes include:

- ✓ **Prioritize tribal consultation and encourage greater collaboration between agencies and tribes** to inform federal policies that have tribal implications, including compliance and grants management policies.
- ✓ **Provide educational programs and training** to educate federal staff on the nation-to-nation relationship with tribal governments, tribal economies, tribal reliance on federal funding, Native culture and history, and the implications for grants administration.
- ✓ **Involve tribal liaisons** on key decisions affecting tribes; including to advise on program evaluation requirements and grant program actions.

### Agency Spotlight

The **Institute of Museum and Library Services (IMLS)** created an interdisciplinary cross organization “Nation-to-Nation” **working group** to improve programs and policies for tribal recipients by facilitating coordination and information sharing between staff involved in the end-to-end recipient experience. They also include **transition information** in the grant administration guidance that can be accessed online to limit disruption when turnover occurs with recipient organizations.

## Community Engagement

*Prioritizing **community engagement** with tribal organizations and tribal grants professionals is the best way to ensure processes and requirements are responsive to tribal needs.*

Programs can save time and resources by consulting directly with tribal organizations in matters affecting tribal recipients. Specifically, engaging with grants administrators, program staff, and practitioners themselves rather than higher level leadership increases the value of the feedback to those who will be most directly affected. Consistent and meaningful community outreach clears the way for continuous iteration in response to evolving recipient needs.

Strategies to **prioritize community engagement** include:

- ✓ **Prioritize continuous engagement with tribal recipients** at multiple points when developing processes and solutions. Note that the Tribal CX Pilot team conducted nearly 100 meetings/interviews to understand challenges and iterate on pilot solutions.
- ✓ **Encourage community collaborations** with organizations that have a wide network of tribal recipients.
- ✓ **Solicit feedback** through tribal events and conferences to reach a cross-section of tribal organizations and professionals.

## Recipient Training and Support

*Providing tribal **recipient training and support** offers accessible resources to help with knowledge transfer and overcoming the staffing challenges common for many tribal recipients.*

As previously outlined, recipient training and staffing challenges are significant barriers to grant reporting and award management, especially for small or remote tribes. This finding aligns with survey results from the [2024 Grants Management Survey](#), conducted by REI Systems, National Grants Management Association, and George Washington University<sup>11</sup>, that highlights the need across the grants community for more training, capacity building and retention, and stronger communication and collaboration to improve grants management. Rural recipients, especially, need accessible avenues for help that may fall outside of typical methods of assistance.

Tribal recipients voiced appreciation for being able to speak directly with another person when encountering an issue with reporting.

Strategies to bolster **tribal recipient training and support** include:

- ✓ **Encourage recipients to use the Federal Grant Systems Hub** (see 'The Federal Grant Systems Hub (beta)' on page 18) to quickly see their grant awards and associated systems, help desks and trainings.
- ✓ **Provide live training and support** to grants management staff and administrators where situation-specific questions can be answered.
- ✓ **Create a centralized location for training materials and resources** to ensure they can be easily accessed at any time.

### Agency Spotlight

Recipients of federal financial assistance from the U.S. Department of the Treasury also have access to staff members within the Office of Tribal and Native Affairs (OTNA) to assist with onboarding, reporting questions, and issues with their awards. When new tribal grant administrators begin, OTNA provides financial assistance agreements or award letters and offers to talk through the tribe's awards. OTNA operates under the mindset of "let's find ways to help this recipient get into compliance."

<sup>11</sup> REI Systems. (March 28, 2024). Key Takeaways from the Grants Management Survey. Retrieved from <https://www.reisystems.com/key-takeaways-grants-management-survey>



## Plain Language and Clear Expectations

Use **plain language and set clear expectations** to simplify post-award reporting requirements and processes.

Consistent and clear communication of expectations and requirements surrounding grant reporting is integral to ensuring recipients can effectively access and implement grants. Per the guidance included in [M-24-11](#), it is important to make sure materials are easy to understand for non-technical and non-federal recipients who may not be familiar with government- or industry-specific jargon.

Strategies to **simplify language** and set **clear expectations** include:

- ✓ **Define expectations for reporting upfront** to help applicants understand reporting requirements and avoid feeling “bait-and-switched” between the application, award notification, and post-award reporting phases of grant administration.
- ✓ **Use plain language and tool tips or glossaries** to make materials easy to understand for all levels of experience.

### Transparency in NOFOs

The Tribal CX Pilot team found that it is not uncommon for specific reporting requirements to be excluded or only vaguely discussed in the Notice of Funding Opportunity (NOFO) (document that announces the opportunity with details of how to apply) and the Notice of Award (document that awards the grant with terms and conditions).

This means that applicants may not find out what performance reports look like until after the grant has been awarded and the terms and conditions signed.

# Appendix

## Examples of Opportunities to Reduce Reporting Burden

Flexible Requirements and Accommodations	
<b>Provide Offline Accommodations and Other Alternative Methods</b>	<ul style="list-style-type: none"> <li>• Develop offline reporting templates.</li> <li>• Enable auto-save features in online portals to save progress.</li> <li>• Allow multiple small uploads and downloads.</li> </ul>
<b>Create Flexible Deadlines</b>	<ul style="list-style-type: none"> <li>• Provide deadline extensions to accommodate unique circumstances and develop reporting strategies based on subsistence seasons to align with community needs.</li> </ul>
<b>Simplify Report Submission</b>	<ul style="list-style-type: none"> <li>• Reduce reporting requirements, ensuring the reporting process is manageable and proportionate to the funding amount.</li> <li>• Align reporting frequency requirements to be proportionate to the award amount and risk assessment.</li> <li>• Design the performance report based on specific data needed for evaluation (in compliance with updated <a href="#">2 CFR 200</a> guidance).</li> <li>• Offer a narrative evaluation form to allow recipients to share success in a flexible open format.</li> </ul>
<b>Increase Awareness of the 477 Program</b>	<ul style="list-style-type: none"> <li>• Encourage tribal recipients to leverage the 477 Program for applicable grants to reduce reporting burden.</li> <li>• Develop educational materials and resources on the benefits and functionality of the 477 Program to better inform federal grant program managers.</li> </ul>
Strengthen Relationships with Tribes	
<b>Tribal Consultation</b>	<ul style="list-style-type: none"> <li>• In compliance with Federal laws, facilitate consultation with tribes when there is a substantial direct effect on one or more tribes.</li> <li>• Incorporate feedback not only on budgetary issues for federal funding but also the implementation of the award, including compliance.</li> </ul>
<b>Provide Educational Programs and Trainings</b>	<ul style="list-style-type: none"> <li>• Develop training materials and programs for federal agencies on tribal sovereignty and federal grant programs (e.g., workshops, regular training session, webinars, etc.).</li> </ul>
<b>Empower Tribal Liaisons and Offices</b>	<ul style="list-style-type: none"> <li>• Involve tribal liaisons on key decisions affecting tribes.</li> <li>• Bring in tribal liaisons to advise on program evaluation requirements.</li> <li>• Request tribal liaisons review important communications to tribal recipients.</li> </ul>
<b>Foster Tribal Affairs Collaborations</b>	<ul style="list-style-type: none"> <li>• Foster collaboration and knowledge sharing between professionals handling all areas of the grants management process to address barriers and improve customer service for tribal recipients (e.g., working groups, cross-departmental initiatives, etc.).</li> </ul>
Community Engagement	
<b>Prioritize Continuous Engagement</b>	<ul style="list-style-type: none"> <li>• Establish and prioritize continuous engagement (e.g., tribal consultation, listening sessions, training events) with tribal leaders, administrators, and practitioners from the tribal community.</li> <li>• Gather feedback, address concerns immediately, and promote collaborations on grant-related initiatives. Include the recipient when testing assumptions and developing solutions.</li> </ul>
<b>Encourage Community Collaborations</b>	<ul style="list-style-type: none"> <li>• Collaborate with community-based organizations and tribal consulting entities to access a wider view across multiple tribal governments.</li> <li>• Develop communication strategies, including community partners, to better share information on grant opportunities and policy and system changes across some of the hardest to reach recipients.</li> </ul>

## Tribal Customer Experience Pilot for Post-Award Reporting

<b>Solicit Feedback Through Tribal Conferences</b>	<ul style="list-style-type: none"> <li>• Deepen cultural awareness and gain insights from a cross-section of tribal professionals and recipients.</li> <li>• To gather diverse insights on system/policy changes from various disciplines and tribal professionals, attend tribal conferences and seminars such as the ones attended by the Tribal CX Team: <ul style="list-style-type: none"> <li>• <b>National Tribal Telecommunications Association (NTTA) Annual Conference</b> (April 2023) <ul style="list-style-type: none"> <li>• Audience: Tribal telecommunications professionals</li> </ul> </li> <li>• <b>BIA Alaska Tribal Providers Conference</b> (November 2023) <ul style="list-style-type: none"> <li>• Audience: Tribal administrators from Alaska Native Villages</li> </ul> </li> <li>• <b>Native American Financial Officers Association (NAFOA) Annual Conference</b> (April 2024) <ul style="list-style-type: none"> <li>• Audience: Tribal finance professionals</li> </ul> </li> </ul> </li> </ul>
<b>Recipient Training and Support</b>	
<b>Encourage Recipients to Use the Federal Grant Systems Hub</b>	<ul style="list-style-type: none"> <li>• Advertise and provide hyperlinks to the Federal Grant Systems Hub, developed as a pilot solution from this Tribal CX Project, to aid all grant recipients in accessing key details and systems associated with their grants.</li> <li>• Give feedback to the Grants QSMO (GrantsQSMO@hhs.gov) on recommended updates for usability, system link edits, and additional features.</li> </ul>
<b>Provide Live Training and Reporting Support</b>	<ul style="list-style-type: none"> <li>• Develop specific transition and onboarding materials for new tribal grant administrators.</li> <li>• Provide multiple avenues for live support for tribal recipients needing assistance with reporting (e.g., virtual office hours, help-desk phone option).</li> <li>• Provide an online platform for tribal recipients to exchange information and seek assistance from federal agency representatives.</li> <li>• Host a training adjacent to another conference where tribal administrators are already coming together (e.g., The Rural Alaska Community Action Program, Inc., (RurAL CAP) hosted a tribal administrator gathering following the BIA Alaska Tribal Providers Conference in Anchorage).</li> </ul>
<b>Create a Centralized Location for Training Materials and Resources</b>	<ul style="list-style-type: none"> <li>• Create an easily accessible location with training materials and resources guides for employees to reference and utilize when needed.</li> <li>• Make materials public whenever possible.</li> </ul>
<b>Plain Language and Clear Expectations</b>	
<b>Define Expectations of Reporting Up Front</b>	<ul style="list-style-type: none"> <li>• Include specific reporting guidelines and deadlines in the Notice of Funding Opportunity (NOFO).</li> <li>• If possible, include a link to the performance reporting template and/or measure in the NOFO and Notice of Award.</li> <li>• Aim to leverage technology to reduce burden of reporting through skip logic when reporting requirements do not apply.</li> </ul>
<b>Use Plain Language</b>	<ul style="list-style-type: none"> <li>• Include a glossary of terms in offline guidance or tool tips in portals to provide additional definition of difficult terms.</li> <li>• Use plain language in all communications, instructions, and guiding materials, ideally at or below an 8th grade reading level.</li> <li>• Use Microsoft Word's <a href="#">readability statistics functionality</a> to ensure documentation and guidance is written in plain, understandable language.</li> <li>• Regularly update assistance and support points of contact information.</li> </ul>

