

OFM Federal Agency Workgroup - Executive Meeting

Meeting minutes

Date: April 4, 2019
Location: Department of Commerce FA Bldg 5, Room 110
Facilitator: Sara Rupe, OFM
Present: see Meeting Sign-in Sheet

1. Round of introduction and welcome of new participants.

2. Management Concepts – Grant Training

- <https://www.managementconcepts.com/All-Courses/id/Grants%20-%20Assistance>
- Asked for feedback from anyone who has attended a training through Management Concepts.
 - ECY (via email): Recommended the classes. They have taken several and like them. They would like to take the subrecipient class and the audit class.
 - Workforce (via email): Thought the class they took was just ok. It was high level and dry.
- The company offers private group trainings; Sara is working on getting more information about bringing someone in to do one of the classes. Sara was considering the following potential classes::
 - Subawarding for Pass-through entities
 - Uniform Administrative Requirements & Cost Principles Overview
 - Financial Administration of Federal Grants for Recipients
 - Internal Controls for Federal Grants for Recipients
- Sara asked the group to review the website and provide feedback on which classes they would like to attend.
- More to come next meeting.

3. Thompson Grants Webinar Training:

- Sara sent out a current list of available webinars on the website including links and PINs to access the training.
- A new column was added for the date the training was added to the list so you can see which trainings were added since the last time the spreadsheet was sent out.
- COM: Took the “Are your policies and procedures aligned with the Uniform Guidance?” Thought it was good and provided a good list of policies that agencies should have.
- These are free on-demand training webinars with a variety of topics related to grants. New classes are continually added to the website.
- Encouraged agencies to take some classes and share their insights and feedback. If classes are relevant to agencies, recommendations can be sent to Sara so she can share the updates before each meeting.

4. Federal Grant Training plan update:

- *SAO Federal Grant Requirements and Management training*
 - The SAO trainer that was assigned to provide this training is no longer at SAO. SAO has not officially determined a new person that will teach the class, but will soon.
 - Most of the materials are already developed. Sara is still working with the SAO trainer to modify or amend training materials to be more relevant to state agency operations.
 - Currently waiting for cost data from SAO to determine the feasibility of OFM sponsoring the training to the state.

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- We are still on track for a Summer time frame to offer the training.
- May consider inviting the SAO trainer to our group meeting to seek feedback from agencies. Details at work.
- *Disclosure Forms*
 - Sara discussed the new federal Disclosure Form eLearning class that she has been working on. Sara showed how to access the DRAFT training and make comments. Sara will send the link to the group to review and provide feedback after this meeting.
 - Sara would like to receive feedback from the group before our next workgroup meeting in June, and will modify the training based on the group feedback.
 - After the Disclosure Form application is open, Sara will provide the training to the staff at the agencies that are responsible for preparing the federal disclosure forms to review the training while they fill out the forms. The staff will be requested to provide feedback by October 2019. Sara will modify the training as needed based on the additional feedback received.
 - Once the class is determined to be final, OFM will record the audio for an eLearning format. The FINAL training with audio will be available (probably on the OFM website) for fiscal year 2020 close.
- *Single Audit Overview*
 - Cover Single Audit Act requirements and the general single audit process in WA
 - OFM is still planning to make this into an eLearning format.
 - OFM will share a DRAFT with the group and other users before we record the audio. A FINAL training will be available hopefully by June 2020.

5. CFDA ER Report:

- No update since last meeting. Sara hasn't had a chance to work on this.
- Continue to let Sara know if there are any other changes to this report that need to be made.

6. Round table

- OSPI: Does anyone have a form or template that they use to collect the pre-award costs from subrecipients? Many times subrecipients will incur pre-award costs when they believe they will get an award. They are allowable under the agreement, but they want to clearly identify them to make sure they are allowable. It's not common, but they want to have policies and procedures and a form in case they have pre-award costs.
 - COM: They believe they just include those costs in an A-19 Invoice Voucher. They will check with program staff to see if there is a separate process for tracking this.
- OSPI: Participant Support Costs. OSPI was wondering if anyone else had participant support costs. If so, how have they dealt with the requirement to request prior approval from the federal awarding agency? They have requested a waiver from Dept of Ed, but haven't heard anything back.
 - *Participant support costs (as defined in 2 CFR 200.75) means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. The Uniform Guidance (2 CFR 200) requires prior approval of the Federal Agency in order to incur Participant Support Costs under federally sponsored awards. The Participant Support Costs must be incurred within the period of performance of the project and be specifically allowed by the sponsoring agency.*
 - DOT: Didn't have participant support costs, but recommended working with a regional office instead of the national office to request the waiver. Also, when requesting waivers, they

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- should clearly outline the requirements and the processes they will put in place to ensure compliance.
- COM: Asked if they have spoken to other states that have the same issues. Did they request a waiver and get approval? Recommended to also include references to precedent in their request to show that it has been approved before.
- WSP: Has been serving on the OneWA PRW Policy Committee and DES Training Advisory Group (TAG). One of the agenda items in this week's TAG meeting included a brief update by DES on the development and/or modifications of the state procurement policies and procedures, specifically the Sole Source Contract Policy and the Delegated Authority Policy. One concern or issue that was discussed involved an interpretation of policy with respect to sole source exempt contracts for procurement of goods or services which have been approved by the federal grant funding agency as exempt from competition. A good reason of why this is a concern is that forensic laboratory equipment and medical equipment often require labor intensive and/or time consuming trainings and certification (to use the equipment) and thus are not feasible or practical to replace the equipment frequently or have to be competitively procured as it would require recertification and a great deal of retraining of staff to use the new equipment. The current interpretation of the policy staff on this sole source exempt issue appeared to have changed from that provided 5-6 years ago and inconsistent with the answer provided in the FAQ.
 - Is a sole source contract allowable only when a grant funding agency specifically requires the grant recipients contract only with a specifically named vendor?
 - If an agency identifies in its grant application that it intends to contract with a specific vendor to perform specific services or provide specific goods for the grant project and also includes the justification or reasons for using this firm or vendor, and if the funding authority approves the application and the use of the named vendor for the contract services or goods, one would expect that such contract should not be required to be competitively awarded and thus would not need to be filed with DES for sole source approval.
- ALL: There was a discussion about the procurement policies in general; the overall feeling was that the policies would be better if they could be broken down further to better address specific agency needs.
- WSP: Mentioned that the DUNS number will be going away eventually. Only the SAM number will be required. Here is a recent article: <https://www.govtech.com/biz/Federal-Grants-Vendors-to-Break--at-Long-Last--from-DUNS.html>
- WSP: Has a subrecipient risk assessment template that they have developed that they are willing the share with the workgroup. Sara will make this available for the workgroup on the common resources page.
- DOC: What process do agencies have for properly identifying expenditures at federal fiscal year-end?
 - DSHS: They use a complex account code structure to ensure expenditures are properly coded.
 - OFM: Would the Month of Service field in AFRS help with this? MOS is used mainly to identify when services were provided to clients and would not help with the federal fiscal year because most federal funding is based on month of payment, not month of service.

7. Next meeting

- June 6, 2019
- Commerce Building 5
- HOMEWORK: Please review the Federal Disclosure Form eLearning training and provide feedback.
- Go over the Statewide Single Audit results