



Federal Grants Streamlining Initiative

# **Pre-Award Work Group**

**Grants Policy Committee**

**Stakeholders' Meeting**

**October 25, 2006**

***Mark Herbst***

***Work Group Chair***



# Areas of Work Group Activity

- **Announcements**
- **Suspension and debarment**
- **Policy framework (2 CFR)**
- **Certifications and assurances**
- **Awards**



# Announcements of Funding Opportunities

- **Initial announcement format (final, June 2003)**
- **Data elements for synopses (final, June 2003)**
- **Enhanced announcement format (future)**



# Suspension and Debarment (S&D) Common Rule

- **Partnership with Interagency Suspension and Debarment Committee (ISDC) as lead**
- **Updated common rule (final, November 2003)**
  - **Plain language**
  - **Certification**



# Alternative to Common Rules

- **Adoptable OMB guidance, like cost principles**
- **Advantages**
  - **Simpler to maintain with one OMB action**
  - **Agency-specific variations easy to see**
  - **Reduced regulatory volume in CFR**



## 2 CFR – A Better Policy Framework

### Established 2 CFR (May 2004)

- OMB guidance in one subtitle
  - Easy to find
  - Still guidance to agencies, not regulation
- Agency implementing rules in second subtitle
  - Single place for agencies' rules
  - Agency rules give guidance legal effect



## Phased Transition to 2 CFR

- **Some OMB guidance as is, pending streamlining**
  - **A-110 (May 2004)**
  - **With Post-Award: A-21, A-87, A-122 (August 2005)**
- **With ISDC: adoptable S&D guidance**
  - **OMB interim final (August 2005) and final (soon)**
  - **Agencies do adopting parts, remove common rule**
- **Other guidance--e.g., A-133, drug-free (future)**



# Certifications and Assurances

- **Certification/assurance statement for SF-424 forms**
- **Considering uniform approach across:**
  - **Announcement**
  - **Application or Central Contractor Registration (CCR)**
  - **Award terms and conditions**



# Recipient Concerns About Awards

- **Recipients see awarding offices awards vary:**
  - From each other
  - From OMB circulars
- **We see tiers with need for good fidelity:**
  - OMB guidance
  - Agency implementing regulations
  - Subcomponent or program rules, manuals, etc.
  - Announcements
  - Award terms and conditions (Ts and Cs)



# OMB Guidance on Agency Awards

## Working on guidance to include:

- Standard organization for awards
- Ts and Cs for core administrative requirements
- Ts and Cs for core national policy requirements
- Clarity on flowdown to subawards
- Reconciled definitions of terms



# Planned improvements Over Current A-102 and A-110

- **Clearly distinguish what speaks to whom**
  - **OMB guidance to agency on Ts and Cs use**
  - **Agency implementation of guidance to awarding office**
  - **Awarding office Ts and Cs to recipient**
- **Core Ts and Cs in guidance should improve fidelity across intervening tiers**



## Two Closing Thoughts

- **Many people in 20 agencies do the work**
- **We highly value and use your input**