# Fiscal Management and Cost Principles Tribal TANF & NEW Programs June 2024

Presented by: The Office of Grants Management

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# Rules of Engagement

- I will pause during the presentation for questions but if you have a question about a topic being presented on a slide, please do not hesitate to raise your hand. We will also make time for questions at the end of the presentation.
- We are happy to share the slide deck. If you will complete the sign in sheets on your respective tables, we will email the slides and associated handouts to you directly. Please include the email of all staff you'd like us to share these materials with on the sign in sheet.
- The "^" throughout the presentation is a reference that there is an associated attachment for the slide.
- The "\(\tilde{\ti
- Please note the resource slides provided on the last four slides of this presentation

# Agenda

- Award Purposes for NEW, TANF & TANF-PEAF
- Governance Program & Fiscal ^
- Awarding NOAs
- Reporting Requirements ^
- Admin Costs
- Allocation
- Prior Approval
- Subrecipient Monitoring
- Closeout
- Audits
- Updates in 2 CFR Part 200
- References & Resources ^

## Introductions – ACF/ Grants Management Team



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# **NEW/ TANF/ TANF-PEAF Program Purposes**

#### The Native Employment Works (NEW) Program Purposes

Funds work-related activities to support job readiness, job placement, and job retention.

#### **TANF Program – Four Purposes**

- Provide assistance to needy families so that children can be cared for in their own homes or in the homes of relatives
- End the dependency of needy parents on government benefits by promoting job preparation, work and marriage
- Prevent and reduce the incidence of out-of-wedlock pregnancies
- Encourage the formation and maintenance of two-parent families

#### **TANF PEAF Program – Non-Recurring Short Term Benefits**

Emergency assistance funds authorized for non-recurrent short term benefits



#### Tribal TANF - Use of TANF Funds

**Tribal TANF Regulations – Proper -** § 286.35 What are proper uses of Tribal Family Assistance Grant funds?

Tribes may use TANF for expenditures that are reasonably calculated to accomplish the purposes of TANF, including:

- provision to low income households with assistance in meeting home heating and cooling costs
- assistance in economic development and job creation activities
- provision of supportive services to assist needy families to prepare for, obtain, and retain employment
- provision of supportive services to prevent of out-ofwedlock pregnancies
- assistance in keeping families together.

**Tribal TANF Regulations – Improper -** § 286.45 What uses of Tribal Family Assistance Grant funds are improper?

- For families or individuals that do not otherwise meet the eligibility criteria contained in the Tribal Family Assistance Plan
- For more than the number of months as specified in a Tribe's TFAP (unless covered by a hardship exemption)
- Tribal Family Assistance Grant funds may not be used to contribute to or to subsidize non-TANF programs.
- A Tribe may not use Tribal Family Assistance Grant funds for services or activities prohibited by 2 CFR Part 200
- Tribal TANF funds may not be used for the construction or purchase of facilities or buildings.
- Tribes must use program income generated by the Tribal Family Assistance grant on TANF services, activities and assistance.

# Governance - NEW ^ Statute, Regulations & Policy

#### **Authorization:**

- Social Security Act, Title IV, Part A, Section 412(a)(2)
- Personal Responsibility and Work Opportunity Reconciliation Act (PWORA) of 1996
- Foster Care Independence Act of 1999 (Public Law 106-169)

Regulations: 45 CFR Part 287 (https://www.ecfr.gov/current/title-45/subtitle-B/chapter-II/part-287)

**NEW Policy:** www.acf.hhs.gov (https://www.acf.hhs.gov/ofa/programs/tribal-programs)

Terms and Conditions^: https://www.acf.hhs.gov/grants/mandatory-formula-block-and-entitlement-grants

SF 425 Report Instructions^: https://apply07.grants.gov/apply/forms/instructions/SF425\_3\_0-V3.0-

Instructions.pdf

**Award Frequency:** Annual appropriation, awarded annually

**Grant Budget & Project Periods**: Available Until Expended (*Note NOA Remarks*)

**Period of Performance**: Same as project period – Section 412 of Social Security Act:

"Without fiscal year limitation"

- Bound by **Uniform Guidance**
- No matching requirement.
- No Administrative Cap



# Governance - TANF ^ Statute, Regulations & Policy

#### **Authorization:**

Social Security Act, Title IV, Part A, Section 412(a)(2)

Personal Responsibility and Work Opportunity Reconciliation Act (PWORA) of 1996. Public Law 104-193

Regulations: 45 CFR Part 286 (https://www.ecfr.gov/current/title-45/subtitle-B/chapter-II/part-286)

TANF Policy: www.acf.hhs.gov (https://www.acf.hhs.gov/ofa/programs/tribal-programs)

Terms and Conditions^: <a href="https://www.acf.hhs.gov/grants/mandatory-formula-block-and-entitlement-grants">https://www.acf.hhs.gov/grants/mandatory-formula-block-and-entitlement-grants</a>

196T Report Instructions^: https://www.acf.hhs.gov/ofa/policy-guidance/tanf-acf-pi-2022-01

**Award Frequency:** Annual appropriation, awarded quarterly

Grant Budget & Project Periods: Available Until Expended (Note NOA Remarks)

**Period of Performance**: Same as project period – Section 404(e) of Social Security Act:

"Without fiscal year limitation"

- Bound by <u>Uniform Guidance</u>.
- No matching requirement.
- 25% Administrative Costs & Cap 45 CFR Part 286.50



# Governance - TANF PEAF ^ Statute, Regulations & Policy

#### **Authorization:**

Social Security Act, Title IV, Part A, Section 403, as amended by American Rescue Plan Act of 2021

Regulations: 45 CFR Part 286 (https://www.ecfr.gov/current/title-45/subtitle-B/chapter-II/part-286)

TANF Policy: <a href="https://www.acf.hhs.gov/ofa/programs/tribal-programs">www.acf.hhs.gov/ofa/programs/tribal-programs</a>)

Terms and Conditions^: https://www.acf.hhs.gov/grants/mandatory-formula-block-and-entitlement-grants

196P Report Instructions^: https://www.acf.hhs.gov/ofa/policy-guidance/tanf-acf-pi-2021-08

**Award Frequency:** initial award 2021; Reallotted award 2023

Grant Budget & Project Periods: Initial 9/30/2023 / Reallotment Awards: 5/31/2024

Period of Performance: Initial / Reallotment Awards: April 1, 2021 – May 2024

- Bound by <u>Uniform Guidance</u>.
- No matching requirement.
- 25% Administrative Costs & Cap 45 CFR Part 286.50



# Governance – NEW/ TANF/ TANF-PEAF ^ Uniform Guidance & OFA Policy

§ 2 CFR Part 200 vs 45 CFR Part 75

§ 45 CFR Part 75 vs Program Policy

§ 75.403 Factors affecting allowability of costs ("Cost Principles")

§ 75.405 Allocable costs

Costs claimed against federal awards must be:

- necessary and reasonable for the performance of the Federal award
- be allocable ... goods or services are assigned to TANF in accordance with relative benefits received. (this is actually found in TANF regulations as well)
- Allocation of costs to the TANF grant would consider:
  - Was cost incurred specifically for administration of TANF or does it conform to any limitation or exclusions of the TANF grant
  - If cost benefits entity or program other than TANF grant, can the cost be distributed in proportions that may be approximated using reasonable methods
  - Is the cost necessary to the overall operation of the non-Federal entity and TANF grant
  - Is the cost adequately documented

§ 75.407 Prior Approval



# **Awarding - NEW ALN - 93.594; TANF ALN - 93.558**

#### Approved NEW & Tribal TANF Program Plan

#### **UEI Renewal<sup>^</sup>**:

-You must renew your UEI registration every year at **SAM.**GOV°



- -Start at least 30 days before current UEI expires check here
- Quick Start Guide for Updating an Entity Registration

Payment Management System (PMS)			
Subaccounts Training			
NEW - "00PDAZNEWP"	New User Access		
FAG - "00PDAZTANF"	PMS Training		
PEAF – "00PDAZTANFC6"	Find Your PMS Liaison		

#### Notice of Award (NoA):

- -includes a summary of the T&Cs & reference to full T&Cs
- -includes award information (i.e., Recipient Information, Federal Agency Information, Federal Award Information, Summary Federal Award Financial Information)
- -available on GrantSolutions

#### Terms & Conditions included in remarks:

https://www.acf.hhs.gov/grants/mandatory-formula-block-andentitlement-grants



Notice of Award FAIN# Federal Award Date

Recipient Information	Federal Award Information		
1. Recipient Name	11. Award Number		
NAME OF ENTITY	12. Unique Federal Award Identification Number (FAIN)		
	13. Statutory Authority		
Congressional District of Recipient     04	14. Federal Award Project Title		
3. Payment System Identifier (ID)	15. Assistance Listing Number		
4. Employer Identification Number (EIN)	93.558 16. Assistance Listing Program Title		
5. Data Universal Numbering System (DUNS)	Temporary Assistance for Needy Families		
6. Recipient's Unique Entity Identifier (UEI)	17. Award Action Type		
	Now 18. Is the Award R&D?		
7. Project Director or Principal Investigator	No No		
	Summary Federal Award Financial Information		
	19. Budget Period Start Date 10/01/2022 - End Date 09/30/2023		
8. Authorized Official	20. Total Amount of Federal Funds Obligated by this Action		
o. Authorized ollicial	20a. Direct Cost Amount 20b. Indirect Cost Amount		
	21. Authorized Carryover 22. Offset		
Federal Agency Information	23. Total Amount of Federal Funds Obligated this budget period	90.00	
ACF/OFA Office of Mandatory Grants	24. Total Approved Cost Sharing or Matching, where applicable	\$0.00	
9. Awarding Agency Contact Information	25. Total Federal and Non-Federal Approved this Budget Period  26. Period of Perfomance Start Date 10/01/2022 - End Date 09/30/2023		
	27. Total Amount of the Federal Award including Approved		
Grants Management Specialist	Cost Sharing or Matching this Period of Performance		
	28. Authorized Treatment of Program Income		
10.Program Official Contact Information	ADDITIONAL COSTS		
	29. Grants Management Officer - Signature		
	Grants Officer		
20 PI	I		
30. Remarks			



# **NEW/ TANF/ TANF-PEAF Federal Reporting^**

Tribal Lead Agencies must submit reports for all open grant years until all funds have been expended.

Program	NEW	TANF	TANF-PEAF	
Report Name/ Instructions	SF 425 Instructions	196T Report Instructions	196P Instructions	
Frequency	Annual	Quarterly	Annual	
Reporting Cycle(s)	QE 6-30	QE 12-31 QE 3-31 QE 6-30 QE 9-30	Last Obligation of Reallotted award = 5/31/2024	
Due	No later than September 28	February 14 May 15 August 14 November 14	No later than August 14, 2024	
Reporting System	PMS (GY 2016 +)  For GY 2015, OLDC or  discuss with your  Grants Specialist	Grantsolutions/ OLDC	PEAF@acf.hhs.gov	



# **NEW & TANF Federal Reporting ^**

# Reduce Recipient Burden

#### FIFO (First in, First Out)

ACF encourages recipients to spend their oldest funds first to underpin sound accounting practices as well as efforts to close out older awards in the Payment Management System.

#### **Expenditure Reports vs. Draws**

- § 45 CFR Part 75.305 (b) For non-Federal entities other than states, payments methods must minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-Federal entity whether the payment is made by electronic funds transfer, or issuance or redemption of checks, warrants, or payment by other means.
  - Draw restrictions may occur in circumstances of non-compliance with <u>terms and conditions</u> of the federal award (including federal reporting)
  - The non-Federal entity must maintain advance payments of Federal awards in interest-bearing accounts if the tribe receives more than \$120,000 in total federal awards per year unless a reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances
  - Interest earned amounts up to \$500 per year may be retained by the non-Federal entity for administrative expense. Any
    additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually
    to the Payment Management System (PMS)
- § 45 CFR Part 286.45 (f) Tribes must use program income generated by the Tribal Family Assistance grant for the purposes of the TANF program and for allowable TANF services, activities and assistance.



### **TANF/ TANF-PEAF Admin Costs**

- Only 25% of Grant Award can be claimed for each TANF Grant Award balance.
- Difference between Program Cost and Admin Cost for purposes of TANF claiming

Award	Admin C	Program Costs	
Awaru	Admin Costs	IDCR	Flogram Costs
\$1,914,669.00	\$298,632.25	\$180,035.00	\$1,436,001.75
		1	

 $$1,914,669 \times .25 = $478,667.25$ 

The Tribe's administrative cost cap (25%) applies to the total Federal TFAG Funds awarded and reported on Line 1 (column A) of the 196T form.

Admin Costs defined at 45 CFR Part 286.5



### **Allocation of Costs**

Tribal TANF Policy: - Q & A: Use of Funds; 45 CFR Part 286.50(d); 45 CFR Part 286.270

**ACF Grants Policy: Property Guidance** 

Uniform Guidance: § 75.405 Allocable Costs; § 75.416 Cost allocation plans and IDCR.

§ 75.405 Allocable costs.

A cost is allocable to a particular cost objective if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received." Thus, costs that benefit multiple programs may not be allocated to a single program.

§ 45 CFR Part 75, Appendix VII - States and Local Government and Indian Tribe Indirect Cost Proposals (D. Submission and Documentation of Proposals)

Each Indian tribal government desiring reimbursement of indirect costs must submit its indirect cost proposal to the Department of the Interior (its cognizant agency for indirect costs).

§ 286.50(d) Is there a limit on the percentage of a Tribal Family Assistance Grant that can be used for administrative costs?

(d) ACF will negotiate limitations on administrative costs based on, but not limited to, a Tribe's TANF funding level, economic conditions, and the resources available to the Tribe, the relationship of the Tribe's administrative cost allocation proposal to the overall purposes of TANF, and a demonstration of the Tribe's administrative capability.

Cost Allocation			
Acceptable?	Methodology		
٧	Staff Assignment/ Allocation		
٧	Square Footage		
٧	Machine/ Software Usage		
X	Federal Award Amounts		
X	Labor Costs		



# **Prior Approval**

Tribal TANF Policy: - 45 CFR Part 263.11(b)

ACF Grants Policy: Tangible Property/Equipment Guidance

Uniform Guidance: § 75.407 Prior Approal

#### § 45 CFR § 75.407 - Prior written approval

"(a) Under any given Federal award, the reasonableness and allocability of certain items of costs may be difficult to determine. In order to avoid subsequent disallowance or dispute based on unreasonableness or non-allocability, the non-Federal entity may seek the prior written approval of the cognizant agency for indirect costs or the HHS awarding agency in advance of the incurrence of special or unusual costs. Prior written approval should include the timeframe or scope of the agreement. The absence of prior written approval on any element of cost will not, in itself, affect the reasonableness or allocability of that element, unless prior approval is specifically required for allowability as described under certain circumstances..."

There is a long list of cost categories listed in this part of the regulations but the following are the most common requests for the TANF program:

§ 75.439 Equipment and other capital expenditures; § 75.474 Travel costs.



# **Prior Approval Requests**

Generally, requests for claims should consider whether costs are:

Allowable Does purchase and activities align with program purposes?

Does the purchase meet the TANF definition of program cost or admin cost?

**Necessary**Is purchase necessary for the administration of the program?

Reasonable Does cost align with what a 'reasonable person' would pay?

Allocable Is cost able to be and proposed to be allocated among all benefiting programs?

Tangible Property/
Procurement/ Disposition

Did you follow your procurement policies? Are there any disposition of property to include in decision? Were proper Sf 428 forms submitted?

Is purchase documented in records? Did it exceed the capital expenditure threshold (currently \$5,000 per unit cost) and if so, did your receive prior approval?

https://www.acf.hhs.gov/grants/manage-grant/post-award-changes



**Documentation** 

#### **EXAMPLES**

#### **Cost Claiming Considerations for the TANF Grant**

- 1) Does it meet 1 of 4 TANF purposes?
- 2) Is it a TANF Program or TANF Admin cost?
- 3) Does TANF regulations or policy prohibit?
- 4) Does Uniform Guidance prohibit?
- 5) Does it require allocation?

Purchase	Prohibited by TANF Policy	Supported by the Uniform Guidance	Counts Against TANF Admin cap?	Need Prior Approval?	Other Considerations	
Microsoft Software and TA Package used for TANF operations Cost: \$5,460K	N	Y	No	Yes	May require allocation if non-TANF programs or other entities benefit	
Vehicle used to transport TANF clients ONLY Cost: \$19,200K	N	Y	No	Yes	SF 428 Form	
Antivirus software Cost: \$2,200K	N	Y	Yes	No	May require allocation if non-TANF programs or other entities benefit	
5 Laptops @ \$2,200/ ea. to be used by TANF staff Cost: \$11,000K	N	Y	N	No	Does not exceed \$5,000 single unit cost threshold and are being used by TANF only staff	
Lot to build facility Cost: \$59,000K	Y	N/A	N/A	N/A	Construction and Real Property are not authorized uses of TANF funding	
HR Server for payroll and timekeeping Cost: \$11,300K	N	Y	Yes	Yes	SF 428 Form May require allocation if non-TANF programs or other entities benefit	

# **Subrecipient Monitoring**

ACF Grants Policy: General Terms & Conditions
Uniform Guidance: § 75.351 Subrecipient vs. Contractor

Subrecipient: "A subaward is for the purpose of carrying out a portion of a Federal program and creates a Federal assistance relationship with the subrecipient."

- Has its performance measured in relation to whether objectives of a Federal program were met;
- Has responsibility for programmatic decision making;
- Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods and services for the benefit of the pass-through entity."

Contractor: "A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with a contractor."

- Provides the goods and services within normal business operations;
- Provides similar goods or services to many different purchasers;
- · Operates in a competitive environment;
- Provides goods or services that are ancillary to the operation of the Federal program; and
- Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons."

# **Subrecipient Monitoring (continued)**

ACF Grants Policy: General Terms & Conditions
Uniform Guidance: § 75.352 Subrecipient Monitoring

All pass-through entities must ensure that:

- every subaward is clearly identified to the subrecipient
- all requirements imposed by the pass-through entity on the subrecipient are in accordance with Federal statutes, regulations and the terms and conditions of the Federal award
- the subrecipient understand requirement that pass-through entity and auditors should be given access to the subrecipient's records and financial statements as necessary
- monitoring of the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.

### Closeout

#### **NEW & TANF Project Period End = 'final' report or full draw**

#### This means:

You should have all of your funds from your PMS account drawn

#### AND

You should have submitted a financial report showing all funds expended (\$0 unliquidated and unobligated)

#### **TANF-PEAF Project Period Ended on 5/31/24**

#### This means:

You should have expended PEAF funds drawn from your PMS account

#### AND

 You have submitted a 'final' 196P to the <u>PEAF@acf.hhs.gov</u> mailbox showing the same amount of expenditures by 8/14/24

Not completing BOTH tasks puts you out of compliance



# **Closeout – Updates to Uniform Guidance**

**NEW & TANF Project Period End = 'final' report or full draw** 

#### § 2 CFR 200.344 Closeout (HHS adoption of 2 CFR 200.344 was effective 10/1/2023)

- -recipients must submit all financial, performance, and other reports as required by the terms and conditions of the Federal award, no later than 120 calendar days after the end date of the period of performance
- -recipients must liquidate all obligations incurred under the Federal award no later than 120 calendar days after the end date of the period of performance as specified in the terms and conditions of the Federal award.
- -The non-Federal entity must account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with §§ 200.310 through 200.316 and 200.330.

**New** as of 10/1/23

- -If the non-Federal entity does not submit all reports in accordance with this section and the terms and conditions of the Federal Award, the Federal awarding agency must proceed to close out with the information available within one year of the period of performance end date.
- (i) If the non-Federal entity does not submit all reports in accordance with this section within one year of the period of performance end date, the Federal awarding agency must report the non-Federal entity's material failure to comply with the terms and conditions of the award with the OMB-designated integrity and performance system (currently FAPIIS). Federal awarding agencies may also pursue other enforcement actions per § 200.339.

### Closeout

#### **NEW & TANF Project Period End = 'final' report or full draw**

#### Responsibilities for closing out your NEW & TANF grants:

Ensure that "final" is selected on your final federal financial report

- Ensure that unobligated balances are zero.
- Ensure that unliquidated obligations are zero.
- Ensure that you have met all program spending requirements:
  - TANF: Ensure that spending on administration did not exceed 25%
- Ensure that all draws have been requested in the Payment Management System (PMS) within 120 days in concert with reported expenditures on your FFR. This includes expenditures reported for sub-awards under the grant as well as the settlement of any other claims reported on the final report for this grant.
- Ensure that all expenditure have been reported on the next FFR due or within 120 days (whichever is later) after the final draw on the grant.

#### **Audits - Governance**

#### <u>Uniform Guidance – Subpart F</u>

**Single Audits:** single audits (or program specific audits) are required annually for tribes that expend \$750,000 or more during the non-Federal entity's fiscal year

- -submitted to FAC within 30 calendar days after receipt of auditor's report or 9 months after the end of the audit period
  - -tribes have option on whether audit report copies are available for public inspection
  - -reports should not include protected personally identifiable information
- tribes should follow procurement standards in §§ 75.326 through 75.335 when procuring audit services
- the objective should be to obtain high-quality audits
- prepare appropriate financial statements, including the schedule of expenditures of Federal awards in accordance with § 75.510.

**Other Audits**: records must be available for review or audit by appropriate officials of the Federal agency, pass-through entity, and Government Accountability Office (GAO).

**All Audits**: tribe should provide the auditor with access to personnel, accounts, books, records, supporting documentation, as needed & is responsible for follow-up and corrective action on all audit findings.

#### **Audit Compliance Supplement**

- the Compliance Supplement is based on the requirements of 31 USC Chapter 75 and 2 CFR Part 200, Subpart F.
- the Supplement provides information for auditors on Federal program's objectives, procedures, and requirements subject to the audit

#### **Audits – TANF Penalties**

# § 45 CFR Part 286.195 & 286.200 Determination that Tribal Family Assistance Grant funds were intentionally misused

- single audit or Federal review

#### **Examples of audit findings that may lead to a penalty:**

- violation of provisions of the Act, 45 CFR Part 75, or any Federal statutes and regulations applicable to the TANF program
- providing assistance beyond the Tribe's negotiated time limit under §286.115 (next FY TFAG reduced)
- intentionally misusing TFAG for an unallowable purpose
- failure to meet the minimum work participation rate(s)
- failure to replace penalty reduction (next FY TFAG reduced)

#### Other considerations:

- Tribe must expend additional Tribal funds to replace penalty reductions in the following FY and report on 196T
- if a Tribe retrocedes the program, the Tribe will be liable for any penalties incurred for the period the program was in operation



#### **Audits - Common Tribal TANF Audit Findings**

<u>FFATA</u>: Proper controls were not in place to ensure compliance with the Federal Funding Accountability and Transparency Act reporting requirements.

<u>Eligibility</u>: documentation missing or not maintained to support proper eligibility decisions for families receiving TANF benefits

<u>Less than arm's length</u>: tribal TANF funds claimed for rental costs where "less-than-arms-length" relationship existed between lessor and lessee

<u>Internal Controls - Records Management/ Property</u>: records were incomplete, not consistently updated when new assets are purchased and complete inventory of property and equipment has not been reconciled to the property records in the required two-year time period.

Financial Reporting: non-compliance with TANF & PEAF reporting requirements; late reporting

<u>Improper Expenditures</u>: Expenditures claimed were determined to not meet one of the TANF purposes.

<u>Cost Allocation</u>: Indirect Cost Plans not negotiated timely; improper indirect costs charged to TANF program; cost allocations and internal charges were not monitored or determined correctly



# **Updates – NEW/ TANF Uniform Guidance Updates Proposed**

Link to Final Rule published April 22, 2024

-§ 2 CFR Part 200 vs 45 CFR Part 75

#### -Reduce agency and recipient burden:

#### Threshold increases:

- -Equipment and unused supplies from \$5,000 to \$10,000 (200.1, 200.313-314)
- -De minimis indirect rate from 10% to 15% (200.414)
- -Single Audit threshold from \$750,000 to \$1,000,000 (200.501)
- -Allow more agency flexibility on disposition of equipment (200.313)
- -Allow admin costs for closeout activities (200.344)

#### -Other Changes:

- -Allowing Indian tribes to follow their own policies and procedures for procurements and equipment disposition (200.313, 200.317) consistent with existing requirements for States.
- -Whistleblower protection (200.217)



# **NEW & Tribal TANF – Reference**

I Need To	Resources	Best Contact	
Allocation Questions	A cost is allocable to a particular cost objective if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received." Thus, costs that benefit multiple programs may not be allocated to a single program.		
TANF Expenditure Report (196T)	196T Report Form and Instructions	ACF/ OGM	Grants Specialist
Uniform Guidance Questions	45 CFR Part 75		
Prior Approval	§ 75.407 Prior Approal		
Tribal TANE Evading Allawahilibe	TANF Policy on Allowable Costs		
Tribal TANF Funding Allowability	45 CFR Part 286.44 & 45 CFR Part 286.45	ACF/ OFA	Program Specialist
Tribal TANF Program Reports	Caseload and Recipient Data	,	
Tribal TANF Plan	Tribal TANF Plan Guidance		
Grantsolutions Access	Request a GrantSolutions account		
NOA Access	Locate a Grant Award:	GRANTSOLUTIONS	Help@grantsolutions.gov
OLDC Access for 196T	If you have access to <u>Grantsolutions</u> but also need access to the OLDC financial report portal within <u>Grantsolutions</u> so that you can access the Tribal TANF financial and program reports, you will need to request specific access for OLDC. Please save your Help Desk ticket # for tracking and follow up purposes. Your request should include the ACF grant program report(s) that you need access, the type of roles and responsibilities (Data entry, certify, submit, revise reports, etc.) and the contact information of the individual requesting the payment transaction information - full name of user, State of entity, name of tribe, phone number of user, and email address of user).		
Unified Experience	Unified Experience Training		
Auditor Verification Requests	If the auditor needs the payment transaction confirmation to come directly from Payment Management Services, please have them submit a written request to the Accounting and Reports Branch at PMSOIGAudit@psc.hhs.gov. (The request should include the PMS Payee Account number(s), PMS Document number(s), and the contact information of the individual requesting the payment transaction information - name, phone number, and email address).	PMS	PMSOIGAudit@psc.hhs.gov
PMS Access	User Request Guidance from PMS		PMS Help Desk: Phone: 1-877-614-5533; Email
PMS Draw	Payment Request Guidance		PMS Account Liaison
Renew my UEI	Sam.gov	SAM.GOV	SAM.gov
Restore my UEI	SAM.gov Help Desk	FSD.GOV	FSD.gov



### Resource - NOA Access



- Unified Experience Training: <a href="https://vimeo.com/734113747/4add945ee2">https://vimeo.com/734113747/4add945ee2</a>
- Request an account: <a href="https://home.grantsolutions.gov/home/getting-started-request-a-user-account/">https://home.grantsolutions.gov/home/getting-started-request-a-user-account/</a>
- Access list of your ACF Grants: <a href="https://home.grantsolutions.gov/home/wp-content/uploads/2022/07/Grants-List-Screen-Updated-July-2022.pdf">https://home.grantsolutions.gov/home/wp-content/uploads/2022/07/Grants-List-Screen-Updated-July-2022.pdf</a>
- Locate a Grant Award: <a href="https://home.grantsolutions.gov/home/wp-content/uploads/2022/07/Searching-for-Awards-Updated-July-2022.pdf">https://home.grantsolutions.gov/home/wp-content/uploads/2022/07/Searching-for-Awards-Updated-July-2022.pdf</a>
- Support: Grantsolutions Help Desk <a href="mailto:help@grantsolutions.gov">help@grantsolutions.gov</a>

## Resource - GrantSolutions - OLDC^

# Access to GrantSolutions & OLDC:

#### Recommended Language and protocol for New Access:

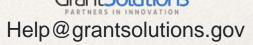
I am an employee with the \_\_\_\_\_ tribal government and I am requesting access to the TANF program in Grantsolutions. I have attached my completed and signed the recipient user form as required. I will need the following access:

- -access to Tribal TANF grant for my entity
- -access to Tribal TANF NOAs
- -access to Tribal TANF federal reporting in OLDC (if appropriate)

#### Recommended Language and protocol for OLDC or updated OLDC access only:

I am an employee with the tribal government and I am requesting updates to my current access in OLDC. My Grantsolutions user id is . Attached is my OLDC form that reflects my necessary updates.

\*Attach your completed OLDC form. Also, please copy your grants and program specialist and save any help desk ticket # or email responses until your request is resolved.





<sup>\*</sup>Attach your completed/signed recipient user form and if appropriate, your completed OLDC form



# THANK YOU FOR YOUR ATTENTION TODAY

**Any Questions?** 



https://www.acf.hhs.gov

