# Region X Tribal TANF Fiscal and Data Meeting

April 26th -27th, 2011

Seattle, Washington

## Summary Report

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## Acknowledgements

The Administration for Children and Families, Office of Family Assistance Region X would like to thank all who participated in the planning and implementation of the Region X Fiscal and Data Meeting.

## Overview of Meeting

The Region X Fiscal and Data Meeting that took place April 26-27, 2011 in Seattle, Washington for Washington, Oregon, and Idaho Tribes was initiated to meet the requests of Tribal TANF Programs regarding further guidance on data management, processing, reporting, and fiscal procedures. For a complete agenda, see Appendix A.

## Day One

*Mr. Leo Smith, Nez Perce Tribal TANF,* led the opening prayer.

*Ms. Judy Ogliore, ACF/OFA Region X*

Ms. Ogliore gave an introduction of Region X staff, Karen "Jack" Granberg; Jennifer Rackliff as a support staff from ICF International on behalf of the Administration for Children and Families Office of Family Assistance Central Office; and Cindy Wright from Eaglesun. Mr. Leo Smith offered the Opening Prayer.

## Programs Attending

A number of Tribal TANF programs from Washington, Oregon, and Idaho attended the meeting. Programs that attended were from the following Tribes:

- Confederated Tribes of the Colville Reservation
- Confederated Tribe of Siletz Indians
- Coeur d'Alene Tribe
- Lower Elwha S'Klallam Tribe
- Lummi Nation
- Nez Perce Tribe
- Nooksack Indian Tribe
- Port Gamble S'Klallam Tribe

- Quileute Tribe
- Quinault Indian Nation
- Shoshone-Bannock Tribes of the Ft. Hall Reservation
- South Puget Intertribal Planning Agency (SPIPA)
- Spokane Tribe of Indians
- Tulalip Tribes
- Upper Skagit Indian Tribe

## Basic Data Introduction and Coding

*Ms. Geene Felix, SPIPA, and Andrea Halstead, Quinault Indian Nation*

Ms. Geene Felix, Coordinator of Client Services at South Puget Intertribal Planning Agency (SPIPA), and Andrea Halstead, TANF Planner at the Quinault Indian Nation, provided instruction and best practices for improving program performance by applying data measurement and proper coding.

## Calculating the Work Participation Rate

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The Work Participation Rate (WPR) is *the number of families receiving TANF assistance that include an adult/mHOH (minor head of household) who is meeting work requirements* divided by *the number of families receiving TANF assistance that include an adult/mHOH required to participate in work activities.* Child-only cases, families with children under the age of one, and families that are penalized for non-compliance with the work requirements up to three times in a 12 month period are always excluded from the calculation (coded as "disregarded"). For the State, the coding guide says that families with children under the age of one are exempt from work for 12 months in a lifetime. Tribal Regulations do not include this stipulation related to children under the age of one in the guidelines for calculating WPR.

Understanding proper coding will increase accuracy and may also result in increased WPR. The *Coding Instructions Manual*[1] issued by the Division of Tribal Services, Administration for Children and Families was provided to each participant.

When calculating the WPR, there are two different statuses to review – disregarded and exempt. Disregarded are those examples from above: (1) child-only cases, (2) families with children under the age of one, and (3) families that are penalized for non-compliance with the work requirements up to three times in a 12-month period. Exempt indicates that the individual will not be penalized for failure to engage in work (i.e., good cause exception); however, the TANF family is included in the calculation of the WPR. Exempt clients stay in the denominator and essentially count against a Tribe's WPR. Understanding this calculation is another way to accurately capture the program's WPR. It is important to look at each individual participant. Depending on each individual Tribal TANF Program's plan, if they are participating in counseling, job search, house hunting, etc., they may be meeting WPR and

> **Participants that should be coded as "Disregarded" include:**
>
> - *Child-only cases;*
> - *Families with children under the age of one; and*
> - *Families that are penalized for non-compliance with the work requirements up to three times in a 12-month period.*

these activities should be captured as work hours rather than coding that participant as an exemption. Cindy Wright, Eaglesun, indicated there is a difference between an exemption from time limit and an exemption from work activities. Staff must understand the difference between these exemptions and even though TANF administrators and directors understand these rules, there is often a disconnect from the leadership level to the case manager staff. It is important to ensure that your staff understands and recognizes these nuances. When the participant still cannot meet the required hours, the participant will have to be coded as "exempt".

The Coding Instructions include specific directives for "Work Participation Status" codes (page 21). Ms. Felix and Ms. Halstead reviewed each of these codes.

- Codes 01 through 03 are disregarded codes.
- Codes 05 through 11 are exempt codes.
- Codes 12 through 14 are for those not participating in work activities. Code 14 is for those that have not engaged in work and have not been sanctioned. When coding a 14, the case needs to be closely examined to understand why this code is being used.

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[1] Coding Instructions for Tribal Temporary Assistance for Needy Families Program (Tribal TANF). U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services, Division of Tribal Services. April 2006. http://peerta.acf.hhs.gov/uploadedFiles/InstructionsFed.pdf

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- Codes 15 through 19 are those that are deemed engaged in work and may or may not be meeting their participation requirements.
- Code 99 is used at the Quinault Indian Nation to indicate illegal alien. At the Quinault Indian Nation, the income of the illegal alien is counted if they are the parent, but the person is not included in the system. While they are recorded as a person in the household, they are not included on the grant because of their status. The Quinault Indian Nation recognizes them as a part of the family, but they are not included on the grant. They are not allowed to receive services. Their income and resources are counted because they are a contributing member of the household. Regardless of their citizenship status, if they are in the household they are included in the income calculation.

## Coding Adult Work Participation Activities

Ms. Felix and Ms. Halstead provided participants with an information sheet outlining work participation status. Programs code work participation activities by coding 49 through 54:

- Code 49: Unsubsidized employment means the participant has a job.
- Code 50: Subsidized private-sector employment
- Code 51: Subsidized public-sector employment.
- Code 52: Work experience.
- Code 53: On-the-Job Training.
- Code 54: Job search and job readiness. If the program is on a reservation with an unemployment rate 50 percent greater than the national average, TANF participants are allowed up to six weeks to job search (only four weeks consecutively). If job search is part of another activity, it does not qualify as part of their six week limit. If the participant is job searching (and no other activity), then the activity qualifies as a portion of their six week limit. If the job search is part of another activity (substance abuse, subsistence, cultural, etc.), the participant should be coded as "62" (other work activities).

Ms. Granberg provided additional information on work experience programs. Tribal TANF regulations do not stipulate a definition for the work experience program, so Tribes have flexibility in how they design these programs. If offering work experience, the Tribe's Federal TANF plan must include a description of eligibility and work experience program design. ACF/OFA will review the proposed definition for allowability, based on ACF/OFA's general guidance. It is possible that work experience programs will vary from one Tribal TANF program to the next. For example the Quinault Indian Nation Tribal TANF program pays wages in lieu of a cash grant and pays fringe, while other Tribe's work experience programs typically offer a stipend. It's important to work with ACF/OFA to get approval for the work experience program. Mary Papp of the Quinault Indian Nation offered to serve as a resource to help Tribes in the definition approval process.

For a participant in a work experience program, he/she would be coded as a "19" and their hours would be entered as participant activities. When calculating a payment, the payment amount should be overridden and the paycheck amount should be entered into the "payment amount" field. Payment amounts must be recorded after the participant has received the check as this counts as a month of assistance. In Tribal Assistance System (TAS)[2], the dollar amount will go into the grant amount or in the family level data.

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[2] Tribal Assistance System (TAS) is the case management software that is used by Tribal TANF programs in Region X.

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For those participants coded a "62" (other activities), their plan must be revisited. They will not stay in an "other activity" code forever, but they may be in that code for several weeks.  Some of the programs and services that would fall under this code include, but are not limited to, driver's license, drug court, group counseling, and looking for homes from the homeless shelter.

## Educating Staff, Tribal Councils, and Participants

Another critical component of successful programs that transition TANF participants to self-sufficiency is educating program staff, Tribal Councils, fiscal staff, and participants. TANF participants are busy and it is essential that case managers capture and document all of their participants' activities.

At the Quinault Indian Nation, participants are given general guidelines for allowable activities and the length of time they can participate in these activities. The guidelines are very general and there are exceptions to the rules.  The Quinault Indian Nation also provides classes for participants on allowable activities, how to read the paperwork, and how to fill out the application and information. These classes have been a helpful activity to both case managers and their participants. The classes are not required, but help the overall process and participation.

At SPIPA, an orientation program is offered to participants that guides them through how to fill out a work participation log (log includes the work activities allowed) and provides them with general information about the TANF program.

Tribes are given a lot of flexibility; it is very important to train and educate staff to understand and employ this flexibility. At times, junior staff may place participants into a pre-existing family plan, rather than thinking outside the box and providing participants with a specifically tailored plan for their family.

## Collecting Data

Tribes are required by ACF/OFA to collect accurate data every month and produce reports on a quarterly basis. This data must also include supporting documents.  TANF program data provides an invaluable resource, which can be used for training, budgeting, and hiring. Additionally, data can be used as a management tool to help show where the largest impact is being made in a program. At SPIPA, a large portion of their grant is being used for transportation. With the 196T form, Tribal programs can track specific expenditures and examine individual program costs. Within ACF/OFA, there is a push for evidence-based programs at the Federal level where simply meeting the WPR is not enough evidence to demonstrate success. Providing evidence-based programming, however, is not a requirement of ACF/OFA.  Compared to previous reporting forms, the 196T includes more comprehensive data, which can be used as more specific evidence to track program achievement.  Data can reveal correlations between the support services provided and the amount of time a participant spends on TANF. Data reveals information regarding what support services are being accessed and utilized and where they are being utilized.

## Increasing your WPR through Coding and Programming Practices

Training is critical for case managers, Tribal Councils, fiscal staff, and grants managers.  Case managers are responsible for capturing and coding all possible hours.

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It is also important to identify and implement a process for reporting. Examining how participants are recording their hours, including when and how these hours are entered, will help capture accurate WPR.  Programs need to assess their own processes and procedures to ensure that participant's needs are met. Sometimes a lapse may occur between a client's approval and the first meeting with the case manager.  At the Quinault Indian Nation, the approval letter includes ideas for participants to meet their required work activity hours so that the client starts meeting the required work activity hours before he or she meets with the case manager. At SPIPA, the Tribal Assistance System (TAS), case management software, has been modified so that if work hours are not entered, a check cannot be issued. SPIPA has also instituted a Monthly Eligibility Report that participants, including child only cases, are required to complete each month. This report helps track changes on a regular basis and provides documentation of any changes for the family. Additionally, at SPIPA, the auditor is able to conduct an audit through TAS.

> **Tips for Increasing your WPR**
>
> - *Review Tribal TANF program practices;*
> - *Monitor program;*
> - *Train staff on coding;*
> - *Train staff on sanctioning; and*
> - *Involve the frontline staff in data collection and monitoring.*

It is important to ensure a client is coded correctly and that the work participation rate is monitored on a regular and consistent basis.

## Question and Answer Session

Following the Basic Data Introduction and Coding session, meeting participants had an opportunity to share comments and ask questions.  Comments, questions, and answers are listed below.

- *Should child-only cases be sanctioned?*
  - SPIPA would issue a sanction for each child. In their plan, the sanctioned case would have a penalty without a time limit as long as the child is not enrolled in school. During this time period, the family is not eligible for other services. At the Quinault Indian Nation, child-only cases are closed if the child shows no improvement and there is a 30-day wait before they can reapply for services. During the month they are trying to show improvement, the Quinault Indian Nation conducts weekly quality checks with the school.

- *For children that have medical issues and learning disabilities, are the schools responsible for paying for the children's tests?*
  - Medical testing can be added to the family plan, but the school is responsible for paying for any tests. Case managers can act as advocates with the school to facilitate the testing. If medical testing is written into the plans and documentation is made, case managers and participants may be able to use TANF dollars to help pay for these tests; however, in order to receive TANF financial assistance, there has to be documentation that there is no other way to pay for these services. Programs should confirm these procedures with the Regional Office staff.

## Conference Call with ACF/OFA Office

## Introduction of ACF/OFA Central Office

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### Ms. Shannon Bopp and Ms. Amelia Popham, ACF/OFA Central Office

Ms. Shannon Bopp and Ms. Amelia Popham were available for a short introductory phone call with the Tribes as new representatives for ACF/OFA's Tribal TANF program.

Ms. Bopp, Presidential Management Fellow, Tribal TANF management, is primarily responsible for the Tribal TANF database, data processing, coding issue resolution, data submission, and WPR. She also works on plan reviews and other policy issues. Ms. Popham, Program Specialist, Tribal TANF management, primarily works on reviewing the Tribal TANF program plans and policy issues. Both are available for any Tribal TANF needs.  During this time, each Tribe had a representative introduce themselves and their Tribe to the ACF/OFA staff.

## Review of Tribal TANF Subsidized Employment Questions and Answers

### Ms. Judy Ogliore and Ms. Karen "Jack" Granberg, ACF/OFA Region X Office

During this session, Region X leadership held a discussion of the Tribal TANF Subsidized Employment questions and answers, prepared by ACF/OFA in response to questions raised at the September 2010 Tribal TANF Conference held at Tulalip.

These questions addressed challenges Tribes have expressed in defining the terms 'subsidized employment', 'work experience', and 'on-the-job training'. Previously Tribes were informed they must follow State definitions, however the recently issued Questions & Answers clarify Tribes have flexibility to define these programs. The Questions & Answers encourages Tribes to contact ACF/OFA if they have questions about allowability. After receiving the Questions & Answers in January, the Quinault Indian Nation requested a review from ACF/OFA to determine the allowability of their existing work experience program. Tribes indicated they rely on the Regional staff to be their voice to the Central Office.

Tribes specifically requested a Question & Answer Session with the Central Office at the September 2011 meeting as it is critical for Tribes to discuss issues and concerns directly with the Central Office staff. The Regional staff assured Tribal participants that any questions received from the Tribes are shared with the Central Office, with responses relevant to other Tribal TANF programs distributed throughout Region X programs.

Some individuals raised concerns that information distributed from ACF/OFA Regional Offices varies from region to region. Tribes requested that if there are any contradictions within the messages between Regions and/or the Central Office, that the Regional staff flags these issues and follow-up with the most accurate answer.

The participants asked generally to be more informed about other programs and services being provided so that they can be better informed about programs that can serve as a lesson for other Tribes.

## Funding Request Discussion (Request and Approval Procedures)

Ms. Ogliore and Ms. Granberg provided some general guidelines for requesting ACF/OFA approval for proposed TANF projects, purchases, or activities. They shared guidelines for questions to keep in mind as programs are proposing new services, programs or activities.

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In general, Tribes do not need to receive approval for program expenditures. However, to avoid possible audit findings Tribes may choose to seek pre-approval from ACF/OFA. The ACF/OFA fiscal staff works with the ACF/OFA program staff to determine allowability.  Most Tribes rarely ask for assistance from the Regional Office on whether a program or service is allowable. The informal guidance provides Tribes with a listing of questions that help to determine whether the proposed project or purchase is in fact an allowable use of TANF funds.  The guidance encourages TANF programs to include research or statistical data to support the need for the project or program.

For example, for TANF Purpose Three (preventing out-of-wedlock pregnancies), research shows that most teens get pregnant between the hours of 3:00 pm and 5:00 pm. One TANF program used this research to support a proposed project that provided specific supervised activities during these hours, and was ultimately approved. As not all activities would necessarily be approved, it's important to contact the Regional Office if TANF programs are uncertain.

## ASSET Initiative Presentation

*Ms. Caron Dwyer, Program Specialist, IORA, and Mr. Thomas Jensen, AFI Regional Consultant*

During this session, presenters Ms. Caron Dwyer, Program Specialist, IORA, and Mr. Thomas Jensen, Assets for Independence (AFI) Regional Consultant, gave an overview of the ASSET Initiative and provided resource information for enhancing and/or developing asset-building services within TANF Programs.

This session aimed to teach participants about the ASSET Initiative collaboration across ACF/OFA; asset building tools to increase financial stability; and the income and asset poverty rates by state in Region X. First, participants explored what assets are – talents and skills, home ownership, land, livestock, fishing boat, health insurance, savings, community assets, Native language, etc. There are many different kinds of assets. This session's discussion focused on financial assets that the Federal AFI grant allows: education, home ownership, and starting a business.

Poverty can be defined in various ways but it is often described as insufficient income to meet basic needs. However, poverty also needs to be thought of in terms of resiliency and financial security. This is where the concept of asset poverty comes into the poverty conversation. Asset poverty is defined as having insufficient financial resources to live at the federal poverty level for three months.

Individuals who suffer from asset poverty often live paycheck to paycheck and usually do not have savings. Assets are important as they establish wealth through ownership. Additionally, assets build wealth over generations, transferring the wealth and ownership through generations.

The Assets for Independence (AFI) Program provides savers with incentives to open and maintain individual savings accounts that are matched by federal and non-federal dollars. The savings account requires that participants save and includes additional services, such as financial education (learning how to budget, credit and debt management, and financial goal setting). The program focuses on home ownership, higher education and training, or starting a small business. In order to be eligible for the grant program, the applicant must live at 200% of the poverty rate and have a net worth of less than $10,000.

AFI programs showcase a variety of strategies that provide financial services.  Some programs are provided through a TANF program and others may be provided by a community-based organization. Some models apply community partnerships in which the AFI programs are responsible for the administrative component and community partners

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are responsible for the services provided. Other programs are responsible for all the administrative services and other services, education, and training for participants. Programs do not have an obligation to meet a certain match rate and it ranges from 1:1 to 1:8. The most successful programs are the multi-site networks of organizations, the grantees that work with many community organizations. From an administrative side, the AFI Program allows for 15% to cover administration and data reporting. The program is intended to be an add-on to existing community programs where case management, financial education and participant support is covered by additional funding sources. Since 1999, there have been 25 Tribal grantee programs. Currently, there are seven Tribal grantees and eight Tribal sub-grantees. All of these grantees collaborate with financial institutions.

The Administration for Native Americans (ANA) and the Office of Community Service (OCS) recently released a joint funding announcement to encourage Tribal programs to develop an AFI program.

## Day Two

Day Two of the *Region X Fiscal and Data Meeting* started off with the first of several panel presentations. *Judy Ogliore* introduced the first panel, *"Introduction of the Office of Grants Management: Audits, Allowable Costs, and TANF Grant Facts, FAQs and Definitions"* moderated by *Judy Ogliore and Jack Granberg.*

### Introduction of the Office of Grants Management

### Audits, Allowable Costs, and TANF Grant Facts, FAQs, and Definitions

*Ms. Patty Fisher and Mr. Sam Stitt, OGM, Region X*

The Office of Grants Management (OGM) is responsible for financial reporting, budget and plan request review, audit resolution, OLDC accounts and access, and technical assistance around budgeting and audits.

### Audits and Allowable Costs

An audit is done on a yearly basis. Audits are not required every year for every program. Larger programs, however, are required to conduct an audit yearly. The A133 audit requires that expenditures by the program are reasonable and allowable expenses that were used for the reasons they were set forth to be used for. It tests for eligibility, allowable activities, and allowable costs.

Programs expending more than $500,000 a year in Federal funds are audited on a yearly basis. Programs spending less than $500,000 are required to have records available for review. Audits are an allowable cost. Programs that have not had an audit yearly are sanctioned. Before the program is sanctioned the OGM works closely with the program to assist in getting the audit completed.

> **Top 10 Ways to Prepare for an Audit**
>
> 1. Assemble an Audit Book.
> 2. Answer auditor questions directly.
> 3. Know the terms and conditions of the award. Have terms and conditions in your Audit Book.
> 4. Ensure expenditures are allowable, reasonable, and allocable.
> 5. Maintain documentation.
> 6. Develop written internal policies and procedures. Update them regularly.
> 7. Keep time and effort reports.
> 8. Obtain written prior approvals.
> 9. Submit timely and accurate Financial and Performance Reports.
> 10. Maintain a working relationship with

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The auditor will review internal controls and procedures for protecting funding, known questioned costs greater than $10,000, known fraud, and prior findings and programs have 30 days to correct any prior findings, if necessary. It is important to understand the Audits Compliance Guide/Compliance Supplements document so auditors can be informed of any State-specific regulations that do not impact the Tribal program.

OGM will work with program staff and OFA to determine if penalties should be pursued or if the audit will be resolved without penalty.

Grantees are responsible for a number of things when they are audited. Grantees must:

- Understand the award terms and conditions;
- Submit required Federal Reports in an accurate and timely manner;
- Ensure required audits are performed and submitted within required timeframes; and
- Follow-up and/or take corrective action on audit findings.

Additionally, grantees are expected to make efforts to eliminate repeat audit findings, understand the audit findings, submit timely responses to the audit letters, and take corrective actions, and maintain a close working relationship with the ACF/OFA Regional Program and Financial Office.


## TANF Grant Facts, FAQs, and Definitions

There are 63 approved Tribal TANF grantees serving 298 American Indian Tribes and Alaska Native Villages and non-reservation American Indian and Alaska Native populations of over 121 counties. The Tribal TANF budget is $181 million dollars nationwide. Region X has 37 percent of the Tribal grantees and receives 22 percent of the national budget, $41 million dollars.

OMB Circulars are being combined into a single Circular rather than having the three Tribal specific circulars (A-87, A-102, A133). The 2 CFR will replace the individual Circulars and will serve as the umbrella circular for distributing information.

Understanding allowable costs is important. The Federal Regulations serve as the baseline for identifying allowable costs, but Tribal TANF Programs may also institute regulations for allowable and allocable costs. Administrative caps are in place at the Federal level. For the first year, programs are allowed up to 35 percent for administrative costs, year two is up to 30 percent, and year three is up to 25 percent. These activities include budgeting, coordination, direction, planning, payroll, personnel, property management, and purchasing.

Anytime TANF programs expend funds, they must be allowable under the Four Purposes of TANF.

Several terms may need further clarification. These include:

- **Unobligated balance** – the remaining Tribal funds after allowable expenditures have been reported against the total TFAG. These funds have not been encumbered (e.g. contracts or any legally binding financial agreement).

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- **Unliquidated balance** – the balance of funds that have been obligated but not "spent down" at the time of report. These funds have been encumbered and obligated but not expended.
- **"Needy"** – for TANF purposes, financially eligible for the benefits per Tribe's income and resource criteria established in the Tribal TANF plan.
- **"Assistance"** – for TANF purposes, this includes benefits directed at basic needs; child care, transportation, and supports for families that are not employed; family members only; and family meeting Tribal TANF definition of "needy".

Fiscal–related regulations can be found at the following:

- 286.35 – Proper use of Tribal TANF Funds
- 286.40 – IDAs
- 286.45 – Improper use of Tribal TANF Funds
- 286.5 – Definitions of Administrative Costs
- 286.50 – Administrative Cost Limits ("Admin Cap")
- 286.55 – Costs subject to the Administrative Cost Limit

Before the American Recovery and Reinvestment Act (ARRA), carry forward funds had to be spent on only "assistance" or administrative costs associated with providing that assistance. ARRA changed this regulation. Now, carry forward funds can be spent on allowable TANF activities without limitation.

## Question and Answer Session

Following the *Audits, Allowable Costs, and TANF Grant Facts, FAQs and Definitions* session, meeting participants had an opportunity to share comments and ask questions. Comments, questions, and answers are listed below.

- What if the Tribe runs both a child support program and a TANF program?
  - Separate the two programs for audit purposes. Keep audit documents separate.
- In obtaining prior approval for capitalized expenditures, should approval come from the program or fiscal staff?
  - It will start with programming and trickle down to fiscal. The final approval will come through the Regional grants office and, ultimately, from Mr. Bob Shelbourne in the ACF/OFA Central Office.
- Is software capitalized over $5,000?
  - It depends on what has been previously approved. If the software is over $5,000 dollars, ACF/OFA must approve the expenditure. One of the questions that might be asked is: "if the program has purchased it before, is this software replacing something already in existence?"
- When should programs request a prior approval?
  - Prior approval must be acquired for any expenditure over $5,000. If it is an expenditure within the approved Tribal plan, prior approval is not required. Approval is also not required if it has been purchased previously and is updating a prior purchase.
- If there is a specific program that is over $9,000 and is identified within their approved plan, do they need to seek prior approval?
  - If it is in their approved plan, they do not need to seek prior approval.

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- Is this presentation and approval process only in relation to Federal grants?
  - Yes, this only applies to Federal grants awarded. State grants may have a different process.
- Is the failure to replace reduction by penalties (Tribal Replacement Funds) still in place?
  - Tribal funds are required to repay penalties. OGM is not sure if 638 funds or 477 funds could be used to repay these penalties. There are ways to repay a penalty through corrective action. If a Tribe can show that corrective action has been put into place, the penalty may be reduced.
- On the program side, if there are no other ways to pay back funds, is it allowable to have certain procedures in place to ensure corrective action?
  - This would be dealt with on a case-by-case basis.
- Is planning for the program a direct expenditure or an administrative cost?
  - This would be an administrative cost. Working with clients specifically is not an administrative cost. Administrative costs are costs related to ensuring the program is running smoothly.

## Grants Management

*Ms. Patty Fisher and Mr. Sam Stitt, OGM, Region X*

## TANF Grant and Funding Process

Award letters get cut from the Central Office and the letters are sent to the general Tribal contact address. If a TANF program would like to have copies of the Grant Award letter, contact Mr. Sam Stitt. Awards are generally cut on the fiscal year schedule and come out on a quarterly or quasi-quarterly schedule. If the Award Letter has "Award Letter Notes", TANF programs should pay special attention to them. Also attached to the Award Letters are the terms and conditions of the Awards. TANF programs should get a copy of the terms and conditions each fiscal year.

## Financial Reporting

Quarterly reports (196T) follow the Federal fiscal year and are due 45 days after the end of each quarter. Use the most up-to-date 196T available on the ACF/OFA Tribal TANF webpage. The original signed copy must be submitted to Central Office, but a copy (digital is acceptable) should be sent to the Regional Office. If using funds from a previous fiscal year, two 196T reports must be submitted. One 196T must be from the previous year and include the expenditures from that year's grant. Another 196T must be completed for the current year that notes that funds are obligated but have not been spent.

Once Region X has received a copy of the 196T, the information gets put into the On Line Data Collection (OLDC) system. OLDC captures any errors in the report that might have occurred, rather than having the Regional fiscal staff capture them at a later date and resubmitting the 196T. ACF/OFA is turning to the OLDC system for financial reporting. The benefits of using OLDC include quarterly reports being submitted electronically, latest forms are available, automatic calculations, warnings and errors are captured immediately, email notification of submission, and the ability to report and retrieve information on specific grants. Programs must have two staff members to get the program, a data entry staff and a certifier.

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Fiscal folders were given to each of the Tribes in attendance. The folders are meant to show the TANF program staff the fiscal components of their program. They include the award letter, terms and conditions, reporting due date cycles, instructions for the 196T, the most recent 196T submissions, and a snapshot of the inventory of reports for the Tribal program.

## Question and Answer Session

Following the *Grants Management* session, meeting participants had an opportunity to share comments and ask questions. Comments, questions, and answers are listed below.

- If a program uses both Federal funds and State funds, but it spends the Federal funds first, how should this be reported throughout the rest of the year that Federal funds are not being spent?
  - The 196Ts are cumulative. They will report the same information from the previous 196T if the expenditures have not changed.
- Is there another category of OLDC system for a person to review only?
  - Yes. TANF program people may be interested in this option.

Office of Family Assistance
Administration for Children and Families
Department of Health and Human Services

Region X
Fiscal and Data Meeting
April 26-27, 2011

# Appendices

# Appendix A: Agenda

**Tuesday, April 26th, 2011**

| | |
|---|---|
| 8:00 – 8:30 | Networking |
| 8:30 – 8:45 | Opening Prayer<br>Welcome & Logistics for Meeting |
| 8:45 – 9:00 | Introduction of Federal Staff, Presenters and Attendees |
| 9:00 – 10:00 | Basic Data Intro/Coding<br>*Geene Felix, SPIPA*<br>*Andrea Halstead, Quinault Indian Nation* |
| 10:00 – 10:15 | Break |
| 10:15 – 10:45 | Conference Call with New D.C. Staff |
| 10:45 – noon | Review of Tribal TANF Subsidized Employment Question and Answers<br>*Judy Ogliore*<br>*Jack Granberg* |
| Noon – 1:15 | Lunch on your own |
| 1:15- 2:30 | Funding Request Discussion<br>Unofficial form<br>Request and approval procedures<br>*Judy Ogliore*<br>*Jack Granberg* |
| 2:30-2:45 | Break |
| 2:45-4:00 | Asset Building Discussion |

**Wednesday, April 27th, 2011**

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|---|---|
| 8:00-8:30 | Networking |
| 8:30-9:30 | Intro/OGM (Office of Grants Management)<br>Audits<br>Allowable Costs/TANF Grant Facts<br>FAQ/Definitions<br>*Patty Fisher, OGM, Region X*<br>*Sam Stitt, OGM, Region X* |
| 9:45-10:00 | Break |

| | |
|---|---|
| 10:00-11:00* | Individual Files (distribute)<br>Funding Process/Flowchart<br>Awards, Terms &Conditions<br>Reporting Overview (196T)<br>OLDC (On Line Data Collection)<br>Questions<br>*Patty Fisher, OGM, Region X*<br>*Sam Stitt, OGM, Region X* |
| 11:00-Noon | Introduction to Fiscal Profile/Folders<br>Group Q & A<br>Individual Q&A |
| Noon | Adjourn |