



April 16, 2020 - Grants Innovation Exchange Session

*M-20-21, Implementation Guidance for Supplemental Funding
Provided in Response to the Coronavirus Disease (COVID-19)*

Natalie Rico
Senior Policy Analyst, Office of Federal Financial Management
Office of Management and Budget

Rhea Hubbard
Senior Policy Analyst, Office of Federal Financial Management
Office of Management and Budget



April 16, 2020



- **Welcome**
- **Speaker Introduction**
- **Innovation Exchange Presentation**
- **Cross Agency Priority Goal 8: Results-Oriented Accountability for Grants**
- **Q&A**
- **Stay Informed!**





Speaker Introductions



Natalie Rico is a Policy Analyst with the Office of Federal Financial Management at OMB. She contributes to government-wide initiatives to improve federal financial policies, processes, and systems. Specifically, Natalie supports government-wide financial data transformation and transparency efforts. In this role, she engages federal and non-federal stakeholders on key issues to foster a more efficient and effective federal management.

Natalie is passionate about improving government accountability, efficiency, and transparency. Prior to OMB, Natalie was detailed to the Senate Budget Committee, and served as a Special Assistant to the Chief Financial Officer (CFO) and Deputy CFO at the Department of Labor (DOL).

Natalie has a Master in Public Policy from Georgetown University and Bachelor of Arts in Mathematics from the University of California, Riverside. She served in the Peace Corps and is a Partnership for Public Service (PPS) Senior Excellence in Government Fellow.



Rhea Hubbard is a Senior Policy Analyst with the Office of Management and Budget (OMB), Office of Federal Financial Management (OFFM). She contributes to government-wide initiatives to improve Federal financial assistance policies, processes, and systems. In this role, she engages with relevant Government and non-Federal stakeholders on key issues to foster more efficient and effective Federal management. She is currently the OMB staff lead for the Results-Oriented Accountability Cross-Agency Priority Goal under the President's Management Agenda.

She started her decade long Federal career in grants management operations and later transitioned into policy. She is passionate about solving long-standing grants management challenges to ensure successful results for the American taxpayer while finding opportunities to alleviate recipient burden.

Rhea has a Master of Public Policy Degree from American University and a Bachelor in Arts Degree in Psychology from the University of Missouri – Columbia.

***M-20-21, Implementation Guidance for
Supplemental Funding Provided in Response to
the Coronavirus Disease (COVID-19)
Framework for Implementation***



Key Takeaways

- The Administration is **committed to the rapid delivery** of COVID-19 relief funds and **response efforts**
- **Accurately recording and tracking funding for awards** made under the new relief legislation is essential to **providing relief to citizens and businesses**, facilitating oversight, and creating accountability for results
- The Administration **remains committed to minimizing recipient burden**, allowing recipients to focus on COVID-19 response activities
- **Leveraging community work** on disaster relief and transparency reporting on **USAspending.gov** enabled OMB to **minimize reporting burden to agencies and recipients**
- Looking forward to **working closely with stakeholders**, oversight officials, awarding agencies, and recipients



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

April 10, 2020

M-20-21

MEMORANDUM FOR THE HEADS OF DEPARTMENTS AND AGENCIES

FROM: Russell T. Vought *RVT*
Acting Director

SUBJECT: Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19)

The Federal Government's aggressive response to the coronavirus disease 2019 (COVID-19) includes an unprecedented economic relief package for Americans in need. A series of laws, including the Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020 (Public Law 116-123), the Families First Coronavirus Response Act (FFCRA; Public Law 116-127), and the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Public Law 116-136), provide direct economic relief to the American people, including individuals and small businesses, while providing health care resources to the front line battles where medical professionals are fighting the virus and defending the lives of Americans.

Time is of the essence, and the Administration is committed to the rapid delivery of these funds to the COVID-19 relief and response efforts.¹ At the same time, spending transparency and regular reporting will provide important accountability mechanisms to help safeguard taxpayer dollars.

This Memorandum directs agencies to leverage and continue to employ existing financial transparency and accountability mechanisms wherever possible. In balancing speed with transparency, agencies are to consider the three core principles below:

- Mission achievement – Federal managers and recipients at all levels should use data and evidence to achieve program objectives;
- Expediency – Agencies should rapidly issue awards and fund programs to meet crucial needs; and
- Transparency and accountability – Agencies must report information on awards to provide the public with information in a clear, accurate, and timely manner.

¹For purposes of this Memorandum, "COVID-19 relief and response" refers to the Federal Government's response to the national public health emergency declared by the Secretary of Health and Human Services as a result of confirmed cases, retroactive to January 27, 2020, pursuant to section 319 of the Public Health Services Act (42 U.S.C. § 2476).



CORE MESSAGE: OMB's goal is for USASpending.gov to be the primary and authoritative source for all COVID-19 related reporting.



Background

- Incorporates lessons learned, builds on **existing technology solutions** and data management
- **“From appropriation to outlay”**: (1) systematic; (2) award-level; (3) outlay data; and, (4) “event” specific
- Recommendation from the communities was to **leverage DEFC** through existing mechanisms developed for FFATA and the DATA Act



Summary

This Memorandum:

- Provides **user-friendly means** to agencies and recipients
- Acknowledges the **importance of accountability and oversight** and **balances** expediency with proper management and controls agencies
- Directs agencies to **leverage existing** technology, financial transparency and accountability mechanisms wherever possible
- Sets the foundation to **coordinate** with the Pandemic Response Accountability Committee (PRAC)
- **Does NOT** include **additional reporting** requirements for recipients



Disaster Emergency Fund Code (DEFC)

- M-20-21 amends the requirement in M-18-08 to use a unique DEFC value to include covered funds in the COVID-19 relief legislation that are not designated as emergency.
- OMB will work with agencies separately on other mechanisms that may be used to identify agency spending related to COVID-19 relief that is derived from base funding.



Reporting Requirements Summary for 15010 and 15011

Agencies must:

- Include DEFC in financial files (Files B and C)
- Include Outlays in File C
- Begin reporting and certifying Files A, B, C on a monthly basis

Agencies should leverage existing regulations and OMB guidance:

- Federal Acquisition Regulation for procurement data quality
- OMB M-18-16 Data Quality Plan



Existing guidance on Reporting Integrity and Data Quality

- M-18-16 cover memo directed agencies to develop and maintain a **Data Quality Plan** that considers the incremental risks to data quality in Federal spending data and any controls that would manage such risks, including for financial assistance.
- Existing Federal Acquisition Regulation guidance on procurement reporting and data quality is leveraged as is the timely reporting of contract awards.



Implications for Recipients

- The Administration remains **committed to minimizing recipient burden**, allowing recipients to focus on COVID-19 response activities
- **Existing financial reporting** from recipients under FFATA should be **sufficient** to meet the requirements of the statute.
- **Macro-economic data** and select programmatic data from agencies will provide the best sources of information on **economic impact and jobs**.
- **Additional reporting** on jobs from recipients would not add value to this analysis, and is **not required by OMB**.



Timeline and Reporting Requirements for Agencies



| Reporting Requirement | This applies to | Timeline |
|--|---|--|
| P.L. 116-123, Emergency: DEFC value “L” | Existing reporting requirement for accounts designated as emergency. | Currently reported to GTAS. |
| P.L. 116-127, Emergency: DEFC value “M” | Existing reporting requirement for accounts designated as emergency. | Currently reported to GTAS. |
| P.L. 116-136, Emergency: DEFC value “N” | Existing reporting requirement for accounts designated as emergency. | Currently reported to GTAS. |
| P.L. 116-136, Non-emergency: DEFC value “O” | Most accounts that received non-emergency funding in the CARES Act. | Immediately. Aligned with GTAS reporting windows. |
| Outlays in DATA Act File C (a running total of outlays by award) | All agencies subject to DATA Act reporting required to report under the CARES Act provisions. | DATA Act Q3 reporting schedule will not change, which is to include outlays for FY 2020Q3. Monthly reporting will begin in July for the month of June. Monthly submission will align to the GTAS reporting schedule. Agencies will not report outlays in Files A and B for Period 1. |
| Monthly Reporting for DATA Act Files A, B and C, including all DEFC values in Files B and C | All agencies subject to DATA Act reporting required to report under the CARES Act provisions. | DATA Act Q3 reporting schedule will not change, which is to include the DEFC code for FY 2020 Q3. Monthly reporting will begin in July for the month of June. Monthly submission will align to the GTAS reporting schedule. |
| DEFC Code in DATA Act Files B and C, including DEFC values “L” through “O” and subsequent COVID-19-related values | All agencies subject to DATA Act reporting. | No later than with the monthly June 2020 DATA Act submission. |
| Twice monthly reporting Files D2 | All agencies subject to DATA Act reporting. | No later than with the monthly June 2020 DATA Act submission. |
| Program Activity in DATA Act File C | All agencies subject to DATA Act reporting | FY2021 Q1 |
| Monthly Reporting for DATA Act Files A, B, and C | All agencies subject to DATA Act reporting. | FY 2022 Q1 |
| Outlays in DATA Act File C | All agencies subject to DATA Act reporting. | FY 2022 Q1 |
| NIAC | Consistent with the FAR and OMB guidance, agency procurement actions supporting COVID-19. | Through duration of NIA designated reporting period, directly in FPDS. |
| Purchase Cards | All agencies required to report under the CARES Act provisions. | Monthly submission will align to the GTAS reporting schedule. |

For Additional Information.....

- For Federal agencies:
<https://community.max.gov/display/OMB/OMB+Coronavirus+%28COVID-19%29+Coordination>
- General Inquiries Email: coronaresponse@omb.eop.gov
- Grant Recipients: To stay informed and receive the latest news from the OMB Grants Team, please join our Grants Community of Practice by clicking “join” at:
<https://www.performance.gov/CAP/grants/>





Results-Oriented Accountability for Grants

Cross Agency Priority Goal (Grants CAP Goal)



Goal Statement

- Maximize the value of grant funding by applying a risk-based, data-driven framework that balances compliance requirements with demonstrating successful results for the American taxpayer.



Challenge

- The Federal government uses grants to invest approximately \$700 billion each year in mission-critical needs for American taxpayers, but managers report spending 40% of their time using antiquated processes to monitor compliance instead of analyzing data to improve results.



Opportunity

- Standardize the grants management business process and identify, open, standardize, and link data. Use standard business process and data to establish a robust marketplace of modern solutions that ease burden and drive efficiencies, respond to customer needs, and deliver on mission. Leverage data, including data produced by annual audits, to assess and manage recipient risk. Hold recipients accountable for good performance practices that supports achievement of program goals and objectives and streamline burdensome compliance requirements for those that demonstrate results.



Grants CAP Goal Strategies

Hold recipients accountable for good performance practices that support achievement of program goals and objectives; & streamline burdensome compliance requirements for those that demonstrate results.



Achieve Goals and Objectives



Manage Risk

Leverage data, including data from annual audits, to assess & manage recipient risk.



Build Shared IT Infrastructure

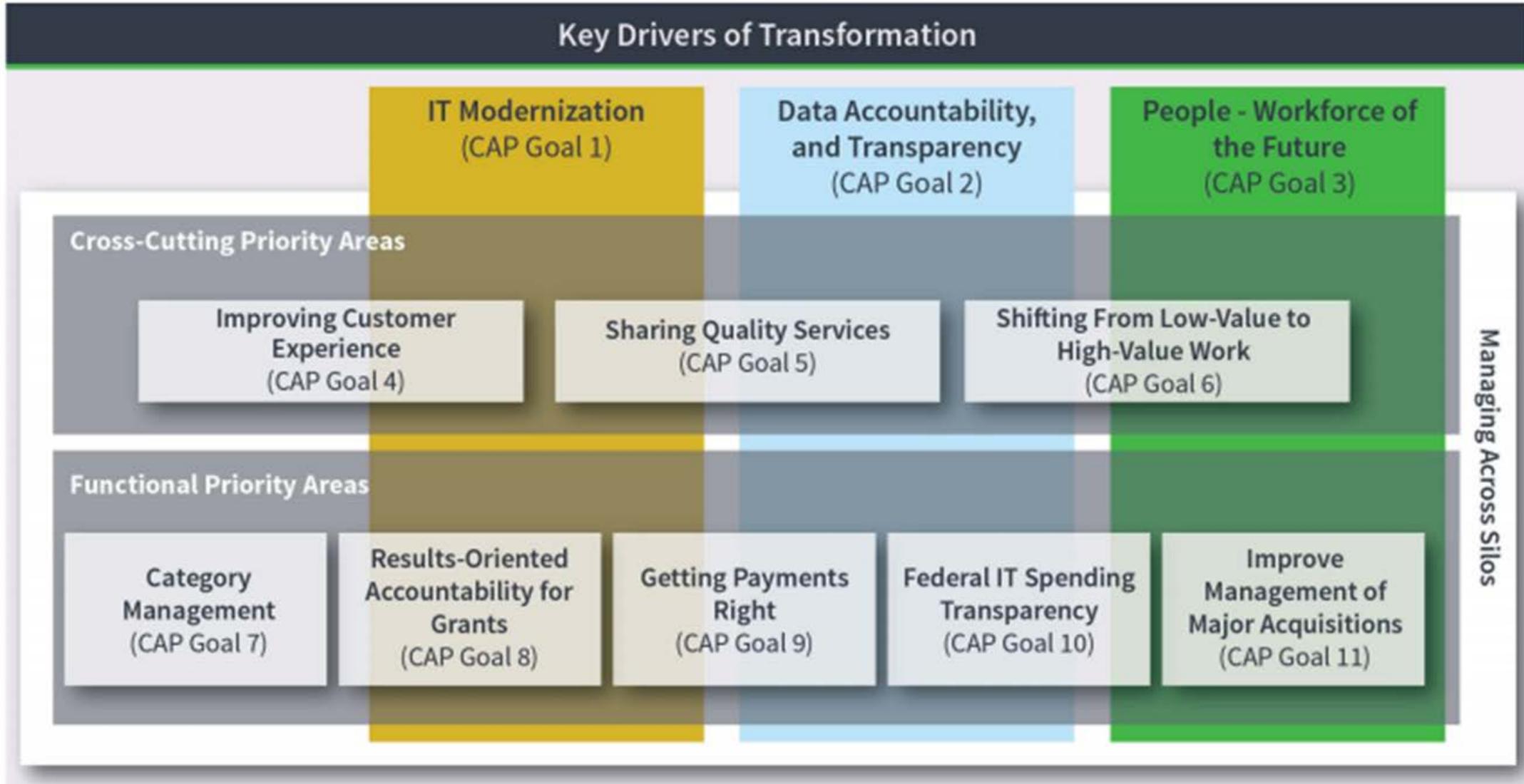
Use standard business process and data to establish a robust marketplace of modern solutions that ease burden and drive efficiencies, respond to customer needs, and deliver on mission.



Standardize Business Processes & Data

Standardize grants management business processes & identify, operationalize, standardize, & link data.







Instructions:

Please enter your questions via the chat feature via Adobe Connect; or

Email them to GrantsTeam@omb.eop.gov





Stay Informed

JOIN OUR COMMUNITY TODAY!

<https://www.performance.gov/CAP/grants/>

**Results-Oriented
Accountability for Grants**

NEWS & EVENTS RESOURCES **JOIN COMMUNITY**

NEXT INNOVATION EXCHANGE SESSION :

March 31, 2020

DO YOU HAVE AN INNOVATION YOU WOULD LIKE TO SHARE?

Please email the Grants Team at GrantsTeam@omb.eop.gov