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Financial reporting, cash requests, electronic systems, and the burdens they bear – managing a federal labyrinth

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Sponsored Program Administration Organization Chart





Federal Reporting Responsibilities by Team

- Grant Administration teams (2 Associate Directors and 9 Grant & Contract Officers)
 - Progress report submission when financial report must accompany progress report.
- Contract Administration team includes subcontract administration (Associate Director and 3 Grant & Contract Officers)
 FFATA reporting



Federal Reporting Responsibilities by Team

- Institutional Support Team (Associate Director and 3 Accountants)
 - Cash/LOC Draws
 - LOC revenue distribution to projects
 - ARRA Reporting
 - Electronic Invoicing systems
- Billing & Accounts Receivable Team (Associate Director and 3 Accountants)
 - All invoicing for cost and fixed price projects which do not have electronic invoicing systems
 - Collection activities
- Financial Reporting Team (Associate Director and 8 Accountants)
 - All interim and final financial reports
 - Including final invoices on cost-based projects



Organizational Challenges

- Determination of where responsibility for new reporting requirements should best reside
- Avoiding duplicative steps across teams.
- Coordination between teams when unknown reporting requirement comes to light at the "last minute".
 - e.g. Progress report requires financial data.
- "Reacting" to new requirements as opposed to being able to actually plan for them.



System "Challenges"

Inconsistencies at sponsor

- Changes in personnel at the sponsor may lead to revised requirements
- Address/email discrepancies
- Progress reports tied to cash draws draw must be *last* thing submitted.
- Keying "errors" that could be eliminated if data was pre-populated.
 - Rejections due to spaces, dashes, etc. ARRA
- As agencies switch systems, sometimes have to resubmit duplicative information.



System "Challenges"

- Systems that do not pre-populate all awards make us dependent on internal coding to ensure we are submitting requests for all applicable awards. (e.g. WAWF)
- Access to agency systems requires "personal" information.
 - e.g. HUD required SS#s for involved staff
- Department of Energy
 - VIPERS pays Net 30 after request is submitted as opposed to 1–2 days for LOC draw.
 - Two different payment systems.
 - Prohibited us from drawing on DoE main award until ARRA portion was entirely spent.



Specific System "Challenges"

- Wide Area Workflow (WAWF) various Department of Defense agencies
 - Instructions not clear
 - Unable to get technical assistance
 - No auto-population of information
 - Coding information sometimes missing (WAWF coding info provided varies by agency)
 - Limited on–line editing
 - Disjointed process for final reporting final cash draw takes a different route than the final SF425
 - Agencies are not using system consistently
 - e.g. must sometimes resubmit final to show zero balance due
 - Бut not all agencies require this
 - Red tape involved with getting PKI certification



Specific System "Challenges"

HRSA – EHB

- Various entity numbers for single institution.
- HRSA will not accept final FSR until it matches LOC draw amount.
- Suggested workaround is to reopen previous quarter's LOC to revise the amount for that award and resubmit.
- No support from HHS to encourage HRSA to stop the bad practice (workaround).



Nuances = Nuisances

- Navigation of systems practice makes perfect.
- Due to system nuances, difficult to crosstrain.
- Therefore, no coverage if system expert is unexpectedly out of office.



Changing Requirements

- How did we organize around ARRA reporting?
 - ~ 100 direct (prime) ARRA awards
 - ~ 20 ARRA flow-through awards.
 - One senior accounting staff on our Institutional Support team completed all reporting.
 - Since much of the work done by that team is cyclical, we were able to fit the reporting in amongst other tasks.
- How sustainable would this model be if similar reporting is implemented under the DATA Act?
 - In a word..... NOT!!!
 - Budgetary situation will not likely allow for additional staff.
 - Hard questions will need to be answered.



Quantify, quantify, quantify!

Figuring out the needs



- For WSU ~ 850 active Federal awards/year
- Other considerations the unknowns......
 - If the DATA Act or other potential reporting requirements become reality, will some of our other reporting burdens be removed?
 - Others???



Quantifying the Intangibles

Can we find ways to quantify burden?
Considerations.....

• Staff time logs.



- Elevation of cumbersome tasks to higher level.
- Segregation of duties.



Miscellaneous Issues

- Have to deal with potential fallout from less staff being asked to do more (i.e. morale).
- Have to be conscious of union positions and the constraints of job descriptions.
- Light at the end of the ARRA tunnel turns into a longer, darker tunnel with the advent of new reporting expectations.



Demonstrating Burden

- Document variety of systems and issues (pro/con) with each.
- Continue discussions at available forums.



Maintain hope that federal agencies will recognize the need to significantly reduce the number of systems. If not during our career spans, than at least during our lifetimes!

lab-y-rinth: noun

"A maze of paths bordered by high hedges, as in a park or garden, for the amusement of those who search for a way out."

