Memorandum

U.S. Department
of Transportation
**Federal Transit
Administration**

Subject: INFORMATION: Consistent Regional Grant Review and Approval Process

Date: JUN 22 1995

Robert W. Stout

From: Robert W. Stout, Chairperson, Task Force on Regional Programs Delivery

Reply to Attn. of:

To: Hiram J. Walker, Associate Administrator for Program Management

This is to provide you with an update on the progress of the special committee of the Task Force on Regional Programs Delivery which was established to examine the regional grant approval process.

As you know, site visits were made to Regions 3, 4, 5, and 9 during the months of April and May. Each region responded to the same detailed questions about their approval process. Attached are the final drafts of their responses, including our suggestions/comments where appropriate. We are providing our draft documentation of the responses with the region involved to obtain any comments or corrections. The comments are due on June 30. Generally speaking, we found that most of the regions have a sound process in place, although updated documentation of the process is usually lacking. The regions can benefit from each other by sharing practices that work effectively in their region. As you know, one or more regions may require more in-depth instruction on fund tracking and reservation procedures.

Based on this review, we have prepared the attached summary outline of a grant processing guide we plan to develop for dissemination to the regions. Sample grant processing procedures and standard grant review/approval documents are being developed. Also attached is our first draft of a standard grant approval memorandum and review checklist. The concept we are using is that the memorandum will incorporate by reference the review and findings made in the checklist as well as in the Findings and Determinations. There does not need to be repetition in two or three different pieces of paper.

We would like to meet with you at your convenience to discuss these products and next steps this committee plans to take.

Attachments (7)

cc: TPM-10, 20, 30, 40

Sample of Grant Processing Procedures and Funds Control

Each region should develop and maintain written procedures for reviewing grant applications and approving/awarding grant funds. Attached are sample procedures.

In addition, each regional office should have system for tracking and maintaining apportionment records for various urbanized areas, programs, and funding years. This system should include the following:

- A logging system for flex fund transfers should be set up and maintained.
- Grant reservations should not be made before the grant representative has reviewed the application to ensure that the amount is reasonable. The grant rep should do an initial review, tell the grant control assistant or other assigned person the amount to reserve, and agree on the source of funds. For Section 5309 funds, the monthly report on obligations issued by TPM-10 is a good source document. All grant reps and the grant control assistant should have a copy of this report applicable to their region.
- GMIS is the FTA official system of record. All regional staff should have a shared responsibility for what is entered, not just the grant control assistant. For example, grant reps, not the grants control assistant, should enter the grant budgets into GMIS.
- Before obligation of funds, the Deputy Regional Administrator should ensure that the grant control assistant and the grant rep have selected the appropriate source and amount of funds. Grant funds should be immediately obligated in GMIS as soon as the Regional Administrator signs the grant.

REGION 3 GRANT PROCESSING PROCEDURES

ACKNOWLEDGING RECEIPT OF GRANT APPLICATIONS AND FORWARDING THEM TO THE U.S. DEPARTMENT OF LABOR (DOL)

1. Date stamp application transmittal letter or first page of application when it is received.

   a. You should receive an original plus two copies of the grant applications for Sections 3, 9, FAUS and Interstate Transfer projects. Additional copies may be submitted for major projects. An original and one copy is usually received for Sections 8/26, 16 and 18 applications.

   b. For amendments you should receive an original plus one copy.

2. Assign project number.

   Region II (New York) staff assigns the project numbers for all applications submitted by grantees located in New Jersey (e.g. Delaware River Port Authority). After you receive the project number, indicate it in the logbook as well as the person providing the number and the date received.

3. Complete and mail the appropriate DOL letter (attached) to DOL within five working days of receipt, along with two copies of the application (federal express). DOL letter not required for Sections 8/26, 16, 18 or Section 9 planning projects.

   For amendments, see Transportation Program Specialist for information for completion of letter.

4. Complete and mail acknowledgement letter to grantee (attached).

5. Make one copy of the signed DOL letter and acknowledgement letter and file in Folder No. 1.

6. Make up Folder #1 (green file). First, make up identifying labels for outside of folder, which include Project No., Grantee's Name and Folder #1. Then set up all appropriate tab dividers and place original application on the left side (under Application) and the copies of the DOL and acknowledgement letters on the right side (under the General Correspondence section).

7. For Grant Amendments place original application and copies of DOL and acknowledgement letters in brown folder.

8. Place GMIS set-up sheet in folder for TPS to fill out and return (attached).

9. Give folder to the responsible TPS.

NOTE WELL:

IF THE SCOPE OF A GRANT APPLICATION CHANGES AFTER IT HAS BEEN REFERRED TO THE DEPARTMENT OF LABOR FOR CERTIFICATION, THE APPROPRIATE TPS IS RESPONSIBLE TO ENSURE THAT DOL IS INFORMED OF THE CHANGE. THIS SHOULD BE ACCOMPLISHED BY SIMPLY SENDING ANOTHER REFERRAL LETTER WITH THE NOTATION "REVISED" AFTER THE PROJECT NUMBER. THE REFERRAL LETTER SHOULD ALSO CLEARLY INDICATE WHEN THE PREVIOUS APPLICATION WAS FORWARDED TO THEM FOR CERTIFICATION. WE MUST ALSO PROVIDE DOL WITH A COPY OF THE REVISED GRANT APPLICATION. THIS IS CRITICAL. OTHERWISE, WE WILL BE APPROVING A SCOPE THAT DOL HAS NOT CERTIFIED.

Attachments

KYC: 4/20/95:R:\PROCEDUR.SAM

Outline

Regional Processing Guide
For Capital and Operating Assistance Grants

1.	Sample of grant processing procedures, including: - statement of need to have written procedures - funds control system	(attached)
2.	Standard Grant Review Worksheet	(attached)
3.	Standard Grant Approval Memoranda	(attached)
4.	Standard Grant Award Letters	(already developed)
5.	Standard DOL Referral Letters	(attached)

GRANT REVIEW WORKSHEET

GRANT NUMBER: ______________ FEDERAL SHARE: ______________

GRANTEE: ______________ DESIGNATED RECIPIENT: ______________

CITY/UZA ______________ VENDOR CODE: ______________

MASTER AGREEMENT DATE: ______________

PART I - **(Submissions required with each Application)**

	Submitted	Remarks
A. Transmittal Letter	______	______________
B. SF-424 Form	______	______________
C. Program of Projects/ Budget	______	______________
D. Project Description/Justification	______	______________
E. Project Implementation Schedule	______	______________
F. Assurance of Local Share (Sec.5303)	______	______________
G. Labor Certification	______	______________
H. Project Eligibility	______	______________
I. Supplemental Agreement	______	______________

PART II - **(Annual Submissions)**

A. Annual Certifications/Assurances ______________
B. TIP (including Air Quality Conformity) ______________
C. STIP ______________
D. UPWP ______________
E. Transfer Letter ______________

PART III - **(Environmental 23 CFR Parts 635,640,650,712,771&790) (49 CFR Part 622)**

A. Class 1 (EIS) ______________

Remarks ______________

B. Class 2 (CE's) ______________

Remarks ______________

C. Class 3 (EA) ______________

Remarks ______________

D. Section 4f/Section 106

PART IV - **(Section 5309)**

A. Public Hearing/Transcript ______________

B. Update of Transit System ______________

PART V - **(Rolling Stock)**

Expansion ______________ Replacement ______________ Rehab ______________

1. Vehicles to be Replaced (Age or Mileage): ______________

____

2. Spare Ratio:
Total Fleet ________ Peak Requirement ________ No. of Spares ________

PART VI - **(Status of Oversight Findings)**

A. Triennial Review ______________ D. ADA ______________

B. Financial Management ______________

C. Procurement ______________

____
Program Manager Date

Memorandum

U.S. Department of Transportation
Federal Transit Administration

Subject: Grant No. XX-XX-XXXX

Date:

From: Transportation Rep/Community Planner

Reply to Attn. of:

To: Regional Administrator

Through: Director, Office of Planning and Program Development

1. Applicant (Grantee) :

   Designated Recipient :

   Urbanized Area :

2. FTA Program (Section): Urbanized Area Formula Program (Section 5307), Capital Program (Section 5309), etc.

   FTA Funds : $

3. Project Description and Evaluation:

   (Include a brief description of major elements of the grant. For routine grants, such as replacement buses, operating assistance and equipment, reference the Approved Project Budget. Evaluation should include a discussion of issues pertaining to the project(s) in the grant application. Routine projects may not require an evaluation. Also include discussion of any environmental issues not adequately covered on the Grant Worksheet such as additional justification for a Categorical Exclusion, and a FONSI with notable mitigating measures.

4. Recommendation: Based on the above, I recommend approval of this grant. The applicant meets all requirements for funding under §5307 (or §5309, etc.) of the Federal Transit Act as indicated on the attached Grant Worksheet. Likewise, the required legal and administrative findings have been made and are included in the attached Findings and Determinations. Both attachments are herein incorporated by reference and made a part of this approval memorandum.

APPROVED: ______________________________
Regional Administrator

DATE: ____________________

Attachments (2)

Sample DOL Referral Letter

New Grant

Kelley Andrews
Director, Statutory Programs
U. S. Department of Labor
Office of the American Workplace
Room N5411
200 Constitution Avenue, N. W.
Washington, DC 20210

Subject:

Dear Ms. Andrews:

Enclosed are two (2) copies of the subject grant application. The Federal Transit Administration's projected timetable for acting upon the subject grant is ___________________. In order to meet that timetable, Department of Labor certification is requested no later than two weeks prior to that date. Please establish a time schedule for negotiations pursuant to 29 CFR 215.3(d). Please advise us of the 49 USC §5333(b) (formerly Section 13(c)) terms and conditions for inclusion in the grant contract.

Sincerely,

Regional Administrator

Enclosure

Sample DOL Referral Letter

Grant Amendment

Kelley Andrews
Director, Statutory Programs
U. S. Department of Labor
Office of the American Workplace
Room N5411
200 Constitution Avenue, N. W.
Washington, DC 20210

Subject:

Dear Ms. Andrews:

Enclosed is one copy of the subject grant amendment application.

The Department of Labor (DOL) certified the original project on ________________. This amendment represents ____________________ ____ ____ ____.

The Federal Transit Administration's projected timetable for funding the subject grant is ___________________. In order to meet that timetable, DOL certification is requested no later than two weeks prior to that date.

Please advise us of the 49 USC §5333(b) (formerly Section 13(c)) terms and conditions for inclusion in the grant contract.

Sincerely,

Regional Administrator

Enclosure

Sample DOL Referral Letter

Concurrence Letter

Kelley Andrews
Director, Statutory Programs
U. S. Department of Labor
Office of the American Workplace
Room N5411
200 Constitution Avenue, N. W.
Washington, DC 20210

Subject:

Dear Ms. Andrews:

The Department of Labor (DOL) certified the original subject grant on _______________. At that time, DOL made its determination that fair and equitable arrangements existed to protect the interest of employees affected by the project as required by 49 USC §5333(b) (formerly Section 13(c) of the Federal Transit Act as amended).

This amendment represents ____.

Therefore, we feel the nature of the amendment is such that a new DOL certification is not required. If you agree, please indicate by signing the bottom of this letter and returning it to this office as soon as convenient.

Sincerely,

Regional Administrator

DOL CONCURRENCE:

BY:________________________________ DATE:__________________

DOL NON-CONCURRENCE:

BY:________________________________ DATE:__________________

Sample DOL Referral Letter

Information Letter

Kelley Andrews
Director, Statutory Programs
U. S. Department of Labor
Office of the American Workplace
Room N5411
200 Constitution Avenue, N. W.
Washington, DC 20210

Subject:

Dear Ms. Andrews:

This letter is to inform the Department of Labor that the subject amended grant application has been received by this office and we are notifying you of such. A 49 USC §5333(b) (formerly Section 13(c)) certification has already been received for the original project and no further certification is required. The amended application falls into the category checked below:

____ Application for incremental funding for multi-year grants where a 49 USC §5333(b) certification has been issued for the entire project scope.

____ Amended application for a change in dollar amount within the scope of the original project.

This letter is for informational purposes only and a copy of the amended application is enclosed for your information.

Sincerely,

Regional Administrator

Enclosure

Region 3 Responses to Questionnaire
6/21/95 draft
(Regional Comments Pending)

Grant Review and Approval Process (Non-EGMM Grants)
Standard Questions for Review of Regions

1. Is there a written process for handling new grant applications and for reviewing and processing applications? If so, obtain a copy(s). (Note: A checklist may or may not embody a process depending on how it is structured and how thorough it is.)

   Yes, the steps used to process grants are attached. The Grants Control Assistant processes the new grant application. Also, a checklist is used to review the applications.

2. What are the first three things you do when you receive a grant application?

   1. Date stamp application transmittal letter or first page of application.

   2. Assign project number.

   3. Prepare appropriate letter to be sent to Department of Labor with copies of application attached.

3. Regarding setting up an application in GMIS:

   a. Who decides if an application will be set up in GMIS?

      The Transportation Representative (Rep).

   b. Who does the set-up?

      The Grants Control Assistant does the set-up in GMIS.

   c. When does the set-up take place?

      There is no specific time when the grant set-up takes place, that decision is made by the Rep..

   d. Provide answers for flexible fund grants if these are handled differently.

      Flex funds are not treated differently, with the exception that some flex grants already have the project numbers assigned. This is done in some cases, before the funds are transferred, the recipient requests a project number.

4. Regarding assigning project numbers:

   a. Who assigns project numbers?

      The Grants Control Assistant assigns the project number.

   b. How are they assigned?

      A log is kept of the numbers assigned and the next sequential number is assigned to the project.

   c. Who tracks project number assignments?

      The Grants Control Assistant tracts the project numbers by maintaining a manual log.

   d. Provide answers for flexible fund grants if these are handled differently.

      A manual log is maintained for flex fund grants also.

5. Regarding referrals to the Department of Labor:

   a. Who decides the type of referral to make to DOL?

      The Grants Control Assistant has basic form letters. The Rep makes the decision on the appropriate letter to be used.

   b. Who sends the application in?

      The Grants Control Assistant sends in the letter and two copies of the grant application.

   c. Are there standard letters in the local area network (LAN)?

      Yes, standard letters of are located on the local area network.

   d. How do you handle DOL concur/non-concur requests? courtesy copies for previously certified grants?

      The concurrence letter goes with the appropriate approval package. The non-concurrence letter goes in the files.

6. Who enters the initial budget in GMIS?

The initial budget is entered by the Transportation Rep.

7. Is there a standard approval package in the LAN -- approval memo, letter, grant agreement, and checklist?

a. There is a standard approval package in the LAN for the approval memo.

b. The approval letter is not on LAN. This format was created by Headquarters.

c. The standard agreement is prepared by the legal staff (Region 3 or TCC).

8. If so, are grant reps required to use them or do they create their own from old files?

The grant reps are required to use and circulate something that is current and not from the old files.

9. When are funds reserved? Who does the reservation?

The funds are reserved anytime after the grant approval documents are circulated.

Funds are reserved by three people; each person has a geographical area.
The Grants Control Assistant reserves funds for the State of West Virginia,
a Transportation Program Specialist reserves funds for the District of Columbia,
Penn. and Delaware. Another Transportation Specialist reserves funds for the States of Maryland and Virginia.

10. How do you maintain and track apportionment records for various urbanized areas, programs (e.g., Sections 9, 16, 18, and earmarked 3), and funding years? Who does this?

The apportionment records are tracked by the use of ledger sheets and through GMIS.

A deobligation file is maintained for each fiscal year. Copies of the apportionments are sent to the grantees with a standard letter notifying them of lapsing funds. If there are lapsing funds, the Rep works closely with the grantee to prevent the loss of funds by substituting old lapsing funds.

11. Regarding the reviews of grant applications:

a. Is the grant review process a sequential or a concurrent review process?

The actual grant review process is concurrent (ex: Environmental and Engineering).

The approval process is sequential.

b. Who determines what, if any, sequential/concurrent reviews are necessary for a particular application (e.g., environmental, engineering, planning)?

The Transportation Rep determines what reviews are necessary. A checklist is used to indicate what reviews are required.

c. Do you use a routing slip to forward the grant package?

Yes. A routing slip is used to forward the grant approval package (attached).

d. How do you track the status of the review?

There is no set process for tracking the status of the review process.

Suggestion: Process for tracking the status of review could be setup, possibly a simple Lotus spreadsheet.

e. Is there a process for coordinating the grant award with the program management staff?

Copies of the grants released are given to program management staff.

12. Regarding the grant obligation:

a. After the Regional Administrator signs and dates the approval package (for those grants that have delegated approval authority), when is the obligation entered into GMIS?

Generally, the obligation date is entered within a day.

b. When is the obligation entered into GMIS for grants signed by the Administrator? What is your process for sending and tracking these grants?

The obligation date is entered into GMIS when the staff is notified by E-Mail from the Office of Regional Operations at the Headquarters Office.

The process is to keep a copy of the grant approval package along with the route slip. When the approval package is signed by the Administrator the copy is then pulled.

c. Who enters the obligation in GMIS?

The same three staff members that reserved the funds, obligates the funds.

d. Provide answers for flexible fund grants if these are handled differently.

The flexible fund grants are not handled any differently from the regular grants.

13. Regarding flexible funds:

a. Who keeps track of flexible funds that are transferred, and how is it done?

The Transportation Program Specialist keeps track of their flex funds by using a log which is divided by state. Flex funds are also tracked in GMIS with the limitation codes.

b. Is the grant number under which flexible funds are transferred always used for the actual obligation of funds? If not, why not?

Yes, the same grant number is used throughout the process.

c. Does the Regional Office receive documentation (notification) from FHWA for every transfer? Where is it kept? Who keeps it?

Sometimes the Regional Office receives documentation from FHWA. Many occasions, there is no notification. A close working relationship with the State is necessary when there is insufficient documentation from FHWA. The Transportation Program Specialist maintains a log or file by State.

d. How does the region assure that flexible funds are obligated under the correct limitation code? By FHWA documentation (notification)? By TBP e-mail notification?

Although there may be some documentation from FHWA, the Rep relies on the E-mail notification from TBP and the Grants Control Assistant's records.

14. Do you require a legal sign off on a planning approval package (Section 8/26)? What about Section 3 and 9 planning grants?

There is legal sign off on all the grant approval packages.

15. Do you get a civil rights sign off at the grantee level (EEO, DBE, Title VI ADA) or at the grant application level?

Civil rights sign off is at the application level by the Civil Rights office in Headquarters.

16. Who maintains the currency of information in GMIS for existing projects? This includes corporate/grantee information plus grant data (budget revisions, financial status reports, progress reporting).

    Currently, the grantees enter information in the GMIS, such as budget revision, financial status reports and quarterly progress reports. Before EGMM or GMIS, the Rep was responsible for entering all the data.

17. Other

    We had some discussion with the Regional Counsel in Region 3. This discussion included:

    a. The elimination of the 'Findings and Determination' signoff as part of the grant approval process. She indicated that she would like to replace this with a paragraph.

    b. She also expressed that she would like to see some modifications or changes in the EGMM, such as the Environmental Conditions screen and the Budget Line Item Screen.

    c. On the subject concurring on approval packages, she indicated that she has signed off on packages without labor certification when she would be out on leave or travel because she did not want to delay the process. This concurrence is done on the condition that the pending labor certification will be received in a short period of time. She indicated that she is confident in signing off on these packages because she has complete trust in the Transportation Rep's capability.

    The staff expressed a desire to have someone work with their staff (computer person from Headquarters) to guide them in creating reports from GMIS (ex: E-Z write reports and downloading files to create a list of grants pending release).

Comments: The first day of the interview (conducted April 24-25, 1995), we (Lucille Pearson, TGM-30, and Paul Fish, TRO-5) met with Michele Destra, Director, Office of Program Operations. She answered all of the questions with the exception of Questions 10 and 13.

The second day, we met with the staff: Sheila Burn, Transportation Program Specialist answered questions 10 and 13. She went over her log that she maintained to track flexible funds and she went over her apportionment log. Karen Crippen, Grants Control Assistant, explained her process for logging in grant applications and the preparation of files for review process. The Regional Counsel, Nancy Greene, discussed the grant approval process in the terms of her role and future enhancements she would like to see in EGMM.

We were generally pleased with the process described by TRO-3 and had only one suggestion (see no. 11d above).

6/13/95 Draft
(Regional Comments Pending)

Region 4 Responses To April 26, 1995 Site Visit Grant Review and Approval Process Questions

1. Is there a written process for handling new grant applications and for reviewing and processing applications? If so, obtain a copy(s). (Note: A checklist may or may not embody a process depending on how it is structured and how thorough it is.)

   No. There is not a comprehensive, up-to-date written process that is used on a day-to-day basis. However, there are several written items that assist in the process. They are: (1) past documentation of the application, review/approval, and release processes for the Transportation Program Specialist (attached); (2) a grant application checklist for ensuring and documenting that all required items have been submitted or accounted for (attached); (3) a grant approval route slip for obtaining sign-offs and noting legal review comments (attached); and (4) an outdated package for grantees prepared by the former Region 3/4 Area which indicated the requirements for a complete grant application for FTA review.

   Suggestion: Region 4 should update and maintain a comprehensive written process. This will be particularly helpful for continuity when there are staff changes.

2. What are the first three things you do when you receive a grant application?

   (1) The Transportation Program Specialist (TPS), who has duties similar but more complex than a grant control assistant, reviews the application to see if it is a new grant or an amendment and assigns a project number. Sometimes it is necessary for the TPS to consult with the appropriate Transportation Program Manager (Rep) or for the Rep to contact the grantee to determine whether it is a new or amended grant.

   (2) The TPS types the Findings and Determinations forms, types the letter to the Department of Labor (DOL), and sets up two project folders: a green folder containing the original grant application which is kept as a permanent file, and a blue folder which is given to the Rep, containing a working copy which is circulated within the office and later becomes part of the official file. (Most grantees submit an original application plus three copies. Two copies are sent to DOL. If the applicant is a new grantee, one copy is forwarded to the Civil Rights Office. One copy is set up as the working copy. The TPS makes additional copies if the grantee has not provide enough.)

   (3) The TPS enters the project set-up information (e.g., all Form 424 data), but not the budget, in GMIS. The TPS also enters information in a dBase system of pending grants maintained by the regional office (sample attached). This system includes basic grant

information and tracks key processing dates, including grant received, to and from DOL, Civil Rights, and approved and released.

* Region 4 requested that TGM develop a GMIS download and dBase LAN system for all regional offices that could be used to track pending grant applications. This system could incorporate GMIS data, thus avoiding duplicate data entry.

Also, the Director of Program Operations uses the TPS's dBase list to create a management report of pending grants for assessing regional workload and planning quarterly schedules.

3. Regarding setting up an application in GMIS:

   a. Who decides if an application will be set up in GMIS?

      Region 4 sets up all grant applications in GMIS.

   b. Who does the set-up?

      The TPS sets up all grants in GMIS.

   c. When does the set-up take place?

      Immediately after receiving the grant application.

   d. Provide answers for flexible fund grants if these are handled differently.

      No difference from other grants.

4. Regarding assigning project numbers:

   a. Who assigns project numbers?

      The TPS.

   b. How are they assigned?

      A manual log of project numbers, by state and by program/section, is used to assign project numbers. The log includes the project number, date the grant was received, grantee name, urbanized area, and proposed Federal share of funding.

   c. Who tracks project number assignments?

      The above log is maintained by the TPS.

d. Provide answers for flexible fund grants if these are handled differently.

Flexible fund grants are identified in the project number log. Otherwise, they are not handled any differently from other grant applications. Unlike the situation experienced in some other regions, Region 4 has not had any cases where FHWA wants a project number before FTA has received the application. The application has always been in hand when Region 4 entered the project number.

5. Regarding referrals to the Department of Labor:

a. Who decides the type of referral to make to DOL?

The TPS prepares a standard referral letter to DOL for all first time grants. However, for applications for grant amendments, including Full Funding Grant Agreements, the TPS first consults with the Rep and then prepares the appropriate letter. As a method of control and further input, the Director of Program Operations signs ALL of the letters to DOL. (Note: Planning grants are not sent to DOL.)

b. Who sends the application in?

The TPS.

c. Are there standard letters in the local area network (LAN)?

Yes. There are standard form letters already printed and the TPS fills in the blanks.

d. How do you handle DOL concur/non-concur requests? courtesy copies for previously certified grants?

In some cases, a 13(c) certification is not necessary, and a simple concur/non-concur (PIC) letter is sent. However, Region 4 always waits to receive DOL's concurrence letter before approving a grant.

6. Who enters the initial budget in GMIS?

Each Rep enters the budget for his or her grants.

7. Is there a standard approval package in the LAN -- approval memo, letter, grant agreement, and checklist?

Yes. Region 4 has an organized system of files in the network which are accessible to all users. Standard documents/forms are provided for each program, and are updated when necessary. Separate subdirectories are provided, by state, urbanized areas, and grantees, and the standard files are saved into these areas and tailored to the specific grant when processing applications.

Regarding the approval memorandum: Currently, Region 4 prepares a "stand-alone" memorandum which incorporate all aspects of the grant. It includes a detail justification and complete budget breakdown. Region 4 is considering revising this procedure to allow a new, more detailed checklist to become the findings and to attach this, along with the GMIS budget, to the memorandum. Region 4 also indicated that memoranda forwarded to headquarters for approval would not be as simple as formula grants.

8. If so, are grant reps required to use them or do they create their own from old files?

   Reps are required to use the standard formats in the LAN.

9. When are funds reserved? Who does the reservation?

   Funds are reserved by the TPS just prior to obligation, before the final package is circulated to the Regional Counsel, Director of Program Operations, and Regional Administrator.

10. How do you maintain and track apportionment records for various urbanized areas, programs (e.g., Sections 9, 16, 18, and earmarked 3), and funding years? Who does this?

    The Rep completes a financial budget request memorandum (attached) and submits it to the TPS. The TPS verifies fund availability and documents on the Rep's memorandum the codes that are used. The TPS maintains balances using a funding log in LOTUS format and is responsible for these balances. The numbers are reconciled periodically in a number of ways. They are sent to grantees for verification via a form letter from the Regional Administrator. They are reconciled with GMIS numbers on a quarterly basis. At the end of the year, a balance is made by state and by section/program with the reports provided by TGM.

11. Regarding the reviews of grant applications:

    a. Is the grant review process a sequential or a concurrent review process?

       The review process is a sequential one, with occasional concurrent reviews on an as-needed basis.

    b. Who determines what, if any, sequential/concurrent reviews are necessary for a particular application (e.g., environmental, engineering, planning)?

       The TPS, Rep, Regional Counsel, and Director of Program Operations see all grant approval packages for initial review prior to final sign-offs. In most cases, the Rep determines if additional reviews (e.g., environmental and engineering) are needed. The planning area has not been addressed in a comprehensive manner; there is not much interface on Section 8 and 26 grants, except to get a STIP approval date.

c. Do you use a routing slip to forward the grant package?

Yes, a routing slip (attached) is attached to the blue working folder. The TPS completes the top of the routing slip and sets up the grant. The Rep reviews the application, makes the initial environmental finding, and forwards information to the environmental staff person if there is an environmental assessment. The Rep prepares a preliminary review letter to the grantee. The Regional Counsel reviews the grant application. The Rep finalizes the review letter, identifying any and all deficiencies noted in the legal review, and gives the grantee a response due date which fits into the quarterly review/approval schedule. Upon receipt of the grantee's response and final actions by the Rep, the package is prepared in final, the funding request memo included, and it is routed for final sign-off to the Rep, TPS, Regional Counsel, Director of Program Operations, and Regional Administrator (also, Offices of Program Development and Program Oversight, if necessary).

d. How do you track the status of the review?

The TPS dBase tracking sheet and the Director of Program Operations status report track the major grant approval activities. The status within the regional office would have to be obtained by asking the Rep.

Also, files are maintained for all grant approvals. A black folder is kept on each approval and includes the approval memorandum, grant award letter, contract, and budget.

e. Is there a process for coordinating the grant award with the program management staff?

The program management function is carried out by the Office of Program Operations that handles the grant review and approval process.

Beginning this fiscal year, the Director of Program Operations shares his list of grant applications with Program Oversight. Oversight staff note any pending Triennial Reviews for these grantees and this information is passed along from the Director of Program Operations to the Regional Counsel.

Region 4 also plans to implement a similar process regarding procurement reviews and ADA.

12. Regarding the grant obligation:

a. After the Regional Administrator signs and dates the approval package (for those grants that have delegated approval authority), when is the obligation entered into GMIS?

The obligation is entered into GMIS on the same day the Regional Administrator signs or as soon as possible thereafter.

b. When is the obligation entered into GMIS for grants signed by the Administrator? What is your process for sending and tracking these grants?

Obligations for grants signed by the Administrator are entered into GMIS after Headquarters calls/e-mails to notify that the grant has been released. The date used for the obligation is the same date as the actual release date. The region does not wait for the package to be returned before entering the obligation.

A special folder is sent to Headquarters for grant approval with the necessary items included. On the cover of the blue folder held by the TPS, the date is indicated when the package was sent to Headquarters.

If Headquarters only requires Talking Points for releasing a grant prior to the Regional Administrator signing the package, a copy of the Talking Points is placed in the blue folder with the date marked when the Talking Points were sent to Headquarters. The Regional Administrator signs the package when the region has been notified that the grant was released.

c. Who enters the obligation in GMIS?

The TPS.

d. Provide answers for flexible fund grants if these are handled differently.

No difference from other grants.

13. Regarding flexible funds:

a. Who keeps track of flexible funds that are transferred, and how is it done?

The TPS keeps track of transferred flex funds in the funding log.

b. Is the grant number under which flexible funds are transferred always used for the actual obligation of funds? If not, why not?

Yes. This has not been a problem for Region 4.

c. Does the Regional Office receive documentation (notification) from FHWA for every transfer? Where is it kept? Who keeps it?

The Rep receives FHWA notification for every transfer and keeps it with the project folder.

d. How does the region assure that flexible funds are obligated under the correct limitation code? By FHWA documentation (notification)? By TBP e-mail notification?

The limitation code used is that provided by TBP. The TPS compares it with the one provided in the FHWA notification.

14. Do you require a legal sign off on a planning approval package (Section 8/26)? What about Section 3 and 9 planning grants?

For Section 8 and 26 grants, the Rep signs off on a boiler plate memorandum prepared by the Regional Counsel which indicates that the Rep can certify to the legal opinion. The Regional Counsel does not sign off on these grants.

All Section 3 and 9 grants receive a legal sign-off, even if they are for planning only.

15. Do you get a civil rights sign off at the grantee level (EEO, DBE, Title VI ADA) or at the grant application level?

The civil rights sign-off is at the application level. The Region 4 Civil Rights Officer is currently located in D. C.

Region 4 believes that it makes good sense to have this performed at the grantee level. This is especially true in light of the new DOT regional civil rights office currently being formed.

16. Who maintains the currency of information in GMIS for existing projects? This includes corporate/grantee information plus grant data (budget revisions, financial status reports, progress reporting).

The corporate/grantee information is maintained by the Reps, although there is no formal mechanism for ensuring this maintenance. (An AmiPro mailing list is used for mailings to grantees which does not rely on GMIS data.) Each Rep is also responsible for entering budget revisions. A data entry clerk handles the entry of all financial status and progress report information and serves as the control point for this function.

17. Other

- o Region 4 hopes that many policy questions relating to the grant review and approval process will be addressed by Headquarters. For example, should FTA be putting emphasis on reviewing the substance/justification of each project, or should the emphasis be on accepting local decision-making and getting the grants out?

- o Also, staff stated that much more emphasis and action must be taken if full project justifications are to occur in the STIP stage, thus making actual grant approval routine and quick. Region 4 believes that EGMM will not work effectively until this is done.

- o Region 4 staff also reflected on FTA goals, such as increasing the use of flexible funding versus streamlining the grant process.

- o It was also noted that this questionnaire does not address other fund transfers, such as transferring from Section 9 to 18 or from 18 to 9.

- o Region 4 hopes that this effort will product a consistent, comprehensive checklist which can be used as an attachment to a simplified approval memorandum. The focus should also be to make this paper grant review and approval process compatible to EGMM for a smooth transition.

The above questions were asked by Carol Kerr, TGM-30, and Paul Fish, TRO-5, to Region 4 staff on April 26, 1995, prior to a regional reorganization anticipated on June 1. Tom McCormick, Director of Program Operations, and/or Marie Lopez, Transportation Program Specialist, responded to questions 1 through 16. Item 17 was compiled from a group discussion with all Reps present that day.

6/13/95 Draft
(Regional Comments Pending)

Region 5 Responses To April 19, 1995
Grant Review and Approval Process Questions

1. Is there a written process for handling new grant applications and for reviewing and processing applications? If so, obtain a copy(s). (Note: A checklist may or may not embody a process depending on how it is structured and how thorough it is.)

   No, there is not a written process. There are handwritten instructions used by the Grants Control Assistant (GCA). Also, a checklist and routing slip used in the process provide additional documentation. Additionally, there was a process documented back in 1983, but it is not well known and has not been updated.

   Suggestion: Region 5 should develop and maintain a comprehensive and up-to-date written process. This will be particularly helpful for continuity when there are staff changes.

2. What are the first three things you do when you receive a grant application?

   (1) The GCA gives the application to the Grant Representative (Rep) responsible for the state and urbanized area of the applicant. The Rep checks (a) for the type of funding requested so that a project number can be assigned, (b) whether or not the application is or should be an amendment to an existing grant, and (c) the type of notification that should be provided to the Department of Labor (DOL). This is accomplished by the Rep in a very short amount of time. The Rep returns the application and provides the information in a note to the GCA.

   (2) The GCA assigns the project number, using a manual log, and, if necessary, coordinating with another FTA region with overall responsibility for that urbanized area.

   (3) When instructed by the Rep, the GCA sends copies of the application with the standard form letter to DOL, logging on a routing sheet the date it went to DOL and making a copy of the cover letter. The application and original copies are then placed in a folder and provided to the Rep (or the Rep team).

3. Regarding setting up an application in GMIS:

   a. Who decides if an application will be set up in GMIS?

      The Rep.

b. Who does the set-up?

The Rep.

c. When does the set-up take place?

It varies. Some are set up as soon as the Rep receives the application folder. Others are waited on until they are further along, since the Rep may anticipate that changes will be made to the project. (The set-up process, not including budget entry, takes approximately 5-10 minutes to do.)

d. Provide answers for flexible fund grants if these are handled differently.

No difference from other grants.

4. Regarding assigning project numbers:

a. Who assigns project numbers?

The GCA.

b. How are they assigned?

A manual log is used.

c. Who tracks project number assignments?

The GCA. GMIS serves as a check and balance system, since GMIS will not allow for use of an existing project number.

d. Provide answers for flexible fund grants if these are handled differently.

The process is the same, except sometimes project numbers for flexible fund grants are assigned prior to receiving the grant application. This may lead to problems later (see #13b below).

5. Regarding referrals to the Department of Labor:

a. Who decides the type of referral to make to DOL?

The Rep.

b. Who sends the application in?

The GCA.

c. Are there standard letters in the local area network (LAN)?

Yes.

d. How do you handle DOL concur/non-concur requests? courtesy copies for previously certified grants?

If only a concur/non-concur letter or courtesy letter is required, the Rep informs the GCA that a standard letter to DOL is not necessary. The Rep then processes and tracks these letters, often discussing the situation directly with DOL.

6. Who enters the initial budget in GMIS?

The Rep.

7. Is there a standard approval package in the LAN -- approval memo, letter, grant agreement, and checklist?

Yes, all of the approval package documents are in the LAN. The only exception is the checklist, which is provided to Reps in quantity in hard copies. Each Rep, however, uses his or her own local disks to update the documents for the specific grant. Also, the Rep may vary the approval memorandum depending on the circumstances.

8. If so, are grant reps required to use them or do they create their own from old files?

The Reps are not required to use them. The Rep may use a previous version of documents for that same grantee in order to avoid duplicating previous work.

Suggestion: The Reps should use the standard documents. The Task Force will be developing these for all regions to use.

9. When are funds reserved? Who does the reservation?

The timing of the fund reservation varies, however, it is done prior to the approval package being formally circulated in the office (i.e., after the Rep has reviewed the application and prepared the approval memorandum, award letter, etc.). The Director of Program Operations does all of the grant reservations, using the funding sources provided by the Rep and checking against the GMIS information while using the system. This way, the reservation exercise is a brief one but there is review and control over the process.

10. How do you maintain and track apportionment records for various urbanized areas, programs (e.g., Sections 9, 16, 18, and earmarked 3), and funding years? Who does this?

    Each Rep maintains manual, hand-written funding records by source, urbanized area, and year. The region plans to convert this to a LOTUS system. A separate system than GMIS is necessary since GMIS does provide tracking for each transaction.

11. Regarding the reviews of grant applications:

    a. Is the grant review process a sequential or a concurrent review process?

       Both. Concurrent reviews take place as follows: The Rep lets the engineer know about the pending project. The engineer can comment on the grant but does not need to formally sign-off. Another concurrent review is made by the Civil Rights Officer, who is immediately provided with a referral notice.

       The rest of the review process is sequential. The process goes from the Rep to the Director of Program Operations (for fund reservation only) to the Civil Rights Officer, Regional Counsel, Director of Program Operations (for review/sign-off), and Regional Administrator.

    b. Who determines what, if any, sequential/concurrent reviews are necessary for a particular application (e.g., environmental, engineering, planning)?

       The Rep determines if an engineering review is necessary. The Rep personally handles environmental and planning issues.

    c. Do you use a routing slip to forward the grant package?

       Yes.

    d. How do you track the status of the review?

       The Rep keeps track of the review and approval package. An office log is maintained, with entries made by each Rep, that tracks the major steps of the process.

    e. Is there a process for coordinating the grant award with the program management staff?

       No. The Rep may request their participation on a particular grant application review.

12. Regarding the grant obligation:

    a. After the Regional Administrator signs and dates the approval package (for those grants that have delegated approval authority), when is the obligation entered into GMIS?
    Almost immediately after approval.

    b. When is the obligation entered into GMIS for grants signed by the Administrator? What is your process for sending and tracking these grants?

    (Question not asked on 4/19/95.)

    c. Who enters the obligation in GMIS?

    The Director of Program Operations or his staff, including the GCA.

    d. Provide answers for flexible fund grants if these are handled differently.

    No difference from other grants.

13. Regarding flexible funds:

    a. Who keeps track of flexible funds that are transferred, and how is it done?

    The Reps keep track, using their manual logs. A new log has been established to keep track of limitation codes.

    b. Is the grant number under which flexible funds are transferred always used for the actual obligation of funds? If not, why not?

    No. Sometimes States will not do a transfer until they have a project number, yet the grant application has not been received by FTA. In those cases, the regional office assigns a project number and asks the grantee to use that number when the application is submitted. However, there have been some cases where the grantee has not used the project number on the application, and the regional office -- not realizing the omission -- assigns a new project number. Consequently, the reservation/obligation are made against a different number from the one used for the transfer.

    c. Does the Regional Office receive documentation (notification) from FHWA for every transfer? Where is it kept? Who keeps it?

    FHWA does not provide documentation for every transfer, which creates a problem. The Director of Program Operations keeps a master list of these notifications and provides copies to the Reps.

d. How does the region assure that flexible funds are obligated under the correct limitation code? By FHWA documentation (notification)? By TBP e-mail notification?

The same process used for Section 9 grants are used for flexible funds, cross-referencing the codes used for the transfer. The TBP e-mail is used as the source of limitation code.

14. Do you require a legal sign off on a planning approval package (Section 8/26)? What about Section 3 and 9 planning grants?

A legal sign-off is not obtained for Section 8/26 planning grants but is for Section 3/9 planning grants.

15. Do you get a civil rights sign off at the grantee level (EEO, DBE, Title VI ADA) or at the grant application level?

At the application level.

16. Who maintains the currency of information in GMIS for existing projects? This includes corporate/grantee information plus grant data (budget revisions, financial status reports, progress reporting).

Many people maintain the corporate information, as changes are noted, including the GCA, program management and oversight staff. The Office of Program Oversight is responsible for budget revisions and financial status and progress reports information.

The above questions were asked by TGM-30 staff (Carol Kerr, Lucille Pearson, and Kate Webb) to Paul Fish, TRO-5, on an April 19, 1995 teleconference.

6/19/95 draft
(Regional Comments Pending)

Grant Review and Approval Process Questions
TRO-9
May 8-10, 1995

1. Is there a written process for handling new grant applications and for reviewing and processing applications? If so, obtain a copy(s). (Note: A checklist may or may not embody a process depending on how it is structured and how thorough it is.)

   Yes, there is a six page set of instructions covering "Setup Process", "Fund Reservation" and "Return Contracts Process" - although a bit outdated since still refers to "UMTA". There is also a checklist and routing slip used in the process.
   SUGGESTION: *Update instructions to embody recent changes. A comprehensive written process is particularly helpful for continuity when there are staff changes.*

2. What are the first three things you do when you receive a grant application?

   1) The Grants Control Assistant (GCA) assigns a project number, enters the project set-up information in GMIS, and sets up the application in an action folder.

   2) The GCA sends a letter to the Department of Labor (DOL), if applicable, also sends a standard letter to CALTRANS (the State) if flex funds will be involved, and sends a postcard to the grantee acknowledging receipt of the application.
   SUGGESTION: *If feeling overburdened, TRO-9 may consider letting the grantee initiate the flex funds transfer. They are the only region that takes on this additional responsibility/task.*

   3) The secretary and paralegal both fill out the checklist and then give the application to the appropriate Grant Representative (Rep.)
   SUGGESTION: *No need for the secretary to fill out the checklist, this is a duplication of the paralegal's efforts.*

3. Regarding setting up an application in GMIS:

   a. Who decides if an application will be set up in GMIS?
      The GCA

   b. Who does the set-up?
      The GCA

c. When does the set-up take place?
The same day it is received if possible. It should be noted that set up occurs before the Rep has even seen the application.

d. Provide answers for flexible fund grants if these are handled differently.
The actual setup in GMIS is no different; however, TRO-9 does a couple extra steps with regard to flexible funds:
1) Sends a form letter, the 424 form and the budget to CALTRANS notifying them of the transfer.
2) Sends a compendium of pending flex fund transfers on a quarterly basis to CALTRANS. This also serves as an additional tracking mechanism for the Region.

4. Regarding assigning project numbers:

a. Who assigns project numbers?
GCA

b. How are they assigned?
Manually from a control log binder which is separated by program/section.

c. Who tracks project number assignments?
The GCA maintains the log binder.

d. Provide answers for flexible fund grants if these are handled differently.
There is no difference.

5. Regarding referrals to the Department of Labor:

a. Who decides the type of referral to make to DOL?
This is mainly the GCA's call; however, she defers to the Rep. if she has questions. TRO-9 operates on the premise that everything gets referred to DOL except 8/26 planning grants.

b. Who sends the application in?
The GCA sends the application under the Regional Administrator's signature.

c. Are there standard letters in the local area network (LAN)?
Yes, there are three standard DOL referral letters. Copies are attached.

d. How do you handle DOL concur/non-concur requests? Courtesy copies for previously certified grants?
In those cases which a 13(c) certification is not necessary, a concur/non-concur letter is sent.

6. Who enters the initial budget in GMIS?
The GCA
SUGGESTION: Per Hiram Walker's 5/22/95 e-mail, it was requested that the Reps. begin entering the grant budgets into GMIS.

7. Is there a standard approval package in the LAN -- approval memo, letter, grant agreement, and checklist?
Yes, but the more important question is, "Does everyone use them?" There is variation in the approval memos themselves as well as inconsistent approaches to the use of the checklist (i.e.. what the rep has responsibility or authority for challenging or changing). Of the five project managers, only three use the standard approval package. It was also noted that there is inconsistency in what "gets through the system". What is acceptable documentation for one grant is not adequate for another without any rhyme or reason.
SUGGESTION: Once the Task Force comes up with a "standard" approval memo and checklist, it should be used by all Reps for consistency and efficiency.

8. If so, are grant reps required to use them or do they create their own from old files?
They are not required to use them.

9. When are funds reserved? Who does the reservation?
Funds are reserved by the GCA after the application has been set up and the checklist (not the entire application) is reviewed by the Rep. The reservation amount is the amount found in the application's budget - any changes to that would have to come from the Rep.
SUGGESTION: Reservations may be done too early in some cases. At a minimum this causes unnecessary work by the GCA (she has to make changes in about 1/2 of the grants) and in the worst cases results in reservations and even obligations when funds are not even available for a particular project. There are presently no checks and balances to verify the correct reservation amount.

10. How do you maintain and track apportionment records for various urbanized areas, programs (e.g., Sections 9, 16, 18, and earmarked 3), and funding years? Who does this?
Once again, this is one of the GCA's duties. Although at one time there was a manual log used to track the various apportionment records, the log has been missing for some time and the GCA admits that she would like to get back into the practice of keeping a log. But as for the present.....a record is not kept and reservations are generally based on the amount requested in the grant verified against the amount in the TIP, without adequate checks on the availability of those funds. It is assumed that the grantee is not requesting more than they are entitled to.
SUGGESTION: Definite need for checks and balances here. Paul Fish left a copy of TRO-5's log which should serve as a good model. It is essential that a manual or LOTUS type file is maintained.

11. Regarding the reviews of grant applications:

a. Is the grant review process a sequential or a concurrent review process?
Sequential

b. Who determines what, if any, sequential/concurrent reviews are necessary for a particular application (e.g., environmental, engineering, planning)?
This is the Reps call. There is no formal engineering review for grants; however, the Rep. can always seek an engineer's input on an as needed basis. STIP approval is the only planning review.

c. Do you use a routing slip to forward the grant package?
Yes. The routing slip used has just recently been changed and there was some strong discussion about which slip was preferred (internal politics).

d. How do you track the status of the review?
By using your feet and looking in in-boxes.

e. Is there a process for coordinating the grant award with the program management staff? No, however this really isn't an applicable question for TRO-9 since under their present organization structure, the Programs Operations staff carries out almost all of the grant making activities. There will be a need for coordination under the proposed reorganization when responsibilities will be organized along the lines of "pre-grant" and "post-grant" .

SUGGESTION: *The "subject to" approval of grants by the Regional Counsel and the Acting Director of Operations have resulted in grants being released before certain requirements had been met. (The necessary signatures were in place and from a quick glance the package looked ready to go.) This practice should be used very sparingly and with great caution.*

12. Regarding the grant obligation:

a. After the Regional Administrator signs and dates the approval package (for those grants that have delegated approval authority), when is the obligation entered into GMIS?
The same date the Regional Administrator signs, or as soon after as possible.

b. When is the obligation entered into GMIS for grants signed by the Administrator? What is your process for sending and tracking these grants? The obligation is entered after receiving the notification from Headquarters (Bob Stout) that the grant has been released. The date entered would be the actual release date. Grants that are pending the Administrator's signature are kept in a designated "holding drawer" on the secretary's desk.
SUGGESTION: *For grants that Headquarters only requires talking points for release (as opposed to the whole package), have the Regional Administrator sign*

*the approval package **AFTER** the grant has been released by Headquarters to avoid the problem of obligating grants before they are released.*

c. Who enters the obligation in GMIS?
The GCA.
SUGGESTION: Per Hiram's 5/22/95 e-mail, this amount should be verified by the Rep. and Acting Director of Program Operations (Leslie) to assure that the appropriate source and amount of funds have been selected.

d. Provide answers for flexible fund grants if these are handled differently.
No difference.

13. Regarding flexible funds:

a. Who keeps track of flexible funds that are transferred, and how is it done?
The GCA maintains a manual control log book which includes copies of FHWA Notification letters and TBP-20 e-mails.

b. Is the grant number under which flexible funds are transferred always used for the actual obligation of funds? If not, why not?
Yes, due to the fact that TRO-9 is the party that initiates the transfer after receiving the grant application, this has not been a problem for them.
(There is some question as to whether TRO-9 is taking on unnecessary work - most other Regions have the grantee initiate the transfer.)

c. Does the Regional Office receive documentation (notification) from FHWA for every transfer? Where is it kept? Who keeps it?
Yes. They are kept in the GCA's log book. Due to recent problems, a copy is now also included in the grant approval package.

d. How does the region assure that flexible funds are obligated under the correct limitation code? By FHWA documentation (notification)? By TBP e-mail notification?
Both the FHWA notification and the TBP e-mail are used. The GCA will not obligate the money unless she sees the FHWA or CALTRAN memo confirming that the money has been transferred.
SUGGESTION: *Can't use first in first out method for obligating flex funds. They should really be treated like earmarks and very specifically allocated to the particular grant for which the funds were transferred.*

14. Do you require a legal sign off on a planning approval package (Section 8/26)? What about Section 3 and 9 planning grants?
Section 8/26 - no; Section 3 and 9 - yes.

15. Do you get a civil rights sign off at the grantee level (EEO, DBE, Title VI ADA) or at the grant application level?
The civil rights sign off is at the grant application level. Due to the fact that TRO-9 does not have its own Civil Rights Officer, the work is split between the TRO-10 and the TRO-8 Civil Rights Officers.

16. Who maintains the currency of information in GMIS for existing projects? This includes corporate/grantee information plus grant data (budget revisions, financial status reports, progress reporting).
This is mainly the GCA's responsibility; however, the Reps. and the Secretary assist in adding the financial status reports data. De-obligations and close outs are presently done by John Hunt (Program Oversight Staff) with the notion that the GCA will eventually learn and assume this task.

These question were asked by Paul Fish (TRO-5) and Kate Webb (TGM-30) on May 8-10, 1995. Also in attendance were Melton Baxter (TGM-11), Pam Brown (TBP-23), and Dori Delph (TBP-23).

Upon arrival in TRO-9 Monday afternoon, Deputy Regional Administrator (Acting Director of Program Operations) Leslie Rogers gave us an overview of their organization, the region and a recent history of the office. On the proceeding day he went over the questionnaire, question by question, and offered some explanations for deficiencies. Leslie did stress that their problems are recognized and the challenge now is to fix them. We also met with the Regional Council, the GCA, the Secretary and the Grant Representatives and asked them to outline their roles in the Grant Making Process and to offer any suggestions for streamlining.