

OMB Questions on Form OFA-100 and OFA Answers

On form OFA-100, Part 1:

1. A box should be provided for all FY09 and FY10 qtrs to indicate if the information is estimated or actual. This is different than revised.

Answer: We considered having such a box but decided against it. The main reason we did not is that a jurisdiction could provide its best actual number at a point in time but it might not turn out to be final data, for example if some counties reported late or if a contractor payment was later than expected. That is why we opted to require the jurisdiction to complete the sheet in each reporting period so we will be able to tell if there are such revisions without a checkbox.

2. What is meant by completion date? It seems like this is something that OFA fills out. The jurisdiction should fill in the submission date. The form should include space so that ACF documents the date the form is approved and the date the funds are awarded to the applicant?

Answer: The completion date is the date that the jurisdiction completes the form (See instruction 2 on page 4 of the instructions). Our purpose in having a completion date was to distinguish iterations of the OFA-100 from the same jurisdiction. It also makes clear how current the data are. ACF does not make changes to the form and return it to the jurisdiction so there would be no opportunity for us to put the date it is approved. Instead, OFA has a process for documenting our actions on each request and sign and date a letter informing the jurisdiction that we have approved its request. The Office of Grants Management then sends a grant award notice that is also dated.

3. We should ask jurisdictions to identify the total requested amount of Emergency Funds for each category.

Answer: An earlier draft of the form had such a “total amount requested” but we removed it for two reasons. First, we and the parties we consulted thought including the amount requested was an unnecessary burden since the award amount is predetermined (80 percent of the increase). Second, it is a source of potential error and confusion since jurisdictions make could easily make mistakes in the amounts they initially report. We have seen this already on the requests submitted so far.

In the Instructions:

4. Page 1 Application Dates. The instructions are not clear about applying for multiple quarters of funding at one time. I would prefer to have the instructions be clear about what’s allowable (both prospective and retrospectively)? Please be more explicit in this section and indicate how many future quarters a jurisdiction can apply for at one time.

Answer: We agree and will modify the instructions to be clearer in this area.

Miscellaneous:

5. Can a jurisdiction can estimate their annual Emergency Fund amount prospectively? For example, State Y has an interest in passing a \$100 million emergency welfare program for FY10. They would like to ask their state legislature for \$20 million and then request \$80 million in federal funding. Is this an allowable scenario? We're curious what the program staff thinks of this proposition.

Answer: With certain caveats, yes. First, the jurisdiction cannot request prospectively the entire amount for the fiscal year; it can only request funds for a quarter up to one month in advance of that quarter. Second, the jurisdiction needs to understand that it must in fact achieve the expenditure increase it estimates, or it would not end up being eligible for the full \$80 million in your example. Also, in making such a decision, the jurisdiction should realize that there is always a risk that the Emergency Fund could run out so there is no assurance that the full amount would be available even if it spent its share.