

**Title VI Webinar**  
**April 18, 2018**  
**SF-425 Reporting**  
**Speaker: Fong Yee, Administration for Community Living/ Administration**  
**on Aging (ACL/AoA)**

**Operator:** Good afternoon and thank you for standing by. And welcome to the Title VI webinar. Today's call is being recorded. If you have any objections, please disconnect at this time. Your lines have been placed on a listen-only mode until the question and answer session of today's conference. At that time, you may press star followed by the number one to ask a question. I would now like to turn the conference over to Tara Nokelby. Thank you. You may begin.

**Tara Nokelby:** Thank you. Good afternoon. And thank you for joining us today. My name is Tara Nokelby, and I will be facilitating your webinar. Today's webinar will be the SF-425 reporting from our speaker Fong Yee with ACL/AoA. There will be a question and answer session at the end of the presentation. At that time, you can press star one to open up your phone line. This presentation will also be recorded and posted on Older Indians at a later date. If you would like the presentation sent directly to you, please feel free to put your email address in the chat box on WebEx, and I'll get that to you as soon as possible. At this time, I will turn it over to our speaker, Fong. Thank you.

**Fong Lee:** Hi, thank you, Tara. This is Fong Yee of ACL, which stands for US Administration for Community Living Region 9 in San Francisco. Thank you again. So, let the show begin.

Some of the slides are repetitive from my last presentation on the 12th of last month, but please bear with me because I put in some new information in hopes that it won't bore you. So, on slide number 2, this is a picture showing the 2017 to 2020 Title VI grantees. So, we have 269 Part A grantees, 1 Part B grantee, and 237 Part C grantees. You might want to know, you always say Region 9. So, this is a map of the US Department of Health and Human Services, and we divided the entire United States into 10 regions. The blue one is Region 9, which includes California, Arizona, Nevada, Hawaii, but I am also responsible for Region 10, which includes Alaska, Idaho, Oregon, and Washington State. And there are three other Pacific Territories, America Samoa, Commonwealth of Northern Marianas Islands, as well as Guam, not included in this picture. But I also oversee their system. Now, we are on to slide number 4. So, this is a breakdown of the Title VI Parts A, B, and C among the regions. So, you can tell that I have altogether 141 Title VI Part A and Part B grantees, as well as 125 Part C grantees. Please don't let this intimidate you. If you have any questions, reach out to us, okay? I always have time for my grantees.

So, we are on to slide number 5. This shows the 2017 Title VI awards by regions. On the bottom, you will see the Part A in 2017. The total grants for the grantees was more than \$30 million, and then for the Part C in 2017, which started April 1, 2017 ended March 31st, 2018, was close to \$7.5 million, and the NSIP is close to \$3.7 million. So, how awards are determined? For the Part A and C are based on the numbers of eligible elders in your service areas from your grant application. So, in case you are going to renew your grant applications in 2020, make sure you have the correct numbers in your grant applications because that will determine what your future

three-year grant awards would be. And what about the NSIP? You do not have to send me any grant application for the NSIP award. The NSIP stands for Nutrition Services Incentive Awards. Below it is the formula. So, the total appropriation from the Congress divided by the total nationwide meal counts, and then plus your meal counts reported in previous year's PPR. Let me stop here for a second. I hope you are on ACL/AOA weekly update. Cynthia LaCounte, the Director of our Title VI program, she writes weekly updates in that updates whatever...So, I read this. So, she said, "Remember that your asset allocation is based upon the total meals that you served in 2016." So, ask yourself how many of you have not submitted the 2016 PBR's. If you have not, you are toasted. And ACL staff have been checking those numbers carefully, comparing them to your reported numbers from 2015 and contacting you with any discrepancies. So, I don't know how many of you have a call or an email from my colleagues, okay. But you have to have an explanation if the discrepancy is more than 10% between your 2015 and 2016 meal counts from your Part A Program Performance Report. And if you have not received any call, reach out to us. Explain to us. Because you are aware if anything happens in those reports. So, just let us know, so that we can put the documentation in our file. And then, you will be receiving the NSIP awards accordingly. However, please note that some of the NSIP numbers we are still working on. We cannot finalize it. But we already set a date, which will be this Friday. If you have been contacted to verify your meal count, please respond to us ASAP. We want to make sure that you have the correct NSIP award so that we can provide you a maximum reimbursement for your meals served. So, please take this as your top priority. And also, the other thing I would like to remind you, maybe several times before the end of this webinar, is to submit your PPR ended March 31st, 2018 by June 30th, 2018.

Let us move on to the next slide. So, you have received partial 2018 awards as of April 1st, 2018. That is a very long process since October 1, 2017 started the FY 2018. Well, we have not received the entire year budget until March 23rd, 2018. So, the bill was signed according to the circular 811 Office of Management of Budget under the White House has up to 30 days to appropriate the funds to each department. ACL released approximately 25% of the grant awards for Part A, Part B, and Part C by April 1st, 2018. The remaining 2018 awards will be released in about 6 weeks after the bill is signed. However, we are working very hard by our grants office in Washington, D.C. to finalize the numbers and then send out the notices of awards. However, as I mentioned previously that some of you have not submitted [unintelligible] PPR's ended March 31st, 2016. We are still trying to give you the last chance to finalize your meal counts. So, the drop dates will be this Friday the 20th and then we will be releasing the NSIP awards accordingly.

So, the next slide is Part A funding bands. As I mentioned, your grant awards are based on the numbers of elders in your service area. And the second column shows the 2017 funding band. The funding bands are from 50 elders to a hundred. How come there is no funding band for less than 50? Because that is in the Older Americans Act. You have to have at least 50 elders in your tribe or in your service area to be eligible to apply for the Part A or Part C grants. So, the minimum number, the magic number is 50. So, we base on the number of elders using a hundred as the grade. So, 50 to 100 and then 101 to 200 and so forth. And the last column is roughly about 25% of the funding level of 2018. So, you will see the final one when you receive your remaining awards.

Okay. Now, I can go on to slide number 9, and that shows the Part C funding band. It is also roughly 25% of the 2018 funding level. We are on to slide number 10. This is the notice of award. So, for those who sat on my call last week, you already know about how to read this notice of award. So, the date was April 1, 2017. That was the beginning of the three-year project period, April 1st, 2017 through March 31st, 2020. And when you received the grant award, you received a number. So, the first two digits is for this fiscal year. So, like three funding cycles before we decided to give you the same award numbers for that entire project period. So, the first two digits stands for the fiscal year. So, that will remain through the three-year project period. And [unintelligible] to be award number with...and XX stands for your state. If it is Alaska, it will be AK. If it is California, it will be CA. And the last four digits, T6NS, stands for Title VI Nutritional Services. T6CG stands for Title VI Caregivers' Program. And NSIT stands for NFIP for Tribes. So, on April 1st, 2017 we issued this Notice of Grant Awards. We call it sequence number 2017/1. While during 2017 it was the same situation as this current fiscal year because we did not get the entire year award timely. So, we had to send separate notices of awards. So, this was the first one we ever sent out in 2017. However, if you read down to the box below the grant awards number, you see that a budget period started April 1, 2017 ended March 31st, 2020, and the project period is the same because this was the first year of the three-year project period. So, the budget year and the budget period is the same as the project period. And for funding purposes, we break up the three-year project period into three budget years. So, each year you will receive funding for that budget year. So, we move down to the EIN number. EIN stands for employer identification number. And usually that has only 9 digits, but in PMS it has 12 digits. In order to fill the blanks, we put the number in front of your actual EIN number and then at the end we put A1 as your, to fill that 12 digits. And also, some grantees raised some questions regarding well the EIN number is incorrect. Unfortunately, you cannot change the EIN number during the three-year project period. So, once you complete your [unintelligible] grant application in 2020, you put your correct EIN number and put the remark that this is the correct EIN number.

Let us move on to the award action. Since we did not give you the entire year budget, so the award in action stands for the level that we award to you. So, the awarded action equals to the cumulative grant award to date because this was your first 2018 award. On slide number 11, so we issued the second award in 2017 on June 22nd. And the secret number changed to 2017/2. And the award on June 22nd under award action was \$54,100 and the cumulative grant award to date that equals to the previous award that you received on April 1st plus the one you received in this notice of award. So, the total award for 2017 for this grantee was \$107,430. Now, we move on to slide number 12. This is for the 2018 award that you just received earlier this month. The sequence number is 2018/1. And you see the budget period has been changed from April 1, 2018, and then it will also go through the end of the project period March 31st, 2020. The award this action, you will see oops, how come it dropped so significantly? Because it represents about 25% of the 2018 awarding level. The cumulative grant awards today, so you add up all the three notices of awards that you received since April 1, 2017. So, it comes up to \$133 thousand and change. And also, I strongly recommend you don't stop here. Once you see how much you receive, you say oh, that's it. No, please continue to the terms and conditions because they are very important messages we would like to share with you. So, this is the terms and conditions for Part A, Part B, and Part C. So, item number 4 already spells out your responsibility to submit a Program Performance Report annually. So, the first program report that you should submit

would be ended March 31st, 2017, and they are due by June 30th, 2018. And again, I have to emphasize the importance of submitting the PPR timely because that will affect your MSIP award next year. And also, item number 5 that spells out the submission date of your financial status report, SF-425, for the first year started April 1, 2017 through March 31st, 2018. The 425's are due by July 30th, 2018. Please read the first sentence. This grant action is issued as a supplemental award to the fiscal year 2017 grant, and it is effective April 1, 2018. So, that means while next year when you submit your 425's, you have to add up the first and second years' expenditures. So, these financial reports are cumulative. However, for you Program Performance Reports, you just report what you served in the past 12 months. I hope that it's clear for you.

And this is a continuation of the Notice of Award under remarks. It already spells out that this level is about 25% approximately based on the total current estimated total FY 2018. So, when we release the remaining 2018 Title VI Part A, Part B, Part C grants, then that will be your total awards. So, don't be intimidated by this 25%. There will be adjustments. And also, the NSIP will be awarded later. You did not receive any partial NSIP at this time. If you would like to contact the ACL staff, you can find our contact information on the second page of the notice of award. So, if you have any program issue, contact my colleagues who are the ACL program specialists or for the fiscal specialists the contact information is also listed in your notice of grant award. We have now released 2018 NSIP. So, I just bring up the 2017 NSIP award notice, and I would like to point out to you about the terms and conditions number 7 and 8. So, please read it. I highlighted in red that the NSIP money can only be used to purchase food. You cannot use that for meal preparation and it may not be used to pay for other nutrition-related services, such as nutrition education or for your local administrative costs. And also, in the Older Americans Act Section 3.11 b.4, it also stated that the disbursements shall only be used to purchase the domestically-produced food. So, you can only use the money to purchase the food, locally grown or processed. For example, I love to use this example, if you are going to purchase bananas, if they are from Hawaii, yes, you can use NSIP money to purchase. However, if the bananas are imported from [unintelligible], you cannot use NSIP money. You can use the Part A money to pay for those bananas.

Okay. And also, under terms and conditions number 8, the meal counts can only be counted once either by the Title VI program or, if you receive Title III money, and the money paid for that meal then you can only let the state report that meal count. You cannot be duplicated, reported by both state and Title VI. And also, you have to that meal qualified to be counted, you have to follow the Older Americans Act instructions. That means the meal served to the individuals who meet the service criteria in the Older Americans Act regulation cannot be means tested. That means if the person cannot provide like contributions, you cannot refuse or deny their service to that person. However, you can offer an opportunity for the participant to do a voluntary contribution.

Okay. So, now we have many questions about what the Title VI funds can or cannot be used. So, we are back to the fundamental cost principles. This applies to all the federal grantees, so not just the Title VI grantees. So, all the federal grantees are responsible for efficient and effective administration of federal awards, and also you are required to administer the federal funds consistent with agreement, program objectives, and the terms and conditions of the federal award. So, that's why I spend time to go over the terms and conditions of your notices of awards.

Please, read those once you receive the notices of award. And according to the Title 45 CFR part 75, the CFR stands for the Code for Federal Regulations. The cost should be allowable, reasonable, and allocable. So, it can be very boring and very detailed in the 45 part 75. If you have time, you can go online, read through it, and that will put you into sleep faster than what I am presenting here. So, what is allowable costs? The cost must be necessary and reasonable. And they have to be consistent with your own policies and procedures, and you have to treat them consistently with the other expenses. So, in plain English, so funds cannot be used as a match for another federal grant. Funds must not be used for activities the grant is funded for, must be used okay. Funds cannot be used to influence political activities. No lobbying using any federal money. You cannot use for personal gain through gifts or cash payments. And you cannot use for illegal activities or to purchase illegal product. So, if you look at those two pictures, you will see those are called [unintelligible]. So, which one is allowable? Which one is not allowable? I think it's very clear. And all the costs must be documented, so while it doesn't happen if the thing is not written down. So, make sure you have all the documentation.

Slide number 18. What is reasonable cost? So, again cost is generally recognized as ordinary and necessary to run the program according to your terms and conditions of the Title VI program. Also, you have to follow any restrictions. For example, the NSIP awards cannot be used for other purposes. So, that is the restriction. And also, you cannot deviate from your own policies and procedures to increase the award costs without a justification. Also, you cannot pay more for things than anyone else would be because you are using the grant awards. You are using the grant money, so you're okay I can pay higher cost than the regular cost. No, you have to treat the federal funds as your own money. So, you shop around. Buy the best quality you can afford, and also if you [unintelligible] ask for help if you don't know how much the product is. What is allocable cost? Allocable cost is the cost allocated to a particular federal award. It may not be charged to another federal award. There is one exception under Older Americans Act, you can transfer the Title III supportive services and Title III C, which is the Nutrition Services. Other than that, you are not allowed to transfer any money. So, you have to use your Title VI A or C money properly. And also, you have to use, like if you use your Title VI funds they need to have a direct connection to the Title VI activities. Again, this is very important because sometimes people are asking, "Oh, can we use the money to do this?" Well, I'll ask, "Are they related to the Title VI activities?" So, in case you have any item that an activity [unintelligible] multiple programs, you have to split the costs using indirect cost rate. You cannot just say, "Oh, well. We have some Title VI money left over, we can pay more." No, no, no. So, the indirect cost rate is the rate that your organization, the tribal organization has to process and obtain approval, usually through the Department of Interior. And we will honor that approved rate.

Okay. So, there are two kinds of allowable allocable costs. The first one is direct cost. So, those other costs can be identified. Specifically, with a particular award. That is according to the 45 CFR part 75. And the money can be assigned very easily with a high degree of accuracy. However, on the opposite side, if that cost cannot be identified specifically with a particular award, you have to go by the indirect cost rate. And again, this has to be applied by your tribal organization to the Department of the Interior. We do not ask for a copy of the indirect cost rate. However, if the rate is extremely high because I have seen rates as high as like 49%, then I will ask for a copy.

Now, let us move on. There's a short list of allowable costs. This is only a short list I put all together from the 45 CFR part 75. So, this is only a list that not limited to it. This is the unallowable cost. So, I want to point out that indirect cost for NSIP is no, no, no. And [unintelligible] construction. Title VI is not a construction grant, so you cannot use that to construct like a senior center or anything. You cannot donate, use our Title VI funds to donate to other organizations. You cannot use it for entertainment. You cannot use the money to pay for fines and penalties on behalf of your tribal organization. You cannot use the Title VI money to do fundraising. You cannot purchase goods or services for personal use. You cannot pay for interest or other financial costs. You cannot do lobbying. You cannot do public relations. And you cannot use the money for the under-recovery of costs under grant agreements. So, how do we find out, your auditor, would find out from the audit, and then if there is any unallowable cost or questionable costs that you cannot fully explain to us, then we will collect those monies from you.

Okay. So, now let us go to what are required services or activities for the Title VI. For the Part A and Part B, you have to provide nutrition services and supportive services, mainly information and assistance. For the Part C, there are 5 parts unless somebody else is doing it, like your tribal organization, if you have a health clinic or the IHS or the state are providing those services. Those 5 parts are information, assistance, counseling and training, respite care, and supplemental services. Okay. So, for the following slide for those fiscal people who say, "Why do I need to know this?" Yes, you do because, as I mentioned on the previous slide, the costs should be reasonable, allowable, and allocable. So, how can you tell? These several slides, I will put down the definition of what the services are, so any costs related to those services are allowable costs. So, for the meals, that is very straightforward. The meals provided to eligible persons at the meal site or congregant meal and they meet the Older Americans Act requirements. Those are allowable costs. Nutrition education. So, this is to promote better health by, like physical fitness, sensible nutrition, or nutrition-related health information. Yes, the expenses are allowable. Nutrition counseling that is provided by a professional like a dietitian or others. If you have like a health clinic, they can go there and then have individual advice and guidance, who are at nutritional risk. This is a continuation of the Part A, Part B services. Information and referral. So, when your Title VI program provides information to the individual, like what services is available in the community, link them to their services, and then follow up. So, any cost involved. Yes, allowable.

Outreach. If the tribes go out to the health fair, have a booth, and then reach out to the elders about existing services and benefits also by doing public announcements, public presentations, newsletters. Those costs are allowable.

Case management. This is to set up like activities to help the elders to access the need to develop a care plan and then follow up and do the reassessment as required. So, those are allowable costs related to the services.

Transportation. This is very simple. If you have a transportation to transport the elders from one point to another, like from the home to the meal site and then from the meal site to a drug store and then back home. So, those expenses are allowable costs.

Legal services. Not too many tribes have this such service, but in case your tribe provides legal advice, counseling, and representation by an attorney. Read the keyword, by an attorney or another person acting under the supervision of an attorney. Yes, that is allowable cost.

Homemaking services. So, if you have staff or you pay someone to help the elders to prepare meals, shopping for personal items, managing their finances, like paying checks, etc., then yes.

Personal care home health aide service. So, this is to provide assistance for the elders with eating, dressing, bathing, toileting, transferring in and out of bed, chair, or walking, or provide health-related tasks like check on the blood pressure or blood sugar and assist with personal care and cleaning and maintaining the house, managing money, or preparing meals.

Chore services. This is to help the elders to do some heavy tasks, like shoveling snow, chopping wood, carrying water, so the elders might not be able to do it themselves because of the age or their health, but these services may not be needed to be performed by some specialist, so that is allowable cost.

Visiting. That means your staff goes to visit the client at home, check on them or just call to check up. "Hey, how are you doing?" Those are allowable costs.

Family support. This is similar to like a family caregiving services, but family support might be just the family members. Just check on them. "How is the elder doing? How are you holding up?"

Ombudsman. This is a very limited service for the tribal grantees because that kind of service would be performed by a state certified long-term care ombudsman.

Health promotion and wellness. So, this is to promote the mental and physical health of elders, including walking groups, exercise classes, or other types of recreation and health education classes on healthcare and others. So, the assessment, that means you collect information of clients to determine if they are eligible for a service or not. Also, escort service. That means to accompany the elders to see a doctor or go to like a Social Security office to obtain like a Medicare card or other.

So, public information. This is to write or produce, or mailing the newsletters, etc.

Okay. So, now we are on to Part C services, and we know that there are lots of questions regarding use of the Part C money. It's not a big pot, but there are lots of questions about that. Part C services, please remember the Part C services, the caregiver services is mainly for caregivers. And the caregivers are unpaid, informal individuals who assist the elders. So, those 5 categories. Information. This is for the caregivers. The information for the caregivers also at the health fair or by newsletter. Access assistance. That means a service to provide information to the caregivers. What kind of information the caregivers may need, or service may be available for them, etc. And then follow up if necessary. And counseling. And this is to support caregivers so that they can make the decisions and solve problems when they [unintelligible] their caregiver roles. This can be done in a setting to individuals, support groups, or training. And a support

group that is led by an individual, a moderator, or personal professional to facilitate the...this kind of support group. So, it can be held regularly, by phone, by person, webinar, or you can do the caregiver group by training, education, and other topics. So, caregivers' training. And this will help the caregivers to perform their jobs, like relating to the health, nutrition, and financial management, providing personal care and communicating with healthcare providers and other family members. And supplemental services. And this one can be provided on a limited basis to caregivers, such as elders, children, adults with disabilities, people with a high-risk disease so that they can help them to do their work. So, like supplemental services may include lending closets, chair lifts, emergency response systems, incontinence supplies, home modifications, school supplies if the caregivers are caring for the children who are 18 or younger.

So, the respite services. This is the most asked about question. The services provide temporary substantive support or living arrangements for care recipients in order to provide a brief period of relief, or rest for caregivers. So, this may include in-home respite. So, that means someone will go to the elder's home to sit with the elders or to perform personal care, homemaking, and other in-home respite so the caregiver can have his own time for himself or herself to run out for errands. Or the respite could be provided by placing the elders at like a senior center or congregant meal site or like a nursing home for a very short period of time, so the caregivers can have some time of her own or his own. And also, for the grandparents caring for children. The respite can include sending the kids to the summer camps, to the daycare, just so the grandparents or the older caregivers can take some time off. Again, the respite care is for caregiver only.

So, time is running out, so I have to rush. And now we are really into the 425. Reporting timeline. This is for the financial status report SF-425. And you have to submit individual financial reports for Part A, Part B if you have it for Hawaii only, Part C, as well as NSIP. And now, the first 12 months of the three-year project period have passed, so the reports for April 1 through March 31st '18 are due by July 30th, 2018. And then, in July 2019, at that time, you should submit a 24-month cumulative 425 ended March 31st, 2019. And by the end of the three-year project period, March 31st, 2020, you have only 90 days instead of 120 days to submit your cumulative final 36-month FS-425.

Okay, report submission. We recommend our grantees to report, to submit the reports online. If you do not have access to our online reporting system, you can ask to set up your profile with Cecelia Aldridge or Lacey Vaughan with the phone numbers and email address provided on this slide. If you forget your id or password because you use it only once a year, contact your ACL regional office staff. If you cannot complete reports online, you may complete the paper report and send an email attachment or fax to the regional office. So, this is the link to our Title VI reporting system online. And the system had several computer glitches, but it's fixed right now. So, you can go online to submit your reports. Once you log in, then you will see the report status. I would like to spend some time to talk to you. If you see a gray P, it stands for report pending. That means nobody has touched it. And W stands for reports waved. We have not, or no waiver will be granted. So, that means don't even ask. E stands for the report has been accessed. You may save it. You might just have to submit 3 reports, but you have only done 1 or 2. So, it will show Edit. And F stands for you already submitted and waiting for ACL regional staff action. And if your report is approved, the status will change to A. So, once you log in to the system,



you will see the name of your tribe. And then once you click that plus sign, then it will show the screen of either SF-425 or PPR or both. It depends on your online profile setup. So, now you can tell from this slide that this grantee's SF-425 ended March 31st, 2018 and the PPR ended the same period of time are pending because the grantee did not go online to enter any numbers yet.

Okay. So, once you click on that P or report SF-425, you will see this slide, I mean this page, so make sure you click edit, because if you click view, whatever numbers you enter into the system can't be saved. So, it's a waste of your time, and we got so many panicked phone calls saying how come I cannot save my report? Because you picked the wrong button. You have to choose edit. And, I already put in some explanation in those boxes, so don't change it. That is generated by the system. This will show your up-to-date...it will show the grant awards, either for 12 months for the first year, 24 months for the second year or 36 months for the end of the three-year project period. And then, line E is federal share of expenditures. Since this is the first report ended March 31st, 2018, so you just put in the 12-month expenditures. There is formula set up for this report. So, whenever you put a number in line E, then it will automatically show if you have any money left on line 10-H. For the first and second years, we do not care too much about it because this is a three-year project period grant and you can use it within three years. In the past, grantees are asked to submit two documents. One is request to continue the grant. And the second it requests to carry over the unspent funds. While but since we give you the same grant award numbers, so you do not need to do anything. So, you just continue spending the money until the end of the three-year project period. And also 10-I is for the required match. But you can ignore it because the Title VI program has no match required. The 10-J that is for the non-federal share expenditures. So, in case you have any like tribal funds or tribal funds okay, not AAA funds. Don't put down any state money you receive under Title III into this program. No. Just report any funds from your tribal. We would like to tell the Congress the actual funds put into the program. And if you have voluntary contributions, put it into 10-L and you have to spend the program income before you request the funds from the payment management system. And also, you have to use the money contributed to the program to increase the services, that is the 10-N.

Okay. So, no indirect cost is allowed. And also, if your indirect cost, if you have difference in direct rates dealing on the reporting period, you can separate it, put in the remarks. So, on the item number 13 of the report. Put down the name of the person who completes the report. The contact information because we do not want to call your tribal chair whose name and email address or phone numbers show up on this report because your tribal chair may not know what we are talking about. I strongly recommend you to save your report every 5-10 minutes. But, if this report is completed, then you click Complete Report. And then now, it says submit report line button shows up when completed boxes are checked. If only two reports were completed check mark and one isn't, then that submit report button will not show up. So, once you click submit report, and then you may get a 404 error message. That is timeout. So, unless you save all your reports, you may not be able to bring back the data. Common errors. So, for the fiscal report, the second and third year fiscal reports are not cumulative. The notice of award already are put in the terms and conditions to remind you, but someone may not have read that part . So, indirect cost charged against NSIP. That is an error, and your final financial reports do not match the disbursements and/or cash drawdown from payment management system. So, some of you may have received emails from us telling you, "Hey, we are going to close out the grants, and

you have discrepancies. So, please take action on that." And reports are late or missing so that is also a common error. So, what is the consequence of delinquency report? No reports equals no money. So, that will affect your NSIP award, and we might suspend your grant awards. So, this is something new about the procurements because in the past, we just asked for two things. If you are going to purchase equipment or anything with a line item \$5,000 or more, that three [unintelligible] and also justification of purchase. But there is a third requirement. According to the executive order posted on the whitehouse.gov website, Buy American laws. Do not place order until you receive the written approval from ACL. So, what is Buy American Law? This is it, okay? The executive order was issued on April 18th, 2017 just happy anniversary today. The last sentence, that means you have to use the goods, products and materials used in the United States. Again, this only applies to the purchase of equipment with line item of \$5,000 or more. If you are going to purchase like a vehicle that is over \$5,000 for sure. But if you want to purchase some food, the line item would not be \$5,000. For a bag of potatoes \$5,000? No, I don't think so. So, what you can show to us accompanying your bid and your justification is to ask your vendor to put assurance saying that yes, this vehicle is manufactured in the United States. We do need to see something that is new and make sure you do that.

So, equipment management system. I'm not going to go through this. I just want to mention to you. People always get confused, "Oh, I already submitted our PMS reports. How come you're still asking me for ACL reports?" Because we do not interchange reports, we do not share, and also PMS request 4 reports a year and ACL reports only once a year. And you have to submit those reports separately, either to PMS.pfc.gov or to ACL website. Okay. So, this is the new look of our Payment Management System, PMS. I'm not going to go through this. However, pay attention because PMS is closing the 2013 awards. You should have received emails from your fiscal specialist or program specialist of ACL telling you that it's a discrepancy, so you have to act on this because PMS will close those accounts by September 30th, 2018. So, this is what you should do for the closeout. If you have money to draw down because you reported more expenditures, then, it's time for you to do it. But in case your expenditures are less than your draw down, then you have to return the funds. This is the draw down process. You have been through this since 2013. But that's no big deal. The resources and coming soon, just wanted to invite you to the 40th Anniversary National Conference in Washington, D.C. August 13th to 16th. And we should have a tentative agenda early in May, and also, we are beginning plans for our 2018-2019 cluster training. So, watch out for the dates and locations. For the national conference this year, it will be in Washington, D.C. Before you pack for those national conference or cluster training, you have to submit your reports. So, Part A, Part B, and Part C Program Performance Reports ended March 31st, '18 are due by June 30th, and the 12-month SF-425 are due by July 30th, 2018. I know there are several fiscal people on this call, so I would suggest that you work with the Title VI program directors. Please, reach out to them or the Title VI directors reach out to you. Please, make the connection, meet with them maybe every month to go over the budget, to go over the expenditures of the Title VI program, so the Title VI directors know how much money is still available. And also, make sure all the Title VI awards are fully obligated by March 31st, 2020, the end of the three-year project period. You have an additional 90 days to liquidate the obligations and submit the 425 and also for the Title VI directors submit your PPR's timely. If you have any questions, keep in touch with the ACL program specialists and/or the ACL fiscal specialist.

So, this last slide shows the contact information for the [unintelligible] offices, as well as the fiscal specialists for the ACL regional offices. So, please feel free to reach out to us. We are here to help you. We are here to answer your questions, so that you can run a successful Title VI program. Don't be afraid of us, okay? We are not scary. I am so sorry I don't have time to answer any questions, but you can send, reach out to us if you have additional questions or I talk too fast, you don't understand me, by all means reach out to us. So, Tara. My apologies. Please take over.

**Tara:** No worries. Thank you so much, Fong. And thank you, everyone, for attending. Again, if you would like the presentation sent directly to you, please put your email address in the chat box on WebEx or you can email me. And thank you again, and we will all talk to you guys next month.

**Operator:** And thank you. This concludes today's conference call. You may go ahead and disconnect at this time.