

## **Federal Aid Coordinators Working Group Report**

**to the**

**Trust Fund Committee, 03/13/2020**

### **Grant Solutions**

Grant Solutions is a significant concern for the Federal Aid Coordinators Working Group (FACWG) and Federal Aid Coordinators (FACs) in the next year. One of the concerns is about duplication of effort between TRACS and Grant Solutions and the increased burden on state FACs. The go live date for Grant Solutions is April 17, 2020.

### **TRACS**

The TRACS Enhancement is still a concern for the Federal Aid Coordinators Working Group (FACWG) and Federal Aid Coordinators (FACs) however, the alpha testing went well and there was a lot of positive feedback as to how well the system performed. The Working Group is anticipating the results of the upcoming beta testing.

### **Alpha Testing**

Last spring staff from the states and from the service participated in alpha testing. Overall, the system was intuitive and easy to use and there were lots of positive comments from the testers. The time to enter a project was significantly faster than the original version. Overall there were 395 suggestions that were submitted to the development team. A majority of these suggestions were implemented or identified for future development once the system goes live.

### **Beta Testing**

- Beta testing will occur April 1-30, 2020 and the FACWG has identified the number of testers that will represent their states.
- The purpose of beta testing is to identify any fatal flaws that would impact the release of the system.
- Each state will have one or more administrators responsible for assigning groups and roles in the system
- Comments that are received may not be addressed prior to the release but will be set aside for later development.
- The system will be a fully functional system available for testing.

### **Upcoming System Testing Schedule:**

- At the time of this report, the TRACS testing, training, and development schedule is anticipated to proceed as follows:
- July 2020: The TRACS WG will hold a Training Workshop in Denver available to a select number of Federal Aid Coordinators and Project Leaders in conjunction with the launch of the fully functional TRACS Enhancement.
- July 2020: TRACS Enhancement Training through Distance Learning for fully functional system. This training will be available indefinitely for relevant audiences.

### **TRACS Timeline Update from WSFR:**

- TRACS Preview for States – March 11-13, 2020
- Beta/Fatal Flaw Testing – April 1 -30, 2020
- TRACS Release Date – June 15, 2020
- Roll-out Training – June 15-Sept 4, 2020
- TRACS Training Workshops (in Denver) July 21-22, 2020
- TRACS Working Group Meeting – July 23-24, 2020
- State’s Acceptance Vote – September 16, 2020
- State Hand-off – October 1, 2020

### **Progress in Development:**

- As of January 2020, the system can now complete a grant proposal, attach FBMS award, approve project statements, create an amendment and report on objectives.
- By March the Land and Facilities module will be complete and available for beta testing.
- The TRACS Working Group worked on completion of the final business requirements at the meeting in Denver in January 2020.
- A few issues still remain such as how the system will handle multi-year grants at the reporting level, but these do not affect the go-live date and will be addressed in later development.
- For multi-state grants it was decided that the lead state would be responsible for the submission in TRACS.

### **Land and Facilities Module**

- SF429 and DOI Requirements: On March 21, 2019, the Department of the Interior “Financial Assistance Interior Rule” was published in the Federal Register (RIN 1090-AB19). Among other matters, this rule proposed a requirement for grant recipients use the SF429 for all grant actions related to land, facilities, and capital improvements. The TRACS land and facilities modules were developed with the

intention of providing an alternative method for collecting the information reported on the SF429 in a streamlined fashion. On August 30, 2019, the Final Rule was published in the Federal Register. It is still unclear if the land and facilities modules will be deemed an approved alternative to the SF429.

### **Legacy Land Records**

- TRACS will need to be seeded with legacy records soon after release but an exact date has not been established.
- There was discussion at the January 2020 TRACS Working Group meeting about having the USFWS staff entering an abbreviated amount of data to seed the system and then states would be responsible for entering the remaining data.
- There are 9 fields that were agreed upon for Land Reconciliation that already exist in the system: Award number, Facility/Area/Property Name, County, Grantor/Seller/Vendor, Federal Grant Number, grant program, Type of Interest, location information, and Acquisition date.
  
- **FACWG Concern:** The FACWG is concerned that if TRACS is not approved as the alternative to the SF429, states would be required to report both on the SF429 and in TRACS essentially doubling the workload for reporting. While the FACWG recognizes the potential beneficial role that these modules will have in reducing reporting requirements for lands and facilities, there still remains some anxiety about the additional burdens being placed on the States. Given that the responsibilities for TRACS data entry and management within States oftentimes fall solely on the FACs, these perspectives are of crucial importance to the acceptance and engagement in the TRACS Enhancement. Based on what states have seen so far it appears to be developing well and we anticipate the release of the working version of the modules during beta testing.  
The FACWG is also concerned about the uncertainty of the workload required to enter the remaining land records into the system.
  
- **FACWG Recommendation for Land and Facilities Modules:** The FACWG is supportive of collecting information through the land and facilities modules if the following conditions apply:
  - 1.** The SF429 becomes the requirement for all land, facilities, and capital improvements funded through WSFR Grants.

2. The land and facilities modules are an approved alternative to the SF429.
  - a. However, if the Land and Facilities Modules are not an approved alternative, the FACWG recommends that the WSFR Partnership revisits the need and utility of the land and facilities modules.
3. The timeline for entering legacy records is reasonable so as to not overburden the FAC's right after the deployment of a new system.

### **TRACS Conservation Viewer:**

- The purpose of the Viewer is to communicate the excise tax return on investment to the industry and investors, report the results of conservation activities, and to provide success stories of the WSFR partnership.
- The Viewer would provide information at a high level and could be reported at the national, regional, and state level.
- The Viewer would not only provide reports for PR and DJ grants but SWG as well.
- The state narrative page would give the states the opportunity to tell their stories and would provide contact information for industry to find out more detailed information from the states
- The TRACS matrix has been sent out to Industry to prioritize the fields that were important to them so that the reports can contain information that is useful.
- The Viewer is still about a year out since the focus is to finish development of the system.

### **TRACS Communications:**

- The FACWG and TRACS WG have worked to develop a communication strategy to ensure transparent dissemination of information regarding the activities of the TRACS WG and to share progress updates for system developments that will impact end users of the TRACS Enhancement. This communication was first used after the January 2019 TRACS WG meeting to share highlights and decisions points from the meeting.
- Future communications will include results and process from Beta Testing, and other pertinent topics during testing.
- The FACWG anticipates continued coordination with the State members of the TRACS WG to ensure streamlined sharing of information as the rollout of the TRACS Enhancement approaches. The FACWG welcomes suggestions on ways to improve communication among the States as the TRACS Enhancement rollout approaches.

### **FACWG Recommendations & Requests:**

The FACWG has several recommendations and requests regarding the TRACS Enhancement. Several of these concerns are ongoing for FACs nationally and have been raised to the TFC in previous reports:

1. The FACWG wishes to stress the continued importance of training materials and guidance from the TRACS WG and WSFR be provided to States – both in anticipation of the initial rollout and to address what will undoubtedly be significant challenges facing both States and WSFR Regional Office Staff.
2. The FACWG recognizes that the purpose of TRACS is a WSFR-funded grant performance reporting platform and that Grants Solutions will be the grant management system. However, there appears to be some duplicative effort in reporting performance between the two systems. The FACWG would like the Service to minimize the effort needed to submit performance reports. It is our desire that TRACS is the reporting tool and Grant Solutions is developed to talk to TRACS to obtain final performance reports.
3. As noted in a previous report to the TFC, in the interest of the State-WSFR Partnership, the FACWG requests that WSFR convene a review team comprised of State and WSFR staff after a full grant cycle has been completed in the TRACS Enhancement to address any problems that have arisen with the functionality of the TRACS Enhancement.
4. The FACWG would like to stress the importance of having TRACS be the alternative to the SF429's for lands reporting. To report on the SF429 and in the TRACS modules will be overly burdensome to the states.

### **2019 FACWG Action Items:**

- The FACWG will remain engaged and encourage FACs to remain vigilant in watching for these notices and to comment when appropriate.
  - In the coming year, the FACWG anticipates significant effort among the States and Regions to consider the impacts on the Federal Aid Program in States and the overall impact to the State-WSFR Partnership.

#### **I. Real Property Chapters**

The new service manual chapters on real property (520 FW 6 – Real Property Overview and 520 FW 7 - Real Property: Valuation, Negotiation, and Acquisition) were released, with an effective date of December 4, 2019.

The chapters were reviewed following the publication of the *Financial Assistance Interior Rule* (FAIR), 2 CFR 1402 (84 FR 45627, August 30, 2019). Changes were made to the chapters to align with the FAIR. Primary areas where changes were made include:

1. All appraisals initiated under a financial assistance award that is issued or revised on after October 29, 2019 (FAIR's effective date), must conform to the Uniform Appraisal Standards for Federal Land Acquisitions (UASFLA or Yellow Book). The date of issuance or revision of the award is the date the award or the revision of the award is signed by an authorized Service official.
2. Some definitions in 520 FW 6 are added, revised, or deleted to ensure a common understanding of the most important real property terms.
3. Qualification standards for appraisers and review appraisers are adjusted to reflect the FAIR.

**FACWG Concern/Request:**

It is important for State personnel that manage real property under WSFR awards to read and understand the chapters. WSFR will offer several training opportunities over the coming year to assist the Service, States, and appraisers in understanding and implementing the chapters

## **II. Rule Revisions**

### **50 CFR 80 Revisions**

The Final Rule of the updates to 50 CFR 80, originally posted in December 2017 (82 FR 59564), was published in the Federal Register on August 27, 2019. The most significant updates included license certification requirements, use of program income, and updates to eligible activities.

### **2 CFR 200 Changes**

Per OMB, the proposed 2 CFR revisions reflect the foundational shift outlined in the President's Management Agenda (PMA) to set the stage for enhanced result-oriented accountability for grants. This guidance is the beginning of the Administration's pivot towards actions geared to focus on improved stewardship and ensuring that the American people are receiving value for money spent on grant programs. The proposed changes were published in the Federal Register on January 22, 2020 and comments are due on March 23, 2020.

**FACWG Concern/Request:**

The FACWG understands that some of these proposed changes have come from other sources but changes seem to be occurring at a very fast pace, with no advance notice. However, if WSFR intends to move forward with revision to other regulatory revisions in the future, the FACWG requests that WSFR engage with the States early in the proposed revision process to avoid confusion and frustration.

### **III. JTF Issue Identification**

- In January 2019, WSFR distributed a memo detailing a proposal that identifies a process to bring issues to the JTF for consideration at future meetings. The intention is to formalize the issue identification process and append it to the JTF charter.
- The proposed process would require the FACWG to review issues brought forth by the February 15<sup>th</sup> deadline at the Spring Meeting of the WSFR Chiefs and FACWG.
- The FACWG appreciates the opportunity to engage with the JTF in this process and hopes to provide a unique perspective as day to day practitioners of the Federal Aid Program in the States.

#### **FACWG Request:**

The FACWG is requesting approval of the bylaws, which have been updated to include the proposed process for the review of issues presented to the JTF.

### **IV. FACWG/WSFR Meetings and Invitational Travel**

The FACWG appreciates the continued invitation from the JTF to have the Chair and Co-Chair of the FACWG attend the spring and fall JTF meetings. We believe this is an important way to facilitate ongoing communication between these groups now that JTF meetings have been separated from the WSFR Chiefs/FACWG meeting. The request for FACWG engagement in the JTF Issue Identification process will further strengthen the communication and relationship between these groups (see Section VI above).

#### **FACWG Concern/Request:**

- Invitational Travel: With the potential increase in administrative funding, the FACWG hopes invitational travel will be considered again. Based on a given FAC's ability to find funding for travel using State funds, it may not be possible for the FACWG to fully participate in these annual meetings as expected. While the FACWG understands the budgetary constraints currently facing the WSFR Program, we believe that continued attendance at these meetings is an important component of conveying the perspective of FACs directly to the State Directors and WSFR Leadership. Without the ability to attend these meetings, the FACWG has concerns that the perspective of the Federal Aid Coordinators, who deal with the day-to-day administration of these programs, will be lost, and thus, support to WSFR programs may also suffer.

### **V. CAHSS Technical Advisory Committee**

Tammy Brooks (Region 2/Unified Region 6) will serve as the FACWG representative on the Technical Advisory Committee to the Council to Advance Hunting and Shooting Sports (CAHSS). There has been no committee activity since fall of 2018 when the committee

reviewed the annual CAHSS report. It is anticipated that the committee will review the next CAHSS report in the fall of 2019 and continue to work towards incorporating past recommendations.

**2019 FACWG Action Items:**

There has been no activity to report.

**VI. Communication**

The Communication Protocol for relaying high level information from WSFR to the States continues to facilitate communication and increase transparency. The FACWG strongly supports the continued use of this communication strategy for all WSFR-related policy level communications.

The FACWG has continued to facilitate the flow of information between various groups by:

1. Holding FACWG conference calls to discuss matters of importance to Federal Aid Coordinators (FACs).
2. Corresponding via email amongst the FACWG regarding current topics of interest to FACs.
3. Disseminating FACWG reports and meeting minutes to the regions and State agency counterparts.
4. Continuing liaison roles to various WSFR-related working groups including:
  - a. TRACS Working Group – John Seabourne (Regions 1, 7, 8);
  - b. CAHSS Technical Advisory Committee – Julie Kempf (Region 3).

**2019 FACWG Action Items:**

The FACWG will continue to facilitate the communication of important matters to their respective FAC counterparts through continued participation in other working groups and engagement with WSFR staff. We anticipate frequent communications in the next six months regarding the TRACS Enhancement and forthcoming regulatory revisions.

## Other Matters

### *FACWG Membership:*

The current FACWG Roster as of 02/1/2020 is:

Region 2: Tammy Brooks; Chair (TX)

Region 5: Chris O'Bara; Vice Chair (WV)

Regions 1,7,8: John Seabourne (OR)

Region 3: Heather Kieweg (MN)

Region 4: Paul Wilkes (KY)

Region 6: Adam Brooks (MT)

Detailed contact information for each member is attached to this report.

The following members will be choosing shadows this year:

Region 2: Tammy Brooks

Regions 1,7,8: John Seabourne

The following groups have formal representation through the FACWG:

TRACS Working Group: John Seabourne

CAHSS Technical Advisory Committee: Tammy Brooks

50 CFR 80 Scheduling: Vacant until further notice

5-year Report: Vacant until further notice