

EXECUTIVE OFFICE OF THE PRESIDENT OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, D.C. 20503

June 28, 2024

CA-24-2, Reminder of New Requirements for 2024-2025 Assistance Listings Updates

Controller Alerts are designed to highlight emerging financial management issues that may require agency attention or action. These Alerts are intended to inform the Chief Financial Officer (CFO) community and Financial Assistance Community of key issues where the Office of Management and Budget (OMB) believes further action may be warranted, but do not constitute official guidance or prescribe specific tasks for agencies beyond consideration of appropriate steps to address the issue.

The purpose of this Controller Alert is to remind agencies of new Assistance Listing reporting requirements that further implementation of the Federal Program Information Act (Pub. L. 95-220, as amended, codified at 31 U.S.C. 6101-6106); and the Metropolitan Areas Protection and Standardization (MAPS) Act of 2021 (Pub. L. 117-219).

One Program per Assistance Listing

On April 4, 2024, OMB issued Memorandum M-24-11, "Reducing Burden in the Administration of Federal Financial Assistance," which communicated the requirement that, for each newly authorized Federal financial assistance program, each Assistance Listing should align with only one program. For all existing Assistance Listings, agencies must identify where multiple programs have historically been included in a single Assistance Listing, and, where appropriate and in consultation with relevant congressional committees and stakeholders, create a separate Assistance Listing for each program. This guidance will improve transparency of program spending and outcomes through the new Federal Program Inventory (FPI)¹, a comprehensive online tool that allows the public to access and search critical information about all programs that provide grants, loans, or direct payments. The FPI uses Assistance Listing data as a foundation. By combining Assistance Listing data with additional data sources, such as financial information from USASpending.gov, the FPI can present a comprehensive picture of programs. Ensuring that each Assistance Listing represents one program. is a critical step in connecting historically desperate data sources to present an increasingly comprehensive picture of programs. In accordance with M-24-11, agencies must create and maintain one Assistance Listing for each newly authorized Federal financial assistance program. Agencies must also review their existing Assistance Listings to determine if any include more than one program. Where Assistance Listings including more than one program are identified, agencies must work with OMB and their congressional partners to ensure each program is assigned to one

¹ The Federal Program Inventory is available at https://fpi.omb.gov/.

Assistance Listing. GSA's annual Assistance Listings data call includes guidance on how to identify a single program.

Core-Based Statistical Areas (CBSAs)

As discussed in <u>OMB Bulletin No. 23-01</u>, OMB delineates Core-Based Statistical Areas (CBSAs) for use in Federal statistical activities. OMB recognizes that agencies may use the CBSAs for non-statistical purposes, but recommends only doing so upon full consideration that OMB does not modify the delineations to meet the requirements of any non-statistical program. The MAPS Act of 2021 requires agencies to identify in their Assistance Listings whether CBSA delineations are used under a program. Specifically, Assistance Listings must address:

- (1) whether the most current CBSA delineation has been affirmatively adopted pursuant to section 31 U.S.C. 6309;
- (2) which historical CBSA has been maintained, in cases where an updated delineation has not been affirmatively adopted pursuant to 31 U.S.C. 6309;
- (3) what purpose the CBSA delineation serves, including—(A) to determine eligibility for any Federal service, benefit, or funding; (B) to determine distribution of any Federal service, benefit, or funding; and (C) any other standardized category of purpose determined by the Director;
- (4) whether the use of CBSA delineation directly concerns any—(A) prime recipient of any Federal service, benefit, or funding; and (B) subrecipient of any Federal service, benefit, or funding; and
 - (5) the date when the information collected was last updated.

Item (3) should include consideration of whether the CBSA serves a statistical purpose (e.g., used in statistical programs and policies) or a nonstatistical purpose (e.g., used to determine recipient or subrecipient eligibility). The Act requires that the aforementioned information be "easily discoverable" through searches and updated not less frequently than once every year. The Act also requires the information to be available by December 4, 2024. OMB will add relevant questions to the agency Assistance Listings template. OMB is extending the Assistance Listings reporting cycle beyond the end of the fiscal year to accommodate these and other reporting changes. Please consult as necessary with agency managers who are familiar with the use of CBSAs for the program prior to completing the questions in the template.

Financial Information Check

The FPI aggregates financial information from several sources, including Assistance Listings. To capture the most up to date financial information for each Assistance Listing, including actual obligations for the previous and current fiscal years, the Assistance Listings reporting cycle will now run on a calendar year, rather than a fiscal year. As a part of this change, agencies will update their obligation data closely following the end of each fiscal year. GSA's 2024 Assistance Listings data call describes

additional details on this change in the "Submission Process and Deadlines" section. Please note that if an Assistance Listing has no obligations in the current fiscal year and is ineligible for archiving (see criteria below), agencies should enter a \$0 amount in the Fiscal Year 2024 obligations field and explain in the listing narrative why the funding level is "\$0", e.g., program offers non-financial assistance, no new awards made but existing projects are still active, etc. For any past fiscal year, if the agency reported \$0 in obligations to SAM.gov but not to USAspending.gov, the agency should make an effort to identify and if appropriate, resolve the discrepancy.

Archiving Inactive Listings

Agencies should closely review and update all their respective active Assistance Listings. Assistance Listings provide vital context to key stakeholders including, but not limited to, applicants, agencies, and the oversight community, who make decisions based on that data. Agencies should archive listings for programs where no more awards will be provided, and no future expenditures by a non-federal entity will occur, i.e., listings which are no longer active. For listings where no more agency assistance or awards will be provided, but entities are still reporting expenditures, the assistance listing should remain active, and the agency must explain this in the listing description, e.g., "Program is no longer making new awards, but funded projects may still actively report expenditures." Once archived, Assistance Listings will be unavailable for use in government-wide systems such as Grants.gov and USAspending.gov. Archived Assistance Listings can be reactivated; to do so, the awarding agency should contact the Federal Service Desk. Once an Assistance Listing is archived, the detailed information for the Assistance Listing is removed from the public view in the Assistance Listings; however, the historical record of the listing can be searched and displayed for reference. In addition, if future funding becomes available, the Assistance Listing can be restored to an active status. The Assistance Listing number of an archived Assistance Listing title will not be reassigned to another Assistance Listing.

Submission Process and Deadlines

As noted previously, the timeline for collecting Assistance Listings is changing from fiscal year to calendar year to facilitate changes in reporting requirements. The SAM.gov submission deadlines will be as follows:

ACTION REQUIRED	TIMELINE
Update agency SAM.gov	As needed throughout the year
account to reflect agency user	
roles and permissions	
Submission of Assistance	At least one month before
Listings for <i>new programs</i>	requesting applications and
	proposals
Submission of <i>updated</i>	By no later than November 15,
Assistance Listings	2024
Submission of actual	Between October 1, 2024 and
obligation data for FY 2023	November 15, 2024
and FY 2024	

Archiving inactive programs	By no later than November 15, 2024
Submission of agency plan Assistance Listing plan described per M-24-11	By no later than November 15, 2024
Submission of a <i>new</i> Assistance Listing for each program combined with another program in a single Assistance Listing	Per timeline in agency plan submitted to OMB (See M-24- 11)

Agency managers who are involved with the Assistance Listings process are encouraged to share the information in this controller alert with managers who are most familiar with management and delivery of assistance programs reported to SAM.gov.

Additional information will be provided to agencies through GSA's annual Assistance Listings data call.

If you have any questions regarding this Controller Alert, please email OMB's Office of Federal Financial Management, <u>MBX.OMB.OFFM.Grants@OMB.eop.gov</u>.

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