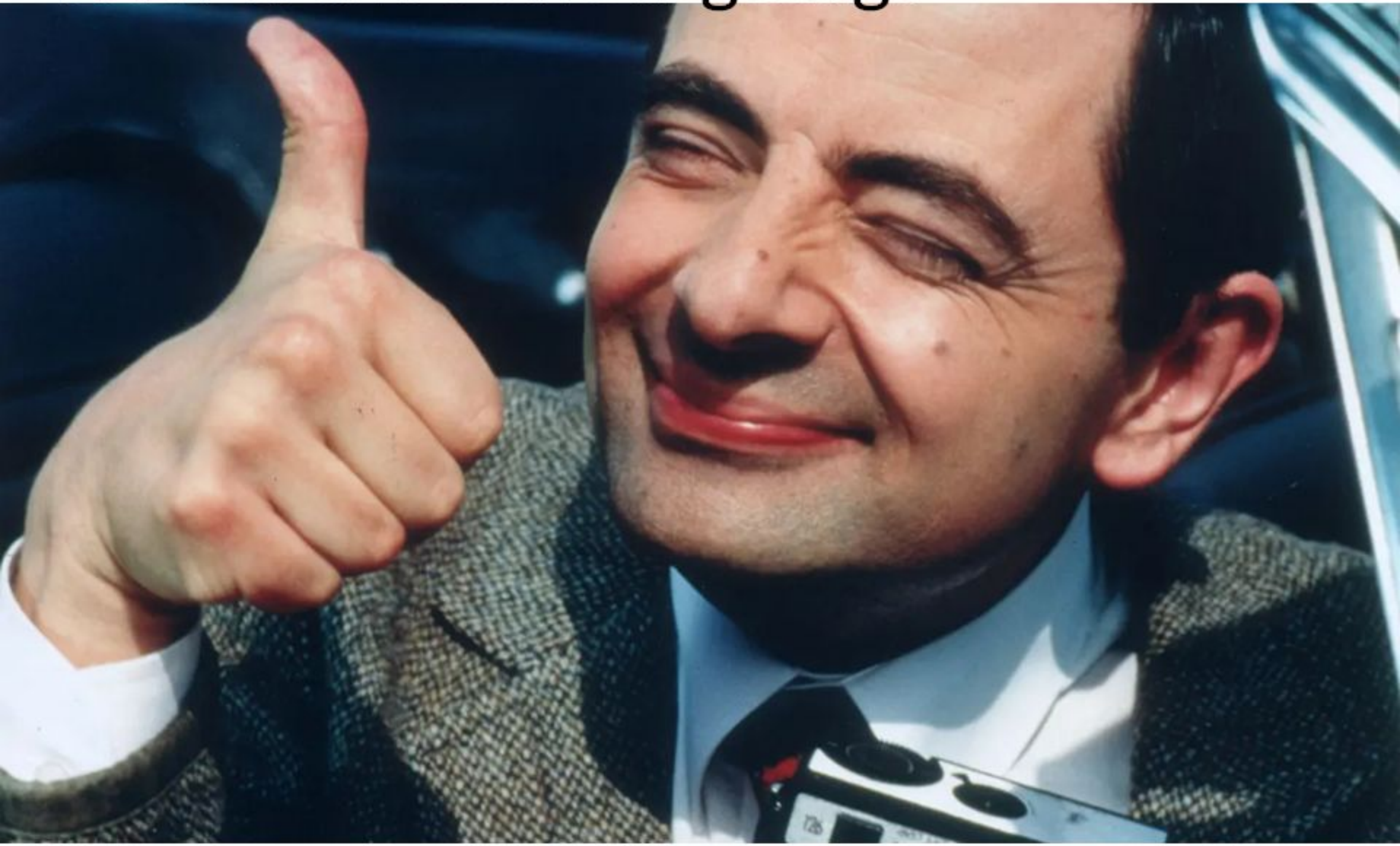
U.S. General Services Administration

The Importance of the Pre-Review Process

presented by

Kevin Murphy

How is the review going?



Great! I haven’t slept in 3 weeks and now I can hear colors and see sounds!

Purpose of the Review

- Ensure Compliance with Federal Regulations and State Plan of Operation
- Minimize risk
- Fulfill the Donation Program Mission
- Help the state agency improve its ability to run its Donation Program
- Remind the state that we are partners in this relationship

Purpose of the Pre-Review

- Provide assistance to SASPs to prepare for upcoming review
- Define expectations and timelines
- Obtain as much information as possible so that a significant portion of the review can be completed prior to the actual review
- To prepare Personal Property Management (PPM) associates to conduct the review
- GSA wants to:
  - Understand any significant operational changes since the last review
  - Review prior review deficiencies highlighted/discussed in the spirit of continuous process improvement

Getting Started

The state agency director must be contacted to establish the review date and time

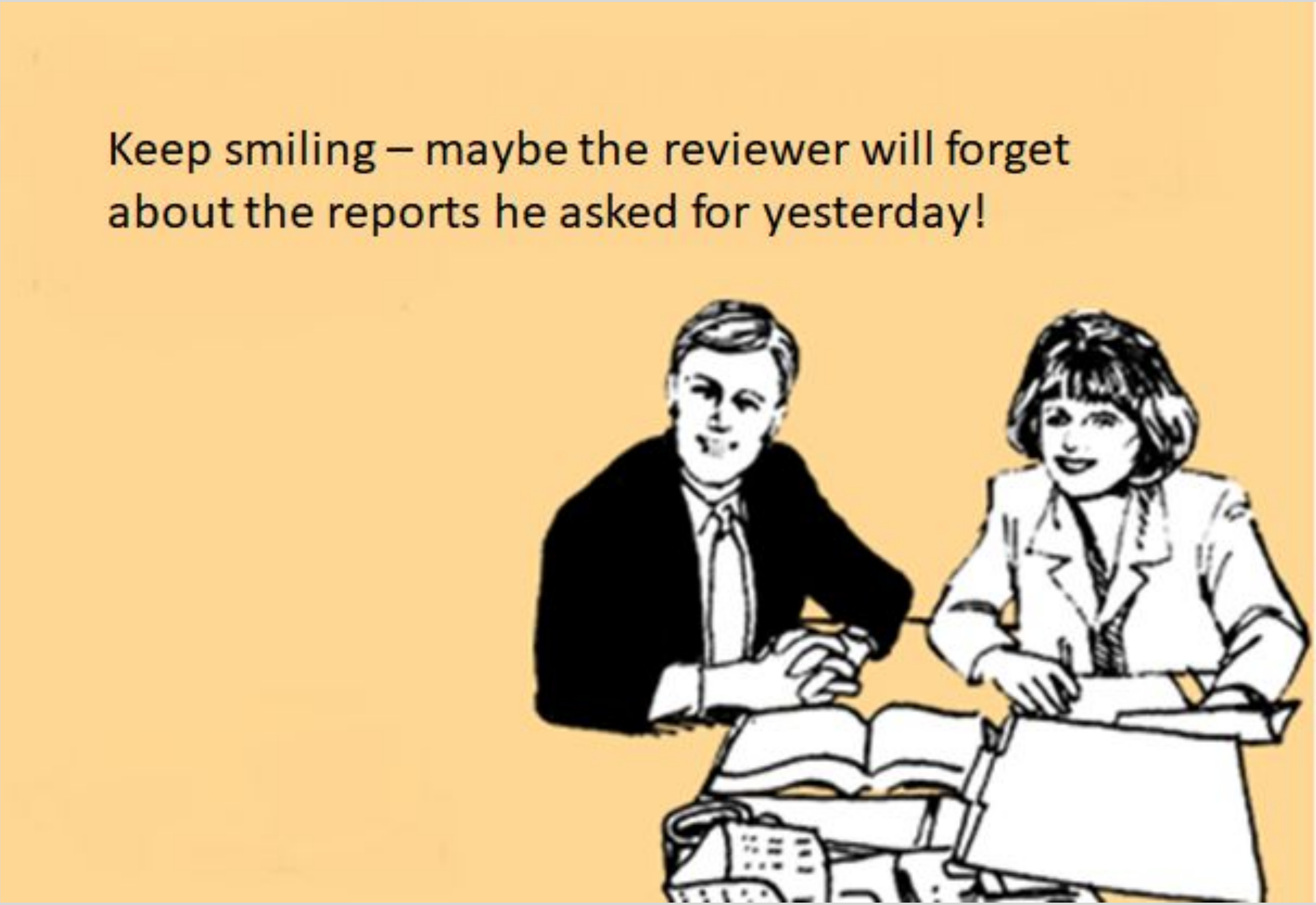
- Allow sufficient time to collect information and review prior to the review date
- Only request information that you can truly use prior to the review
- Complete as much preparation work as possible
- The more you do now, the less you will you have to do later!

Seven Desired “Reviewer” Traits:

1. Be a Relationship Builder
2. Be Detail-Oriented
3. Be Inquisitive
4. Be Organized
5. Be Familiar with Donation Program Regulations/Guidelines and State Plan
6. Be Familiar with the Prior Review Findings and Corrective Actions
7. Be Reasonable with Assessments

Seven Desired “Reviewee” Traits:

1. Be Familiar with Prior Review Findings and Corrective Action
2. Be Familiar with Donation Program Regulations/Guidelines and State Plan
3. Be Accessible and Cooperative
4. Possess an Organized Filing System
5. Document, Document, Document
6. Look for Collateral Benefits
7. Assume Positive Intent


Keep smiling – maybe the reviewer will forget about the reports he asked for yesterday!

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State Agency Review Checklist

presented by

Greg Flores

Evolution of State Reviews 1989-2021

- Reviews were done every 2 years
- Req’d small written summary for each review elemen initially
- Report further developed in Region 5
- Created a simple list of questions and folders for each element
- All questions were rewritten & placed into yes/no format in early 90’s
- Added sample requirements & recommendations in mid 90’s
- Added sample attachments including a SF123 and eligibility grid in late 90’s
- Created “Big 4” approach- 2/4 yrs- ‘97
- Impacted by OIG audit reports
- Poor post review follow-up & inconsistent reports amongst regions

- Reviewed every review question, requirement, recommendation and attachment
- Merged overlapping review elements
- Added new standard attachments
- Established process to monitor post review efforts
- Established format for SASPs to follow when responding to report requirements
- Created instructions and best practice list for regions
- Created Low Volume/Inactive SASP review template
- Created self-certification statement
- Shaped Dynamic Review process.

What Is The State Agency Review Checklist?

- Document used to process a state review from start to finish.
- Contains:
  - Instructions for the review team
  - Best practices
  - Pre-review checklist
  - Guidance for conducting entrance and exit interviews
  - Sample correspondence between GSA & the SASP
- Briefly demo REVIEWCKLIST12.DOC

Instructions

- Contact SASP to set review date. Send formal letter/email sent at least 45-60 days in advance to confirm dates, provide other details, and request information using the "Pre-Review Checklist".
- Notify GSA's Office of Civil Rights (OCR), so that OCR may perform its survey.
- Prepare file folder for each review element. Collect needed documents, other work papers, notes, etc. and place in appropriate folders to keep information organized and save time during review. Suggest team leader assign specific elements to each team member.
- Many items on "Pre-Review Checklist" can be used to complete areas of review report template and its attachments. This will conserve precious resources and enable the review team to focus on areas of greatest need and importance.
- To be eco-friendly and improve our efficiency when performing reviews, it is suggested the review team embrace an electronic method for recording and sharing review information.
- Review reports should be finalized and distributed no later than 30-45 days after completion of the actual review.
- All regions shall require SASPs to provide a written action plan for every requirement noted in the review report.

A Thought To Ponder….

"Being organized and prepared before you do something, prevents you from mucking things up and leaving behind a pile when you finally do it! " **- G. Flores**

Best Practices

- Prepare, prepare, prepare, organize, organize, and organize. Regions most prepared and organized when performing reviews, typically generate the most efficient and effective review reports.
- Maximize use of pre-review checklist and self-certification template to answer as many of the review report questions as possible before the review. The questions and areas in the review report template and its attachments that are highlighted in “yellow” may be addressed and finished prior to the review.
- At minimum, initiate completion of review report attachments for SF123s, 3040s, profit & loss and eligibility.
- Utilize an URSA query to generate a listing of items actually allocated in GSAXcess to and select items from the output for use in completing the SF123 attachment.
- Arrange work/desk space for review team members. While this pre-review request might seem simple, ensuring any needed accommodations should never be overlooked.

Best Practices (Continued):

- Coordinate with the state agency to schedule donee visits to be completed either before or during the review.
- Bring laptops to record and share all appropriate findings, requirements, recommendations, spreadsheets, etc (for each review element). Ideally, team leader should monitor the completion of a “master copy” of the review report on a shared drive or through the use and exchange of information via thumb drives/email.
- Discuss and finalize work of the team during the review while everyone’s thoughts are fresh and everyone is physically present. To wait days or weeks only dilutes one’s ability to effectively review and finalize the work of his/her team. This will only further delay the issuing a draft or final report.
- Ideally, team should attempt to compile and complete a draft report before leaving the agency. If the team is successful, a draft report may be given to the agency and discussed during the exit interview.

A little humor, perhaps?

Q: Who is the leader of the Kitty Communist Party?

A: Chairman Meow.

"If con is the opposite of pro, then isn't Congress the opposite of progress?"- *Jon Stewart*

Pre-Review Checklist

- Provides explanation of how items on“pre-review checklist” may be leveraged to complete the review report template and attachments prior to the actual visit.
- Provides details on how to complete specific questions and attachments.
- Specific questions- “Operational Capabilities”, “Property Accountability and Control”, “Fiscal Management”, “Compliance”, “Customer Relationships”, “Eligibility”, Screening”, “Audits”, and “Cooperative Agreements”.
- Specific attachments- A, B, C, D, E, and F
- In total, the review team can complete approximately 79 questions out of a total of 134 questions by using the self-certification statement and completing all of the pre-review checklist tasks. In other words, the the review team has an opportunity to complete approximately 59% of the review offsite.

Sample Correspondence

- Letter/email to the SASP confirming the review details. Also, the "pre-review checklist" shall be sent to the SASP denoting items requested prior to the review.
- Letter/email to the SASP director providing a draft review report (if requested and/or needed).
- Letter/email to the SASP director providing the "final" review report.
- Signed statement from SASP director confirming the Federal surplus program has implemented all stated remedies and corrected all reported deficiencies which generated "requirements" in the report.
- Letter/email from regional PPM management to respective PPM center of expertise certifying that to the best of his/her knowledge his/her review team has obtained action plans from the state agency that were implemented and expected to correct all reported deficiencies which generated "requirements".

Getting a Review Report Out!

- Ideally, the review team should compile and complete a draft report before leaving the agency. If the team is successful, a draft report may be given to the agency and discussed during the exit interview.
- During the exit interview, the following subjects should be discussed:
    - Summary of findings, requirements and recommendations.
    - Discuss difference between a "Requirement" and a "Recommendation".
    - Discuss any potential compliance issues discovered.
    - Explanation of the process to be followed by the agency when responding to the draft report (if desired) and the "action plan" format to be followed when responding to requirements listed in the final report.
    - Discuss expected format for actions plans and monthly status reports.
    - Describe internal process completed by GSA before submitting the "final" report to agency.
- Does the agency want to respond to a formal "draft" report or does the agency feel comfortable with the information disseminated in this meeting and is ok with the team simply issuing a final report after returning to the office?

Questions?

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Requirements Vs Recommendations

presented by

Greg Flores

Requirements vs Recommendations

- Requirements are generated when a SASP demonstrates that it is not in compliance with the FMR, the Donation Handbook, the state's plan of operation and/or GSA's implicit interpretation of any of these references.
- Recommendations represent opinions formulated by the review team that are suggestions for improvement.

Noteworthy Reminders

- Every review question which generates a negative ("no") answer must have a corresponding recommendation or requirement
- Typically, there will only be one requirement or recommendation per negative answer
- If there is not an appropriate recommendation or requirement, one must be recorded next to the "other" box
- Sometimes, a recommendation may become a requirement depending on circumstances
- The state must address all requirements in writing when submitting its action plan.

Sample Recommendations & Requirements for Operational Capabilities

Recommendation

- None
- Update state plan to include a current organizational chart and submit the proposed changes to GSA for approval.
- Secure authority and funding to hire a new employee devoted to eligibility and compliance.
- Ensure that persons responsible for eligibility and compliance receive formal GSA-sponsored eligibility and compliance training.
- Secure authority and funding to attend appropriate national/regional conferences and training.
- Create and distribute position descriptions to all employees.
- Update state plan as noted in this report and submit the changes to GSA for approval.
- Amend state plan accordingly if major or minor changes occur with the SASP's operational procedures and submit the proposed changes to GSA for approval.

Requirement

- None
- Secure additional resources to ensure all program areas are adequately staffed.
- Ensure that persons responsible for eligibility and compliance receive formal GSA-sponsored eligibility and compliance training.
- Specifically assign eligibility and compliance to one or more staff members.
- Immediately initiate effort to update state plan as noted in this report and submit the changes to GSA for approval.
- Other ________________________

Briefly demo REVIEWTEMPLATE12.DOC

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Review Report Design for Less Active SASPs

presented by

Greg Flores

How many flippin' state agency review processes do we have?

Background

When it became apparent that our traditional state review template was not optimally suited for use in reviewing SASPs which were considered to be low volume or inactive, we created a new review template for such use.

Admittedly, it was very difficult to delete, revise and create new review questions to accommodate both inactive and low volume SASPs within one template.

The template provides the team with guidance on how to proceed or skip certain questions or entire review elements. Attention was given to carefully extract pertinent details as to why a SASP is either considered inactive or low volume.

A SASP shall be considered "inactive" if it did not receive any property during the review period or one that is considered to be a "low volume" program. Most importantly, this template should be considered for use when it is believed that the normal state review template can no longer be effectively used to review a SASP.

Several steps were taken to improve and fine tune our review approach

Accomplishments

- For purposes of comparison, the original state agency review template had approximately 135 questions while this new template contains 103 questions. For the most part, all 103 questions will be used when analyzing a “low” volume program while only 24 of the 103 questions will be used when evaluating an “inactive” program.
- Created a self-certification statement from the report template that can be answered by the state agency director and sent back to the team in advance of the review.
- Increased emphasis on "Customer Relationships".
- Created new attachment- "Attachment D- Donee Contact" used to document communication with current or past donees.
- This new template may create anxiety for review teams as there are new questions that may be difficult to ask/evaluate or may generate controversial answers especially those which have been added to the Conclusion. It is often difficult to pinpoint with accuracy why a SASP has become inactive or a low volume program. It may be because of a management problem or personnel issues at the state agency; a management issue at a level just above the SASP; or even because of political issues that originate at a level as high as a governor’s office.
- Most importantly, this new template attempts to produce answers as to how GSA and/or the SASP should proceed in rebuilding the program when possible.

Briefly demo REVIEWTEMPLATELOW3.DOC

Questions?

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Preview Standardized Eligibility Application

presented by

Greg Flores

Background

- Over the years, it has become increasingly apparent that the physical design of the eligibility application for some SASPS has led to confusion among applicants and difficulties for the SASPs in processing applications.
- I have developed a standardized eligibility application that will hopefully lessen the likelihood of such occurrences and ultimately, help the SASPs make more efficient eligibility determinations.
- Not required to use, but highly recommended!

We (GSA)…..

- Desire consistency amongst SASPs in their approach to eligibility when possible and feasible.
- Believe a strong eligibility application will help applicants properly complete the form and include all required supplemental documentation.
- Designed the form in a user friendly way for not only the applicant to complete, but the SASP to process as well.
- Designed the form to make it easier for the applicant to pick and choose the appropriate eligibility category which has often been a past source of confusion and problems.
- Incorporated definitions and notes to help educate applicants and remind the SASP of what is required for eligibility..
- Added a listing of sample restriction periods and areas (blocks) where the applicant can include its program narrative details and its want or needs list.
- Incorporated all of the extra documents that donees were required to "separately" execute into the actual application with a summary statement and signature block at the end of the application.
- Created a fillable PDF styled document which can be either printed/completed manually or completed/submitted electronically.
- Incorporated all of the elements or requirements of an eligibility application into "one" document. Normally, the nondiscrimination assurance clause, the certifications and agreements document and the museum access statement are separate documents that are executed and signed separately. Now, they are combined into one document with a "signature statement" appearing at the end of the application.
- Added a signature area for museum applicants (only) to complete as added insurance that museums read, understand and agree to the museum access agreement.

Briefly demo
ELIGIBILITYAPPLICATION1.DOC

Questions?

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Compliance “War” Stories

presented by

Greg Flores

Case Studies

Da Bad Boat

Lansing Veteran's Memorial Museum

Questions?

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