Eligibility/Compliance/State Review Training

Virtual
January 2021
The Learning Process

#1 – Receive new information

#2 – Retain new information

#3 – (Re) Use new information
Four Learning Asks

#1 – Remain open-minded throughout the learning process.

#2 – Search for opportunities for improvement.

#3 – Recognize some “gray area” will remain.

#4 – Understand that this training is a reciprocal educational process for both GSA and SASPs.
Learning Objectives – Day 1

Understand the importance of the GSA-SASP Review and the critical areas of emphasis
Identify “best practices” for those critical areas
Distinguish between findings that warrant a Requirement versus a Recommendation
Approach the review as a 3-phased process (Pre; During; Post)
Adjust preparation/expectations based on operational size and activity
Understanding the Review’s Purpose

#1 – Ensure Compliance with Federal Regulations and State Plan of Operation

#2 – Minimize Risk

#3 – Fulfill the Donation Program Mission (effective and efficient operation)

#4 – Focus more on current process than findings
11 Current Checklist Elements

Operational Capabilities
Property Accountability and Control
Fiscal Management
Compliance
Customer Relationships
Eligibility
Screening
Audits
Cooperative Agreements
Records Management
Nondiscrimination Assurance
Focus on the “Big 5”*

Property Accountability and Control

Fiscal Management

Eligibility

Compliance and Utilization Reviews

Customer Relationships*
Property Accountability/Control

Key Considerations:
When Maintaining a Warehouse Function:
- Security and Safety
- Inventory Variance(s)
- Property Display and Marketing Process
Accurate and Complete Documentation (Transfer/Distribution Docs; Cancellations; Overages/Shortages; 3040 Report)
3040 Report

RECEIPTS
Federal Agencies; Overseas; Other States; Other Receipts/Adjustments

PUBLIC AGENCY DONATIONS
9 Distinct Categories; 2 or More; Other

NONPROFIT DONATIONS
5 Distinct Categories

MISCELLANEOUS TRANSFERS
Other States; To the SASP; SEAs; Return to Feds; SBAs; Veteran Orgs

MISCELLANEOUS NON-TRANSFERS
Sold; Abandoned/Destroyed; Other Negative Adjustments
Fiscal Management

Key Considerations:

Service Charge Assessment

**Methods of Payment**

“Surplus”/Loss Financial Statement

Tracking of a Reserve Amount (when applicable)

*Review should include communication with Financial Reps for the SASP*
§102-37.275 - May a SASP accept personal checks and non-official payment methods in payment of service charges?

No, service charge payments must readily identify the donee institution as the payer (or the name of the parent organization when that organization pays the operational expenses of the donee). Personal checks, personal cashier checks, personal money orders, and personal credit cards are not acceptable.
Eligibility

Key Consideration:
Appendix B of FMR 102-37

• (2) Provide for donee eligibility records to include at a minimum:
  • (i) Legal name and address of the donee.
  • (ii) Status of the donee as a public agency or as an eligible nonprofit activity.
  • (iii) Details on the scope of the donee’s program.
  • (iv) Proof of tax exemption under section 501 of the Internal Revenue Code if the donee is nonprofit.
  • (v) Proof that the donee is approved, accredited, licensed, or meets any other legal requirement for operation of its program(s).
  • (vi) Financial information.
  • (vii) Written authorization by the donee’s governing body or chief administrative officer Designating at least one person to act for the donee in acquiring property.
  • (viii) Assurance that the donee will comply with GSA’s regulations on nondiscrimination.
  • (ix) Types of property needed
Compliance

Key Considerations:
Utilization Review Process
Timely Notification
Documentation
Coordination with GSA on noncompliance matters, including prompt follow-up action
Sample Utilization Review Content

Date Placed Into Use:__________________   Continuous Occurring?    Yes or No

Type of Use/Purpose:
______________________________________________________________________________
______________________________________________________________________________

Location of Item (address and directions):
______________________________________________________________________________
______________________________________________________________________________

PERSON RESPONSIBLE FOR THE CUSTODY OF THIS ITEM;
Name: ___________________________ Title: ______________________________
Telephone: ______________________ Email: _________________________________

I certify that the information listed hereon is true and correct and that I will notify WVSASP of any changes to this information.
Signature:________________________Date:________________
Customer Relationships

KEY CONSIDERATIONS:
Fair and Equitable Distribution
Updated Needs
Collateral Benefits (compliance, marketing)
Donee Visit Schedule based on geography and emphasis
(“The Good, the Bad and the Uneducated”)
Possible Stretch Goals

AN ELEVATED DISTRIBUTION PERCENTAGE

AN ELEVATED DONATION RATE

A LARGER # OF ELIGIBLE RECIPIENTS OF ALL TYPES

AN EFFICIENT AND EFFECTIVE DONATION PROCESS

A 4-YEAR GSA REVIEW SCHEDULE
Post-Review Actions

Discuss results within entire SASP operation (and tie to individual performance perhaps)

Issue a written response to GSA within requested time frame on “requirements” particularly

Communicate milestone improvements (quarterly with GSA?)

Remain informed on Donation Program updates