

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

FMR 102-37.275

- **§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