

**NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION
ACQUISITION AND GRANTS OFFICE
DISASTER RELIEF APPROPRIATIONS ACT
RISK MANAGEMENT AND OVERSIGHT PLAN
Updated July 16, 2013**

The Acquisition and Grants Office (AGO) will provide acquisition and financial assistance services to implement the Disaster Relief Appropriations Act of 2013 (DRA) for the National Oceanic and Atmospheric Administration (NOAA). In executing its responsibilities for oversight of the financial assistance and acquisition functions to improve and streamline disaster assistance for DRA and other purposes, as addressed within the appropriations act, the following plan is established.

The updated plan describes the AGO enhanced internal control procedures for DRA funding. The plan updates are highlighted in bold font.

GENERAL

1. NOAA Program Management Council (PMC) will serve as the primary review body for DRA programs. The Director of AGO serves as a principal member of the PMC.
2. **All DRA obligations must be recorded in the Commerce Business System (CBS) with DRA-specific Program and Project codes.**
3. **Project Codes created for the DRA funding must include “HS SUPP” (Hurricane Sandy Supplemental) within the Project Code title.**

FINANCIAL ASSISTANCE

1. NOAA Grants Management Advisory Committee (GMAC) will receive comprehensive updates on DRA compliance at its monthly meetings. The GMAC Chair will manage the committee schedule and ensure the agenda focuses on **DRA compliance for all DRA financial assistance actions.**
2. Pre-Program Notice
 - a) Ensure that programs have consistent prominent labels and tags in announcements and notices that clearly distinguish them as DRA actions.
 - b) Monitor program outreach efforts with potential applicants to create or update profiles in Dun and Bradstreet Universal Numbering System (DUNS) and System for Award Management (SAM).
 - c) AGO will assist programs in the development of new codes or modifying existing codes in the Catalog of Federal Domestic Assistance by reviewing requests for completeness and soundness.

- d) Monitor program synopses posted to Grants.gov.
- e) Monitor the posting of Federal Funding Opportunities (FFO).
- f) The NOAA Program Office will coordinate with GMD and DOC, and establish the requisite Catalog of Federal Domestic Assistance (CFDA) number for the Hurricane DRA awards.

3. Pre-Award to Award

- a) AGO will ensure all program offices in NOAA receive guidance on standard terms and conditions or special award conditions necessary for the implementation of DRA.
- b) To fulfill its responsibilities for ensuring transparency, AGO will monitor award level reporting consistent with what is required for USASpending.gov. AGO will determine whether programs are meeting the requirements of DRA.
- c) AGO will monitor compliance with procedure to determine availability of funds, determine funds are allocated for formula grants based on statutory criteria, determine proper review and approval procedures are followed, determine that widespread solicitation of applications occurs, determine that DRA terms and conditions are included, and determine that grants clearly identify recipient reporting requirements. AGO will monitor compliance with procedures for the following requirements:
 - Specify criteria for approval of grant applications or proposed plans for use of funds provided under the Act.
 - **Ensure each grant includes reference to the DRA-specific CFDA Code 11.483 (NOAA Programs for Disaster Relief Appropriations Act – Non-construction and Construction).**
 - Ensure that each proposed grant activity has clear timelines for execution and completion within the statutory period available for grantee expenditure.
 - **Ensure that grant notices and terms and conditions require grantees to expend DRA funds within the 24-month period following the agency’s obligation of grant funds unless a waiver is obtained from OMB. If a waiver is obtained for a grant, ensure the grant notice and terms and conditions require expenditure in compliance with the terms of the waiver.**
 - Ensure that any request to OMB to waive or extend the 24-month expenditure period be limited to only those activities that are long-term by design, where it is impracticable to expend funds within the 24-month period and achieve program missions.

- Be aware of all audit findings (GAO, IG, single audit) and ensure all findings are resolved within six months after completion of the audit.
- Avoid granting extension requests for audit report submissions.

4. Post-Award

- Record all DRA-funded grants in USAspending.gov referencing CFDA Code 11.483.**
- AGO will monitor grantee performance to ensure grantee adherence to award requirements and the work performance period.
- AGO will monitor grantee use of funds and compliance with terms and conditions of the award, requests for changes to the budget, and grantee compliance to the award performance period of the grant. AGO will perform grant closeouts in a timely manner. AGO will monitor grantees' return to the agency of any funds not expended within the 24-month period, **or OMB waiver approved period**, following the agency's obligation of funds for the grant.

ACQUISITION

- NOAA Acquisition Management Advisory Committee (AMAC) – the Acquisition Management Advisory Committee will receive comprehensive updates on DRA compliance at its monthly meetings. The AMAC Chair will manage the committee schedule and ensure the agenda focuses on **DRA compliance for all DRA contract actions**.
- Pre-Solicitation
 - Acquisition Planning – Develop acquisition and milestone plans for all actions greater than \$100,000. Coordinate acquisition and milestone planning with programs and the Oversight Board.
 - Acquisition Review – Identify those acquisitions requiring Investment Review Board (IRB), OAM, and AGO review and approval. Prepare planned acquisitions for required reviews and obtain approvals.
 - Notices – Prepare Federal Business Opportunities (FBO) announcements and ensure required DRA language is included, if required.

3. Pre-Award to Award

The following guidance is applicable to all contract awards for NOAA obligations using DRA funds.

- Consistent with DRA funding guidance, AGO will ensure:

- 1) Use of competitive procedures to the maximum practicable extent;
- 2) Contract Type selection consistent with sound business practice;
- 3) Appropriate use of incentive and award fees and terms;
- 4) Development of requirements that deliver meaningful and measurable outcomes;
- 5) Maximization of opportunities for small business consistent with mission needs;
- 6) Maximization of utilization of non-profit agencies employing people who are blind or severely disabled consistent with mission needs;
- 7) Use of streamlined acquisition flexibilities;
- 8) Oversight of contract performance;
- 9) Adequate staffing;
- 10) Timely and effective inspection and acceptance.

b) AGO requests requisitioners include a brief description within the Purchase Request identifying the DRA funds for obligation.

c) AGO will prepare award level reporting in Federal Procurement Data System – Next Generation (FPDS-NG), ensuring timeliness, completeness and correctness. HCOs shall verify and certify the accuracy of all DRA actions in FPDS-NG. AGO will ensure that all contract actions obligating DRA funds will be reported in FPDS-NG using the National Interest Action value (NIA) of H13S.

d) NOAA contract awards that are funded with both DRA and other types of funds shall:

- 1) Be awarded as two separate contract actions for reporting within FPDS-NG; and**
- 2) Use a separate contract line item number (CLIN) identified specifically for DRA.**

e) Micro-purchases using a Government-wide commercial purchase card obligating DRA funds must be recorded in CBS with DRA-specific Program and Project codes and must comply with policy and procedures within the OMB Circular A-123 Appendix B, and Commerce Acquisition Manual (CAM) 1313.301. Cardholders shall not split requirements to circumvent the purchase card threshold. Micro-purchases are not eligible to be recorded in FPDS-NG.

4. Post Award

- a) Determination of whether contract deliverables are compliant and timely.
- b) AGO will monitor contractor compliance with terms and conditions of the contract, as well as cost, schedule, and performance compliance during the performance period of the contract. AGO will perform contract closeouts in a timely manner.