

# FINAL UGG CHANGES AND UPDATING LEA POLICIES AND PROCEDURES

Tiffany Kessler, Esq.  
[tkessler@bruman.com](mailto:tkessler@bruman.com)

Kelly Christiansen, Non-Attorney  
Professional

[kchristiansen@bruman.com](mailto:kchristiansen@bruman.com)

[www.bruman.com](http://www.bruman.com)

October 2025

# WHY DO WE NEED POLICIES AND PROCEDURES?

Avoid  
monitoring and  
audit findings

Prevent fraud,  
waste, and abuse

They are  
required internal  
controls

# REQUIRED WRITTEN POLICIES

**Work:** Dress for the job you want,  
not the job you have  
**Me:** \*arrives at work\*



Conflicts of Interest Policy – 200.318(c)



Accounting Policies – 200.306(h)(2)(i); 200.400; 200.430(i)



Compensation Policies – 200.430(a)



Fringe Benefits Policies – 200.431











Employee Health and Welfare Policies – 200.437



Travel Reimbursement Policy – 200.475(a)

# REQUIRED WRITTEN POLICIES

-  Real property sales procedures – 200.311(c)(2)
-  Time & Effort Procedures – ED Cost Allocation Guide
-  Written Allowability Procedures – 200.302(b)(7); 200.403(c)
-  Written Cash Management Procedures – 200.302(b)(6) and 200.305
-  Written Procurement Procedures – 200.318(a), 200.319(d), and 200.320
-  Procedures for Managing Equipment – 200.313(d)
-  Participant support cost classification, 2 CFR 200.456
-  Record conversion quality control, 2 CFR 200.336

# WHEN TO REVIEW POLICES AND PROCEDURES

Annually?

Staff Changes

New or  
Changing  
Systems

After  
Monitoring or  
Audit Findings

Any Other  
Big Changes

# UGG EFFECTIVE DATES

- **UGG Effective Dates (New awards after Oct 1, 2024)**
  - ED Uniform Guidance FAQ, July 2024:  
<https://www2.ed.gov/about/offices/list/ofo/oaga/uniformguidancefaq.pdf>
  - ED Uniform Guidance FAQ (Updated January 16, 2025):  
<https://www.ed.gov/media/document/faqs-uniform-guidance>
- **EDGAR Effective Dates (Sept 30, 2025)**
  - <https://www.govinfo.gov/content/pkg/FR-2024-08-29/pdf/2024-17239.pdf>



# FINANCIAL MANAGEMENT

# REQUIRED **FINANCIAL** CERTIFICATIONS – 200.415

- a) **Financial** reports must include a certification, signed by an official who is authorized to legally bind the **recipient**
- b) **Subrecipients** must certify to the pass-through when applying for funds, requesting payment, and submitting financial reports:

*"I certify to the best of my knowledge and belief that the information provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to violations of U.S. Code Title 18, Sections 2, 1001, 1343 and Title 31, Sections 3729-3730 and 3801-3812."*



# FEDERAL PAYMENT – 200.305(b)(CONT.)

- Cash advances must be maintained in insured accounts
- Accounts must be interest-bearing unless **one of the** following applies:
  - Aggregate Federal awards under \$250,000
  - Account not **reasonably** expected to earn in excess of \$500 per year
  - Bank requires minimum balance so high, that such account is not feasible
  - A foreign government or banking system prohibits or precludes interest-bearing accounts
  - **An interest-bearing account is not readily accessible (for example, due to public or political unrest in a foreign country)**
- Interest amounts over \$500 must be returned to the Federal payment system.

# PROGRAM INCOME – 200.307

- Encouraged to earn income to defray program costs where appropriate
  - Must be used for the original purpose of the Federal award
  - May only be used for costs incurred during the period of performance or allowable closeout costs
  - Must be expended prior to requesting additional Federal funds
- Three methods for tracking:
  1. Deduction: deduct from total allowable costs (default method)
  2. Addition: added to federal award (requires prior approval)
  3. Cost sharing: may be used to meet cost sharing requirement; (requires prior approval of federal awarding agency)

# REVISION OF BUDGET/PROGRAM PLANS – 200.308

- Must report deviations from budget or project scope or objective and request prior approvals from Federal awarding agencies **or pass-through entities** for budget and program plan revisions
- The Federal awarding agency or pass-through entity must review the request for budget or program plan revision and **should** notify the recipient or subrecipient whether the revisions have been approved within 30 days of receipt of the request.
- The Federal agency or pass-through entity **must** inform the recipient or subrecipient in writing when a decision can be expected if more than 30 days is required for a review.

# OBLIGATION PERIOD

- Subgrantees: Begin to obligate when application is approved or substantially approvable 76.708
  - Competitive grants begin to obligate upon final approval
- Drawdown funds: when final approval only.
- If application is denied, updated appeal process under EDGAR 76.401; 76.783.
- Clarifies that aggrieved applicants **must allege a specific federal or state statute or regulation has been violated.**

# WHEN DO COSTS OBLIGATE? 34 CFR 76.707

Type of Cost	Date of Obligation
Acquisition of real or personal property	On the date on which the State or subgrantee makes a binding written commitment to acquire the property
Personal services by an employee	When the services are performed
Personal services by a contractor	On the date on which the State or subgrantee makes a binding written commitment to obtain the services
Performance of work other than personal services	On the date on which the State or subgrantee makes a binding written commitment to obtain the work
Travel	When the travel is taken
Pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR part 200, subpart E.	On the first day of the grant or subgrant period of performance.

# CLOSEOUT – 200.344

- a) Federal agency or pass-through **must** close out the award when it determines that all administrative actions and required work of the Federal award have been completed.
- b) Recipient (SEA) closeout reports: 120 days; subs: 90 days
- c) **SEA must liquidate within 120 days of obligation date**
  - **LEA has 90 days to liquidate** (or an earlier date as agreed upon by the pass-through entity and subrecipient).
- *When justified*, the Federal agency or pass-through entity may approve extensions for recipient or subrecipient.



# FINANCIAL PROCEDURES

- ☐ Accounting system(s)
- ☐ Process for comparing budgets to expenditures
- ☐ Cash Management: Reimbursements and Advances
- ☐ Closeout and carryover
- ☐ Program income
- ☐ Applicable Credits
- ☐ Indirect Costs
- ☐ Administrative caps



# ALLOWABILITY



16

# BASIC FACTORS OF ALLOWABILITY - 200.403

To be allowable, a cost *must*:

- Be **necessary, reasonable** and **allocable**
  - Comply with the cost principles and Federal award
  - Be consistent with policies and procedures applying uniformly to Federal and non-Federal activities and costs
  - Be consistently treated as either direct or indirect costs
  - Be determined in accordance with GAAP
  - Not be included or used to meet cost sharing / match requirements
  - Be adequately **documented**
  - **Administrative closeout costs may be incurred until due date of the final reports.**
- All other costs must be incurred during the approved budget period.

# SELECTED ITEMS OF COST EXAMPLES



**Alcohol - 200.423** (Not allowable)

**Entertainment and Prizes - 200.438**

- a) Entertainment costs. Costs of entertainment, including amusement, diversion, and social activities and any associated costs (such as gifts), are unallowable **unless they have** a specific **and direct** programmatic purpose and are **included in a** Federal award.
- b) **Prizes. Costs of prizes or challenges are allowable if they have a specific and direct programmatic purpose and are included in the Federal award.**

# PARTICIPANT SUPPORT COSTS – 200.I

- Participant support costs are **direct costs that support participants and their involvement in a Federal award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants.**
  - Must be defined in your policies and procedures and consistently treated!
- Who is a Participant?
  - **An individual participating in or attending program activities under a Federal award, such as trainings or conferences, but who is not responsible for implementation of the Federal award**
    - Examples: community members, students, or conference attendees
    - DOES NOT INCLUDE: consultants, project personnel, or staff members
- **Prior approval requirement removed**

# PROFESSIONAL DEVELOPMENT

## Training and education costs – 200.473

- Allowable

## Conferences – 200.432

- Generally allowable
- Allowable conference costs include rental of facilities, costs of meals and refreshments, transportation . . . unless restricted by the Federal award
- Costs related to identifying **and providing** locally available dependent-care resources **for participants** are allowable **as needed**
- Conference hosts must exercise discretion in ensuring costs are appropriate, necessary, and managed to minimize costs to Federal award



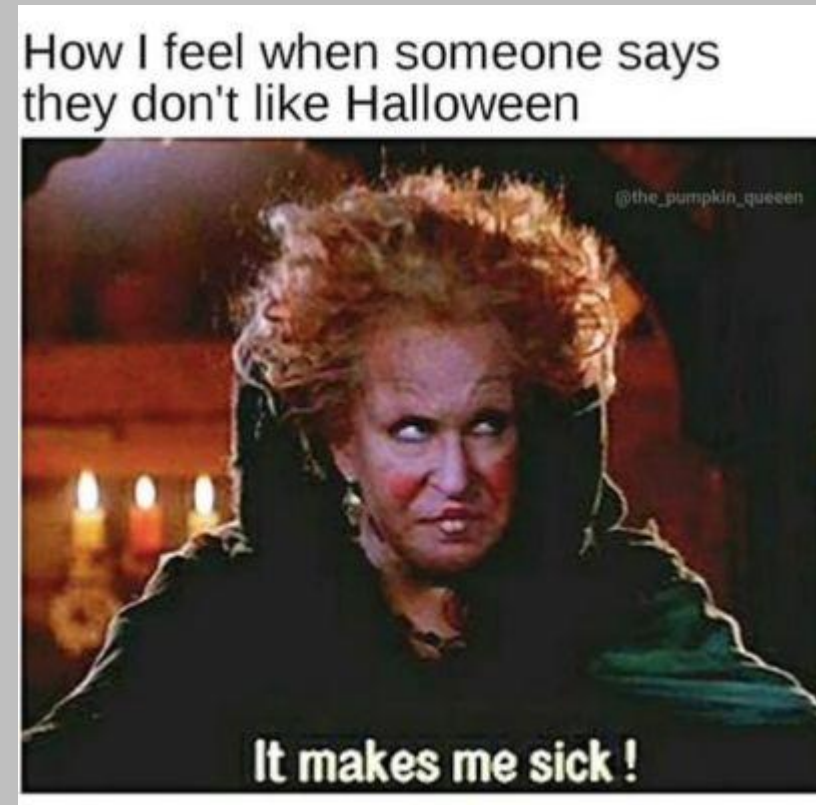
# PROFESSIONAL DEVELOPMENT (CONT.)

## Other considerations:

- “Grantees should consider whether a face-to-face meeting or conference is the most effective or efficient way to achieve the desired result and whether there are alternatives, such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting.”
- “If a grantee charges a fee for attendance at a particular meeting or conference paid for with Federal grant funds, any income generated must be treated as program income.”

# USDE'S NEW GUIDANCE ON FOOD DURING PD ACTIVITIES

- Frequently Asked Questions (FAQs) to Assist U.S. Department of Education (ED) Grantees to Appropriately Use Federal Funds for Food, Conferences, and Meetings - August 2024
- <https://www.ed.gov/media/document/faqs-food-and-conferences>



# ED'S GUIDANCE ON FOOD, CONFERENCES AND MEETINGS (CONT.)

Food and beverage costs are not of a type generally recognized as ordinary and necessary for the operation of the grantee or the proper and efficient performance of the Federal award

- A grantee needs to substantiate with specificity the rationale for why paying for food and beverages with Department funds is necessary to meet the goals and objectives of a grant.
- Hosting an event: First consider structuring the agenda for the meeting so that there is time for participants to bring or purchase their own food, beverages, and snacks.
  - Consider a location in which participants have easy access to food and beverages.

# ALLOWABLE FOOD EXAMPLES (CONT.)

## Food costs at a family engagement event:

- If a family meeting would occur during a typical mealtime, or if the grantee has evidence that attendance at the event would be affected by the absence of food or snacks, the grantee may be able to justify that is reasonable and necessary to provide light refreshments or meals to participants.



# UNALLOWABLE FOOD EXAMPLES



**Food costs at regular staff meetings:** Food costs for recurring business meetings, staff meetings, or other day-to-day activities are generally not reasonable



**Food costs for remote meetings:** Food costs for meetings conducted remotely, such as sending food to individual meeting participants' locations, are generally not justified



**Entertainment:** Celebrations, receptions, banquets, and other social events generally are not events where purchasing food with ED grant funds is appropriate



**Food costs at networking sessions:** Purely social focus is not justified



**Alcohol:** In all cases, use of Federal funds for alcoholic beverages is unallowable

# ED'S GUIDANCE ON FOOD, CONFERENCES AND MEETINGS (CONT.)

**What if the costs of meals are included in hotel meeting rooms? What if the hotel provides complimentary beverages?**

- It would not be acceptable for a vendor to embed the cost of beverages in other costs, such as meeting space, without those costs being separately allowable.
  - The grantee should work with the hotel to have the food and beverage costs removed and have the price for the meeting space appropriately adjusted.

**May indirect cost funds be used to pay for food and beverages?**

- No. They are more appropriately treated as direct costs rather than indirect costs. Federal grant funds cannot be used to pay for food and beverages unless doing so is reasonable and necessary.

**Can we provide participants with the option of paying for their food?**

- Yes.



# TRAVEL – 200.475

- Travel costs may be charged on actual cost basis, a per diem or mileage basis, or a combination of the two, provided the method used is applied to an entire trip and not selected days of the trip
  - The method used must be consistent with state/local activities and established written policies
- Travel charges must be consistent with entity's **established written** policies
  - Must also document and justify that participation of an individual is necessary for the federal award and costs are reasonable and consistent with written policies.

# TRAVEL (CONT.)

- New ED Guidance
- “Among other considerations, grantees should consider how many people should attend a meeting or conference on its behalf. The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant. The grantee should also determine whether it is necessary to attend the entire meeting or conference, or whether attending only a portion of the meeting or conference is reasonable and necessary.”
- “To determine whether the expenses are ‘reasonable,’ grantees should consider how the costs (e.g., lodging, travel, registration fees) compare with other similar events and whether the public would view the expenses as a worthwhile use of Federal funds.”

# ALLOWABILITY PROCEDURES

- ☐ Documentation required for reasonable cost
- ☐ Procedure for who does allowability check
- ☐ Any required approvals
- ☐ Include any common purchases
- ☐ Participant support costs
- ☐ Selected Items of Cost reference



# TIME AND EFFORT



30

# WHO KEEPS TIME AND EFFORT



Time and effort must be collected for all employees (not contractors) whose salaries are:

- Paid in whole or in part with federal funds (200.430(a)(3)) ; and
- Used to meet a match/cost share requirement (200.430(g)(4))

Includes:

- Full time and part time employees
- Federal stipends that are considered salary expenses!

# TIME AND EFFORT - 200.430(i)

Time and effort records MUST:

- Be supported by a system of internal controls which provides reasonable assurance that charges are accurate, allowable, and allocable;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated;
- Encompass all activities (federal and non-federal);
- Comply with established accounting policies and practices; and
- Support distribution among specific activities or cost objectives.



## RECONCILIATION – 200.430(g)(1)(vii)

- Budget estimates (meaning, estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that:
  - The recipient's or subrecipient's system of internal controls includes processes to perform periodic after-the-fact reviews of interim charges made to a Federal award based on budget estimates. All necessary adjustments must be made so that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

# TIME AND EFFORT PROCEDURES

- ☐ Who keeps time and effort records?
  - ☐ How do you include stipends and part time employees?
- ☐ What records are maintained?
  - ☐ Blanket certifications, PARs, etc.
  - ☐ Who signs them?
  - ☐ When are they completed?
- ☐ Budget estimates
- ☐ When reconciliation is made



# PROCUREMENT

# PROCUREMENTS BY STATES AND INDIAN TRIBES – 200.317

- States and Indian tribes follow their own policies and procedures
  - If such policies and procedures do not exist, more restrictive requirements under 200.318 through 200.327 apply.
- State/Tribal procedures must include procurement standards in 200.321, 200.322, 200.323, and 200.327
  - 200.321 – Contracting with small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms.
  - 200.322 – Domestic preferences
  - 200.323 – Procurement of recovered material
  - 200.327 – Contract provisions

# OTHER PROCUREMENT PREFERENCES



- Prohibition on using geographic preferences removed!
- 200.322 – Domestic Preference for Procurement
- 200.323 – Procurement of Recovered Materials
  - New (b) Should, to the greatest extent practicable and consistent with law, purchase, acquire, or use products and services that can be reused, refurbished, or recycled; contain recycled content, are biobased, or are energy and water efficient; and are sustainable

# CONFLICTS OF INTEREST – 200.318(C)

- Maintain written standards of conduct covering conflicts of interest actions of employees engaged in the selection, award, and administration of contracts.
- A conflict of interest arises when any of the following has a financial or other interest in the firm selected for award:
  - Employee, officer, agent, or **board member**
  - Any member of their immediate family
  - Their partner
  - An organization which employs, or is about to employ, any of the parties indicated herein or has a financial or other interest in or tangible personal benefit from an entity considered for a contract

# CONFLICTS OF INTEREST – 200.318(C) (CONT.)

- No employee, officer, agent or **board member** may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors
- However, recipients and subrecipients may set standards for when the financial interest is not substantial or gift is an unsolicited item of nominal value
- Standards of conduct must include any discipline actions to be applied in the event of any conflict of interest violations
- **Mandatory Reporting:**
  - Conflicts of interest (200.113): Recipients and subrecipients must promptly disclose whenever it has **credible evidence** of a violation of **conflicts of interest** to the federal agency, OIG and pass-through entity.

# METHODS OF PROCUREMENT – 200.320

- Informal procurement methods – These procurement methods expedite the completion of transactions, minimize administrative burdens, and reduce costs.
  - Micro-purchases
  - ~~Small Purchases~~ Simplified acquisition procedures
- Formal procurement methods – Required when the value of the procurement transaction under a federal award, exceeds the simplified acquisition threshold of the recipient or subrecipient.
  - Sealed bids
  - Competitive proposals
- Noncompetitive procurements



# INTERGOVERNMENTAL AGREEMENTS - 200.318(E)

- When appropriate for the procurement or use of common or shared goods and services, recipients and subrecipients are encouraged to enter into State and local intergovernmental agreements or inter-entity agreements
- Fosters greater economy and efficiency
- Documented procurement actions of this type (using strategic sourcing, shared services, and other similar procurement arrangements) will meet the competition requirements of this part

# NONCOMPETITIVE PROCUREMENTS – 200.320(C)

Allowable only when:

1. The aggregate amount of the transaction is under the micro-purchase threshold
2. **The procurement** transaction can only be fulfilled by a single source
3. There is a public emergency for the requirement that will not permit delay resulting from **providing public notice of** a competitive solicitation
4. The **recipient or subrecipient requests in writing to use a noncompetitive procurement method, and the** federal agency or pass-through entity provides written approval, or
5. After soliciting **several** sources, competition is determined inadequate

# MANDATORY DISCLOSURES – 200.113

- Applicant, recipients, and subrecipients must **promptly** disclose **whenever it has credible evidence of the commission of** a violation of federal criminal law involving fraud, **conflict of interest**, bribery, or gratuity violations under Title 18 of the US Code or the Civil False Claims Act (31 U.S.C. 3729–3733)
  - Includes both criminal and civil false claims actions
  - Applies to any activities or subawards in connection with the Federal award
- Must be made in writing to the Federal agency, **the agency's Office of Inspector General, and the** pass-through entity (if applicable)
  - Also required to report matters to SAM and FAPIIS, etc. (as appropriate)
- Failure to report can result in remedies for noncompliance (200.339)

# WHISTLEBLOWER PROTECTIONS – 200.217

- An employee of a recipient or subrecipient must not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is:
  - Evidence of gross mismanagement of a Federal contract or grant;
  - A gross waste of Federal funds;
  - An abuse of authority relating to a Federal contract or grant;
  - A substantial and specific danger to public health or safety, or
  - A violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant.
- The recipient and subrecipient must inform their employees in writing of employee whistleblower rights and protections under 41 U.S.C. 4712

# PROCUREMENT PROCEDURES

- ☐ Who can make purchases
- ☐ Who can enter into contracts
- ☐ Purchase thresholds – ensure that the thresholds comply with any state and local rules
- ☐ Contract administration system
- ☐ Purchasing cards
- ☐ Full and open competition
- ☐ Non-competitive procurement
- ☐ Conflicts of Interest



# PROPERTY MANAGEMENT



46

# PROPERTY THRESHOLDS



**Equipment:** tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of **\$10,000** or more per unit



**Supply:** All tangible personal property other than equipment



**Computing Devices:** If less than **\$10,000** per unit, defined as supplies

# GENERAL EQUIPMENT RULES - 200.313(B)

- A State must use, manage, and dispose of equipment acquired under a Federal award in accordance with State laws and procedures.
- Indian Tribes must use, manage, and dispose of equipment acquired under a Federal award in accordance with tribal laws and procedures.
  - If such laws and procedures do not exist, Indian Tribes must follow the guidance in this section.
- Equipment purchases required prior approval (200.439)
- Other recipients and subrecipients, including subrecipients of a State must follow paragraphs rest of 200.313



## EQUIPMENT USE – 200.313(C)

- Equipment must be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the Federal award
- Equipment must be available for shared use, provided such use will not interfere with the purpose for which it was originally acquired, and it follows this order of preference:
  - First by other programs from same agency
  - Then open to other Federal programs
  - Non-Federal programs, **provided such use will not interfere with the purpose for which it was originally acquired**

# INVENTORY PROCEDURES – 200.313(D)



- Regardless of whether equipment is acquired in part or its entirety under the Federal award, the recipient or subrecipient must manage equipment utilizing procedures that meet the following requirements:
- Recipient/subrecipient is responsible for maintaining and updating property records when there is a change in status of the property

# EQUIPMENT DISPOSITION –200.313(E) AND (F)

- When property is no longer needed in any current or previously Federally-funded supported activity, must request disposition instruction from the Federal agency **or pass-through entity**.
- Disposition will be made as follows, in accordance with Federal agency **or pass-through entity** disposition instructions:
  - Fair market value more than **\$10,000 (per unit)** = pay Federal share back to federal agency **or pass-through entity**
    - May retain **\$1,000** to cover expenses associated with the selling and handling of the equipment
  - Fair market value of **\$10,000 or less (per unit)** = no money owed back to feds

# SUPPLIES – 200.314

- If there is a residual inventory of unused supplies **at the end of the period of performance** exceeding **\$10,000** in total aggregate value, and the supplies are not needed for any other Federal award, the State or LEA may retain or sell the supplies
  - **Unused supplies** means supplies that are in new condition, not having been used or opened before. The aggregate value of unused supplies consists of all supply types, not just like-item supplies
- Fair market value more than **\$10,000 (aggregate)** = pay Federal share back to federal agency **or pass-through entity**
  - May retain **\$1,000** to cover expenses associated with the selling/handling of the supplies.

# PROPERTY PROCEDURES

- ☐ Definitions of equipment, supplies and computing devices
- ☐ Physical inventory timeline
- ☐ Use of Equipment
- ☐ Maintenance
- ☐ Lost, damage, or theft
- ☐ Replacement equipment
- ☐ Disposition of equipment and supplies



# RECORDKEEPING

54

# 76.722 SUBGRANTEE REPORTING REQUIREMENTS

- A State may require a subgrantee to submit reports in a manner and format that assists the State in:
  - Complying with its state reporting requirements (34 CFR 76.720)
  - Carrying out other responsibilities under the program
  - Engaging in periodic review and continuous improvement of the State's plan
  - Supporting the subgrantee in engaging in periodic review and continuous improvement of the subgrantee's plan

## 76.732 RECORDS RELATED TO PERFORMANCE (CONT)

- **Continuous improvement** means using plans for collecting and analyzing data about a project component's implementation and outcomes (including the pace and extent to which project outcomes are being met) to inform necessary changes throughout the project.
  - These plans may include strategies to gather ongoing feedback from participants and stakeholders on the implementation of the project component.
- New definitions for Evaluation and Independent Evaluation 34 CFR 77.1



# 76.732 RECORDS RELATED TO PERFORMANCE

- a) A grantee must keep records of significant project experiences and results.
- b) The grantee must use the records under paragraph (a) to—
  - 1) Determine progress in accomplishing project objectives;
  - 2) Inform periodic review and continuous improvement of the project plans; and
  - 3) Revise those project objectives, if necessary.



# METHODS OF COLLECTION, TRANSMISSION AND STORAGE OF INFORMATION – 200.336

- When practicable, the Federal agency or pass-through entity and the recipient or subrecipient must collect, transmit, and store Federal award information in an open file, non-licensed, and machine-readable formats.
- Recipient or subrecipient may substitute electronic versions of original paper records through duplication or other forms of electronic conversion, provided that the procedures are subject to quality control reviews.
- Quality control reviews must ensure that electronic conversion procedures provide reasonable safeguards against alteration of records and assurance that records remain in a format readable by a computer system.

## ACCESS TO RECORDS- 200.337

- The Federal agency, or pass-through entity, Inspectors General, the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to any records of the **subrecipient or recipient** pertinent to the Federal award to **perform** audits, **execute site visits, or for any other official use.**
- This right also includes timely and reasonable access to the recipient's and subrecipient's personnel for the purpose of interview and discussion related to such documents **or the Federal award in general.**

# DOCUMENTATION PROCEDURES

- ❑ How long records are kept
- ❑ Electronic vs. paper records
  - ❑ Quality controls
  - ❑ Backup systems
- ❑ Ensure PII is secure
- ❑ Who can access student records



NOW WHAT?

# WHAT'S NEXT?

- Set the tone that compliance is important and critical for success
  - Not just for compliance, but to ensure funds benefit students
- Set clear timelines and communicate expectations
- Make certain you have the proper people involved
- Review them annually!





# MAKING POLICIES AND PROCEDURES HELPFUL

Consider adding  
definitions or a  
reference to 200.1

Check for the use of  
acronyms that new  
employees may not  
know

Look for other terms  
that are only used in  
your entity that need  
clarification (time and  
effort v. PAR)

Consider staff grants  
test (*for fun?*)

Add FAQ section for  
top concerns of  
questions that arise

Ensure they are in a  
language that staff can  
understand, consider  
accessible options and  
translation options



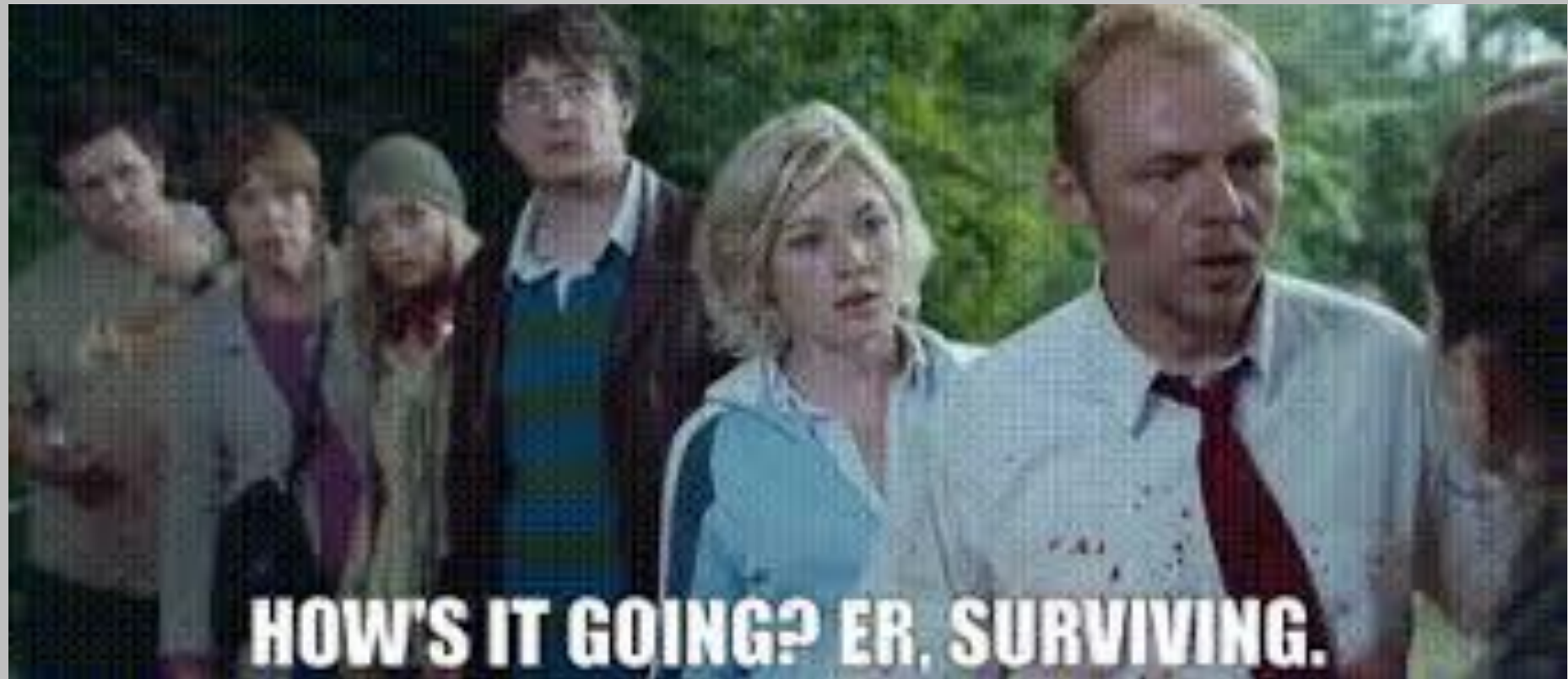
# UGG FUTURE UPDATES

- Comments from Andrea Brandon, deputy assistant secretary at the U.S. Department of the Interior:
  - “Leadership wants to streamline [the UGG] even more to get down to the least amount of requirements necessary to comply with appropriations law and ensure the proper stewardship of federal funds.” “When it comes out, you should take a look at it and provide comments.”
  - No set timeframe provided.
  - Changes align with current Executive Orders.
  - Focus on risk assessment, cost/benefit
  - Focus on “Outcomes not Outputs” → quantitative analysis

# UGG FUTURE UPDATES (CONT.)

- Technology and Artificial Intelligence
  - For AI to make a predictive analysis to give proper insight, it's important that data is clean and accurate, and that the data on grant programs is valid and valuable.
  - Current data systems are in place (e.g., USAspending.gov, FAC.gov), but federal agencies must collectively ensure there are proper methodologies in place to maintain the right data so that when we are implementing AI, it is grabbing the right information, and that we have checks and balance in place to verify that information.
  - Plan to use more chatbots.
    - Recipients seeking assistance from a federal agency can use software currently being piloted to ask a question to the chatbot, which is aided by AI to grab information for a response.
    - Agency officials will still be available if needed.

# QUESTIONS???



# DISCLAIMER

This presentation is intended solely to provide general information and does not constitute legal advice or a legal service. This presentation does not create a client-lawyer relationship with The Bruman Group, PLLC and, therefore, carries none of the protections under the D.C. Rules of Professional Conduct. Attendance at this presentation, a later review of any printed or electronic materials, or any follow-up questions or communications arising out of this presentation with any attorney at The Bruman Group, PLLC does not create an attorney-client relationship with The Bruman Group, PLLC. You should not take any action based upon any information in this presentation without first consulting legal counsel familiar with your particular circumstances.