**Federal Aid Coordinators Working Group Report**

**to the**

**Trust Fund Committee, 03/08/2019**

1. **TRACS**

The TRACS Enhancement will be the most significant issue for the Federal Aid Coordinators Working Group (FACWG) and Federal Aid Coordinators (FACs) in the next year. As the performance reporting platform for WSFR-funded grant activities, TRACS will significantly impact the administration of the WSFR Program in all States. The FACWG is anticipating high visibility for all things TRACS in the next six months as the December 2019 roll-out of the TRACS Enhancement approaches.

**Progress in Development:**

* Since the last Trust Fund Committee (TFC) Meeting, the Joint Task Force (JTF) has approved, after revisions, the Standard Performance Reporting Questions which will enable the States to provide the additional information required by WSFR in accordance with governing regulations (e.g. 2 CFR 200 and 50 CFR 80). The performance reporting questions will be required as part of States’ performance reports and will be in addition to the standard grant reporting metrics.
* The TRACS WG is also working to develop the lands and facilities modules which will address additional federal reporting requirements beyond grant performance reports. These modules are currently under development and will be disseminated for national review in the coming months.
* As development progresses, the TRACS WG anticipates providing training materials, guidance, and communications to TRACS users in anticipation of the TRACS Enhancement rollout.

**TRACS Shutdown and Grant Submissions:**

The existing TRACS system was closed to data entry on October 1, 2018. Currently, all states are submitting grant actions and reports directly through the WSFR Regional Offices or Grants.gov. This will remain the standard process for submissions until the TRACS Enhancement is live or additional guidance is provided by WSFR.

**System Testing Schedule:**

At the time of this report, the TRACS system development schedule is anticipated to proceed as follows:

* February 2019: WSFR will distribute guidance materials to the States which will include:
  + Updated TRACS Tasks Schedule
  + Fact Sheets to assist States in data entry for each Grant Objective
  + Templates for Grant Proposals and Project Statements
  + The Complete Grant Matrix reviewed and approved in 2017
  + Standard Project Statements developed by WSFR Training Branch in 2016
  + FAQ Sheet – This will be a working document updated regularly based on feedback and questions from the States leading up to the December 2019 rollout.
* March 2019: Land and facilities matrices will be distributed for comment and WSFR will host a national webinar on these topics – more details follow in next section.
* March 31, 2019: All initial rollout system requirements finalized
* April 2019: Acceptance testing begins for TRACS WG members only
  + Acceptance testing will be somewhat limited as only core functionality will be ready and subject to testing.
* September 2019: Beta testing begins for all TRACS users
  + Substantial system functionality will be available for the Beta Testing.
* December 2019: Launch of TRACS Enhancement
* January 2020: TRACS Enhancement Training through Distance Learning for fully functional system

**TRACS Communications - Meeting Summary:**

* At the January 2019 meeting of the TRACS WG, it was decided that the FACWG Liaison would distribute the major decision points from the meeting to FACs nationally through the FACWG. The goal of this communication was to provide the most up-to-date information on TRACS to State users in advance of forthcoming guidance documents from WSFR. Prior to distribution to the States, each FACWG member worked with the State Representatives to the TRACS WG from their region(s) to add pertinent region-specific information.
* The FACWG and TRACS WG are working to develop a communication strategy to ensure transparent dissemination of information regarding the activities of the TRACS WG and to share progress updates for system developments that will impact end users of the TRACS Enhancement.

**Land and Facilities Modules & Webinar:**

* Comment Period and Webinar: In March 2019, WSFR will distribute the matrices for the land and facilities modules through the Communication Protocol for review and comment by the States. Shortly thereafter, WSFR and the TRACS WG will host webinars for TRACS users to present the land and facilities module wireframes. The distribution of the matrices and webinars is designed to assist States in understanding the requirements of the modules and provide the necessary context to make substantive comments on these modules during the comment period. The webinars will be recorded and made available for subsequent viewing and/or download.
* SF429 and DOI Requirements: It is anticipated the results of a recent Department audit will lead to the requirement that grant recipients use the SF429 for all grant actions related to land, facilities, and capital improvements. The TRACS land and facilities modules were developed in an attempt to meet the anticipated new reporting and monitoring requirements that are likely to be published in the Federal Register. WSFR is currently working with DOI to have the TRACS modules be an approved, less burdensome alternative for collecting and tracking this information.
* Cost Accounting in Modules: In an effort to ensure that the TRACS facilities and land modules are approved as an alternative to reporting on the SF429, these modules will require cost accounting lower than at the grant level. This requirement is a departure from Section 5(I) Mutual Agreement of the TRACS MOU between AFWA and USFWS which states, in part, that “financial information in TRACS will be collected at the grant level.” In order to move forward with the land and facilities modules as currently drafted, the FACWG strongly recommends that the parties to the MOU consider the implications of these changes to cost accounting to ensure there is agreement on the issue.
* Impact on Audits: It is important to note that if the land and facilities modules are approved as an alternative to the SF429, an auditable document, it is likely that these modules would also be subject to audit. Section 5(I) of the TRACS MOU also states, in part, that “financial audits will be based on the information contained on the Federal Financial Report. TRACS will not be audited for financial information.” States should consider this when commenting on the land and facilities modules.
* FACWG Concern: The FACWG is concerned about the additional reporting requirements that these modules will place on FACs, above and beyond the performance reports required for WSFR grant-funded activities. While the FACWG recognizes the potential beneficial role that these modules will have in reducing reporting requirements for lands and facilities (e.g. SF429 for all grant actions), there is significant anxiety about the additional burdens being placed on the States. Given that the responsibilities for TRACS data entry and management within States oftentimes fall solely on the FACs, these perspectives are of crucial importance to the acceptance and engagement in the TRACS Enhancement.

**SWG Effectiveness Measures Subgroup:**

This subgroup is charged with investigating the viability of a SWG Effectiveness Measures Module in the TRACS Enhancement. The subgroup will translate the AFWA SWG Effectiveness Measures Report into a matrix format for distribution and comment by the States. Feedback received will be reviewed by the subgroup and the entire TRACS WG and used to further define the requirements of the module. The product of the subgroup will be presented to the JTF for endorsement before any program development would begin. Because the JTF endorsed the concept of incorporating SWG Effectiveness Measures into TRACS as long as it did not impede the timeline the TRACS Enhancement, this module will not be part of the initial rollout of the TRACS Enhancement.

**TRACS Public Viewer Group:**

* Initiative comprised of State Staff, WSFR Staff, and Industry Representatives to identify a mechanism through TRACS to highlight success stories from States that are of interest to Industry Partners and the general public.
  + Chaired by Massachusetts Director Mark Tisa.
* AFWA hosted a scoping meeting on February 19th where initial discussions took place between Industry Representatives, WSFR Staff, and Massachusetts representatives.
* After discussions to determine the desires of the parties involved, Director Tisa proposed that Massachusetts develop examples based on our WSFR funded projects that would be presented and reviewed by the stakeholders at the North American Meeting.
  + This would provide an opportunity for the industry to provide feedback on the types of information that States could use to populate the Public Viewer.
  + Director Tisa will be providing an update on the project to the AFWA Executive Committee.
* Initially, the FACWG had concerns about this effort because of the uncertainty in the scope of information that would be readily available and the workload it would present to State Staff. Based on the outcome of the initial scoping meeting, this seems to be a reasonable approach for States to highlight a few stories resulting from their WSFR grant funded projects rather than creating comparisons between and among States. The FACWG welcomes the opportunity to engage in this process further if appropriate.

**FACWG Recommendations & Requests:**

The FACWG has several recommendations and requests regarding the TRACS Enhancement. Several of these concerns are ongoing for FACs nationally and have been raised to the TFC in previous reports:

1. The FACWG recognizes that the purpose of TRACS is a WSFR-funded grant performance reporting platform. As the development continues to take shape, it is becoming clear that TRACS is expanding into a grants management system rather than a performance reporting platform. However, there should not be any element of the grant submission or approval process tied to TRACS. The FACWG requests that WSFR Regional Offices remain flexible and work with their State partners to enter grant information into TRACS – particularly in the early stages of the TRACS Enhancement rollout.
2. Request prism-style notifications in the TRACS Enhancement to provide a double-check for States to verify reporting due dates. Automated email notice to grant contacts 30 days before reports are due.
3. The FACWG wishes to stress the importance of training materials and guidance from the TRACS WG and WSFR be provided to States – both in anticipation of the initial rollout and for implementation to address what will undoubtedly be significant challenges facing both States and WSFR Regional Office Staff.
4. As noted in the previous report to the TFC, in the interest of the State-WSFR Partnership, the FACWG requests that WSFR convene a review team comprised of State and WSFR staff after a full grant cycle has been completed in the TRACS Enhancement to address any problems that have arisen with the functionality of the TRACS Enhancement.

**2019 FACWG Action Items**:

* Mike Sawyers (Region 5) will continue to serve as liaison between the TRACS WG and FACWG. As part of this role, he attended the annual TRACS WG meeting in January 2019 and will participate in a TRACS Training Workshop planned for late 2019. As appropriate, he will continue participating in subgroups focused on finalizing the TRACS Enhancement framework and continue to solicit input via the FACWG from FACs nationally.
* The FACWG will survey their States to request feedback on what assistance is needed from the TRACS WG and WSFR to prepare for the TRACS Enhancement rollout.
* The FACWG anticipates coordinating additional communications with the State members of the TRACS WG to ensure streamlined sharing of information as the rollout of the TRACS Enhancement approaches.

1. **Forthcoming Regulatory Revisions**

The FACWG understands that new regulatory requirements are anticipated through the Department of Interior that would impact WSFR grants – particularly those including real property and facilities. While the specifics of the proposed regulatory changes are currently unknown to the FACWG, it is anticipated that these changes will lead to more accountability for land acquisition documentation and long-term record keeping. These proposed changes have a direct nexus to the proposed land and facilities modules discussed in the TRACS Section of this report.

**FACWG Concern/Request:**

The FACWG is concerned about the impact that the new regulations will place on States. With State Federal Aid Programs already under pressure with the TRACS Enhancement forthcoming and the ordinary operations of State Programs, another change to regulatory requirements for WSFR-funded grants will be quite burdensome. When published, the FACWG requests assistance from the TFC and AFWA in considering the impacts of the proposed regulatory changes to ensure comments are addressed and submitted with a unified State voice.

**2019 FACWG Action Items**:

* The FACWG will remain engaged and encourage FACs to remain vigilant in watching for these notices and to comment when appropriate.
  + In the coming year, the FACWG anticipates significant effort among the States and Regions to consider the impacts on the Federal Aid Program in States and the overall impact to the State-WSFR Partnership.

1. **Real Property Chapters**

In October 2018, WSFR requested that the FACWG send an update to FACs nationally with a status update of the real property chapters. Through this communication, FACs were informed of:

1. WSFR’s intent to publish the real property chapters in the near future,
2. A history of the chapters since 2014,
3. Anticipated changes to regulatory requirements affecting land acquisition (see Section II above), and
4. WSFR’s intent to maintain flexibility within their regulatory constraints.

At the time of this request, two regions were having their annual FAC meeting where WSFR would be providing an update on the real property chapters. In an effort to communication this information nationally, WSFR requested the assistance of the FAWG to disseminate the information. WSFR felt it was important to share this information across the board to all relevant recipients – and not just the regions that happened to be having their annual meetings at that time. The FACWG is grateful for the preliminary communication from WSFR on this matter and their efforts to ensure all FACs are informed of this important topic simultaneously

**FACWG Concern/Request:**

* Several months has passed since the FACWG distributed this information. What is the current timeline for publishing of the real property chapters and when will the new guidelines take effect for WSFR-funded land acquisitions?

1. **50 CFR 80 Revisions**

The FACWG understands that the Final Rule of the updates to 50 CFR 80, originally posted in December 2017 (82 FR 59564), will soon be published in the Federal Register. At the previous September 2018 TFC Meeting, WSFR had not yet determined the manner in which additional updates on the Final Rule would be shared with the States. The FACWG has been advised that when the Final Rule publishes, the sections of 82 FR 59564 that are not moving to Final Rule will be distributed to the States with a rationale for the decision. The FACWG appreciates the transparency and partnership from WSFR through their decision to openly communicate on an issue that was of significant concern in early 2018.

**FACWG Concern/Request:**

If WSFR intends to move forward with revision to 50 CFR 80 or other regulatory revisions in the future, the FACWG requests that WSFR engage with the States early in the proposed revision process to avoid confusion and frustration.

1. **JTF Issue Identification**

* In January 2019, WSFR distributed a memo detailing a proposal that identifies a process to bring issues to the JTF for consideration at future meetings. The intention is to formalize the issue identification process and append it to the JTF charter.
* The proposed process would require the FACWG to review issues brought forth by the February 15th deadline at the Spring Meeting of the WSFR Chiefs and FACWG.
* The FACWG appreciates the opportunity to engage with the JTF in this process and hopes to provide a unique perspective as day to day practitioners of the Federal Aid Program in the States.

**2019 FACWG Action Items**:

* In anticipation of the JTF Issue Identification process being formally adopted, the FACWG plans to update their bylaws to formally define this annual responsibility and further develop the internal process by which the FACWG will review, deliberate, and respond to these issues – including a schedule and deadline for providing feedback to the JTF.

1. **WSFR Shared Vision Team**

At the Fall 2018 TFC Meeting, the FACWG reported that former FACWG representative Doyle Brown would remain the representative on the WSFR Shared Vision Team if additional activities were undertaken by the group. Since the Fall 2018 meeting, no additional actions have been taken. We appreciate the request from WSFR to engage in these high level discussions that will impact the future of the State-WSFR Partnership. The FACWG believes having a FAC on these type of groups provide an important perspective from day-to-day practitioners of the State Federal Aid Program.

**FACWG Concern/Request:**

The FACWG requests that WSFR engage with the FACWG in the future of this Visioning Team reassembles or similar endeavors are undertaken.

1. **FACWG/WSFR Meetings and Invitational Travel**

The FACWG appreciates the continued invitation from the JTF to have the Chair and Co-Chair of the FACWG attend the spring and fall JTF meetings. We believe this is an important way to facilitate ongoing communication between these groups now that the Spring JTF meeting has been separated from the WSFR Chiefs/FACWG meeting. The request for FACWG engagement in the JTF Issue Identification process will further strengthen the communication and relationship between these groups (see Section V above).

**FACWG Concern/Request:**

* Invitational Travel: WSFR will not be providing invitational travel funding for the foreseeable future due to budgetary constraints. Based on a given FAC’s ability to find funding for travel using State funds, it may not be possible for the FACWG to fully participate in these annual meetings as expected. While the FACWG understands the budgetary constraints currently facing the WSFR Program, we believe that continued attendance at these meetings is an important component of conveying the perspective of FACs directly to the State Directors and WSFR Leadership. Without the ability to attend these meetings, the FACWG has concerns that the perspective of the Federal Aid Coordinators, who deal with the day-to-day administration of these programs, will be lost, and thus, support to WSFR programs may also suffer.

1. **CAHSS Technical Advisory Committee**

During FFY2019, Julie Kempf (Region 3) will serve as the FACWG representative on the Technical Advisory Committee to the Council to Advance Hunting and Shooting Sports (CAHSS). During fall of 2018, the committee reviewed the annual CAHSS report, and compiled recommendations were shared with CAHSS. Changes were incorporated by CAHSS to the extent possible, and the updated report was accepted by WSFR. Comments around the incorporation of SMART objectives, and additional budget information such as fund subaccounts used will continue to be reviewed for future adoption. Future CAHSS reports will align with federal fiscal years, rather than continuing with a September 1 start date.

**2019 FACWG Action Items**:

The FACWG representative on the CAHSS Technical Advisory Committee will continue to review and respond to requests as appropriate to provide the perspective of the FACWG. While this may be an intermittent task, the FACWG believes it is important to continue participation in this group moving forward.

1. **Communication**

The Communication Protocol for relaying high level information from WSFR to the States continues to facilitate communication and increase transparency. The FACWG strongly supports the continued use of this communication strategy for all WSFR-related policy level communications.

Since the Fall 2018 TFC Meeting, the following opportunities to comment were received from WSFR through the Communication Protocol:

1. September, 2018: WSFR Chiefs distributed new guidance on program income which includes eligibility of the cost sharing method for assessing program income on WSFR grants (*FACs and Fiscal Program Coordinators Only*).
2. January, 2019: WSFR Chiefs distributed the memo on the JTF Issue Identification along with the annual call for issues for JTF consideration.
3. January, 2019: WSFR Chiefs distributed new guidance on the eligibility of no-cost online hunter education courses as a third party match contribution.

The FACWG has continued to facilitate the flow of information between various groups by:

1. Holding FACWG conference calls to discuss matters of importance to Federal Aid Coordinators (FACs).
2. Corresponding via email amongst the FACWG regarding current topics of interest to FACs.
3. Disseminating FACWG reports and meeting minutes to the regions and State agency counterparts.
4. Continuing liaison roles to various WSFR-related working groups including:
5. TRACS Working Group – Mike Sawyers (Region 5);
6. CAHSS Technical Advisory Committee – Julie Kempf (Region 3).

**2019 FACWG Action Items**:

The FACWG will continue to facilitate the communication of important matters to their respective FAC counterparts through continued participation in other working groups and engagement with WSFR staff. We anticipate frequent communications in the next six months regarding the TRACS Enhancement and forthcoming regulatory revisions.

**Other Matters**

*FACWG Membership:*

Two FACWG members’ terms are expiring at the end of September. The efforts of these members have been of particular importance in continuing dialog and communication at a particularly busy time in the State-WSFR Partnership.

The following members are rotating off the FACWG:

Region 5: Mike Sawyers (MA)

Region 6: Eric Hyatt (UT)

The current FACWG Roster as of 2/1/2019 is:

Region 5: Mike Sawyers; Chair (MA)

Region 2: Tammy Brooks; Co-chair (TX)

Region 3: Julie Kempf (IN)

Region 4: Matt Thomas (GA)

Region 6: Eric Hyatt (UT)

Regions 1,7,8: John Seabourne (OR)

Region 5 Shadow: Chris O’Bara (WV)

Region 6 Shadow: Adam Brooks (MT)

Detailed contact information for each member is attached to this report.

The following groups have formal representation through the FACWG:

TRACS Working Group: Mike Sawyers

CAHSS Technical Advisory Committee: Julie Kempf

50 CFR 80 Scheduling: Vacant until further notice

5-year Report: Vacant until further notice