

GAP PROGRESS REPORTING

The purpose of this document is to increase awareness and ensure consistency on decisions related to General Assistance Program (GAP) progress reporting in EPA Region 9. This document was created as a result of a RTOC GAP End of Year Revamp Subcommittee meeting on progress reporting.

In accordance with 2 CFR § 200.329, GAP grant recipients are required to submit progress reports. The regulations provide flexibilities in reporting frequency and format.

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WHAT INFORMATION NEEDS TO BE PROVIDED IN THE PROGRESS REPORT?

In accordance with 2 CFR § 200.329, grant reports should contain brief information that includes a comparison of actual accomplishments to the objectives of the grants, discussion about commitments that are behind schedule and a new estimate of completion, and any additional pertinent information, such as budget to actual costs, and proposals to revise the work plan and budget if needed. There is not a required reporting format. The Tribal Branch in Region 9 has developed templates that are available on the R9 Tribal Website.

HOW FREQUENT DO THESE REPORTS NEED TO BE SUBMITTED?

According to 2 CFR § 200.329, GAP recipients will need to submit progress reports on at least an annual basis and no more frequently than quarterly. Within those parameters, you may request the frequency you deem works best for you.

Frequency Option	Pros	Cons
Quarterly	Helpful to track progress, make timely changes to the workplan and budget as needed, and facilitate check-ins	Frequent reporting may be an administrative burden on grantee
Biannual/Triannual	Reduces the number of reports that need to be produced while still providing for 1-2 mid-year reviews of progress	Harder to keep track of progress with less frequent reporting
Annual	Only one report to submit	Report must capture work completed throughout the entirety of the year and all associated deliverables; grantee may lose track of workplan commitments and not report needed changes to workplan before the end of year evaluation.

Please request any change of frequency of reporting with your GAP Project Officer. Requests on changing frequency of reporting should be made before the award is issued.

COULD EPA DENY MY REQUEST FOR LESS FREQUENT REPORTING?

Although the regulations do allow flexibility in terms of frequency of reporting, EPA has the final authority in determining the frequency. Our regulations state that “the non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity.” If a GAP grantee has been

frequently documented as being unresponsive, unreachable, or missing deadlines with reporting, EPA may decide that approving a more infrequent reporting requirement would conflict with the Agency's ability to track progress as part of their grant management oversight responsibilities. If you have concerns or disagreements with your GAP Project Officer rationale, please let the EPA R9 Tribal Branch Manager know.

WHAT IF I DON'T THINK I WILL BE ABLE TO SUBMIT MY PROGRESS REPORT ON TIME?

EPA understands that there are lots of reasons you may need more time to complete a report. **Request an extension from your GAP Project Officer if you won't be able to submit a progress report by the deadline.** Reasonable extensions will be granted and will not factor into any funding decisions.

WILL MY GAP PROJECT OFFICER REVIEW MY PROGRESS REPORT?

Yes! GAP Project Officers use progress reports to track progress and as part of the grant evaluation process. Project Officers will review your progress reports and let you know if they have questions. Your Project Officer should review your progress report within two months of receipt and should notify the grantee after it was reviewed.

COULD WE USE OTHER WAYS TO TRACK PROGRESS BESIDES PROGRESS REPORTING?

Since GAP grants are considered cooperative agreements, the GAP Project Officer and the GAP grantee should do regular check-ins about the grant, regardless of the frequency of progress reporting. Check-ins have many benefits:

- Builds a positive relationship
- Provides for open discussions on progress
- Provides opportunities to make needed changes to your GAP workplan and budget and answer your grant or programmatic questions
- Provides opportunities for the GAP Project Officer to hear and be responsive to your technical assistance requests

Check-ins can be emails, phone calls, or scheduled meetings. You can let your GAP Project Officer if you have preferred methods of communication and how frequently you'd like to be in contact. GAP Project Officers should be responsive to these preferences, but will want to be in contact at least quarterly. As a cooperative agreement, the terms and conditions of the award will require substantial involvement which can be fulfilled by these check-ins. **In instances where progress reports will be submitted on a less than quarterly basis, quarterly check-in meetings between the GAP Project Officer and GAP Grantee will be added as a workplan commitment to better track progress and address any issues before the end of year evaluation, as part of the joint evaluation process.** If you have concerns with how communication is going with your GAP Project Officer, please let the EPA R9 Tribal Branch Manager know.

WHAT DO I DO IF WORKPLAN COMMITMENTS AND/OR DELIVERABLES NEED TO CHANGE?

Please notify your GAP Project Officer ASAP to make changes to the workplan as needed. The Project Officer can approve changes to the workplan when requested if the cost of work is reasonable and the activities are GAP-eligible. Deliverables can also be changed if they reflect the work being completed. Grantees should use the most recently approved workplan to create their progress report.