American Recovery and Reinvestment Act Reporting Policy

Updated May 2010

I. Background

On February 17, 2009, President Barack Obama signed the *American Recovery and Reinvestment Act of 2009* (ARRA) into law. The ARRA authorized over $100 billion in federal funding to be spent on education reform by September 30, 2011. As a condition to receive these funds, the ARRA is clear that every dollar spent must be subject to unprecedented levels of transparency and accountability. To achieve this goal, the Office of the State Superintendent of Education (OSSE) sets forth the following reporting policy to ensure compliance with ARRA Section 1512 reporting requirements.

II. Authority

Section 1512 of the American Recovery and Reinvestment Act of 2009.

III. Scope

This policy applies to the following ARRA grants[1]:

- ARRA 1003(g) School Improvement Grant (CFDA 84.388)
- ARRA Enhancing Education Through Technology (CFDA 84.386)
- ARRA IDEA, Part B 611 (CFDA 84.391)
- ARRA IDEA, Part B 619 (CFDA 84.392)
- ARRA McKinney-Vento Homeless Assistance Act (CFDA 84.387)
- ARRA State Fiscal Stabilization Fund Education Stabilization (CFDA 84.394)
- ARRA State Fiscal Stabilization Fund Government Services (CFDA 84.397)
- ARRA Title 1, Part A (CFDA 84.389)

IV. Overview of the Reporting Process

OSSE collects and reports both prime and sub-recipient reporting data quarterly to the District of Columbia (Reporting.dc.gov) as well as the Federal Government (FederalReporting.gov) in accordance with Section 1512 quarterly reporting deadlines. Each entity receiving ARRA funds must, at least quarterly according to specific reporting deadlines, complete an ARRA Reimbursement and Reporting Workbook containing the required data elements and submit the workbook to OSSE. OSSE, in turn, reports the required information on sub-recipients' behalf to the District of Columbia's online data collection system (Reporting.dc.gov). Sub-recipients may not report directly to either Reporting.dc.gov or FederalReporting.gov.

V. Quarterly Reporting

In accordance with the ARRA Section 1512 guidance issued by the federal Office of Management and Budget (OMB), data on the use of ARRA funds by recipients (i.e., the state) and sub-recipients (i.e., local educational

[1] Grants included in OSSE's ARRA monitoring activities are subject to change without advance notice.

agencies [LEAs] and other entities receiving funds through the state) are due to the federal government no later than the 10th day after the end of each reporting quarter. To ensure timely, complete, and accurate reporting, OSSE requires sub-recipients to submit an ARRA Reimbursement and Reporting Workbook to OSSE.Reimbursment@dc.gov, at a minimum, quarterly according to the following schedule:

Reporting Quarter	Quarterly Submission Periods for Submitting ARRA Reimbursement and Reporting Workbooks to OSSE
III	**March 17 - March 22, 2010**
IV	**June 16- 21, 2010**
V	**September 16-21, 2010**
VI	**December 17-22, 2010**
VII	**March 16-21, 2011**
VIII	**June 17-22, 2011**
IX	**September 17-22, 2011**

Sub-recipients electing to submit more frequent ARRA Reimbursement and Reporting Workbooks may do so; however, each must submit a signed workbook by 5:00 pm on the last day for each quarterly submission period outlined above. Sub-recipients electing not to submit expenditures for reimbursement during a given ARRA reporting quarter must still submit a signed workbook to OSSE.Reimbursement@dc.gov. OSSE program staff will contact all sub-recipients failing to submit an ARRA Reimbursement and Reporting Workbook within three business days of the reporting deadline. ARRA Reimbursement and Reporting Workbooks, with the exception of revised workbooks, received after the last day of the applicable reporting quarter (e.g. a QIII ARRA Reimbursement and Reporting Workbook received on or after April 1, 2010) will not be processed for reporting purposes until the subsequent reporting quarter.

VI. Data Collection and Reporting Systems and Processes

OSSE utilizes three data collection systems to collect and report ARRA financial and jobs created/retained information:

- OSSE's internal Payment Tracking System (PTS)
- The District of Columbia's financial system of record (SOAR)
- The District of Columbia's stimulus reporting database (Reporting.DC.gov).

Sub-recipients submit an ARRA Reimbursement and Reporting Workbooks to OSSE. The ARRA Reimbursement and Reporting Workbook contains tabs for each ARRA grant, enabling the sub-recipient to collect and report information for all applicable ARRA grants in one centralized report. Sub-recipients submit the ARRA Reimbursement and Reporting Workbook to OSSE to both a) fulfill their federal Section 1512 reporting requirements and b) seek reimbursement for expenditures charged against ARRA grant programs.

Upon receipt of the ARRA Reimbursement and Reporting Workbooks, OSSE program staff enters the expenditure and job information in the Payment Tracking System (PTS). Each grant program is responsible for reviewing and approving its respective sub-recipients' ARRA Reimbursement and Reporting Workbooks in accordance with PTS operating guidelines (see PTS manual). Additionally, ARRA program staff must update the following additional ARRA-specific fields in PTS:

- Applicable ARRA Reporting Quarter
- FTEs Requested
- FTEs Approved

Each ARRA Reimbursement and Reporting workbook is subject to a multi-layer review. Program staff conducts an initial review to verify a) all required fields are completed, b) expenditures submitted for reimbursement are allowable according to program requirements and the sub-recipient's approved application, and c) whether the number of FTEs reported is reasonable. As applicable, program staff may contact sub-recipients to request additional information and/or to seek clarification. Program staff reports the amount of expenditures and FTEs requested by the sub-recipient as well as the amount approved according to program staff's review.

Following program staff's review, each PTS order advances to the program manager for another review and approval. The program manager reviews the sub-recipient's submitted information and enters the amount of expenditures approved for reimbursement as well as the amount of FTEs approved for reporting purposes. The PTS order is then processed for payment according to the steps set forth in the PTS manual. Only "Amount Approved for Reimbursement" as well as "FTEs Approved" data approved by the Program Manager may be reported for local and federal reporting purposes.

Once OSSE reimburses the sub-recipient based on the program manager "Amount Approved for Reimbursement", program staff consults SOAR, the District of Columbia's financial system of record, to confirm payment information. Each sub-recipient is paid from a purchase order established for an amount equaling the sub-recipient's allocation (one purchase order per grant per sub-recipient). OSSE establishes a separate purchase order for ARRA and non-ARRA grants based on separate Grant Award Notices (GANs) issued for ARRA and non-ARRA grants. The purchase order serves as an internal control to separately track federal funds and to ensure a sub-recipient does not receive payment in excess of its allocation. Both program staff and the Office of the Agency Fiscal Officer confirm available purchase order funding prior to authorizing payment for the amount approved by the program manager. Following payment, the program staff then updates payment number, payment date, and payment amount fields in PTS for each sub-recipient based on the financial data provided in SOAR.

Each reporting quarter, program staff updates prime-recipient and sub-recipient information in the District's stimulus data collection system: Reporting.dc.gov. To inform quarterly Reporting.dc.gov updates, program staff references a number of source documents including, but not limited to: Grant Award Notices, SOAR financial reports, PTS reports, and draw down reports from the U.S. Department of Education's G5 system. OSSE's Stimulus Coordinator, as well as the District's ARRA Coordinator, must review and approve each ARRA grant file prior to submission to FederalReporting.gov. OSSE's Stimulus Coordinator is responsible for validating and submitting each ARRA grant file to FederalReporting.gov within the defined federal reporting timeline. Additionally, if the federal agency identifies an issue with a report during the review process, the OSSE Stimulus Coordinator is responsible for working with the appropriate ARRA grant manager to amend the grant submission in a timely manner.

VII. Prime-Recipient Data Elements

Program staff is responsible for collecting and inputting all prime-recipient and sub-recipient data into Reporting.DC.gov which is then submitted to FederalReporting.gov on a quarterly basis. As part of the prime recipient responsibilities, program staff must create a unique profile for each grant to ensure accurate reporting. Each grant profile contains sections dedicated to general grant information, funds/awards

information, project information, prime-recipient resources, prime-recipient vendors, and sub-recipient information. Protocols for updating information are informed by both federal and local reporting guidance (e.g. U.S. Department of Education Tip Sheets and DC Prime Recipient Reporting Protocol). Data elements to be collected and reported at the prime-recipient level for each grant may include, but are not limited to:

1. General Information
    - Prime Recipient DUNS Number
    - Award Number
    - Award Description
    - Award Type
    - OCFO Code
    - Prime Recipient Account Number

2. Funds/Awards Information
    - Total Award Amount
    - Total Federal Amount ARRA Funds Received/Invoiced
    - Total Federal Amount of ARRA Expenditures
    - Total Amount of Subawards

3. Place of Performance
    - Address

4. Project/Award Information
    - Award Number
    - Federal Agency Code
    - Funding Agency Code
    - Funding Agency Name
    - Awarding Agency Code
    - Awarding Agency Name
    - Program Source (TAS)
    - CFDA Number
    - Award Date

5. Project Information
    - Project Name
    - Project Description
    - Project Status
    - Activity Code
    - Number of Jobs
    - Description of Jobs Created

6. Prime Recipient Resources
    - Project Name or Program Title
    - Name
    - Job Title
    - # of FTEs Created/Retained

7. Prime Recipient Vendors
    - Vendor Profile
    - Vendor DUNS
    - Vendor Name

- Vendor Address or Headquarter Zip Code
- Produce and Service Description
- Payment Amount
- # of FTEs Created/Retained

8. Sub-Recipient Information
    - Sub-Recipient Name
    - Sub-Recipient DUNS
    - Subaward Number (assigned by Program Manager)
    - Sub-Recipient Congressional District
    - Subaward Date
    - Amount of Subaward
    - Total Subaward Funds Disbursed
    - # of FTEs Created/Retained
    - Related Place of Performance

VIII. Sub-Recipient Data Elements

Data elements to be collected from each sub-recipient, for each grant, include (1) data that must be reported to the federal government at the sub-recipient level (for example, the name of the sub-recipient and the amount of each subaward) and (2) data that OSSE needs to collect from sub-recipients to properly report at the recipient (state) level (for example, the number of jobs retained or created).

Sub-recipients are responsible for providing OSSE with individual-level data for jobs created and retained. Sub-recipients submit job data through the ARRA Reimbursement and Reporting Workbooks at a minimum on a quarterly basis according to the schedule set forth in Section V. Reporting.

Sub-recipients must provide the following data elements to OSSE:

1. Sub-Recipient Information (for submission to Reporting.dc.gov)
    - DUNS Number
    - Address

2. ARRA Reimbursement and Reporting Workbook Information (Quarterly)
    - For each non-personnel expenditure submitted:
        - Program Category
        - Budget Category
        - School or Campus where Services were Performed
        - Payee
        - Required or Optional Set-aside (as applicable)
        - Description of goods or services provided
        - Invoice Date
        - Total Invoice Amount
        - Check Number
        - Check or Payment Date
        - Amount Requested

    - For each personnel expenditure submitted:
        - ARRA Funding Source (Grant Title)

- Name of Employee (Last, First)
- Program Category (refer to approved budget)
- Title/Position
- School or campus where employee works
- Brief job description
- Total annual salary
- Total salary during this reporting period
- Budget/program category
- Beginning and end date of hours worked for the reimbursement period
- Number of hours worked by the employee during the reimbursement period (Numerator)
- Total number of hours worked by a full-time employee in a similar position during the reporting period (3 months) (Denominator)
- Percent of time charged to each cost objective/funding source

- For applicable vendor employees:
  - ARRA Funding Source (Grant Title)
  - Vendor Name
  - Name of Employee (Last, First)
  - Vendor DUNS number or Vendor's headquarters' zip code
  - Amount of ARRA funds paid to the vendor during the reporting period
  - Confirmation if employee was hired/retained as a result of the sub-recipient payment
  - Brief job description
  - Total number of hours worked by the person for the period of time reported
  - Total number of hours worked by a full-time employee in a similar position during the reporting period (3 months) (Denominator)

IX. Reporting Jobs Created/Retained

In accordance with the Office of Management and Budget's (OMB) Memorandum M-10-08, OSSE defines jobs created or retained as those paid for by the Recovery Act or will be reimbursed with Recovery Act funds. Jobs partially paid or approved for reimbursement with Recovery Act funds will only be counted based on the proportion funded by the Recovery Act. OSSE does not make subjective judgments on whether a given jobs would have existed were it not for the Recovery Act. Only hours worked that are either directly tied to an actual Recovery Act expenditure or an expenditure approved for Reimbursement with Recovery Act funds by the Grant Manager are counted for reporting purposes.

OSSE reports jobs in the quarter in which the personnel expenditure was either (A) approved for reimbursement with Recovery Act funds by the Grant Manager (applicable for prime-recipient vendor, sub-recipient, and sub-recipient employees) or (B) paid with Recovery Act funds (applicable for prime-recipient employees). All jobs are reported in terms of full-time equivalents (FTEs).

Calculating Sub-Recipient, Sub-Recipient Vendor, and Vendor Jobs:

OSSE employs a reimbursement process to pay sub-recipients, sub-recipient vendors, and prime recipient vendors. As such, OSSE implemented a methodology for calculating the number of jobs funded by the Recovery Act that compensates for instances in which a sub-recipient or vendor may submit expenditures for hours worked in previous reporting quarters. To ensure the accurate number of FTEs are reported in these instances, OSSE (1) compares hours worked by the employee to that of a typical employee during the

reimbursement period[2], (2) only considers the portion of hours worked that are approved for reimbursement with Recovery Act funds (e.g. hours supported with Recovery Act funds), and (3) compares number of days worked and sought for reimbursement to that of a typical federal ARRA reporting quarter[3].

OSSE employ the following calculation to derive # of FTEs created or retained for sub-recipients and vendors: "Hours worked by an employee during the reimbursement period" divided by "Hours worked by a typical, full-time employee during the reimbursement period" times the "Percent of salary and benefits charged to the ARRA funding source" (e.g. ARRA IDEA, Part B 611). This product is then multiplied by the number of days included in the reimbursement period divided by the average number of business days in a federal ARRA Reporting Quarter. The output is "Full-Time Equivalents (FTEs) Reported" in decimal form.
Sub-recipients are NOT required to calculate the number of FTEs created or retained; rather, the ARRA Reimbursement and Reporting Workbook automatically computes "Full-Time Equivalents Reported" based on the data entered by the sub-recipient. Depending on the length of the reimbursement period, a sub-recipient may submit personnel expenditure information for a fraction of or more than one FTE.[4] OSSE program staff and the grant manager review all personnel and job reporting information and populate the field "Full-Time Equivalents Approved" accordingly. Disallowed personnel expenditures are not included in "Full-Time Equivalents Approved" as these portions of FTEs will not be reimbursed with Recovery Act funds. OSSE reports the number of "Full-Time Equivalents Approved" to Reporting.dc.gov and FederalReporting.gov. The number of "Full-Time Equivalents Approved" by the grant manager may differ from the number of "Full-Time Equivalents Reported" by the sub-recipient.

Calculating Prime Recipient Jobs:

"Prime Recipient Jobs" refers to OSSE employees whose salaries are paid in full or in part with Recovery Act funds. Only OSSE personnel with a documented payroll expenditure recorded in SOAR during the applicable reporting period may be considered as a "job funded with Recovery Act funds" for local and federal reporting purposes. For each ARRA grant, the program manager must create a "Prime Recipient Resource" profile for each employee specifying the individual's name and job title. The program manager then creates a corresponding "Prime Recipient Time Card" to document the number of hours worked and funded with Recovery Act monies each month. Based on the hours worked information entered, Reporting.dc.gov then automatically calculates the total number jobs created per quarter by (a) adding the number of hours worked by the employee during the three months comprising the quarter and (b) dividing that sum by 520 hours (the number of hours worked by a typical full-time employee assuming a 40 hour work week). Reporting.dc.gov aggregates the number of full-time employees funded by the particular Recovery Act grant per quarter. The total number of prime and sub-recipient resources (in terms of full-time equivalents) funded by the Recovery Act grant is then represented in the summary field "Number of Jobs XXX-XXX" (e.g. Number of Jobs Jan-Mar).

---

[2] "Reimbursement Period" refers to the period of time the employee worked for which the sub-recipient is seeking reimbursement.
[3] "ARRA reporting quarter" refers to the federally defined three-month reporting quarters (e.g. April 1, 2010 to June 31, 2010).
[4] OSSE's reimbursement policy enables sub-recipients to submit valid personnel expenditures at any point during the applicable grant cycle; therefore, sub-recipients may submit workbooks containing reimbursement information spanning several ARRA reporting quarters at one time. OSSE's methodology for calculating and reporting jobs accounts for these challenges and ensures that at the end of the grant cycle all jobs reimbursed with Recovery Act funds are accurately reported.

X. Risk Management and Internal Controls Over Data Quality

To ensure accurate, complete, and compliant quarterly ARRA quarterly reporting, OSSE implements the following efforts:

1. **Automate Key Features of the ARRA Reimbursement and Reporting Workbook**—OSSE requires each sub-recipient to enter the base data that is then automatically calculated to derive the fields "Amount of Expenditures Requested" and "Number of Jobs Reported". OSSE program staff then conducts a thorough line-item review for allowability and enters a corresponding field "Amount of Expenditures Approved" and "Number of Jobs Approved" which are the data points that are then submitted to local and federal reporting systems. The built-in functionality of the ARRA Reimbursement and Reporting workbook automatically aggregate these key fields at the grant level to ensure accurate reporting.

2. **Utilize Consistent, Accurate Data Sources**—OSSE program staff report expenditure information from the District of Columbia's SOAR system, revenue information (i.e. "Amount Drawn Down") from the GAPS/G5 system, and job information from the "Approved FTEs" field in OSSE's Payment Tracking System (PTS). OSSE's reporting protocols specify the relevant data fields in each used to populate grant-specific information in Reporting.dc.gov.

3. **Centralize Data Collection**—The District of Columbia's Reporting.dc.gov platform enables District agencies to house data in one main system. Each quarter agencies update information, as required; however, the main data fields remain populated. The streamlined process eases the reporting burden, reduces data entry errors, and allows agencies to easily export data for internal review and verification.

4. **Employ a Multi-Layer Data Review**—Prior to submission to FederalReporting.gov, each ARRA grant file undergoes a thorough review by OSSE program staff and the grant manager, OSSE Stimulus Coordinator, and District Stimulus Coordinator. The reviews involve cross-referencing PTS and SOAR reports with information uploaded to Reporting.dc.gov, ensuring grant profile information aligns with federal guidance, verifying that data elements are logically related, and confirming all required data entry fields are complete, etc. The Reporting.dc.gov platform requires the appropriate individuals to approve each file before it can advance to the next level and ultimately generate the XML file required for upload to FederalReporting.gov.

5. **Identify Late/Non-Submitters**—OSSE contacts each sub-recipient who does not submit the required reporting documentation by the deadline. Sub-recipients that demonstrate systematic or chronic deficiencies in meeting their reporting responsibilities may receive additional monitoring as well as be required to provide additional supporting documentation with their ARRA Reimbursement and Request Workbook submissions.