MINNESOTA Management & Budget

Office Memorandum

Date: August 17, 2009

To: Commissioners
Deputy Commissioners
Agency Budget Directors
Agency Stimulus Coordinators

From: Tom J. Hanson *TJH*
Commissioner

Subject: Recovery Act Reporting Guidance

This memo is intended to help you prepare for reporting requirements of the American Recovery and Reinvestment Act (ARRA). The initial reporting is due in less than eight weeks and it is critical that our state be ready to make this information available.

In follow-up communications, you and your staff can expect more specific reporting issues and checklists to ensure that we're all as prepared as well as possible. In this memo, we provide an initial list of considerations to help you register for federal reporting.

Another significant element of this memo is my request that all agencies provide Section 1512 reports to MMB prior to sending data to the federal government. This initial submission should be no later than October 7. This step is intended to provide a quick, outside review of data to help minimize errors or inconsistencies across state agencies.

It will take everyone's attention to ensure that this brand new process works smoothly. This process has been slow to evolve for all of us and I appreciate you and your staff's work to adapt. You've done an excellent job with quickly utilizing federal recovery dollars and I look forward to working with you to ensure that the state accurately reports the results.

Background

At the end of June, the federal Office of Management and Budget (OMB) released documents that define Section 1512 reporting requirements under the American Recovery and Reinvestment Act (ARRA). This reporting requirement covers most, but not all, of the ARRA related activities. Since then, OMB has provided additional clarification on its requirements and webinars to further explain the reporting process and the responsibilities of recipients.

The responsibility for reporting ARRA activities resides with the primary grant recipient, with additional expectations that the Governor assure statewide quality. In most cases, that means that your agency is lead for providing the required information and MMB is responsible for review and data quality oversight. The federal government is expecting that all data will flow from the grant recipients to a web

site called federalreporting.gov. On this website, recipients of specific ARRA contracts, loans and grants must report on their award. Data loaded into this site will ultimately be reported on the main federal web site, recovery.gov.

Some key steps for the next couple months are outlined below.

August 17:	Registration for federal reporting begins
September 1:	Agencies' ARRA reporting roster due to MMB
On-going:	Preparation and readiness assessments completed
October 1-10:	Initial reports routed to MMB for initial screening by October 7th; approved data submitted
October 11-21:	Prime recipients review data submitted by their sub recipient(s) and perform data quality reviews. Prime and sub recipient(s) make corrections.
October 22-30:	Federal agencies provide quality reviews and place data on searchable web site at www.recovery.gov

Preparing for Section 1512 Reporting

- As you know, state agencies need to identify all the ARRA programs/awards that require 1512 reports. As a reference, please refer to List of Programs Subject to Recipient Reporting. This document contains all the ARRA awards by CFDA that require 1512 reports. This list of programs has been updated multiple times since it was first released, so please check for additional updates even if you have reviewed this document previously.

- A report is required beginning on October 1st for any ARRA award listed where a state agency has received an award notice prior to September 30th.

- Your agency is responsible for reporting on any award subject to 1512 where your agency is the prime recipient, or if you are acting as a sub recipient and have been delegated reporting requirements by the prime recipient.

- If there is more than one state agency that is the prime recipient of an award, it will be necessary to coordinate reporting across state agencies.

- Within your agency, it will be necessary to clearly articulate who is responsible for compiling the report data and submitting the report. Multiple users make sense for many state agencies, but roles and responsibilities should be clarified up front.

- Clearly articulate the responsibilities of your sub recipients. Prime recipients may delegate the reporting on the sub recipient data elements (FFATA data elements) to the sub recipient, but there are issues to consider with delegating sub recipient reporting including double counting, staff capacity and sub-recipient compliance.
  - o If a prime recipient delegates reporting to the sub recipients, the prime cannot view the data reported by the sub recipient until after the 10th day of reporting. Additionally, even

if sub recipient reporting is delegated, the prime recipient still must report on overarching elements such as jobs created and activity and project descriptions.

- If you choose to delegate sub recipient reporting (FFATA data elements) to sub recipients, you must do so for the entirety of the award. NOTE – Even if you delegate sub recipient reporting, sub recipient data must be provided to MMB for review and reporting on the state website. Additionally, as the prime recipient you are still responsible for data verification and the integrity of the data submitted by the sub recipients.

- Identify how data will be submitted to federalreporting.gov. Choices include: using the web interface on www.federalreporting.gov, downloading and uploading the Excel spreadsheet or using an XML schema. If you are choosing to use an XML schema the logistics of this should be worked out well in advance of the reporting deadlines. MMB strongly discourages agencies from using the web interface to report data. Using the web interface will not allow you to easily transmit your data to MMB for review and will not allow you to work on the reporting in advance of October 1.

- Agencies must submit a completed ARRA Reporting Roster to MMB by September 1. This spreadsheet will come with a subsequent memo and is intended to allow MMB to centrally identify the parties responsible for reporting, the method agencies will use for reporting, in addition to assessing the readiness of agencies.

Reporting Registration

- Registration for federalreporting.gov goes live on August 17th.

- Before a ARRA report submission can occur through federalreporting.gov, a one-time registration process is required

- Registration Requirements
  - Receipt of ARRA related award
  - Recipient's 9-digit D-U-N-S number
  - Registration with Central Contractor Registration (CCR). Being registered with CCR is only necessary for prime recipients
  - Valid email address and phone number

- Register earlier, as complications could arise with D-U-N-S and CCR information.

- If you do not have an existing D-U-N-S or CCR number it may take up to a week to register in these systems. If you are registering for a D-U-N-S number be sure to reference our state headquarters number in your request so the new D-U-N-S will be linked into the state structure.

- Each individual who wants to participate in report submissions for their agency must register. Once registered, that individual may report on multiple awards.

- If agencies have decided to delegate the responsibility of reporting the sub recipient data elements to the sub recipient, agencies must inform the sub-recipients of this delegation, work out the logistics of reporting and ensure the sub recipients have the required information needed to report beginning on October 1st. If sub recipients have been delegated the responsibility for reporting, they must register in federalreporting.gov.

MMB Recommendations

- Register early for federalreporting.gov. Issues may arise with D-U-N-S and CCR information, which can take up to a week or two to resolve.

- Compile as much of the 1512 data elements as possible before October 1. Much of the data can be generated in advance, so the only elements outstanding are those that rely on quarter-end data.

- Include a central data check in your timelines. This review will be expedited but you should plan on sending any draft material to MMB prior to or on October 7. Federalreporting.gov may encounter technical difficulties with the high volume of report traffic in the final couple of days of reporting. If you can provide your data early to MMB, we will turn it around quickly so you can submit your report early and beat the rush.

Additional Resources

Public entities across the county are struggling to manage the changing expectations and quick timelines associated with ARRA. Within just the last couple weeks, some useful material has been produced and I'd encourage your team to use them, as needed. These resources include:

- o OMB's Recovery Act Webinars at
  http://www.whitehouse.gov/recovery/webinartrainingmaterials/
- o OMB Guidance (including reporting guidance, excel spreadsheet, XML schema, and FAQs) at http://www.recovery.gov/?q=content/recipient-reporting
- o Federal reporting HelpDesk (goes live August 17th)
- o Federalreporting.gov

cc: Sen. Richard Cohen
      Rep. Loren Solberg
      Rep. Lyndon Carlson