American Recovery and Reinvestment Act (ARRA) of 2009

October 5, 2009 Workshop
Speakers

Cheryl Mowdy, Director Support Operations
Finance and Administration
Mississippi Institutions of Higher Learning

Deborah Gilbert, Associate Executive Director for Finance and Administration
State Board for Community & Junior Colleges
Today’s Guest Speaker

Samantha Atkinson, Director
Performance Audit Division
Mississippi Office of the State Auditor
Agenda

Section 1512 Reporting

- Definitions
- Who does what for ARRA reporting?
- Registration Requirements
- Guidelines
  - Report Due Dates
  - Using the Excel Templates
  - Prime Recipient
  - Sub-Recipient
  - Vendors
Agenda

• Job Creation/Retention Reporting
• Procurement Requirements
• Documentation
• Other ARRA Requirements
• Financial Aid
• Contact Information
Section 1512 Reporting answers the following questions:

– Who is receiving Recovery Act dollars and in what amounts?

– What projects or activities are being funded with Recovery Act dollars?

– What is the completion status of such projects or activities and what impact have they had on job creation and retention?
Central nationwide data collection system for federal agencies and recipients of federal awards under Section 1512 of the Recovery Act.
ARRA Types

I. State Fiscal Stabilization Funds (SFSF) - Flows through the IHL/CJC Board Offices to the Universities and Colleges

II. Other ARRA - Direct awards issued to the universities and colleges from federal agency or via a pass-through entity

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What programs are subject to ARRA Section 1512?

In order to determine the federal programs subject to ARRA Section 1512 reporting requirements a link has or will be established on IHL/CJC’s Stimulus home pages:

http://www.whitehouse.gov/omb/assets/memoranda_fy2009/m09-21-supp1.pdf
Definitions
ARRA Definitions

Prime Recipient – Recipient of funds directly from a federal agency.

Office of the Governor- State of Mississippi = Prime Recipient of State Fiscal Stabilization Funds (SFSF)

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ARRA Definitions

Sub-Prime or Sub-Allocant – When a State agency, as the Prime Recipient awards a grant to another State agency.

IHL/CJC Board Office = Sub-Prime for the SFSF

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ARRA Definitions

**Sub-Recipient** – non-federal entity that expends federal awards received from another entity to carry out a federal program but does not include an individual who is a beneficiary of such a program.

**Institutions/Colleges**

= Sub-Recipient for SFSF

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**Vendor** – Dealer, distributor, merchant, or other seller providing goods or services that are required for the conduct of a federal program.

**Payments issued by institutions or colleges to an external entity for the purchase of contractual services, commodities or equipment.**
U.S. Department of Education
= Funding Agency

Governor via MS Department Finance & Administration
= Prime Recipient

IHL/CJC Board Office
= Sub–Prime or Sub-Allocant

Universities/ Colleges
= Sub Recipients

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Who does What to Satisfy Section 1512 Reporting?
1. Institutions/Colleges submit specified information to the IHL/CJC Board Offices

2. IHL/CJC Board Office will compile and review data

5. IHL/CJC Board Office emails report to designated contacts at DFA

6. DFA submits report to www.federalreporting.gov and Stimulusreports@governor.state.ms.us

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OTHER ARRA Section
1512 Reporting

Institutions and Colleges satisfy Section 1512 reporting associated with all OTHER ARRA Funds (non-SFSF)

Reports must be emailed to the following:

• www.federalreporting.gov and
• Stimulusreports@governor.state.ms.us and
• Stimulusreports@mississippi.edu (IHLs)
• Stimulus@mscjc.edu (CJCJs)

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Registration Requirements

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Preliminary Steps

1. Conduct a DUNS Number Review

2. Register at the Central Contractor Registration (CCR) Database: www.ccr.gov


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III. Federal Reporting Registration

After accessing www.FederalReporting.Gov, refer to left-hand side of screen

- Not Registered?

  Click: Register Now

- Will be prompted for personal information
- Email address will serve as the User ID
- Will receive a temporary password via email
I. DUNS Number REVIEW

Conduct a thorough review related to your institutions/colleges’ Dun and Bradstreet (D-U-N-S) number, which is the nine-digit unique identification number established for your institution/college and/or a particular unit or branch of the institution or college.
II. CCR Registration

- Make sure your institution/college is registered at FederalReporting.Gov

- A one-time registration must be completed in order to submit reporting data to FederalReporting.Gov. Submission of reporting data began on October 1, 2009.
Section 1512
Reporting Guidelines
ARRA Section 1512
Reporting:

• Is DIFFERENT from routine federal reporting.

• Is required for EACH ARRA award.

• Is not a substitute/replacement for regular funding agency reports; rather they are IN ADDITION to these reports.

• Is required for any ARRA funded award once in receipt of the award. If no funds have been expended but the award document is received, must report zero as expended.
ARRA Section 1512 Reporting

• Is to be cumulative.

• For the quarter ending, the first 10 days of the following month are allowed for submission the report.

• Edits and corrections to reported data are allowed; however, new data cannot be added.

• At the end of day 10, users will be locked out of the system and cannot make additional edits.

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ARRA Section 1512 Reporting

- At the end of the month, data will be posted to www.USASpending.Gov

- Failure to submit reports within the required time-frame is considered non-compliance and may be considered a violation of the award agreement resulting in repayment of funds.

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Report Due Dates
Timeline and Activities-
1st Quarter

Phase 1 or First Quarter: October 1 - October 10
- Recipients prepare reporting data
- Recipients submit report(s) by October 10th

SFSF will NOT be reported for first quarter.
OTHER ARRA funds MUST be reported for first quarter.
Timeline and Activities - 1st Quarter

Phase 2 or 2nd Quarter: October 11 - October 21
• Prime Recipients review data submitted by their Sub Recipients
• Prime and Sub Recipients work together through any potential report corrections
• Awarding Agencies have access to view reports submitted by Recipients

Phase 3 or 3rd Quarter: October 22 - October 29
• Awarding Agencies review Recipient reports submitted (or updated in Phase 2) and provide comments as necessary on select reports
• Prime Recipients and Sub Recipients work together on corrections identified/comments made by the Awarding Agencies

Phase 4: October 30
• Recipient reports available on Recovery.gov

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Due Dates

2nd Quarter Due Date = January 10, 2010
Covers reporting period October 1, 2009 - December 31, 2009

3rd Quarter Due Date = April 10, 2010
Covers reporting period January 1, 2010 – March 31, 2010

4th Quarter Due Date = July 10, 2010
Covers reporting period April 1, 2010 – June 30, 2010

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Steps for 1512 Reporting

1. [www.federalreporting.gov](http://www.federalreporting.gov)

2. See Download Templates (far-left hand side of screen)

3. Select Microsoft Excel


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Using the Excel Templates

Deborah Gilbert, Associate Executive Director for Finance & Administration
State Board for Community & Colleges

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Section 1512 Report
Reminders for SFSF

- DFA will complete the **Prime Recipient** Excel Template for the SFSF Funds

- **Institutions/Colleges** will complete the **Sub-Recipient** and **Vendors** Excel Templates for SFSF and submit to the IHL/CJC Board Offices

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Important Caveats regarding SFSF sub-recipient reporting (previous slide):

• If sub-awards are made to *individuals*, such as scholarship awards paid to students, it will be necessary to also complete a section of the Prime Recipient work-sheet within the approved Excel templates.

• If *jobs are created or retained*, such as adjunct faculty or instructors in which SFSF funds a portion or all of salaries, it will be necessary to complete the Project Information (jobs section) of the Prime Recipient work-sheet within the approved Excel templates.

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Section 1512 Report
Reminders for OTHER ARRA Funds

Institutions/Colleges will complete the Prime Recipient Excel Template for any funds in which they are a direct recipient of the federal award.

NOTE: It is important to refer to individual award documents related to specific reporting instructions to ensure there is no duplicative reporting.

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The names and total compensation of the five most highly compensated officers of the entity must be reported if:

- The entity received 80% or more of its annual gross revenues in the preceding fiscal year from Federal awards, AND
- The entity received $25,000,000 or more in annual gross revenues in the preceding fiscal year from Federal awards, AND
- The public does not have access to this information through the Securities and Exchange Commission as mandated by the Securities and Exchange Act of 1934 OR through Internal Revenue Service filings as mandated by Section 6104 of the Internal Revenue Code. Neither of these regulations apply to state agencies, but they may apply to sub recipients.
Using the Templates

FederalReportingTemplate - Grants and Loans 10_2009.xls

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Job Creation/Retention Reporting

Sam Atkinson, Director
Performance Audit
Office of the State Auditor

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Job Creation/Retention Reporting

- Prime recipients are required to report on all jobs they have created or retained due to ARRA
- Recipients will report direct job numbers using a standard calculation to get total FTEs for full and part-time employees
- Recipients will estimate job creation for grants, loans and contracts to another entity
- Recipients can go through a process to get permission from the federal government to use an alternate methodology

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5.3 What methodology should recipients use when calculating the number of jobs created or retained?

The requirement for reporting jobs is based on a simple calculation used to avoid overstating the number of other than full-time, permanent jobs. This calculation converts part-time or temporary jobs into “full-time equivalent” (FTE) jobs. In order to perform the calculation, a recipient will need the total number of hours worked that are funded by the Recovery Act. The recipient will also need the number of hours in a full-time schedule for a quarter. The formula for reporting can be represented as:

\[
\frac{\text{Cumulative Recovery Act Funded Hours Worked (Qtr 1...n)}}{\text{Cumulative Hours in a Full - time Schedule (Qtr 1...n)}} = FTE
\]
Job estimate example (continued)

<table>
<thead>
<tr>
<th>Period</th>
<th>3rd qtr</th>
<th>4th qtr</th>
<th>1st qtr</th>
<th>2nd qtr</th>
<th>3rd qtr</th>
<th>4th qtr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full-time Schedule</td>
<td>520</td>
<td>1040</td>
<td>1560</td>
<td>2080</td>
<td>2600</td>
<td>3120</td>
</tr>
<tr>
<td>Full-time employee 1</td>
<td>520</td>
<td>1040</td>
<td>1560</td>
<td>2080</td>
<td>2600</td>
<td>3120</td>
</tr>
<tr>
<td>Full-time employee 2</td>
<td>520</td>
<td>1040</td>
<td>1560</td>
<td>2080</td>
<td>2600</td>
<td>3120</td>
</tr>
<tr>
<td>Part-time employee (half time)</td>
<td>260</td>
<td>520</td>
<td>780</td>
<td>1040</td>
<td>1300</td>
<td>1560</td>
</tr>
<tr>
<td>Temporary employee (650 hrs.)</td>
<td>0</td>
<td>0</td>
<td>130</td>
<td>390</td>
<td>650</td>
<td>650</td>
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<tr>
<td>Total hours worked</td>
<td>1300</td>
<td>2600</td>
<td>4030</td>
<td>5590</td>
<td>7150</td>
<td>8450</td>
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<tr>
<td>Quarterly FTE</td>
<td><strong>2.50</strong></td>
<td><strong>2.50</strong></td>
<td><strong>2.58</strong></td>
<td><strong>2.69</strong></td>
<td><strong>2.75</strong></td>
<td><strong>2.71</strong></td>
</tr>
</tbody>
</table>
• *Alternative calculations* based on percentages of activities is acceptable for recipients that must comply with OMB Circular A-21, Cost Principles for Educational Institutions

  o For an instructor on contract less than 12 months: consider the total hours worked during the school year as equivalent to 1 FTE even if the period is less than 12 months if the instructor is working pursuant to a contract that the recipient regards as full-time.

  o In this scenario an instructor may be reported as more than 1 FTE
Consider this example. The hypothetical full-time schedule for an instructor is to work 520 hours in quarters 1-3 then to work only 1 month in quarter 4 (173 hours).

<table>
<thead>
<tr>
<th>CHW</th>
<th>Q1</th>
<th>Q2</th>
<th>Q3</th>
<th>Q4</th>
</tr>
</thead>
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<tr>
<td>Full + Summer</td>
<td>520</td>
<td>1040</td>
<td>1560</td>
<td>2080</td>
</tr>
<tr>
<td>Full–Time Schedule</td>
<td>520</td>
<td>1040</td>
<td>1560</td>
<td>1733</td>
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<tr>
<td>FTE:</td>
<td>1.00</td>
<td>1.00</td>
<td>1.00</td>
<td>1.20</td>
</tr>
</tbody>
</table>
Documentation

Cheryl Mowdy
Director Support Operations
Mississippi Institutions of Higher Learning

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Important Reminders Regarding Documentation

• All decisions must be reduced to writing.

• Work papers must be maintained to support Section 1512 elements.

• A working paper file is to be established for EACH ARRA award.

• Work papers must be orderly, accessible and auditable.

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Master Work Paper File

• Each sub-recipient should have a section with the master work paper file.

• Each vendor should have a section within the master work paper file.

• Report Reviewer’s checklist should become part of the master work paper file.
Other Requirements
Buy American

Under ARRA Title XVI, Section 1605, no funds appropriated by the Act may be used for public buildings/work projects unless “all iron, steel and manufactured used...are produced in the United States.
RFPs and Bid Notices

All entities are required by State law to post RFPs and bid notices to the MS Development Authority Procurement Technical Assistance Program. As such, ensure ARRA funded projects follow suit.
RFPs and Bid Notices

- RFPs and bid notices must be emailed to bids@mississippi.org

- As part of the email, provide appropriate contact information, opening and closing dates, and a brief description

- Refer to the following website to see information reported: http://www.mscpc.com/ProgramOffice/tabid/77/Default.aspx

- Ensure documentation is maintained to support that ARRA funded projects are in compliance.
Subcontracts issued with ARRA funding

It is the Prime Recipient’s responsibility to pass down ARRA requirements as well as other pertinent regulations. Any subcontract agreements issued must stipulate ARRA compliance requirements.
Compliance Requirements

• ARRA Allowable/Non-Allowable Activities
• Applicable Cost Principles
• Buy American (construction projects)
• Davis-Bacon Act (construction projects)
• Allowable Costs/Cost Principles
• Equipment and Real Property Management
• Procurement
• Suspension and Debarment
• Program Income

October 5, 2009
Financial Aid
ARRA provided an additional $200 million in funding to Federal Work Study (FWS) program.

In August 2009, the Office of Management and Budget added FWS to the list of programs subject to Section 1512 Reporting.
If an institution or college has received $25,000 or more in ARRA for FWS, the award is subject to Section 1512 reporting.
<table>
<thead>
<tr>
<th>Serial Number</th>
<th>OPEID</th>
<th>School Name</th>
<th>State</th>
<th>FWS Funding for Award Year 2009-2010</th>
<th>Portion Attributed to ARRA 2009-2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>002226</td>
<td>00239600</td>
<td>Alcorn State University</td>
<td>MS</td>
<td>639,128</td>
<td>111,619</td>
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<tr>
<td>002232</td>
<td>00240100</td>
<td>Coahoma Community College</td>
<td>MS</td>
<td>331,413</td>
<td>57,879</td>
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<tr>
<td>002234</td>
<td>00240200</td>
<td>Copiah-Lincoln Community College</td>
<td>MS</td>
<td>200,000</td>
<td>34,929</td>
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<tr>
<td>002235</td>
<td>00240300</td>
<td>Delta State University</td>
<td>MS</td>
<td>377,071</td>
<td>65,853</td>
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<td>002238</td>
<td>00240500</td>
<td>East Mississippi Community College</td>
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<td>209,393</td>
<td>36,569</td>
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<tr>
<td>002240</td>
<td>00240700</td>
<td>Hinds Community College</td>
<td>MS</td>
<td>500,000</td>
<td>87,321</td>
</tr>
<tr>
<td>002241</td>
<td>00240800</td>
<td>Holmes Community College</td>
<td>MS</td>
<td>200,000</td>
<td>34,929</td>
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<tr>
<td>002242</td>
<td>00240900</td>
<td>Itawamba Community College</td>
<td>MS</td>
<td>342,146</td>
<td>59,753</td>
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<td>002245</td>
<td>00241000</td>
<td>Jackson State University</td>
<td>MS</td>
<td>2,008,094</td>
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<td>002246</td>
<td>00241100</td>
<td>Jones County Junior College</td>
<td>MS</td>
<td>226,794</td>
<td>39,608</td>
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<td>002248</td>
<td>00241300</td>
<td>Meridian Community College</td>
<td>MS</td>
<td>164,903</td>
<td>28,799</td>
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<td>002249</td>
<td>00241400</td>
<td>Millsaps College</td>
<td>MS</td>
<td>161,887</td>
<td>28,272</td>
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<tr>
<td>002251</td>
<td>00241500</td>
<td>Mississippi College</td>
<td>MS</td>
<td>500,000</td>
<td>87,321</td>
</tr>
<tr>
<td>002252</td>
<td>00241600</td>
<td>Mississippi Delta Community College</td>
<td>MS</td>
<td>152,883</td>
<td>26,700</td>
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<td>002253</td>
<td>00241700</td>
<td>Mississippi Gulf Coast Community College</td>
<td>MS</td>
<td>316,556</td>
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<td>002256</td>
<td>00242300</td>
<td>Mississippi State University</td>
<td>MS</td>
<td>1,142,868</td>
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<tr>
<td>002255</td>
<td>00242200</td>
<td>Mississippi University for Women</td>
<td>MS</td>
<td>160,204</td>
<td>27,978</td>
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<tr>
<td>002257</td>
<td>00242400</td>
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<td>002260</td>
<td>00242600</td>
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<td>002261</td>
<td>00242700</td>
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<td>002262</td>
<td>00243000</td>
<td>Pearl River Community College</td>
<td>MS</td>
<td>212,600</td>
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<tr>
<td>002266</td>
<td>00243300</td>
<td>Rust College</td>
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<td>402,744</td>
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<td>002269</td>
<td>00243900</td>
<td>Tougaloo College</td>
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<td>264,623</td>
<td>46,214</td>
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<td>002270</td>
<td>00244000</td>
<td>University of Mississippi</td>
<td>MS</td>
<td>700,000</td>
<td>122,250</td>
</tr>
<tr>
<td>002272</td>
<td>00244100</td>
<td>University of Southern Mississippi</td>
<td>MS</td>
<td>894,405</td>
<td>156,201</td>
</tr>
</tbody>
</table>
As of this date, no special reporting requirements have been communicated regarding Pell Grant.
Important Websites

IHL website: Go to IHL’s home page and click on Stimulus Link: http://www.ihl.state.ms.us/stimulus/

SBCJC website: Go to SBCJC’s home page and click on ARRA Stimulus Information: http://www.mscjc.edu/stimulus/

Governor’s website is considered official site for the State: www.stimulus.ms.gov

Recovery.gov: http://www.recovery.gov/

October 5, 2009
Contact Information

Cheryl Mowdy
Director Support Operations
cmowdy@mississippi.edu
601.432.6112

Deborah Gilbert
Associate Executive Director for Finance & Administration
dgilbert@mscjc.edu
601.432.6392

October 5, 2009
Questions