

DEPARTMENT OF WORKFORCE DEVELOPMENT  
DIVISION OF EMPLOYMENT AND TRAINING  
ADMINISTRATOR'S MEMO SERIES

XX ACTION ADM09-05  
\_\_\_ NOTICE

ISSUE DATE: 09/21/2009  
DISPOSAL DATE:

\*PROGRAM CATEGORIES:

\_\_\_ AS \_\_\_ FL \_\_\_ ML \_\_\_ TR  
\_\_\_ CR \_\_\_ IT \_\_\_ RA XX WIA  
\_\_\_ FM \_\_\_ JC \_\_\_ TC \_\_\_ YA  
\_\_\_ LM \_\_\_ TA XX ARRA

**To:** Workforce Development Board Directors  
ARRA Grant Recipients

**From:** Roberta Gassman /s/  
Department Secretary

**RE:** American Recovery and Reinvestment Act (ARRA) reporting instructions.

**PURPOSE:** This Administrator's Memo provides instruction to recipients of ARRA funding from the Department of Workforce Development on preparing the monthly and quarterly ARRA reports as required in Section 1512 of the ARRA and as required by the Governor's Office of Recovery and Reinvestment.

**BACKGROUND:** The American Recovery and Reinvestment Act (ARRA) of 2009 provided \$35,052,273 in WIA formula funds, \$7,291,549 in Wagner-Peyser funds, and additional funds on a discretionary grant basis. Prior technical guidance had been provided for the implementation of the program and specific program requirements.

Section 1512 of the ARRA requires recipients to report on the use of ARRA funds. On June 22, 2009 the Office of Management and Budget (OMB) issued guidance on reporting under section 1512 of the ARRA to the Federal Agencies. On August 14, 2009 the Department of Labor (DOL) issued Training and Employment Guidance Letter (TEGL) 1-09 providing initial guidance on reporting requirements in section 1512 of the ARRA, customized to the DOL programs.

ARRA calls for an unprecedented level of transparency for how the Federal dollars are being spent. This level of transparency is essential to drive accountability for the timely, prudent and effective spending of recovery dollars. The Section 1512 reports are an OMB requirement. The reports are separate, and in addition to the regular DOL financial and program reporting. The

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\*PROGRAM CATEGORIES:

AS--Apprenticeship  
Standards

CR--Civil Rights

FM--Financial Management  
Requirements

FL--Foreign Labor Certification

IT--IT Systems

JC--Job Center

LM--Labor Market  
Information

ML--Migrant Labor

RA--Refugee Assistance

TC--Tax Credit Programs

TA--Trade Assistance

TR--Transportation

WIA--Workforce

Investment Act

YA--Youth Apprenticeship

Section 1512 reports contain more detailed program information and will be posted on [www.recovery.gov](http://www.recovery.gov) and made accessible to the public as soon as possible after filing.

The Governor's Office of Recovery and Reinvestment (ORR) has taken the lead on reporting to OMB on all ARRA funds received by the State. Each state agency is responsible for ensuring that required data is accurate and submitted timely to ORR for reporting to OMB. ORR may add additional data elements to the required OMB data elements to increase the state's transparency of ARRA activities and expenditures throughout the state. State added requirements relating to subrecipient reporting will be added to the reporting spreadsheet required to be completed by DWD and by grantees of the DWD.

**POLICY:** The Wisconsin Department of Workforce Development (DWD) is responsible for assuring that the ARRA program and reporting requirements are met for all ARRA funds received by DWD. ORR will compile reports submitted by all State agencies and will upload those reports to the OMB reporting portal. Individual state agencies are responsible for gathering and compiling subrecipient data and will report that data to ORR. DWD will supply a spreadsheet template to all grantees to use in reporting ARRA activities.

Reporting requirements apply only to prime recipients (DWD) and their first tier subrecipients (WDBs). DWD is the prime recipient of ARRA funds and WDBs are subrecipients. Other levels of subrecipients will be rolled into the first tier (WDB) subrecipient reports.

A first trial run of the system of reporting to ORR was completed on August 10, 2009 with June data. A second trial run occurred on September 10<sup>th</sup> with data submitted by DWD grantees for August.

All reporting for ARRA funds received by state agencies will be done through ORR. No reporting has been delegated to any subrecipient. No individual grantee should register on [www.federalreporting.gov](http://www.federalreporting.gov) unless a grantee has received a grant directly from any Federal agency. If so, that grantee would need to report those grants directly to OMB as a prime recipient. The directives in this memo would not apply to those grant funds provided directly to a grantee from a federal agency. While DWD grantees should not register or report to OMB, any agency may access [www.federalreporting.gov](http://www.federalreporting.gov) and use the resources found on that site without having to register. Registering and reporting funds received from DWD will result in duplicate reporting to OMB.

Reports from ORR are due to OMB by the 10<sup>th</sup> calendar day of the month following the end of each quarter, starting with the quarter ending September 30, 2009. The first reports to OMB are due October 10, 2009. A review period of the data submitted starts on day 11, although OMB may upload preliminary data to [www.recovery.gov](http://www.recovery.gov) for public review as soon as day 11. The website [www.federalreporting.gov](http://www.federalreporting.gov) is the portal for data collection and is used to report and review data. This website is not available for general review by the public. Data from [www.federalreporting.gov](http://www.federalreporting.gov) will be published to the public-facing [www.recovery.gov](http://www.recovery.gov) for viewing.

Each report is cumulative. Cumulative numbers from the inception of the program on February 17, 2009 through September 30, 2009 will be reported on September 30, 2009. Each report thereafter will include cumulative data from program inception to the end of that reporting period. DOL and OMB edit checks will assure that expenditures increase with each submittal.

Each agency is required to do a separate report for each program. WDBs will submit a separate report for ARRA Youth, ARRA Adult, ARRA Dislocated Worker/State Rapid Response, and ARRA Discretionary. All discretionary grants will be on one report.

Grantees will not need to report actual expenditures since DWD will be using the cash draw numbers from CORE to report as grantee expenditures. Grantees need to be careful that the cash draw amounts reflect activity in each grant correctly by the end of each month.

Reporting requirements apply only to prime recipients (DWD) and first tier subrecipients (WDBs). Any other level of subrecipient would be rolled into the first tier subrecipient reports. Subrecipients are also required to report vendor payments over \$25,000 per award, but only DWD is required to report on aggregated sub-awards under \$25,000 and all vendor payments. As a grantee, each WDB is required to obtain a DUNS number and register with CCR. Each WDB is responsible for maintaining an active status within CCR.

### **Reporting jobs created/retained**

DWD is required to report a cumulative number of jobs created/retained as a result of ARRA funding received. That number is a compilation of state and local activity. Grantees (WDBs) are required to report on the number of jobs created/retained with ARRA funding each quarter. Reporting is based on Full Time Equivalents (FTE). Attachment B is included with detailed instructions on how to calculate the FTE for any jobs that need to be reported. Employment and training programs prepare workers for jobs and do not usually result in the actual creation or retention of a job. WIA and Wagner-Peyser activities are not considered economic development activities and are not expected to have a significant job creation component. Participant jobs not paid with ARRA funds will not be included, summer work experience participants whose wages are paid with ARRA will be included as jobs created.

Attachment A contains the data elements required to be reported as of the issuance of this Administrator's Memo, and the instructions on each data element. The attachments may be revised as ORR, OMB and DOL guidance and requirements are revised.

Attachment C is the spreadsheets for vendor payments required to be submitted by WDBs monthly.

**ACTION SUMMARY STATEMENT:** Grantees will complete the Section 1512 reports, along with any additional State required data elements and submit them to DWD by the 4<sup>th</sup> calendar (not business) day of the month following the end of each month and quarter. Vendor spreadsheet data elements are due monthly and the jobs created/retained numbers are due quarterly. This will allow time for DWD to review and upload the data and meet our requirement to report to ORR by the 8<sup>th</sup> calendar day. Not reporting, not reporting timely, or reporting inaccurately will be considered a material omission in the reports and not in compliance with the grant terms and conditions and that agency will be subject to sanctions, including, but not limited to withholding of cash requests.

Since cash draws will be used by DWD for grantee activity reporting in lieu of accrued expenditures, it is important for cash draws to accurately reflect the activity in each grant at the end of each month.

Although the main data elements have been determined and defined for the September 30 time period, there are still a number of areas of clarification and change that may happen for future

quarters. Be aware that the instructions and data elements may change. Any updates will be issued through a revision to this Administrator's memo.

**CONTACT:** Lorie Lange, Grant Accountant. 608-267-7629 [lorie.lange@dwd.wisconsin.gov](mailto:lorie.lange@dwd.wisconsin.gov)

**Attachment(s):**

Attachment A: Instructions and List of Data Elements for Subrecipient Reporting

Attachment B: Reporting Requirements for Jobs Created or Retained with ARRA Funding

Attachment C: Reporting Spreadsheets