

OMB Issues New ARRA Guidance Relating to Data Quality and Reporting Job Estimates

The Office of Management and Budget (OMB) issued new American Recovery and Reinvestment Act (ARRA) guidance on December 18, 2009 in a two part memorandum. The guidance can be found at http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf. The Recipient Reporting Data Model, Supplement 2, has also been updated to align with changes included in the new guidance, and can be found at http://www.whitehouse.gov/omb/assets/memoranda_fy2009/m09-21-supp2.pdf. This new guidance supersedes all Frequently Asked Questions related to jobs guidance issued since the enactment of the ARRA.

Part I of the memorandum provides guidance to federal agencies to improve the quality of data reported under Section 1512 of the ARRA, as well as outlines important steps agencies must take to both identify non-reporting recipients and actions to encourage compliance. While this information is directed at federal agencies, recipients are encouraged to review this information to incorporate some of the recommendations and requirements into their own data quality review plans.

Part 2 of the memorandum makes two very important changes concerning the manner in which job estimates are calculated and reported. First, recipients will now report jobs **quarterly**, rather than on a **cumulative basis**. Accordingly, a recipient will now report job estimate totals by dividing hours worked in the reporting quarter (in this case, October 1 through December 31) by the hours in a full-time schedule in that quarter. The new guidance provides several examples of how to apply this formula so recipients can more accurately and easily report estimates of jobs created or retained by the ARRA. It is important to note, however, that reporting fields that include expenditure data and other qualitative data will still be done on a cumulative basis.

Second, recipients will no longer be required to make a substantive judgment on whether jobs were created or retained as a result of the ARRA. Instead, recipients will only report on jobs funded with ARRA dollars. Jobs funded with non ARRA funds will not be counted unless they are expected to be reimbursed with ARRA money. Jobs funded partially with ARRA dollars will only be counted based on the portion funded by the ARRA. A funded job is defined as one in which the wages or salaries are either paid for or will be reimburse with ARRA funding. Once a job is reported by a recipient as created or retained by ARRA dollars, the recipient shall continue to report this job as created or retained in subsequent quarters, as long as the job continues to be funded by the ARRA.

Some recipients, for example those receiving ARRA funding from the Department of Transportation, have additional job reporting requirements beyond those set forth in Section 1512. In these cases, recipients should follow this guidance, as well as any specific federal agency guidance requirements.

Beginning on February 2, 2010, FederalReporting.gov will be open for correction of all data submitted for the quarter ending December 31, 2009. Recipients will have the chance to make corrections until the start of the next reporting period, April 1, 2010. However, recipients will **not** have the chance to correct any data submitted for the previous quarter - that is the quarter ending September 30, 2009. Instead, recipients who would like to make these corrections or non-reporters who would like to submit reports for prior quarters are directed to maintain this information in their administrative records for submission to the federal government at a time and through a process to be determined in the future. Recipients are not required to recalculate or correct job estimate totals for the quarter ending September 30, 2009 based upon this new guidance. Any corrections to the job estimate totals reported for the quarter ending September 30, 2009 should rely on the definitions of a created or retained job found in the OMB guidance issued on June 22, 2009.