

Alabama Workforce Investment System

Office of Workforce Development
401 Adams Avenue
Post Office Box 5690
Montgomery, Alabama 36103-5690

November 16, 2009

GOVERNOR'S WORKFORCE DEVELOPMENT DIRECTIVE NO. PY2009-03, Change 1

SUBJECT: Reporting requirements under Section 1512 of the American Recovery and Reinvestment Act of 2009 (ARRA)

1. **Purpose.** To provide Local Workforce Investment Areas with the Sub-recipient Reporting Document; and provide guidance on the data elements, reporting mechanism, and reporting timeframes that will be used to ensure timely reporting in accordance with section 1512 of ARRA.

2. **Discussion.** Section 1512 of ARRA requires recipients to report on the use of stimulus funding, providing detailed information, such as: total amount of funds received; the amount spent on projects and activities; estimates of jobs created and retained; and details on sub-awards and other payments.

The Office of Management and Budget (OMB) issued Section 1512 reporting guidance (OMB M-09-21) on June 22, 2009

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

The USDOL Employment and Training Administration (ETA) issued further guidance on August 14, 2009 in TEGL 1-09 (<http://wdr.doleta.gov/directives/attach/TEGL/TEGL01-09.pdf>). These documents identify the data elements ARRA recipients must collect and report quarterly to the federal government via a website called www.FederalReporting.gov.

Reports must be submitted for the Workforce Investment Act (WIA) Adult, Youth and Dislocated Worker ARRA funded programs. The *prime recipient* of WIA ARRA formula funds is the State. Local workforce investment areas and other grantees are considered *sub-recipients*.

A *vendor* is defined as a dealer, distributor, merchant or other seller providing goods or services that are required for the conduct of a Federal program. Prime recipients or sub-recipients may purchase goods or services needed to carry out the project or program from vendors. Vendors are not awarded funds by the same means as sub-recipients and are not subject to the terms and conditions of the Federal financial assistance award.

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The characteristics of a vendor that make it distinct from a sub-recipient are summarized below:

1. Provides the goods and services within normal business operations;
2. Provides similar goods or services to many different purchasers;
3. Operates in a competitive environment;
4. Provides goods or services that are ancillary to the operation of the Federal program; and
5. Is not subject to compliance requirements of the Federal program

While both the OMB and ETA guidance documents referenced above allow delegation of reporting responsibilities from prime recipients (ADECA) to sub-recipients (LWIAs and other grantees), ADECA has chosen not to delegate this responsibility. Accordingly, sub-recipient data elements that aren't currently captured by ADECA through other reporting mechanisms will be collected from LWIAs and other grantees on a monthly basis and aggregated at the state level.

Section 1512 of ARRA requires prime recipients of ARRA funds to report to FederalReporting.gov on the use of ARRA funding no later than the 10th day after the end of each calendar year quarter. Reports will contain cumulative data from the inception of the grant award with the first Federal report submitted for the quarter ending September 30, 2009. However, the State of Alabama Finance Department requires 1512 data elements to be reported on a monthly basis.

As sub-recipients, your organization will be required to provide the following data to ADECA in order to meet Section 1512 reporting requirements:

- Sub-recipient information (Address, Congressional District, DUNS, Contract Number, Award Amount, Funds Disbursed, Primary Place of Performance)
- Estimate of number of jobs created or retained
- Sub-recipient officer names and compensation (Top 5)
- Program activity narrative (Type of activities conducted)
- Vendor information for vendors receiving payments equal to or greater than \$25,000 (DUNS, Zip code +4 of Headquarters (HQ), Name, Product/Service Description, Payment Amount, Total Number of Payments to Vendors, Total Amount Paid to Vendors)

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Prime recipients are required to report an estimate of jobs directly created or retained to administer and implement ARRA-funded projects, activities, and contracts. All recipients are required to report an aggregate number for the cumulative jobs created or retained for the quarter in a separate numerical field and are also required to provide a narrative description of the employment impact. ADECA, as the prime recipient, will need to collect this information from sub-recipients.

ETA has advised that grant recipients should only report job creation/retention numbers for those individuals who are hired or retained to execute grant activities, and whose salaries are paid with ARRA funds. Examples of such jobs include: workforce managers; supervisors, counselors; job coaches; etc. As of September 21, 2009, via TEGL 1-09, Change 1, ETA advised that WIA Summer Youth Employment Program jobs will be counted as jobs created under this category.

A job created is a new position created and filled or an existing unfilled position that is filled as a result of ARRA. A job retained is an existing position that would not have been continued to be filled were it not for ARRA funding. A job cannot be counted as both created and retained.

Staff members are currently working to extract certain information from ADECA's reporting system, but until this method is put into place the estimate of the number of jobs funded by ARRA should be provided in two different formats. The first should be expressed as actual hours worked. The second should be expressed as "full time equivalents" (FTE), which is calculated as total hours worked in jobs created or retained divided by the number of hours in a full-time schedule, as defined by the recipient. The FTE estimates and actual hours worked must be reported cumulatively each calendar month.

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 FTE jobs. In order to perform the calculation, the sub-recipient will need the total number of hours worked that are funded by ARRA. The sub-recipient will also need the number of hours in a full-time schedule for a month. The formula for reporting can be represented as:

$$\frac{\text{Cumulative ARRA Hours Worked (Qtr1...n)}}{\text{Cumulative Hours in a Fulltime Schedule (Qtr1...n)}} = \text{FTE}$$

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Please notice that the example is reporting on a quarterly basis. Adjust the hours in your calculations to best fit your schedule for submitting monthly reports.

Example:

A full-time schedule for the quarter is 520 hours (2080 hours in a work-year divided by 4). To convert hours worked to number of FTEs for the first quarterly report, aggregate all hours worked and divide by the number of hours in a full time schedule for the quarter. In this example, full-time hours worked (520 hrs x 2 employees = 1040 hrs) + part-time hours worked (260 hrs) ÷ number of hours in a full-time schedule for the quarter (520 hrs) = 2.5 FTE reported in the first quarterly report. Because jobs are reported cumulatively each quarter, this same number of FTE would be reported for the second quarter if the same number of employees worked the same number of hours.

Reporting is cumulative across the ARRA project lifecycle, and will not reset at the beginning of each calendar or fiscal year. In the example above, the 2.5 FTE reported in the first quarterly report will stay the same through the project lifecycle, assuming the same number of employees work the same number of hours. The table below shows the FTE calculations through the lifecycle of an 18 month project that uses full-time, part-time, and temporary workers.

Period	3 rd qtr	4 th qtr	1 st qtr	2 nd qtr	3 rd qtr	4 th qtr
Full time Schedule	520	140	1560	2080	2600	3120
Full Time Employee 1	520	1040	1560	2080	2600	3120
Full Time Employee 2	520	1040	1560	2080	2600	3120
Part Time Employee (half time)	260	520	780	1040	1300	1560
Temporary Employee (650 hours)	0	0	130	390	650	650
<i>Total Hours Worked</i>	1300	2600	4030	5590	7150	8450
Quarterly FTE	2.50	2.50	2.58	2.69	2.75	2.71

Sub-recipients should:

- Only count direct jobs. Do not include:
 - employees who are not directly charged to ARRA-supported projects or activities such as

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clerical/administrative staff preparing reports or departmental administrators (allocated overhead); or

- employees using fringe benefits such as paid leave.
- Only report on the jobs and funding attributable to an award (or sub-award) under ARRA.
- To the extent practicable, incorporate any jobs that have been created or retained by ARRA funds for your contractors and vendors into the job creation count that is reported to ADECA.

All other 1512 data elements to be reported will be addressed on the EXAMPLE Sub Recipient 1512 Monthly, which is Attachment 2 of this Directive.

Policy

1. ADECA, as the prime recipient for WIA funds, will be solely responsible for Section 1512 reporting into the Federal Reporting website. The prime recipient is ultimately responsible for the reporting of all data required by Section 1512 of ARRA, including the Federal Funding Accountability and Transparency Act (FFATA) data elements for the sub-recipients of the prime recipient required under 1512(c)(4). To ensure consistency in overall reporting and to simplify reporting requirements for LWIAs, ADECA has opted not to delegate Section 1512 Federal website reporting to sub-recipients.
2. Sub-recipients will report their Section 1512 data elements to ADECA using the ARRA Section 1512 Report attached to this Directive. The report is due by noon on the last day of each month to allow ADECA adequate time to aggregate the information to ensure that Section 1512 reporting requirements are met in a timely and effective manner. As noted previously, the data included in the report is cumulative; therefore, it should reflect, in addition to the current month's data, all previously submitted information.

3. Action.

In order to comply with Section 1512 reporting requirements, each sub-recipient must have a Dun & Bradstreet (D&B) Data Universal Numbering System (DUNS) number. If you do not currently have a DUNS number, you may apply for it using the directions found at: <http://wdr.doleta.gov/directives/attach/TEGL/TEGL29-08.pdf>. A toll-free

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phone number is available in this TEGl and may be the most expedient means of obtaining a DUNS number.

Sub-recipients must identify a contact person to be responsible for ARRA reporting and provide their name, address, phone number and email address to ADECA. The contact person should be associated with the recipient agency.

Review Attachment 1, Sub Recipient 1512 Monthly Reports. Please note there are multiple reports. All information, including job creation/retention estimates and vendor information, is required for each WIA ARRA funding stream (Youth, Adult, and Dislocated Worker). If funds have not yet been disbursed for a funding stream, please indicate this on the form.

Complete and submit the Sub-recipient 1512 Monthly Reports. As noted above, the reports are due to ADECA by noon on the last day of each month. The data reported is cumulative; therefore, the information reported should include current month's data in addition to all data from prior submissions.

4. Contact.

Any questions regarding this Directive should be directed to Melody Koorangi at 334.242.5175 or melody.koorangi@adeca.alabama.gov, or Kelley Black at 334.242.5380 or kelley.black@adeca.alabama.gov.

Handwritten signature of Matthew Hughes in black ink, with the date 11/16/09 written to the right of the signature.

Matthew Hughes, Director
Office of Workforce Development

Attachments

1. Sub-Recipient 1512 Monthly Reports
2. EXAMPLE (Sub-Recipient 1512 Monthly Reports)

2. Did receiving this award prevent any planned or anticipated lay-offs? Please explain and provide total number of jobs retained.

Position Title	Job Description	Cumulative Hours Worked/FTE

Five Most Highly Paid Officer:

This section required if: in the preceding fiscal year, the subrecipient received more than 80% of its revenue from federal contracts, loans, grants and cooperative agreements.

\$25,000,000 or more in annual gross revenues comes from Federal contracts, loans, grants and cooperative agreements, and

The public does not have access to information about the compensation of senior executives through periodic reviews filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o (d) or section 6104 of the Internal Revenue Code of 1986.

Name/Position	Salary

Program Activity: Please provide detail narrative of all activities conducted under this award to include the stage of progress, current and anticipated program outcomes.

SubRecipient Vendor Information: (For payments to vendors of \$25,000 or more)

Vendor DUNS #	Vendor HQ Zip + 4	Vendor Name	Product/Service Description	Payment Amount

Total Aggregate Number of Vendors paid less than \$25,000 _____

Total Aggregate Amount Paid to Vendors less than \$25,000 \$_____

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2. Did receiving this award prevent any planned or anticipated lay-offs? Please explain and provide total number of jobs retained.

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Name/Position	Salary

Program Activity: Please provide detail narrative of all activities conducted under this award to include the stage of progress, current and anticipated program outcomes.

SubRecipient Vendor Information: (For payments to vendors of \$25,000 or more)

Vendor DUNS #	Vendor HQ Zip + 4	Vendor Name	Product/Service Description	Payment Amount

Total Aggregate Number of Vendors paid less than \$25,000 _____

Total Aggregate Amount Paid to Vendors less than \$25,000 \$_____

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Position Title	Job Description	Cumulative Hours Worked/FTE

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Name/Position	Salary

Program Activity: Please provide detail narrative of all activities conducted under this award to include the stage of progress, current and anticipated program outcomes.

SubRecipient Vendor Information: (For payments to vendors of \$25,000 or more)

Vendor DUNS #	Vendor HQ Zip + 4	Vendor Name	Product/Service Description	Payment Amount

Total Aggregate Number of Vendors paid less than \$25,000 _____

Total Aggregate Amount Paid to Vendors less than \$25,000 \$ _____

Sub Recipient 1512 Monthly Report

Adult – CFDA 17.258

This Report Covers the Period enter start date of agreement to enter last day of current month

Subrecipient Name: enter legal name

Subrecipient Address: enter physical STREET address

of headquarters (HQ)

Zip Code + 4 enter zip+4 Country enter country Congressional District enter Con. Dist. where HQ is located

DUNS Number	Contract Number	Amount of Award	Funds Disbursed	Award Date
enter DUNS #	enter # assigned by ADECA	enter award amount on signed contract	enter amount of funds disbursed to date	enter start date of agreement

ALL OF THE INFORMATION BELOW PERTAINS TO THE PROGRAM LOCATION. THE ADDRESS, ZIP, COUNTRY, AND CONGRESSIONAL DISTRICT SHOULD BE FOR THE PRIMARY PLACE OF PERFORMACE OF THE PROGRAM.

Primary Place of Performance enter physical STREET address

of primary place of program

Zip Code +4 enter zip+4 Country enter country Congressional District enter Con. Dist. where program is located

1. Was any new staff hired as a result of this award? List position titles, job description and number of hours worked in this period. (If no new staff was hired, enter N/A in spaces below.)

Position Title	Job Description	Hours Worked Cumulative
enter position of employee	enter duties of employee	enter FTE and actual hours

2. Did receiving this award prevent any planned or anticipated lay-offs? Please explain and provide total number of jobs retained. (If it did not prevent any lay-offs, enter N/A in spaces below. If it did, please provide a detailed narrative in this space.)

Position Title	Job Description	Hours Worked Cumulative
enter position of employee	enter duties of employee	enter FTE and actual hours

Five Most Highly Paid Officer: If officers' salaries are accessible to the public, it is not necessary to list them.

This section required if: in the preceding fiscal year, the subrecipient received more than 80% of its revenue from federal contracts, loans, grants and cooperative agreements.

\$25,000,000 or more in annual gross revenues comes from Federal contracts, loans, grants and cooperative agreements, and

The public does not have access to information about the compensation of senior executives through periodic reviews filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o (d) or section 6104 of the Internal Revenue Code of 1986.

Name/Position	Salary
enter officer's name and position	enter officer's salary

Program Activity: Please provide detail narrative of all activities conducted under this award to include the stage of progress, current and anticipated program outcomes.

**This section should be self-explanatory.

SubRecipient Vendor Information: (For payments to vendors of \$25,000 or more)

Vendor DUNS #	Vendor HQ Zip + 4	Vendor Name	Product/Service Description	Payment Amount
enter DUNS #	enter zip+4	enter legal name	explain what type of product/service was purchased	enter amount

Total Aggregate Number of Payments to Vendors paid less than \$25,000 enter total #

Total Aggregate Amount Paid to Vendors less than \$25,000 \$ enter total amount