



OMB Issues New Guidance on ARRA Jobs Reporting

*By Eleanor A. Evans, Esq., CAPLAW
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In response to confusion about how to calculate and report estimates of jobs created and/or retained by Recovery Act funds, the federal Office of Management and Budget (OMB) recently issued new guidance on ARRA jobs reporting. This guidance applies to ARRA reports for the quarter ended December 30, 2009, as well as to future reports. See Part 2 of M-10-08, “Updated Guidance on the American Recovery and Reinvestment Act – Data Quality, Non-Reporting Recipients, and Reporting of Job Estimates” http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf (Dec. 18, 2009).

Previously, recipients of ARRA funds were expected to make a subjective judgment as to whether a particular job would have existed were it not for the Recovery Act. Now, all jobs funded by ARRA during the quarter are considered jobs “created and retained.” For a job funded partially with ARRA funds, only the portion of the job funded with ARRA funds is to be counted. A job funded with non-ARRA funds does not count, unless it will be reimbursed with ARRA funds.

Jobs are now to be reported on a quarterly basis rather than on a cumulative basis. (However, other items to be reported – such as the narrative description of job estimates and amount of ARRA funds expended – should be reported on a cumulative basis, unless otherwise noted.) Once an organization reports a job as created or retained by ARRA, it should continue to report the job as created or retained in future quarters as long as the job continues to be funded by the Recovery Act.

Estimates of jobs created or retained by ARRA still must be shown as “full-time equivalents” (FTE). For examples of how to calculate FTEs of jobs created or retained, see Sections 5.3 - 5.5 (pages 13-18) of the new OMB Guidance. Recipients of ARRA funds should keep documentation or other written proof to justify their estimates of jobs created or retained.

Prime recipients¹ must collect information on estimates of jobs created or retained by subrecipients and vendors and report that information, along with information on jobs created or

¹ For ARRA reporting purposes, “prime recipients” are entities receiving ARRA funding directly from the federal government, such as states receiving CSBG or Weatherization Assistance Program (WAP) ARRA funds, or other types of “pass-through” ARRA funds, as well as CAAs receiving Head Start ARRA funding. Subrecipients are entities receiving ARRA funding from prime recipients, such as CAAs receiving CSBG and/or WAP ARRA funds from states and delegate agencies receiving Head Start ARRA funds from CAAs.

retained within their own organizations, in the “Number of Jobs” and “Description of Jobs Created” fields on the quarterly reports they file on www.federalreporting.gov.

Prime recipients must file ARRA reports for the quarter ended December 30, 2009 by January 10, 2010. They may make corrections to those reports between January 16 and 22, 2010, and again between February 2 and 28, 2010.

The new OMB guidance (M-10-08) does not apply to reports for the quarter ended September 30, 2009. Thus, recipients of ARRA funds do not need to re-calculate or correct the jobs data reported for that quarter based on the guidance in M-10-08. Instead, prior OMB guidance applies; see M-09-21 “Implementing Guidance for the Reports on Use of Funds Pursuant to the American Recovery and Reinvestment Act of 2009” (June 22, 2009), available at http://www.whitehouse.gov/omb/recovery_default/.

Recipients will be given an opportunity to correct reports filed for the quarter ended September 30, 2009 (and for each subsequent quarter, after the correction period for that quarter closes). For now, they should keep information on corrections in their administrative records. Eventually, they will be required to submit that information to the federal government, at a time and via a process to be specified in the future.