

FREQUENTLY ASKED QUESTIONS
AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009

*Last update: [03/16/2010](#)

NOTE: 12/30/10 Updates and additions have been made to this FAQ. Specifically items: 1b, 1f, 1i, 4f, 5f and 5g.

NOTE: On 12/18/09, the OMB made major changes to the guidelines on reporting jobs. This FAQ provides the most recent information provided by OMB.

Section 1512 of the American Recovery and Reinvestment Act of 2009 (ARRA) requires grant recipients to report the use of ARRA funds to the United States Office of Management and Budget (OMB). The Department of Public Instruction (DPI) is working to reduce the ARRA reporting burden for sub-recipients (Local Educational Agencies (LEAs), 2R Charter Schools, CESAs, etc.) and will report all the information it currently has on behalf of sub-recipients. Despite the DPI’s best efforts, there is still some information sub-recipients will need to provide to the DPI for ARRA reporting.

The state programs funded through the DPI required to adhere to the reporting requirements include:

- Education for Homeless Children and Youth Grants
- IDEA – Flow Through Grants
- IDEA – Preschool Grants
- State Fiscal Stabilization Funds, Government Service Aids (Final disbursement June 2010)
- State Fiscal Stabilization Funds, Educational Aids (Final disbursement June 2010)
- Title I, Part A Grants
- Title I, Neglected and Delinquent Grants
- Title I, Supplemental Grants
- School Improvement Grants
- Longitudinal Data Systems Grants
- Title II, Part D Grants
- VISTA (Final disbursement December, 2010)
- Schools of Recognition

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1. GENERAL INFORMATION

a. Why are these reports required?

These reports will provide the public with an unprecedented level of transparency into how federal dollars are being spent and will help drive accountability for the timely, prudent, and effective spending of the ARRA funds.

b. What are the report periods and deadlines?

Sub-recipients that have received reimbursement from an ARRA claim will be sent a Vendor/Employment Impact survey on March 17, 2011. Sub-recipients will need to submit surveys back to DPI within one week (March 17, 2011).

DPI will continue to provide sub-recipients with future reporting deadlines.

Reporting is extremely time sensitive. It is imperative sub-recipients meet the required timelines.

[Updated per OMB guidance 12/18/09]

c. Will there be any waivers granted to any sub-recipient unable to meet the reporting deadlines?

No waivers will be granted for sub-recipients. If a sub-recipient anticipates issues with meeting the report deadlines, notify the appropriate contact person within the DPI as soon as practicable to discuss how the reporting requirement will be met.

d. What happens if a sub-recipient misses a deadline or does not report the information?

Noncompliance with the reporting requirement, as established under section 1512 of the ARRA, is considered a violation of the award agreement and could result in sanctions, including withholding funds, termination, or suspension and debarment, as appropriate.

e. Do sub-recipients have to file a survey for those ARRA program areas where claims have not yet been filed or paid?

No, the DPI will only send surveys to sub-recipients that have received reimbursement from an ARRA claim.

f. If a sub-recipient submits a claim for a report period, but does not submit another ARRA claim in the next quarter, will the sub-recipient be required to complete a survey for this program in the subsequent quarter?

Yes. Once a sub-recipient makes a claim and receives reimbursement, completion of the Vendor/Employment Impact survey will be required for all subsequent report periods even if a new claim has not been submitted. For example, if a sub-recipient received reimbursement for a claim under IDEA Flow-Through for the first report period but has not made a claim for the second report period, the sub-recipient is still required to complete the Vendor/Employment Impact survey for the second quarter until all the funds have been spent and the last claim has been submitted.

[Updated by DPI 12/09/10]

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- g. Will sub-recipients need to report programmatic information to the DPI?**
Yes, sub-recipients will be required to report specific programmatic data. However, the DPI is awaiting further ARRA reporting guidance from the federal entities overseeing the ARRA funds.
- h. Where will this information be published?**
The Wisconsin Department of Administration, Office of Recovery and Reinvestment (ORR) will post the employment impact of all ARRA funds prominently on the state's recovery website (<http://www.recovery.wisconsin.gov/>). This information will also be posted on the federal recovery website <http://www.recovery.gov/>.
- i. Does DPI have a website that lists all surveys that were sent?**
No, the DPI does not have this list available on its website.
- j. How will DPI send the surveys to districts (electronically, paper, etc.)?**
DPI will e-mail the surveys to districts using Vovici survey software. Districts will need to open their SPAM filter to allow dpiformsmanagement@dpi.wi.gov as well as the two domain names from our survey vendor: vovici.com and vovici.net.
- k. How do sub-recipients file a claim?**
Sub-recipients should follow the same process currently used for the reimbursement of regular federal funds using appropriate ARRA account codes.
- l. What should a sub-recipient do if they discover a reporting error or omission?**
- i.** If a sub-recipient discovers a reporting error or omission on the ARRA Vendor/Employment Impact Survey tool from the **current** report period before the end of the report period, the sub-recipient should send an email to the appropriate DPI contact person notifying them of the error. In the email, the sub-recipient will need to describe the extent of the error or omission, provide accurate data reflecting the correction or omission, and give a specific date for the correction. Corrections and omissions should be emailed to the appropriate DPI contact person as soon as an error is discovered.
 - ii.** If a sub-recipient discovers an FTE reporting error or omission on the ARRA Vendor/Employment Impact Survey tool from a **previous** report, the sub-recipient should document the extent of the error or omission, including accurate data reflecting the correction or omission, and indicate a specific date for the correction. Grant recipients should keep a copy of such corrections on file, including any supporting documentation, for audit purposes.
 - iii.** If the error from a previous report was the omission of a vendor payment, sub-recipients should include the payment information on the next available survey. Sub-recipients should also document the extent of the error or omission, including accurate data reflecting the correction or omission, and indicate a specific date for

the correction. Grant recipients should keep a copy of such corrections on file, including any supporting documentation, for audit purposes.

[Updated by DPI 12/09/10]

2. REPORT PROCESS

a. How will sub-recipients report this information to the DPI?

Sub-recipients will report directly to DPI using the ARRA Vendor/Employment Impact Survey tool. DPI will send the survey tool to the top administrator of the LEA or organization (i.e., district administrator for districts, directors for CESAs and CCDEBs, school administrator for 2R charter schools, etc.) and to one additional contact person per grant program area. The administrator and the additional contact person will need to coordinate who will complete the survey.

b. What happens to the data once a sub-recipient submits the survey to the DPI?

DPI will report sub-recipient data to the Wisconsin Office of Recovery and Reinvestment (ORR) and ORR will report to the federal recovery board on behalf of all state agencies.

c. Should sub-recipients register at federalreporting.gov?

Sub-recipients should **NOT** register at federalreporting.gov unless the sub-recipient received a grant directly from a federal entity.

d. Why does the DPI continue to e-mail reminders to complete a survey when the survey is already complete?

A sub-recipient may receive these e-mail reminders for one or both of the following reasons:

1. The sub-recipient may have answered all the questions on a survey, but only clicked the “Save” button at the end of the survey. The survey software only considers a survey complete when all of the questions are answered and when the sub-recipient clicks the “Submit” button at the end of the survey.
2. The sub-recipient may have submitted a survey, but may have more than one survey to complete. A sub-recipient will receive a survey for each ARRA grant program for which they received reimbursement. The e-mail reminder will identify which survey still needs to be submitted to the DPI.

e. What is the difference between the “Save” button and the “Submit” button on the survey?

The “Save” button will save the information, and sub-recipients are able to go back into the survey to complete or update the survey before it is submitted. Once a sub-recipient presses the “Submit” button in the survey, the sub-recipient cannot go back and change or update the survey. A survey is not considered complete until the sub-recipient selects the “Submit” button.

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f. Can sub-recipients change or update information once a survey has been submitted?

Sub-recipients cannot change or update information in a survey if they selected the “Submit” button at the end of the survey. If districts discover a reporting error has been made, please notify the appropriate ARRA grant program contact person at the DPI as soon as possible. Please see the last page of this document for contact information.

g. How can sub-recipients determine if a survey was sent?

Districts should first determine if the organization has received reimbursement for claims made for the specific ARRA grant program. Next, check with the sub-recipient’s administrator and their additional contact to determine if the survey has been received. The DPI will send the Vendor/Employment Impact Survey tool to the organization’s administrator and one additional contact per ARRA grant program area; for example, the Vendor/Employment Impact Survey tool for IDEA Flow-Through dollars will be sent to both the district administrator and the Director of Special Education.

h. If a sub-recipient is required to complete more than one Vendor/Employment Impact Survey tool will the surveys be available simultaneously? Do sub-recipients have to complete one before the next one is available?

Sub-recipients can work on more than one survey simultaneously. Please note there may be slight differences between the various surveys. If needed, sub-recipients can open multiple surveys at the same time and work through them simultaneously. However, it is important to remember that sub-recipients will need to submit an individual survey for every ARRA grant program.

i. The district has received reimbursement from a claim for an ARRA grant program, so why hasn’t the district received the quarterly Vendor/Employment Impact Survey for the report period?

DPI sends the Vendor/Employment Impact Survey to districts on a quarterly basis; typically two weeks before the end of each report period. If a district has received payment from a claim for an ARRA grant program but did not receive a survey, the district should check with their IT support. There is a chance that the district’s SPAM filter filtered the survey. The district’s IT support needs to open the SPAM filter to allow dpiformsmanagement@dpi.wi.gov as well as the two domain names from our survey vendor: vovici.com and vovici.net.

3. REPORTING DUNS NUMBER AND CENTRAL CONTRACTOR REGISTRATION

a. What is a DUNS Number?

A DUNS Number is a unique nine-digit identification number for the physical location of a business/organization. Dun and Bradstreet maintains a business database containing information on businesses worldwide. A DUNS Number assignment is free for all businesses required to register with the United States federal government for contracts or grants. More information is available at <http://www.dnb.com/us/>.

b. Why do sub-recipients have to provide their DUNS Number to DPI?

This number populates several data elements including organization name and address needed for the OMB reports.

c. What is CCR and what is required of sub-recipients?

Sub-recipients must register their DUNS Number with the Central Contractor Registration (CCR). The CCR is the primary contractor database for the United States federal government. More detailed information on CCR is available at this URL: <http://www.ccr.gov/FAQ.aspx>.

Sub-recipients must provide the DPI written confirmation showing that their DUNS Number is currently registered with the CCR. Written confirmation may simply be a copy of the confirmation from CCR. Please fax or email (as a PDF attachment) the confirmation to Brian Kahl at (608) 267-9187 or brian.kahl@dpi.wi.gov.

d. Who should sub-recipients contact if there are questions regarding the DUNS Number or CCR Registration?

Sub-recipients should direct all questions regarding DUNS Numbers and CCR Registration to Brian Kahl at (608) 267-9187 or brian.kahl@dpi.wi.gov.

e. Which DUNS Number should sub-recipients provide to the DPI and register on CCR?

Sub-recipients should use the DUNS Number that identifies the location of their headquarters.

f. How often do sub-recipients need to submit their DUNS Number and CCR confirmation to the DPI?

Sub-recipients only need to submit their DUNS Number to the DPI one time. However, sub-recipients need to send the DPI a copy of their CCR confirmation at each renewal period.

g. For how long do sub-recipients' DUNS Numbers stay registered in the CCR?

CCR registration is valid for one year from the time the DUNS Number is first registered. It is the sub-recipients responsibility to renew their CCR registration annually.

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4. REPORTING VENDOR INFORMATION

a. What vendor information is a sub-recipient required to report?

Sub-recipients who provide an individual payment of \$25,000 or more to any vendor within one report period must report the following five elements. The \$25,000 **threshold** is triggered by an individual payment to a vendor within a quarter and not cumulative payments to a vendor over the life of the project.

- Unique identifying number (such as a purchase order number)
- Vendor Name
- Zip code of headquarters for vendor (Please note the zip code should be entered in the nine-digit format with no hyphens. If the last four digits are not known, enter 9999.)
- Expenditure description
- Expenditure amount

For example, if a vendor receives a payment for \$17,000 during report period 1 and receives another payment for \$17,000 during report period 2, the sub-recipient does not have to report on these elements.

If using the same example, but both payments occur within the same report period, the sub-recipient does not have to report on these five elements since the individual payments fall under the threshold of \$25,000.

b. Do sub-recipients need to report any employment impact information if the vendor is receiving less than \$25,000 from an ARRA grant program?

Yes, sub-recipients are still required to report any jobs created/retained by vendors (except for materials/equipment suppliers) regardless of the amount of the vendors' contracts.

c. If sub-recipients enter vendor information in the survey for a report period, will the vendor information be pre-populated for subsequent report periods?

DPI will not pre-populate vendor information from one report period to the next. DPI is awaiting further guidance from OMB regarding vendor activity for the duration of the ARRA grant.

d. Do sub-recipients need a DUNS Number for each vendor?

The DPI is only requiring sub-recipients to provide the zip code for the vendor's headquarters. Please note the zip code should be entered in the nine-digit format with no hyphens. If the last four digits are not known, enter 9999.

e. How should sub-recipients report vendor information if a sub-recipient is using funds from several different ARRA grant programs to pay for the vendor's services?

Sub-recipients are required to report the five vendor data elements (listed in item 4.a) for each ARRA grant program that reaches the \$25,000 individual payment threshold (defined in item 4.a.).

For example, School District A contracted with CESA 13 to provide several services. CESA 13 sends School District A a quarterly bill for \$67,000 encompassing the cost of all services provided to the school district. School District A utilizes the following grant funds to pay this quarterly bill in one payment:

\$5,000	IDEA-Preschool (ARRA)
\$26,500	IDEA – Flow-through (ARRA)
\$9,000	Title I, Supplemental (ARRA)

School District A would only need to report the five vendor data elements in the IDEA-Flow Through ARRA report because that is the only ARRA grant program that reached the \$25,000 individual payment threshold.

f. How do sub-recipients identify vendors that should be reported this quarter?

- Any single vendor payments of \$25,000 or more from 2/17/2009- 9/30/2010 should continue to be reported during this quarter.
 - Example #1) Vendor reported in previous quarter with \$30,000 payment with \$0.00 vendor payment this quarter: **\$30,000 will be reported.**
- Any additional payments regardless of dollar amount made to vendors already reported in previous surveys (2/17/09-9/30/10) should also be included in the survey.
 - Example #2) Vendor reported in previous quarter with \$30,000 payment and \$5,000 vendor payment this quarter: **\$35,000 will be reported.**
- Any new single vendor payments that reached or exceeded the \$25,000 threshold during the current reporting period (10/1/10-12/31/10) should also be included on the current report.
 - Example #3a) Vendor with a single \$27,000 payment this quarter: **\$27,000 will be reported.**
 - Example #3b) Vendor with a single \$25,000 payment this quarter and a \$2,500 payment this quarter: **\$27,500 will be reported.**

[Updated by DPI 12/09/10]

5. REPORTING JOBS CREATED AND RETAINED

a. What do sub-recipients need to report?

Sub-recipients will need to report the number of jobs within their organization and by their vendors (other than materials/equipment suppliers and CESAs/CCDEBs) that are DIRECTLY charged to the ARRA grant program for the report period. DPI will provide guidance on how to calculate the number of jobs created/retained with the Vendor/Employment Impact Survey tool. The jobs created/retained information will only reflect the current report period. [Updated per OMB guidance 12/18/09]

b. What jobs should sub-recipients include in the report?

All jobs DIRECTLY charged to ARRA funds should be reported. This includes jobs created or retained by vendors (other than CESAs, CCDEBs, and materials/equipment suppliers) that are charged to ARRA funds regardless of the amount the organization paid to that vendor in one individual payment.

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The FTE Calculator provided in the Vendor/Employment Impact Report survey should be used to calculate positions that are partially funded by ARRA grant funds. [Updated per OMB guidance 12/18/09]

c. Should jobs that are an indirect result of ARRA be reported?

No. Sub-recipients should only report jobs that are directly charged to ARRA. Sub-recipients should not count jobs created/retained by “freed up” funds. [Updated per OMB guidance 12/18/09]

d. What is considered a job created?

A job created is a new position created and filled, or an existing unfilled position that is funded by ARRA. Examples of jobs created include:

- A summer school teaching position is added to increase math readiness in a school using ARRA funds. The number of hours a teacher works during the summer would be reported during the appropriate report period.
- A full-time special education teacher is added to teach Extended School Year (ESY) during the summer. In addition to the teacher’s regular 1.0 FTE contract, the teacher also works as a .25 FTE in the summer, which is funded by ARRA grant program. The additional .25 FTE is added to the appropriate ARRA report period.
- A local educational agency’s (LEA’s) bookkeeper works as a .75 FTE during the school year. As a result of the ARRA funds, the district increases the bookkeeper’s position to 1.0 FTE. The LEA would report the additional hours worked in the appropriate ARRA report.
- A fulltime (1.0 FTE) psychologist is hired using only ARRA funds. The 1.0 FTE is added to the total number of jobs created.
- A substitute teacher is hired to cover for a teacher who is attending a conference. The substitute teacher’s time is funded by an ARRA grant program. The sub-recipient would need to report number of hours the substitute teacher work in the FTE format.

[Updated per OMB guidance 12/18/09]

e. What is considered a job retained?

A job retained is an existing position that is now funded by ARRA. [Updated per OMB guidance 12/18/09]

f. What if a sub-recipient discovers a reporting error or omission from a previous report period?

Sub-recipients should keep a record of any corrections that need to be made to the job numbers from previous quarters’ reports. The Recovery and Transparency Board will determine the best approach for making this information available on recovery.gov.

[Updated by DPI 12/9/10 per USDE Pub. L. 111-5]

- g. Does the sub-recipient need to report on jobs funded by ARRA this quarter if the sub-recipient has not yet received reimbursement for these positions?**

Yes, OMB defines a funded job as one in which wages or salaries are either paid for or will be reimbursed with Recovery Act funding.

[Updated by DPI 12/9/10]

- h. How would a sub-recipient report a job created that was funded by two separate ARRA grant programs (such as Title I, Part A and IDEA-Flow Through)?**

The sub-recipient would report the portion of the job directly funded Title I, Part A on the Title I, Part A survey as well as the portion of the job directly funded by IDEA Flow-Through on the IDEA Flow-Through survey.

- i. Can sub-recipients aggregate substitute teachers who fill-in when staff participate in professional development?**

If an ARRA grant created the opportunity for professional development, sub-recipients may aggregate substitute teachers if the substitute teachers are paid from the ARRA grant program.

- j. If a team of universal screening testers are brought into a school building, should the district list each position separately, or can the district aggregate the number of hours for the testers?**

If the district brought in a team of universal screening testers and the testers' positions were paid directly by ARRA, then the district should report these jobs and may choose to aggregate them for the survey.

Furthermore, if ARRA funds provide the district the opportunity to bring in several teams of testers for several different school buildings, the district may choose to aggregate the FTEs for all the testers. The district would not need to report the testers by school building.

[Updated per OMB guidance 12/18/09]

- k. What if jobs were not created/retained as a result of the ARRA funds?**

On the Vendor/Employment Impact survey, it asks "Were any vendor/employer jobs directly funded, in whole or in part, as a result of funding from the [title of ARRA grant]?" If no jobs are charged to ARRA funds, simply answer these questions by checking the "No" box. [Updated per OMB guidance 12/18/09]

- l. If an employee is re-hired by an organization as a result of the ARRA funds, should this be reported?**

If this position is directly charged to an ARRA grant program, then this position should be reported in the survey.

[Updated per OMB guidance 12/18/09]

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- m. If a sub-recipient's employee would have a job regardless of ARRA funding, but the sub-recipient is using ARRA funding to pay this position's salary, does this position get reported in the survey?**

Yes, this position would be reported in the survey.

[Updated per OMB guidance 12/18/09]

- n. If a sub-recipient moved salaries into one of the ARRA grant programs for Maintenance of Effort (MOE) purposes should these jobs be reported? Their positions would not have been cut.**

If this position is directly charged to an ARRA grant program, then this position should be reported in the survey. [Updated per OMB guidance 12/18/09]

- o. How should sub-recipients collect the job impact information from their vendors?**

In order to fulfill the reporting requirements of the survey, sub-recipients may need to contact their vendors to discuss whether any jobs were created and/or retained. It is the expectation that minimal contact would need to be made with the vendor in order to complete the survey. Please remember that sub-recipients do not have to report the jobs created/retained by their vendors who are materials/equipment suppliers or Cooperative Educational Service Agency (CESA)/ County Children with Disability Education Board (CCDEB) personnel. [Updated per OMB guidance 12/18/09]

- p. If a job is created or retained at a Cooperative Educational Service Agency (CESA) or County Children with Disability Education Board (CCDEB), how should this job be reported?**

The DPI is required to provide information related to the expenditure of the American Recovery and Reinvestment Act of 2009 (ARRA) funds by its sub-recipients. Many of the sub-recipients are using ARRA funds to contract with CESAs and/or CCDEBs for services needed to carry-out activities under the different ARRA grant programs. In this case, CESAs and/or CCDEBs are referred to as vendors for reporting purposes.

Instead of asking each school district/2R charter school to report their portion of a job created/retained by ARRA at a CESA/CCDEB, we are asking CESAs/CCDEBs to report any jobs created or retained by CESAs/CCDEBs on behalf of the school districts/2R charter schools contracting with their individual CESAs/CCDEBs that are due to ARRA grant funding.

DPI sends all CESAs/CCDEBs a quarterly survey asking for the number of FTEs by ARRA grant program. CESAs/CCDEBs only need to provide DPI with an aggregate of FTEs charged to all ARRA funding by each grant program (and not by districts). Therefore, CESAs/CCDEBs may need to contact school districts/2R charter schools to determine the funding source for services the CESA/CCDEB provides.

The DPI believes the CESA/CCDEBs aggregated report will be more accurate, reduce the chance of double reporting, and be less burdensome for the school districts/2R charter schools and the CESAs/CCDEBs.

[Updated per OMB guidance 12/18/09]

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6. ARRA GRANT REPORTING PROGRAM CONTACTS

a. Education for Homeless Children and Youth Grants

Mary Maronek: (608) 261-6322, mary.maronek@dpi.wi.gov or
Rachael Bergstrom: (608) 226-2813, rachael.bergstrom@dpi.wi.gov

b. IDEA – Flow Through Grants

Jack Marker: (608) 266-3928, DPISpedARRA@dpi.wi.gov

c. IDEA – Preschool Grants

Jack Marker: (608) 266-3928, DPISpedARRA@dpi.wi.gov

d. Title I, Part A Grants (including Neglected and Delinquent Grants, and Supplemental Grants) Schools of Recognition Grants and School Improvement Grants 1003(g)

Contact your Title I Consultant <http://dpi.wi.gov/titleone/asp/t1consultants.aspx> or
Rachael Bergstrom: (608) 266-2813, rachael.bergstrom@dpi.wi.gov

e. Title II, Part D Grants

Steve Sanders: (608) 266-3856, stephen.sanders@dpi.wi.gov

f. VISTA

Betsy Prueter: (608) 267-7290, betsy.prueter@dpi.wi.gov