

## ARRA REPORTING REQUIREMENTS (rev. 10/12/09)

# Recovery Act Employment Status Report

### **Recovery Act Employment Status Report**

PDC Construction Coordinator:		_
Project Name:	Address	:
Project Sponsor:		
CDBG-R Award Amount:		
Report Period End Date:		

		Pay Period		Hours		%			
<b>Employee Name</b>	Employee ID	<b>Begin Date</b>	<b>End Date</b>	New Job	<b>Retained Job</b>	MFI	Race	Hispanic	Comments
	TOTAL								

A job created is a new position created and filled or an existing unfilled position that is filled as a result of the Recovery Act; a job retained is an existing position that would not have been continued to be filled were it not for Recovery Act funding. A job cannot be counted as both created and retained. Also, only compensated employment in the United States or outlying areas should be counted. See 74 FR 14824 for definitions.

SIGNATURES REQUIRED:						
PDC Construction Coordinator:	Date:					
Project Manager :	Date:					

This was directly taken from the OMB's Implementing Guidance for the Report's on Use of Funds Pursuant to the American Recovery and Reinvestment Act of 2009 (M-09-21, June 22, 2009)

#### **Section 5 - Reporting on Jobs Creation Estimates by Recipients**

#### 5.1 What reporting is required by the Recovery Act for estimates of jobs created or retained?

There are two distinct types of jobs reports that the Recovery Act requires.

First, the Council of Economic Advisers, in consultation with OMB and Treasury, are required by the Recovery Act to submit quarterly reports to Congress that detail the impact of programs funded through Recovery funds on employment, economic growth, and other key economic indicators. OMB and agencies will continue to partner with CEA on these quarterly reports and other questions regarding macro-level jobs estimates. Agencies with questions about reporting macro-level or indirect jobs estimates should refer to CEA's guidance on reporting jobs: <a href="http://www.whitehouse.gov/administration/eop/cea/Estimate-of-Job-Creation/">http://www.whitehouse.gov/administration/eop/cea/Estimate-of-Job-Creation/</a>

The second type of job estimates should be submitted by recipients of Recovery funds for each project or activity, as required by Section 1512(c)3(D) of the Recovery Act. This section addresses the jobs estimates required to be submitted by recipients.

#### 5.2 What information are recipients covered by Section 1512 required to report?

Recipient reporting requirements for grants, cooperative agreements, and loans were published in two separate Federal Register notices. The first notice contained <u>proposed</u> data elements and instructions on reporting jobs created and retained under grants, cooperative agreements, and loans (74 FR 14824). The comments on this first notice were reviewed, though an alternate data set had to be cleared on an emergency basis to accommodate the more immediate need for reporting requirements at the recipient and federal levels. The second notice contained interim final guidance and a standard award term (2 CFR 176.50) with a request for public comment. The comment period for the second notice ends on June 22, 2009 (74 FR 18449).

While this guidance does not apply to contracts, recipient reporting requirements and a standard award clause for federally awarded contracts were published in an interim final rule with request for public comment (FAR 52.204-11). The public comment period on the contract rule has now closed, and the final rule will be published in the near future.

The final detailed reporting requirements for recipients of grants, cooperative agreements, loans and contracts along with data entry instructions will be posted on <a href="https://www.energia.com/www.ener

The points below provide an overview of the key requirements and supplemental guidance on reporting the employment impact of the Recovery Act funded work.

- Prime recipients are required to report an estimate of jobs directly created or retained by project and activity or contract. Recipients will be required to report an aggregate number for the cumulative jobs created or retained for the quarter in a separate numeric field. Recipients will also be asked to provide a narrative description of the employment impact. While no change is being made to the actual information required to be reported, the clarification that this information will be collected in two separate fields one numeric and a text field for the narrative is an update from previous Recovery Act guidance.
- A job created is a new position created and filled or an existing unfilled position that is filled as a result of the Recovery Act; a job retained is an existing position that would not have been continued to be filled were it not for Recovery Act funding. A job cannot be counted as both created and retained. Also, only compensated employment in the United States or outlying areas should be counted. See 74 FR 14824 for definitions.
- The estimate of the number of jobs required by the Recovery Act 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 (see Section 5.3 for more information). The FTE estimates must be reported cumulatively each calendar quarter.
- Recipients of grants, cooperative agreements, and loans <u>must</u> include in the aggregate number and their narrative description an estimate of jobs created and retained on projects and activities managed by their funding recipients. This clarification is a change from previous guidance, based on comments received on the Federal

Register notice and stakeholder input. For additional guidance on providing these estimates see Section 5.4.

- Recipients should not attempt to report on the employment impact on materials suppliers and central service providers (so-called "indirect" jobs) or on the local community ("induced" jobs). Employees who are not directly charged to Recovery Act supported projects/activities, who, nonetheless, provide critical indirect support, e. g., clerical/administrative staff preparing reports, institutional review board staff members, departmental administrators, are NOT counted as jobs created/retained.
  Recipients report only direct jobs because they may not have sufficient insight or consistent methodologies for reporting indirect or induced jobs. The Council of Economic Advisers is developing a macro-economic methodology to account for the overall employment impact of the Recovery Act.
- The narrative should include a brief description of the types of jobs created or retained. This description may rely on job titles, broader labor categories, or the recipient's existing practice for describing jobs as long as the terms used are widely understood and describe the general nature of the work.
- Recipients will report for all projects and activities or federally awarded contracts regardless of whether they are funded in whole or in part by the Recovery Act, but should report only on the jobs and funding attributable to an award under the Recovery Act.

Please note that certain recipients, such as those funded by Department of Transportation, have job reporting requirements in the Act that go beyond Section 1512. Recipients must follow this guidance with respect to the reporting requirements under Section 1512, and must also comply with program and agency-specific requirements.

#### 5.3 What methodology should recipients use when calculating the number of jobs created or retained?

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 "full-time equivalent" (FTE) jobs. In order to perform the calculation, a recipient will need the total number of hours worked that are funded by the Recovery Act. The recipient will also need the number of hours in a full-time schedule for a quarter. The formula for reporting can be represented as:

### Example:

Assume that a recipient is preparing its first quarterly report and that the recipient's Recovery Act funded work required two full-time employees and one part-time employee working half days for the quarter. Also assume that the recipient's 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 FTE 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 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	3rd qtr	4th qtr	1st qtr	2nd qtr	3rd qtr	4th qtr
Full-Time Schedule	520	1040	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 (620 hrs.)	0	0	130	390	650	650
Total Hours Worked	1300	2600	4030	5590	7150	8450
Quarterly FTE	2.50	2.50	2.58	2.69	2.75	2.71

An alternative calculation based on the allocable and allowable portion of activities expressed as a percentage of the total is acceptable for recipients of assistance agreements that must comply with OMB Circular A-21, Cost Principles for Educational Institutions. OMB Circular A-21 recognizes that practices vary among educational institutions as to the activity constituting a full workload. Compensation charged to sponsored projects must conform to the institution's established policies and reasonably reflect the activity for which the employee is compensated. Charges to sponsored projects may be expressed as a percentage of their total activities. Therefore, for purposes of ARRA reporting of jobs created or retained, colleges and university may count, proportionately, the percentage of effort directly charged to ARRA awards as an FTE equivalent.

For example - A faculty member charging 50% effort on an ARRA award will be counted as .5 FTE. Hourly and part time employees shall be calculated based on actual hours worked on the sponsored agreement and the institution's definition of a full workload for employment.

The total hours reported may include paid leave.

#### 5.4 How should recipients estimate the job impact of funding provided to sub-recipients?

Recipients must include an estimate of jobs created and retained on projects and activities managed by their funding recipients in their aggregate number and their narrative description. This information will be provided for each project and activity funded by the Recovery Act. The clarification that recipients must report jobs estimates for all sub-awarded funds is an update from previous guidance.

For example, consider a prime recipient that receives a \$10 million grant from a Federal agency for a specific project or activity. Assume the prime recipient hires five FTE to administer the program at a total cost of \$1 million, and distributes nine \$1 million grants to sub-recipients. In this case, the prime recipient will report the direct job creation of 5 FTE, and would also provide an estimate of the total employment impact of the nine \$1 million grants (using the same FTE methodology discussed in 5.3).

Prime recipients are required to generate estimates of job impact by directly collecting specific data from sub-recipients and vendors on the total FTE resulting from a sub-award. To the maximum extent practicable, information should be collected from all sub-recipients and vendors in order to generate the most comprehensive and complete job impact numbers available. However, in limited circumstances, the prime recipient can employ an approved statistical methodology to generate estimates of job impact, thereby collecting data from a smaller subset of sub-recipients and vendors in order to extrapolate an estimate of job impacts to all applicable sub-recipients and vendors. A statistical methodology should only be employed in those cases where a comprehensive collection of jobs data from all sub-recipients and vendors is overly costly or burdensome and thus disrupts the prime recipients' ability to effectively implement the underlying mission of the program.

The appropriate Federal agency for a given program area will issue supplementary guidance providing an acceptable statistical methodology for this purpose, including required sampling parameters. Further, OMB will explore with the Board whether the current data collection technology, <a href="https://www.FederalReporting.gov">www.FederalReporting.gov</a>, can be modified in the future to allow sub-recipients to report jobs data directly to prime recipients.

In the narrative description accompanying the estimate, where the prime recipient utilizes a statistical methodology as described above, the prime recipient should note what part of the estimate was generated with actual data received versus what part of the estimate was generated through extrapolation. In addition, the narrative should provide a description of the statistical methodology used.

In addition to providing this information by project and activity as required by the Recovery Act, as a best practice it is also recommended that State governments post the employment impact of all recovery funds prominently on the State recovery website.