



United States
Department of
Agriculture

Food and
Nutrition
Service

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DATE: April 14, 2010

MEMO CODE: SP 21-2010

SUBJECT: Updated Guidance on the American Recovery and Reinvestment Act of 2009 (ARRA) Regarding Recipient Reporting

TO: Regional Directors
Child Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum is a follow-up to the email notification sent to Food and Nutrition Service (FNS) Regional offices on Friday, March 26, 2010. In accordance with Office of Management and Budget (OMB) Guidance M-10-14, dated March 22, 2010, below is a brief synopsis of the additional responsibilities required of FNS and State Agencies (SA) during the first quarter 2010 ARRA reporting period beginning April 1, 2010. While we have provided this synopsis we strongly encourage you to read the entire document to allow for full understanding of the OMB guidance updates.

OMB Guidance M-10-14:

1. Highlights the steps Federal agencies must take to review data quality of recipient reports during the new "Continuous Corrections" period initiated by the Recovery Accountability Transparency Board in January 2010;
 - a. FNS must, at a minimum, conduct a final review of the data upon the close of the continuous corrections period, given that all records are opened and subject to edits and corrections during that time. The FNS review must focus on significant reporting errors, material omissions and administrative/technical problems in a manner consistent with our data quality review processes. After the completion of the 1st quarter 2010 reporting and review period, the continuous corrections period will run from May 3 to June 14. The final reporting data will be published on June 16.
 - b. To check the status of your respective SA's report during the continuous quality assurance period, the last update to the report to include date and name of person is displayed on the prime recipient report under the "Report Audit Trail" section. Please check for updates periodically throughout this period and respond accordingly.

2. Introduces a new category of data quality issues to be identified and tracked by Federal Agencies, “Administrative/Technical,” and provides specific instructions on preventing such issues from occurring;
 - a. FNSROs must instruct all SAs submitting subsequent quarterly reports to use the “Copy and Copy Forward” function. This process will create and preserve a link from the previous quarter’s report to the new quarterly report to be submitted. Additional details are found in Chapter 10, *Copy Forward and Copy Function* of the User Manual located under “Useful Links” on federalreporting.gov’s homepage.
3. Clarifies miscellaneous issues for recipients, such as when a recipient should categorize a Section 1512 report as “final”; and
 - a. SA’s that have complied with their reporting requirements will no longer be required to submit Section 1512 reports under the following circumstances:
 - i. The award period has ended; and
 - ii. All Recovery funds are received (through draw-down, reimbursement or invoice) and the project status is complete per agency requirements and/or performance measures; or
 - iii. The award has been terminated or cancelled.
 - b. A recipient will indicate a “Y” in the final report data field in FederalReporting.gov if its report is considered final and there will be no future reports submitted. Indication of a final Section 1512 report does not replace any other closeout procedures required by the recipient or Federal agency.
4. Provides further clarification on which of the recipient reporting data fields are a quarterly and which are cumulative.
 - a. The only field requiring quarterly data is “Number of jobs.”
 - b. Other fields, i.e., “Total amount of payments to Vendors less than \$25,000/award” and “Total amount of Sub Awards less than \$25,000/award” have a quarterly threshold (below \$25,000) for inclusion in the data element, but the amount reported is cumulative for the award.

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The 1st quarter 2010 reporting period timeline is now up-to-date on federalreporting.gov. Please see attached timeline or the following link:

<https://www.federalreporting.gov/federalreporting/documentation/timeline.pdf>

To reiterate, the information provided in this memorandum is only a synopsis; please review the entire guidelines found in the OMB Guidance M-10-14.

SAs with questions regarding this memo should contact their Regional Office. Regional Office questions should be directed to Lynn Rodgers-Kuperman.

Original Signed

Cynthia Long
Director
Child Nutrition Division

Attachments