

QUESTIONS AND ANSWERS
ARRA JOBS AND VENDOR REPORTING SYSTEM WEBINAR
March 12, 2010

Disclaimer: The following answers are being provided by the Division of Funding and Disbursements Services staff to questions raised by participants of the ARRA Reporting Webinar conducted on March 12, 2010. The answers to the questions below are taken from published and verbal guidance provided from the Federal Office of Management and Budget and the United States Department of Education as of the webinar date and should not be construed as Legal advice. Revisions to these answers are possible as new information is made available and further clarifying guidance is issued by each aforementioned Federal agency.

ARRA reporting questions can be directed the Division of Funding and Disbursement Services at 217-782-5256.

If a teacher works 2 hours in an extended day program in addition to the teacher's regular work day, and ARRA is paying for the extended day program as well as the teacher's regular salary, is that considered a 1.0 FTE?

No, this position would be reported as more than 1.0 FTE. , The denominator (bottom number) would be the quarterly hours in a *regular full-time schedule*. Since the teacher is being paid with all ARRA funds, the numerator (top number) would include the hours worked in the teacher's regular schedule as well as the hours worked in the extended program for the reporting quarter. Divide the actual number of hours worked by the hours in a regular full time schedule. Assuming that these are full time teachers, the FTE will result in an amount greater than 1.0.

Example: The teacher's regular work week is 35 hours. There are 11 weeks in the quarter. The denominator would be 385 (35 x 11). This same teacher worked an additional 4 hours at the extended day program each week in the reporting quarter. The teacher worked 44 hours (4 x 11) in the extended program. The teacher is full time and is paid for all hours worked this reporting quarter with ARRA funds. The formula to determine FTE would be 429 (44 extra hours + 385 regular hours worked) divided by 385. The FTE to report would be 1.11. (Refer to power point slide 10).

If a Title 1 director/assistant is charging a portion of their salary to ARRA, should jobs FTE be reported or are those positions "indirect jobs" as stated on slide 13?

The FTE of the Title 1 director/assistant's salary that is being funded with ARRA dollars should be reported for the reporting quarter if these salaries are included in the ARRA Title 1 budget. These are not "indirect jobs". (Refer to power point slide 13)

If a full time teacher is paid for from local funds, and is working a few extra hours for an extended day/year program, are these hours reported and how?

Since only the extended day program hours are being funded with ARRA dollars, the FTE to be reported would only be of the hours of the extended day program that are worked and funded with ARRA dollars in the reporting quarter divided by the quarterly hours in a regular full time schedule.

Example: The teacher's regular work week is 35 hours and these hours are being paid with local dollars. There are 11 weeks in the reporting quarter. The denominator would be 385 (35 x 11). This same teacher worked an additional 4 hours at the extended day program each week in the reporting quarter. These 44 hours (4 x 11) are paid with ARRA funds. The formula to determine FTE would be 44 divided by 385. The FTE to report would be .11. (Refer to power point slide 10).

We pay tuition to our cooperative high school monthly. Would the high school be considered a vendor?

No. The transaction in this instance does not constitute a vendor payment.

If the district used ARRA State Aid funds to pay salaries last quarter (Oct-Dec, 2009), do I have to go back and complete the last quarter reporting or do I begin for this quarter?

Local education agencies (LEAs) did not receive ARRA funds for General State Aid during the October 1, 2009 - December 31, 2009 reporting quarter. The new Federal guidance issued in December 2009 does not require that LEAs correct ARRA jobs data reported under previous guidance through the period ending September 30, 2009.

If the district pays a vendor \$20,000 twice in the same quarter, does this require reporting as a vendor over \$25,000?

No. The threshold that triggers vendor reporting is a single vendor payment of \$25,000 or more. Single or multiple payments to the same vendor that are less than \$25,000 do not need to be reported even if they are paid in the same quarter.

How do we make ARRA data corrections to a previously submitted reporting quarter? What is the deadline for submission?

Corrections to previously submitted ARRA data must be completed via the new American Recovery and Reinvestment Act ARRA Reporting system in IWAS. Once logged into the system choose *Start New ARRA Report*, then the correct Fiscal Year and Program, and the through date of the reporting quarter that needs corrected. There is no specific deadline for submission of previous reported quarter corrections, but the corrected information should be provided as soon as possible.

Note: ARRA jobs data submitted for the period ending September 30, 2009 under previous federal guidance does not need to be corrected.
(Refer to power point slides 15 through 33)

If a local district pays a special education coop for services provided using ARRA dollars, is the special education coop considered a vendor?

No. This type of transaction is not considered a vendor payment.

If a vendor was paid \$10,000 in one month of the qtr and then the same vendor is paid \$30,000 in another month in the same quarter, how much should be reported for that quarter?

The LEA would only report the single payment of \$30,000. (Refer to power point slide 14).

ARRA - GSA, If we sent an expenditure report for the earlier receipt of funds (i.e. Sept. 30) do we need to report that payment under this new reporting system? I don't remember the over \$25,000 reporting requirement & we used it to cover textbook purchases.

The requirement to report vendor payments that are \$25,000 or more has not changed with the new federal guidance. Corrections to previously submitted ARRA data such as a vendor payment must be completed via the new American Recovery and Reinvestment Act ARRA Reporting system in IWAS. Once logged into the system choose *Start New ARRA Report*, then the correct Fiscal Year and Program, and the through date of the reporting quarter that needs corrected. (Refer to power point slides 15 through 33)

If salaries are used for ARRA General State Aid, does the associated TRS and other benefits need to also be assigned (i.e. is salary only acceptable)?

Any expenditure that is ARRA funded must be assigned the appropriate ARRA revenue code to the expenditure. Reminder: Local education agencies are not required to pay the higher TRS rate for employees paid with State Fiscal Stabilization Funds (GSA payments). The higher TRS rate is required for all other regular Federal or ARRA programs (e.g. Title I and IDEA).

If only employee benefits are being ARRA funded (none of the salaries) do you still need to do the FTE calculation?

No. LEAs are only to report jobs that are funded with ARRA dollars, so if only benefits are being paid with ARRA funds the FTE would not be reported.

What is the due date for ARRA data (jobs and vendor information)? What is the due date for ARRA project expenditure report?

All ARRA data is due the 5th calendar day after the end of the reporting quarter (i.e. April 5, for reporting quarter January 1 through March 31; July 5, for reporting quarter April 1 through June 30, etc.)

ARRA project expenditure report is due 30 days after the end of the reporting quarter (i.e. April 30, for reporting quarter January 1 through March 31; July 30 for reporting quarter April 1 through June 30, etc.)

Does excess cash on hand include funds that are invested, not in the general account?

All Federal funds should only be requested for actual expenditures and expended as timely and practical as possible upon receipt. (Refer to page 3 of the ARRA Local Education Agency Reporting Requirements and Instructions)

Would the electric, gas or other utility company be considered a vendor?

Yes. A utility company could be considered a vendor. Please refer to page 2 of the ARRA Local Education Agency Reporting Requirement and Instructions as well as slide 14 for a further description of a vendor).

Note: The vendor would only be reported in the American Recovery and Reinvestment Act ARRA reporting system if the LEA made a single \$25,000 or more payment to such vendor.

Is it necessary for a LEA to set a separate chart of accounts ARRA funds?

All ARRA revenues must be designated and accounted for in accordance with Part 100 regulations (Requirements for Accounting, Budgeting, Financial Reporting, and Auditing) which can be accessed at:

http://www.isbe.net/rules/archive/pdfs/23IAC100EmerqAmnd_Code.pdf

If we use expenditures from the operation and maintenance fund, do we have to show equal amount as ARRA state aid revenue in the operation and maintenance fund?

If expenditures are made from the Operation and Maintenance fund and ARRA General State Aid funds were used for the expenditures then the transactions must be tracked and assigned to ARRA General State Aid accordingly.

How would a consultant hired for a three month period of time be reported? Are they considered a vendor?

Yes, if the consultant was paid a single payment of \$25,000 or more. (Refer to page 2 of the ARRA Local Education Agency Reporting Requirement and Instructions as well as slide 14).

We did not create any new jobs with ARRA Money. If we use ARRA GSA money to pay our employees for their regular salary, will we have to report full-time equivalent jobs?

Yes, beginning October 1, 2009 forward. New federal guidance requires that the FTE of employees that are ARRA funded within the reporting quarter be reported. (Refer to power point slides 11 and 12.)

The number of hours worked will not match the amount paid since we pay throughout the summer. Can we divide what was paid through ARRA funds by their contract salary amount and come up with a FTE?

The guidance states to use the hours worked and funded with ARRA dollars for the reporting quarter. The payments that are made in the summer are not for hours worked during the summer; they are for hours worked in the previous quarter and will be obligated as of June 30.

Does an LEA have to complete the ARRA reporting requirements and provide the information to the coop or regional liaison to be included in the joint agreement's report? If so, how is this done?

Yes. LEAs that are part of a joint agreement or have a regional liaison must report their ARRA data to their respective agent. This can be done by submitting an excel file created by using the ARRA Joint Agreement excel application or by hard copy submission.

Should substitutes that are paid so that teachers can attend professional development be counted towards FTE's?

Yes, if the substitute is being paid with ARRA dollars. Calculate the number of hours worked and ARRA funded in the reporting quarter by the total number of quarterly hours in a full-time schedule for the position for which they are filling, i.e. if the teacher's work week is 35 hours for 13 weeks for the quarter the denominator would be 455 hours.

If we haven't reported jobs because we had not been approved, how do we report for past quarters?

Jobs that have been funded with local dollars in anticipation of reimbursement with ARRA funds once the application is approved and ARRA funds are received must be reported for each quarter the position is funded. This is reported by using the American Recovery and Reinvestment Act system via IWAS. (Refer to power point slides 15 through 33).

Does the LEA Board of Education need to make a policy regarding ARRA?

All LEAs should have clear roles of responsibility for the receipt, expenditure, compilation and reporting of all ARRA data. (Refer to power point slides 34 and 35)

Our auditor from last year told us to spend GSA ARRA on Regular Education Teacher salaries. How do I determine from the 30 Regular Ed teachers we have who is being paid by ARRA?

The determination as to the salaries that are charged with ARRA Stabilization General State Aid funds is a local decision. Once determined, the expenditures must be tracked by Fund, Function, Object and ARRA Revenue Code.

Who is responsible for written policies LEA's or Joint Agreement's or both?

All LEAs that receive or expend ARRA funds should have adequate written policies and procedures that outline clear roles of responsibility for the receipt, expenditure, compilation and reporting of all ARRA data. (Refer to power point slides 34 and 35)

We did not realize in past quarters that contracted personnel had to be reported. The deadline for those quarters has past, do we need to go back and submit a corrected report?

Single contractual payments of \$25,000 or more using ARRA funds must be reported in each quarter. Corrections to previously submitted ARRA data must be completed via the new American Recovery and Reinvestment Act ARRA Reporting system in IWAS. Once logged into the system choose *Start New ARRA Report*, then the correct Fiscal Year and Program, and the through date of the reporting quarter that needs corrected. (Refer to power point slides 15 through 33)

Is the LEA member of a joint agreement (Coop)/regional liaison responsible for reporting ARRA data and expenditures to ISBE?

No. The joint agreement or regional liaison is responsible for reporting ARRA data (5 days after the quarter ends) and expenditures (30 days after the quarter ends) to ISBE for its member LEAs. The individual districts must provide the information to the appropriate joint agreement or regional liaison.

Since we are receiving our General State Aid for 2nd payment in February and both payments in March in lieu of the "normal" GSA payments, must we use this reporting system since our payroll for staff is being covered by this "new" GSA?

If the LEA is using the ARRA General State Aid payments for payroll expenditures then the new American Recovery and Reinvestment Act Reporting system must be used to report the jobs funded data and any single vendor payments made that are \$25,000 or more.

If the ARRA data reported April 5th is not completely accurate can it be corrected?

Yes, but every effort must be made to ensure that the jobs funded and vendor information reported on April 5 for the reporting period ending March 31 is correct. Corrections to previously submitted ARRA data must be completed via the new American Recovery and Reinvestment Act ARRA Reporting system in IWAS. Once logged into the system choose *Start New ARRA Report*, then the correct Fiscal Year and Program, and the through date of the reporting quarter that needs corrected. (Refer to power point slides 15-33).

If you did not know to report ARRA funded substitute costs as part of the FTE for the first two quarters, can you go back and correct this now?

The new Federal guidance issued in December 2009 does not require that LEAs correct ARRA jobs data reported under previous guidance through the period ending September 30, 2009. If a job's hours were worked and ARRA funded October 1 – December 31, 2009 and corrections need to be made to the December 31, 2009 reporting quarter the lea can make those corrections via the new American Recovery and Reinvestment Act ARRA Reporting system in IWAS. Once logged into the system choose *Start New ARRA Report*, then the correct Fiscal Year and Program, and the through date of the reporting quarter that needs corrected. (Refer to power point slides 15 through 33)

A support full time position is 40 hours per week and teacher is 37.5 hours per week, what figure would we use as the denominator in the FTE calculation?

The denominator (bottom number) will be different for different types of staff. In this example the full time hours in the reporting quarter (denominator) for a teacher will be 37.5 hours multiplied by the number of weeks in the reporting quarter. The full time hours in the reporting quarter for a support person will be 40 hours multiplied by the number of weeks in the reporting quarter.

If we have not spent any ARRA money yet are we required to submit ARRA data and expenditure reports?

Depending on the start data of the project, ARRA data must be reported quarterly even if the reported data is zero. In addition, quarterly expenditure reports must be submitted even if the expenditures are zero.

Could ARRA funds be used to hire long-term substitutes (i.e. leave of absence, maternity leave) for a full time position?

Yes, provided there are ARRA funds available in the specific project to fund such position.

The State Fiscal Stabilization Fund (SFSF) Education Services General State Aid payments were received after February 19, 2010. Can those funds be used for expenditures prior to February 19, 2010?

Yes. The SFSF Education Services General State Aid payments must used for expenditures from January 1, 2010 through March 31, 2010.

What is the difference between SFSF Education Services and SFSF Other Government Services?

SFSF Education Services are American Recovery and Reinvestment Act Stabilization funds to be used specifically for educational purposes. The revenue code is 4850. The last five GSA payments in FY 2009 were paid with these funds. Three GSA payments paid February, 19, March 10, and March 19, 2010 in FY 2010 were also paid with these funds.

SFSF Other Government Services are American Recovery and Reinvestment Act Stabilization funds can be used for any education purpose designated by the Governor. One GSA payment in August, 2009 was paid with these funds. The revenue code is 4870.

Will LEAs be receiving any further ARRA dollars for GSA payments? Will we be required to provide ARRA data or an expenditure report after the March 31, 2010 reporting quarter?

No. The last ARRA GSA funded payment was vouched March 19, 2010. There will be no further GSA payments made with ARRA SFSF funds. March 31, 2010 will be the last reporting quarter LEAs will have to provide job and vendor data for GSA payments. The GSA ARRA data report is due to ISBE no later than **April 5, 2010**. The GSA ARRA expenditure report is due to ISBE no later than **April 30, 2010**. The revenue code for the payments made in February and March is 4850.

Are there any restrictions for ARRA GSA?

Yes. Please see pages 6-8 of the [Local Education Agency Reporting Requirements and Instructions](#).

We used FY 2009 ARRA funds for salaries but did not calculate FTE. Is it necessary to correct this report?

If you reported accurately based on the previous guidance there is no need to submit a corrected ARRA data report. The previous guidance posed the question “Were any jobs created or retained due to the presence of ARRA funds? The new guidance, dated December 18, 2009 took effect for the reporting quarter of October 1 through December 31, 2009.

Should an LEA report a job that is not filled?

No. Only report the FTE of jobs that have hours worked and are ARRA funded within the reporting quarter divided by the quarter hours in a full time schedule. If the position is not filled there would be no hours worked.

Where can I find information regarding the March 12, 2010 webinar presentation?

The March 12, 2010 webinar presentation information can be found at www.isbe.net, go to Hot Topics, Federal Stimulus – American Recovery and Reinvestment Act of 2009 (ARRA), in the Resources (on the right) choose ARRA Webinar Archive. Once on this page you need to look for the March 12, 2010 Webinar.