

**Q&A: Recovery Act Recipient Reporting on FederalReporting.gov –
Penelope Blank**

Q: If we have eight people who have taken on our stimulus project as a full-time project in the interim or temporary full-time project, we would count their work hours even though they were not slated for layoff or anything else?

A: They're being paid for by the Recovery Act funds, right?

Q: Right. Yeah, primarily. That's the scenario. They would be charging their time to an account that would then be rolled up and charged to the Recovery Act time. So, their headcount would be counted in jobs retained and created?

A: Yes.

Q: If you're buying equipment from vendors or other services, you're not required to report the jobs data? You don't have to get that information from the vendors?

A: Not on vendors, no. They're considered indirect, induced jobs.

Q: You mentioned subawards, subcontractors need to register for reporting requirements, but I'm assuming vendors do not.

A: Vendors do not. As the prime recipient, you have to report for vendors. You can report on behalf of your subrecipients, and you have to report their jobs. They can't report their jobs directly, but if you want some of your subrecipients to report directly, you can delegate that to them.

Q: We don't have any subrecipients, but we do need to report on behalf of the vendors? They do not need to register?

A: Yes.

Q: You indicated on the slide 2,080 hours as being an FTE for a year. That would include all their paid leave such as vacation and sick time and so forth. So when we indicate the number of direct labor hours that are charged to the project, somehow we'd have to gross that up to include their indirect share of hours?

A: It depends on how you want to do it. That's just an example. There is no formal definition of what is an FTE. If you go back, OMB has "as defined by the recipient."

Q: I see. So we could say a full-time work year for one of our FTEs might be 1,880 hours?

A: Yes, exactly.

Q: Having gone through this, I really appreciate how you guys are doing this and this program, but I wanted to ask you to go back to the federal reporting slide that shows the three options. For the benefit of my cohorts here, I would suggest you pay a lot of attention to that “upload Excel document.” I spent a day on the online reporting system trying to guess through all the various codes and would get logged out and go back in and get logged out, and the Excel sheet works well. The other thing that I’m delighted to hear that you’re going to have for us is this summary sheet that we can go to, and I wanted to make sure folks understand how important that is. This makes filing your taxes seem simple. You’re trying to guess on all these blank forms, and where exactly is that going to be?

A: It is on the DOE website. If you go to energy.gov and click on the “Reporting,” then click on the “Recovery” on the right side of the page, and there’s a line called “OMB Reporting Help” and when you hit that link, it will be right in the middle. It’s called “Federal Reporting Recipient Information.” We’re actually going to update it with a little bit more information this time around.

Q: Did everybody catch that? That’s really important. Can you say that again?

A: Sure. If you go to energy.gov and click on the “Reporting,” then click on the “Recovery” on the right side of the page, and there’s a line called “OMB Reporting Help” on the left. That’s where all the guidance, all the information is, but there’s a spreadsheet in there called “Federal Reporting Recipient Information” and it’s got a row for every single awardee and all the codes and the various numbers that we can provide for you so you don’t have to search for them. So you can concentrate on how much money you’ve spent, what you’ve done, and the number of jobs.

Q: I had a question about an organization that you’ve contracted for, say, installation of meters. Would that be a contractor, and you would include their hours? Or would that be a vendor?

A: Let’s look: “Were to receive from another organization to carry out a federal program versus a dealer, distributor, or merchant, or other seller providing goods or services.” So it’s a gray area. It’s a service, yeah.

Q: What about consultants that were contracted to help plan the project?

A: That would probably fall under a subrecipient.

Q: I hear about reporting requirements on federal reporting as well as Viper, and I’m not clear about the difference. What are the differences?

Scheer: Could you repeat that question, please?

Q: There is a system called Viper that was introduced by an earlier speaker, and we heard that once you receive an award, you have an award number. You can go and register.

And we are hearing about the federal reporting, so I would like to know how they are related. I also want to know about reporting subawardee reporting, so we are the prime and we have an award number and we can go and report. We can choose to delegate reporting for the subawardees if they want to go and do that. Is there a way to link that (their reports)? Is everything going to be under the same award number then?

A: Yeah. I should have brought the Excel spreadsheet to put up. In the Excel spreadsheet, when you go to the subrecipients and they do their report, they have to put the award number from the federal government. Then they'll have any subaward numbers that they got from you, but yeah, they will be linked.

Q: They get subaward numbers from us?

A: If you do, there's a place in there for it, but they need to report the prime award number to link it back.

Q: So we get the prime award number from DOE? And then we can choose to create award numbers for the subrecipients? And that's how it's going to be linked?

A: No, it's going to be linked when they have to report; they have to put the prime number you got from DOE.

Q: And what about Viper? What's the reporting requirement there?

Scheer: There are two separate systems, so this reporting system is separate from Viper's, and that's the system that you're going to use after you've gotten the award and you're submitting invoices. It will go through that Viper system.

A: Yeah, federalreporting.gov is the overall across-the-government stimulus reporting.

Scheer: I'm glad you brought that question up. It's complicated because there are going to be several reporting systems that you're going to need to know about and use, and so we'll just take this slow and kind of work through it.

Q: In terms of delegation of responsibility to the subrecipient, where is that delegation articulated? Is it in the agreement that we sign?

A: It's up to you. You are ultimately responsible for the subrecipient's reporting.

Q: So you have separate contractual requirements with the subrecipient? Is that the way you suggest that we structure it?

A: I think it's up to you. If you look at the OMB guidance, you'll be responsible as prime for their reporting whether you choose to do it yourself or delegate it to them.

Q: So there's no requirement that we have a responsibility that's articulated in any of the reporting.gov website. Okay.

Comment: I think one of the things you're going to do is actually flow down the Recovery Act provisions to your subrecipients. They're going to be responsible to you. You'll have to choose how you do it, but that's how your basis is.

Q: My question is about what type of data will be required from vendors or recommended that we report from vendors.

A: From vendors, there are just a couple of fields. Ideally there's a DUNS number. If they don't have a DUNS, they ask for the vendor's name and zip code and then a brief description of the services that were provided and the dollar amount, and that's it.

Q: I don't understand under subrecipient why it adds at the end "not a program beneficiary." What's going on in my mind is we have subrecipients that I think of as program beneficiaries. They're participating.

A: I think the definition is they didn't get the funds directly from the federal government.

Q: In terms of the first report we have to file, assuming that we were to conclude an agreement in December, and our first reporting requirement would be on January 10: Is the legal requirement just that we file the jobs and expenditures numbers, and we have until our next report to really build out what our complete quarterly reports to DOE are going to be?

A: Well, it's different: DOE versus federalreporting.gov.

Q: So for federalreporting.gov, it's just jobs and expenditures?

A: There's a little bit more that you have to do. There are four choices of status; there are four different options you can pick and one of them is "Not Started." So essentially, it's the codes, your award number, the value of your award, and pretty much you're done.

Q: So this report can be something very basic that gets that basic federal requirement?

A: Yeah. Federalreporting.gov is how much were you awarded? How much have you spent so far? How many jobs have you created? And a brief little description of what you've done in the period.

Q: I had a question about Congressional districts. I looked at the Excel spreadsheet, and in there for the subawardees, it lists the Congressional district where they do their work. If you have a subawardee or even a prime awardee, and they're doing work in multiple locations, do those need to be separate lines? Or do you just put one line per subawardee with the area where the most of the work has been completed?

A: The second. The OMB guidance is there's just one location per awardee and you put the one that's the primary. It's the most.

Q: My earlier question was vendor versus subrecipient and the confusion there. In terms of reporting jobs, if a lot of your work is done by vendors, a lot of that job is varied. Do you not have the ability to report those jobs? If some of the job creation is heavily dependent on vendors, the jobs that are coming from that, would you not have the ability to report that through, or how will that be handled?

A: Are they jobs created and retained? What they're looking with the vendor is they're very short-term.

Q: Well, it's a couple of years.

A: Are they vendors or are they subrecipients?

Q: That's the mystery. Because if they're building software, installing hardware, doing consulting services over a long period of time and really building the infrastructure with all the Smart Grid components...

A: So they'd be subrecipients then instead of vendors. It's hard, and we'd have to look at the exact. That's a great question to submit to the clearing house with the specifics.

Q: I seem to recall in the draft grant agreement there was a section for a report to be filled out, I guess by a grantee, and there's an identification in there of costs (our costs and the governments costs) by "product activity." Is that supposed to be at the scope level, or is that more granular at the cost category level?

A: For federalreporting.gov, it's one big number at the highest level of the total award.

Scheer: There are different reporting aspects that we'll get into as we proceed throughout the day.

Q: It's about this subrecipient stuff, and I'll just give you a hypothetical. So, for example with us, we're going to install thousands of meters and it's going to take multiple years, but it's all going to be done by vendors—I mean by an outside, hired subrecipient or vendor—I don't know what it is, but it's going to be the lion's share of the money. It's going to be the big project. We're just basically program managers internally. So our people will just be program managers. There's not going to be tons of hours there, but there's tens of thousands of hours out in the field that are contractors.

A: Right, and we want to capture those jobs, yeah.

Q: So we're thinking those are probably subrecipients, but we should ask the clearing house? So the idea would be, build a bunch of questions like that, send them to the clearing house right now, and then come January, we will know what to call them?

A: Exactly.

Q: Further along this line, I'm not even going to try to ask you whether given people are subrecipients or vendors, because I'm convinced that you can't really answer; however, we did in our application indicate who we thought were vendors, and it seems like the advisable practice would be to have an attachment to our award agreement which stipulates who the vendors are and who the subrecipients are based on the project description, and that could be binding. Everyone, is that the recommended practice? Otherwise there would be just so much ambiguity here.

A: Right. That would be for the program folks to determine.

Scheer: That sounds reasonable.

Poston: Actually, I think it's a wonderful idea. Perhaps that's something we should look into to keep it simple for everyone. So, as we do that, we'll try to draft something up for you to find out.

Scheer: That's why we're here today: to surface these questions, and if we don't have answers to them right away, we will shortly.

Q: There seems to be general confusion here. Suppose in all honesty, based on the information you've given us, and whatever instructions we get from our negotiation teams, you file your report and it's wrong, and you find out after the fact that there are errors in what you actually submitted in the report. How will that be addressed?

A: There are a couple different ways. So you have the 1st to the 10th to report. You then have the 11th to the 21st where you can go in and amend that report. You can take a look at it and make changes. There's also a period from the 22nd to the 29th of the month.

Q: Now, suppose we find it after that time?

A: It's already up on federalreporting.gov and recovery.gov, and they've locked that out. The timeline to fix it would be the next reporting period. All the reports are cumulative, so all the reports you file on federalreporting.gov are cumulative, so once you've spent all the federal funds, your award equals your expenditures, you're done.

Q: Will the negotiating teams be giving us more direction and specific guidance in regards to complying with the regulations? We have all these questions, and it seems like everything is changing, so are we going to be getting more direct guidance at that time?

A: There will be direct guidance on the DOE website. We also do webinars for all recipients of DOE that go field by field through that Excel template with specific guidance on each field.

Q: For the vendor versus subrecipient thing, I wonder if there's some tension between the government and the awardees on that because if it's a subrecipient then there are more reporting requirements on us. But at the same time, in the cooperative spirit of the whole thing, we want to see you get as much credit for job creation as possible, so you want them to be subrecipients. Is that going to be an issue at all? Or should we think about that?

Scheer: I think we need to get back to you with more specific guidance about that line, but I think you've captured the point pretty well. I think from the government standpoint, they would like for you to account for as much job creation as is reasonable and appropriate. We'll have to get back to you on that point.

Q: I had a simple test that I used to use for the subrecipients and vendors, and I just want to float this and see if it makes sense. If the person is responsible for cost share, they're a subrecipient. If they're not responsible for cost sharing, they're probably a vendor. Does that make sense?

A: No. It would be interesting if that were the case. Thank you for offering that thought.

Q: May we voluntarily report job statistics from vendors?

A: It's just one number. There's just one box that says "Total Number of Jobs Created or Retained" for everybody.

Q: Could that be a resolution to this big question?

Scheer: It sure could be. Thank you. Two people offering solutions; I love that.

Q: We're obviously going to be reporting direct jobs. I know that probably a lot of people when they were approached by the media were reporting direct, induced, and indirect jobs when they were giving total figures out. Is DOE intending to gross up these figures? Or anything of that for reporting purposes? Obviously we have to deal with our local media.

A: There are separate economic studies from federalreporting.gov.

Q: So is that a yes?

A: I don't know what it's going to be. We're looking at what we think the jobs created should be on both sides. Yeah.

Q: So it's possible that DOE will be reporting a figure that will be different than that?

A: Yes.

Scheer: Later on today, you're going to get a presentation on metrics and benefits, and there are going to be job-related reporting issues there that are going to be addressed, so keep in mind that for the Recovery Act reporting, what Penny has laid out here for jobs is what you need to do. There is other jobs-related data collection that we're going to do.

Q: Is there a process for using the statistical method that you discussed, and are there any benefits to going that route, or detriments?

A: The strong preference of DOE is to report actual jobs. In order to be able to do that—and you'll see the criteria; it's on the website for how to make the request—you really need to demonstrate that it's just too onerous to try and count actual jobs. It is the very strong preference to report actual jobs.