



HALEY BARBOUR  
GOVERNOR

STATE OF MISSISSIPPI  
OFFICE OF THE GOVERNOR

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**To:** State Agency Executive Directors and Stimulus Coordinators  
**From:** Amanda Jones, Counsel to Governor Haley Barbour  
**RE:** Stimulus Update and Reporting Instructions for January Reporting  
**Date:** December 29, 2009



This memorandum discusses the recent briefing by the Recovery Accountability and Transparency Board (RATB) regarding changes to the 1512 reporting process, provides instructions to State entities for submission of Section 1512 reports for the October – December reporting period, and offers highlights on the latest ARRA guidance published by the Office of Management and Budget (OMB) as *M-10-08, Updated Guidance on the American Recovery and Reinvestment Act – Data Quality, Non-Reporting Recipients, and Reporting of Job Estimates* on December 18, 2009. The OMB guidance has been sent to you in the same email as this memorandum, and is also posted at <http://stimulus.ms.gov> under the “What’s New” section.

Of primary concern are the following items:

1. The RATB disclosed that the reporting period opens January 1, 2010, and will remain open through January 15, 2010, to accommodate the late changes in the jobs calculations and the holidays.
2. A “copy forward function” has been added to FederalReporting.gov. However, because this function allows only for online update of data and does not permit downloading of data, **State of Mississippi entities should NOT use this function as there will be no way to provide the copy of the 1512 Report required by the Office of the Governor. State entities are required to use the Excel template for reporting and for submitting a copy to the Office of the Governor.** A new Excel template and a new data model are being released sometime during the week of December 28, 2009. However, you should be able to use what you submitted in Oct 2009 UNLESS your data involves codes that have changed. In that case, you will need to use the new formats to submit this quarter’s reports. Please note that PDF reports of data submitted to Federalreporting.gov are not complete and cannot be submitted to the Office of the Governor in lieu of the template.
3. Links for test submission of your Excel reports are supposed to be available beginning December 28, 2009.
4. New edits have been added to FederalReporting.gov. In particular, in every case where a Congressional District is required, FederalReporting.gov is going to be looking at the associated address/zip to determine if the combination is valid. If CCR contains incorrect address/zip code information, there could be a fatal error on the entry of the

Congressional District. Since it takes time to get this information corrected via D&B (DUNS/CCR), recipients need to verify the CCR information for themselves, their sub-allocants, sub-recipients, and vendors immediately. As a reminder, sub-recipients and vendors are to be registered in the CCR, and a DUNS number is required to complete that registration.

5. Calculations for jobs reporting MUST be carried out using the new OMB Guidance, although questions still exist regarding “time and effort” reporting under SFSF particularly General Services Funds. Issues have been identified by States (including Mississippi) where timely polling of every vendor for the prime as well as the sub-allocants and sub-recipients and their vendors is virtually impossible for getting the data in a form that can be used for the new FTE calculation. To quote Danny Werfel from OMB, “The law requires an estimate, not an actual. There will be imprecision in the numbers.... We defer to your reasonable judgment.”. In other words, your methodology for collecting and reporting FTEs using the new formula must pass the “reasonableness test”. Recipients should get the best possible estimate (as stated in the law) in a reasonable manner.
6. OMB anticipates clarifying several items via FAQs sometime during the week of December 28, 2009. As soon as additional clarifications are available, we will notify you via email and post the clarifications on the Governor’s Stimulus website at [www.stimulus.ms.gov](http://www.stimulus.ms.gov).

Please email us at [STIMULUS-INFO@dfa.state.ms.us](mailto:STIMULUS-INFO@dfa.state.ms.us) if you have any questions or concerns.