OMB policy revision on aggregation of recipient reports

The Federal Office of Management and Budget (OMB) has again revised its policy regarding the $25,000 vendor payment threshold for Section 1512 reporting. Recipients issuing sub-awards or vendor payments below $25,000 may now choose to report this information in an aggregate report or submit separate and distinct records for each sub-award or payment. The following question from OMB’s most recent FAQ update provides further clarification.

Q. Though the M-09-21 Guidance allows aggregate reporting for sub-awards less than $25,000, sub-awards to individuals, and payments to vendors less than $25,000, are prime recipients required to submit aggregate reports? Or can prime recipients choose to submit separate, distinct records for each sub-award?

A. Prime recipients must submit aggregate reports on all sub-awards to individuals. However, prime recipients are not required to aggregate awards for instances where sub-awards are less than $25,000 and where payments to vendors are less than $25,000.

To see all FAQs regarding this issue, please visit http://www.whitehouse.gov/omb/recovery_faqs/#agg1.

Information on federal agency specific guidance

OMB has added a page to www.recovery.gov that brings together all federal agency specific guidance on recipient reporting, including cases where guidance differs from bright line rules provided by OMB. The site is located at http://www.recovery.gov/?q=content/agency-guidance-reporting.

In addition to federal agency specific guidance, certain federal departments have developed tip sheets to assist recipients with completing ARRA In-bound Recipient Reports on www.federalreporting.gov. The tip sheets provide guidance for each data element included in the ARRA In-bound Recipient Report.

These tip sheets may also help reporting agencies avoid some recent difficulties recipients have encountered while testing the reporting system. For example, invalid reports using the XML Schema reporting tool can be caused by something as simple as a misplaced dash in an award number. We suggest that all state agencies and institutions required to report Section 1512 information test their data entry system in the federal reporting system prior to October 1st.
Federal High Volume Coordinator available to Alabama

The Office of Management and Budget (OMB) has initiated a program to provide states with a High Volume Coordinator during the reporting process. Alabama coordinator Fransi Dunagan will be available to the State Recovery Office during normal Eastern Standard Time business hours. If a state agency or institution has a general ARRA question or encounters an issue during reporting, they are asked to first contact their appropriate federal agency contact. If the federal agency contact cannot be reached or is unable to provide a fast and definite response, state agencies and institutions should get in touch with their State Recovery Office point of contact. These contacts are listed below. The Recovery Office contact will forward the question to Ms. Dunagan and provide her the appropriate contact information for the agency or institution. Ms. Dunagan will document all questions from the State Recovery Office and forward them to contacts at federal agencies to help facilitate a fast response to state agencies and institutions.

Recovery Office Contacts
(Coordinator) Anne Elizabeth McGowin: 242-7160 anneelizabeth.mcgowin@finance.alabama.gov
Spears Griffin: 353-4092 spears.griffin@finance.alabama.gov
Brent Jones: 353-7102 brent.jones@finance.alabama.gov
Jonathan Barganier: 353-4134 jonathan.barganier@finance.alabama.gov
Meagan Jones: 353-0893 meagan.jones@finance.alabama.gov
Mark Austin: 353-3371 mark.austin@finance.alabama.gov
Kinley Mangum: 353-2026 kinley.mangum@finance.alabama.gov

ADECA                  Spears Griffin
ADEM                  Spears Griffin
Agriculture & Industries Spears Griffin
Bonds                Mark Austin
Broadband            Jonathan Barganier
Child Abuse & Neglect Prevention Meagan Jones
Coalition Against Domestic Violence Mark Austin
Council on the Arts  Jonathan Barganier
Conservation         Spears Griffin
Crime Victims Compensation Commission Mark Austin
Criminal Justice     Kinley Mangum
DHR                   Meagan Jones
DIR                   Mark Austin
DOC                   Spears Griffin
DOT                   Spears Griffin
Education            Jonathan Barganier
Finance              Spears Griffin
Forensics            Brent Jones
Forestry             Spears Griffin
Homeland Security    Brent Jones
Medicaid             Meagan Jones
Mental Health        Meagan Jones
Military             Spears Griffin
Postsecondary        Brent Jones
Port Authority       Spears Griffin
Public Health        Meagan Jones
Public Safety        Spears Griffin
Public Service Commission Meagan Jones
Rehab                Meagan Jones
School of Mathematics and Science Jonathan Barganier
To assist with both the registration and reporting process, www.recovery.gov has updated its recipient reporting information web page, located at http://www.recovery.gov/?q=content/recipient-reporting.

This page now offers a registration quick reference card, registration guide, Recipient Point of Contact Guide (information specific to points of contact and DUNS administrators), frequently asked questions, and other useful documents to assist in the registration process.

Another option for state agencies seeking reporting assistance is the OMB help desk. OMB has professional staff at the help desk and has encouraged reporting personnel to use the help desk instead of federal agency personnel to resolve questions about registration or site navigation. The help desk is now available and may be used during regular Eastern Standard Time business hours. The help desk has established escalation procedures to elevate particularly difficult problems for resolution. It should be noted, however, that information provided outside of this channel may or may not solve your problem.