

**ARRA Reporting:
A One-Year Check-in**
Presentation to the AASCU Grants Resource
Center - Washington, DC

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COGR

- Council on Governmental Relations
- Established in 1948
- Staff of 5
- Costing, Compliance, Intellectual Property
- Active Board and Committees
- 182 member institutions
- www.cogr.edu

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**Prospects for
Research Budgets**

- The Administration's FY2011 budget was relatively favorable to research, but ...
- Appropriations bills and America COMPETES (NSF & DOE-Science) "moving" through Congress – only NSF prospects are positive?
- ARRA funding opportunities are expired – multi-year awards and no-cost extensions should extend expenditure activity into FY2012

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Prospects for Reporting

- The Administration's commitment to accountability and transparency also has been "favorable", depending on who you talk to ...
- FederalReporting.gov – some glitches continue, though relatively speaking, successful
- OMB and RATB have been responsive!
- However, what groundwork is being laid for the future? ARRA, FFATA, STARMetrics

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OMB Guidance has Stabilized

- OMB Recovery Act web page:
http://www.whitehouse.gov/omb/recovery_default
- M-09-21, June 2009 and M-10-14, March 2010 – Implementing and Updated Guidance
- M-10-08, December 2009 – Updated Jobs Reporting Guidance, with COGR input
- FAQs for Grant Recipients and Contractors
- Holding Recipients and Funding Agencies accountable!

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Agencies under Pressure (and ultimately, us too!)

- Ongoing Quality Assurance (QA) reviews: Late Reports, Significant Errors, Material Omissions, Final Reports
- Monitoring Spending Rates
- Unusual Agency Requests?
 - ✓ DOE, Weatherization programs as "high risk", and "bleeding" to all DOE programs
 - ✓ DOE Monthly reporting, PI Worksheets
 - ✓ COGR letters to DOE (see www.cogr.edu)
 - ✓ ARPA-E success! ... but COGR still tracking

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ARRA & Audit

- "No good deed goes unpunished"
- The Recovery Accountability and Transparency Board (RATB) is responsible for audit oversight, with significant input from agency Inspectors General (IGs) and the Government Accountability Office (GAO)
- ARRA included significant funding for IG activity!
- The HHS IG has hired approximately 50 new people and the NSF IG has expanded outsourcing

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ARRA & Audit

- NSF IG has conducted "compliance / capacity" reviews of ARRA recipients (next slide)
- HHS IG initially focused on "high risk" programs (e.g., Head Start, Community Health) ... NIH activity to be scrutinized in 2011
- DOE IG has initiated audits and DOE Office of Science has conducted a program review
- Education IG, Stabilization Funds ... 50 states
- Jobs reporting ... "NA" for now, but the politics?

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ARRA & Audit

- NSF IG – Initial Focus:
 - ✓ Six-week review at one institution
 - ✓ Internal Controls for audit areas (see below)
 - ✓ Transaction testing for audit areas

FCTR/FFR Reconciliation	Procurement
Fringe Benefits	Property and Equipment
Indirect Costs	Travel
Participant Support	Consultants
Subaward and Sub- Monitoring	Annual and Final Project Reports
Special Terms and Conditions	General Management
Effort Reporting	Acting and Fin System Review
Cost Sharing	Program/Award Income
ARRA Compliance	

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ARRA & Audit

- OMB 2010 Compliance Supplement:
http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2010
- ✓ ARRA-funded programs, "high risk"
- ✓ Subrecipient monitoring and reporting
- ✓ Timely submission of A-133, no extensions
- ✓ Buy American and Wage Rate (Davis-Bacon) compliance, construction awards
- ✓ Stabilization funds, no effort reporting required
- ✓ Jobs reporting: subs, vendors, construction awards? 10

The Post-ARRA World

- Research budgets, ARRA was one-time money
- Rational expectations of Research outputs
- Will audit activity intensify? Universities and research institutions are recognized as "established" organizations with strong internal controls
- F&A rate negotiations have raised ARRA, and will continue to do so ... but so far, relatively "fair"
- Accountability and transparency focus, and its impact on future reporting? 11

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