

Trump, Vicki

From: COGR [cogr@usc.edu]
Sent: Friday, December 18, 2009 8:18 PM
To: cogr-list@usc.edu
Subject: COGR: Updated Jobs Reporting guidance from OMB

Updated Jobs Reporting Guidance from OMB is now available:

http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf

Upon a quick initial review, excerpts from the guidance are shown below. COGR comments precede selected sections from the guidance. We will provide additional comments on Monday and Tuesday.

COGR Comment: Page 10 – Jobs reporting will not be cumulative. Quarterly numbers only will be reported.

This updated guidance reflects an important change and simplification to the manner in which job estimates are calculated and reported. In previous guidance, recipients were required to sum all hours worked from the current and all prior quarters and divide that total against a cumulative sum of all full-time hours from the current and prior reporting quarters. This ratio provided an average Full Time Equivalent (FTE) estimate by project over all reporting quarters since the start of the Recovery Act.

A significant number of recipients expressed concern with the complexity of the multiple steps involved with this formula. As a result of this feedback, this updated guidance changes the job estimate calculation such that the recipient will now report job estimate totals by dividing the hours worked in the reporting quarter (i.e., the most recent quarter) by the hours in a full-time schedule in that quarter. Recipients will no longer be required to sum across multiple quarters of data as part of the formula.

COGR Comment: Page 11 – Essentially, all individuals charged to an ARRA award should be counted. We believe this means that tenured faculty should be included.

2. Definitions of jobs considered to be created or retained:

a. A job created is a new position created and filled, or an existing unfilled position that is filled, that is funded by the Recovery Act;

b. A job retained is an existing position that is now funded by the Recovery Act.

Using the definitions above, recipients must estimate the total number of jobs that were funded in the quarter by the Recovery Act. A funded job is defined as one in which the wages or salaries are either paid for or will be reimbursed with Recovery Act funding.

COGR Comment: Pages 14-15 – The “weighting model” addressed at the COGR meeting is the model that is applicable.

Note Relating to OMB Circular A-21: For recipients of assistance agreements that must comply with OMB Circular A-21, Cost Principles for Educational Institutions, an alternative calculation based upon the allocable and allowable portion of activities expressed as a percentage is acceptable to estimate jobs created and retained. OMB Circular A-21 recognizes that practices vary among educational institutions as to the activity constituting a full workload. Compensation charged to sponsored projects must conform to the institution's established policies and reasonably reflect the activity for which the employee is compensated. Charges to sponsored projects may be expressed as a percentage of their total activities. Therefore, for purposes of ARRA reporting of jobs created or retained, colleges and universities may count, proportionately, the percentage of effort directly charged to ARRA awards as an FTE equivalent.

Under this alternative calculation and consistent with this Guidance, job estimates will be reported:

1. Based on the total available time in the reporting period, regardless of when the grant period or employment period begins.

For example, if a lab technician charges 100% effort on a project for only one month in the quarter being reported (but zero effort the other two months because no work was performed or the grant was not yet awarded), then the recipient report should reflect 0.33 FTE for that individual.

2. For all reporting periods that the grant is active.

For example, if a researcher provides 100% effort in the grant's first quarter and 50% effort in the grant's second quarter, the recipient report for the first quarter will reflect 1 FTE and the second will reflect 0.5 FTE.

COGR Comment: Page 22 – We will not be asked to “correct” the reporting methodology used in the first reporting cycle.

Also, the clarifications to the definition of a job created or retained included in this guidance are not intended to be retroactive to the quarter ending September 30, 2009. Thus, recipients are not required to re-calculate and/or correct job estimate totals for the quarter ending September 30, 2009 based on the definitional clarifications in this guidance. Any corrections to job estimate totals reported for the quarter ending September 30, 2009 should rely on the definition of a created or retained job included in the prior guidance, OMB Memorandum 09-21, issued June 22, 2009.

David Kennedy
Director, Costing Policy
Council on Governmental Relations, COGR
1200 New York Ave. NW, #750
Washington, DC 20005
202.289.6655, Ext. 12
dkennedy@cogr.edu