



OBM

Ted Strickland
Governor

J. Pari Sabety
Director

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TO: Agency ARRA Team Members

CC: Executive Sponsors

**FROM: Pari Sabety, Director
Office of Budget and Management**

SUBJECT: Guidance to sub-recipients – OBM Guidance Memo #10

The Governor's Office and OBM ARRA Teams recently conducted an exit interview with the Government Accountability Office (GAO). The report is anticipated to be released in December 2009 and will be available on the GAO website (www.gao.gov). In light of the GAO findings from this first reporting period, the OBM ARRA Reporting Team is implementing four changes to the current process to create efficiencies and a more uniform set of state-issued guidance to sub-recipients.

- 1) To ensure consistency in guidance issued by all state agencies to the greatest extent possible and to discover best practices to share with all agencies, the OBM ARRA Reporting Team must review all guidance that has been issued by all state agencies to sub-recipients, and all guidance that will be issued going forward. **State agencies should not issue any updated or new guidance to sub-recipients without it being reviewed by the OBM ARRA Reporting Team.**

The OBM ARRA Reporting Team understands that a uniform guidance for all required reporting elements will not fit every program. The team will work with agencies to ensure that all necessary, agency-specific aspects of guidance documents are maintained. Also, the team understands that conflicting guidance may exist from different federal agencies regarding how to collect or report data from sub-recipients. When this dynamic exists, please make the OBM ARRA Reporting Team aware of the divergence.

The team will review the guidance within two business days of its receipt and provide relevant agency ARRA contacts with comments when necessary. If there is an immediate need to release the guidance, be sure to mention that when you send the guidance. An OBM ARRA Reporting Team member will contact you to discuss how to proceed.

For already-issued guidance documents: Please send all ARRA reporting guidance that your agency has already issued to sub-recipients to the ARRA support e-mail address (ARRA.Support@obm.state.oh.us), copying your OBM budget analyst, by Wednesday, November 25th. In the subject line of the e-mail, please write, "(Agency name) Sub-recipient guidance documents for CFDA(s) (list CFDA number(s))." You may send the guidance documents for multiple CFDA numbers in a

single e-mail, but please do not send guidance documents for a single CFDA in multiple e-mails. The OBM ARRA Reporting Team will review these documents in a timely manner and contact agencies if modifications are needed.

For future guidance documents to be issued: Prior to issuing future sub-recipient guidance documents, please send all guidance documents to the ARRA support e-mail address (ARRA.Support@obm.state.oh.us), copying your OBM budget analyst. In the subject line of the e-mail, please write, “(Agency Name), For review: sub-recipient guidance documents for CDFA(s) (list CFDA number(s)).” The OBM ARRA Reporting Team, in conjunction with your OBM budget analyst, will review these documents, in a timely manner, and work with the appropriate agency contacts to make any needed changes.

- 2) Similarly to the collection of all state-released guidance to be housed centrally, please send the OBM ARRA Reporting Team via e-mail (ARRA.Support@obm.state.oh.us) all guidance issued by federal agencies relating to your ARRA programs. Please send them using the process outlined in bullet number 1 with the subject line, ““(Agency Name), Federally-issued guidance documents for CDFA(s) (list CFDA number(s)).” The location of where these guidance documents will be stored has yet to be determined.
- 3) After the review of agency guidance to sub-recipients, all documents will be posted to a web page linked off of recovery.ohio.gov. This central repository for all state-issued guidance will provide sub-recipients with a single location to view all guidance for their respective programs. The central repository also will allow all state agencies to see the guidance being issued by other agencies for reference. This will help agencies take advantage of best practices for specific reporting elements or for guidance documents as a whole.
- 4) To help provide consistency in the computation of the jobs created/retained number for sub-recipients, the OBM ARRA Reporting Team is developing a web-based jobs created/retained calculator as a tool for anyone to use. The calculator will follow the Office of Management and Budget’s (OMB) guidance for the calculation of the jobs created/retained 1512 data element. More information regarding the calculator will be forthcoming in the near future.

Given the nature of the ARRA stimulus funding, the importance of monitoring is critical. One big lesson that was learned from the first reporting period is the essential nature of early monitoring and data assurance review. Early and regular contacts with sub-recipients and collecting data in multiple intervals over the quarter will help make the process at the end of the quarter less demanding and provide you with more time to examine the data for anomalies. As more programs begin to distribute money to sub-recipients, please contemplate your agency’s monitoring plans and try to anticipate any additional needs or changes in order to ensure the adequate monitoring of your ARRA programs to ensure full compliance with ARRA requirements.