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## Department of Energy

Washington, DC 20585

## WEATHERIZATION PROGRAM NOTICE 10-13 EFFECTIVE DATE: MARCH 1, 2010

**SUBJECT:** ARRA REPORTING REQUIREMENTS: OMB QUARTERLY AND DOE MONTHLY REPORTING REQUIREMENTS UNDER THE AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 FOR THE WEATHERIZATION ASSISTANCE PROGRAM

#### REFERENCES:

- (1) OMB Memorandum M-09-21 *Implementing Guidance for the Reports on the Use of Funds Pursuant to the American Recovery and Reinvestment Act of 2009*, June 22<sup>nd</sup>, 2009
- (2) OMB Memorandum M-10-08 *Updated Guidance on the American Recovery and Reinvestment Act Data Quality, Non-Reporting Recipients, and Reporting of Job Estimates*, December 18<sup>th</sup>, 2009.
- **1.0 PURPOSE:** To provide guidance to Weatherization Assistance Program (WAP) Grantees on the Office of Management and Budget (OMB) quarterly reporting requirements and the Department of Energy (DOE) monthly reporting requirements related to funds expended under the American Recovery and Reinvestment Act of 2009 (ARRA).
- **2.0 SCOPE:** The provisions of this guidance apply to Grantees named in the Notification of Grant Award as the recipients of financial assistance under the DOE Weatherization Assistance Program for Low-Income Persons. The provisions of this guidance apply only to WAP funds provided through ARRA and do <u>not</u> apply to the nominal WAP reporting requirements outlined in the Program Year 2010 Weatherization Grant guidance (WPN 10-01).

The monthly reporting requirements outlined by this guidance are authorized under a sixmonth emergency approval by OMB of an emergency Information Collection Request (ICR) which expires on June 30, 2010.

**3.0 LEGAL AUTHORITY:** Title IV, Energy Conservation and Production Act, as amended, authorizes the DOE to administer the WAP. All grant awards made under this Program shall comply with applicable laws including regulations contained in 10 CFR Part 440, the Energy Policy Act of 2005, the Energy Independence and Security Act of 2007, the American Recovery and Reinvestment Act of 2009 (ARRA) and other procedures applicable to the WAP.

**4.0 BACKGROUND:** The WAP funds provided by ARRA represent an unprecedented investment of Federal funds in weatherization activities. Concomitant with this investment, the Administration has pledged that transparency and accountability will be central aims throughout the grant process. Furthermore, the Administration must provide a means through which to effectively monitor and report the return on this investment in terms of jobs created and homes weatherized. Pursuant to these objectives, new reporting requirements have been put in place for all Federal Recovery Act programs. For WAP grantees, these requirements are fulfilled through reporting via two distinct but similar processes:

- 1. Quarterly and monthly reporting of data to DOE
- 2. Quarterly reporting of data to OMB via FederalReporting.gov

In order to effectively track the pace of expenditure of ARRA funds, DOE is collecting a subset of required reporting data on a monthly basis. Monthly reporting for this subset of metrics will become effective in February 2010 with the first report due March 30<sup>th</sup>, 2010 (reporting on all activity taking place in February 2010). The full list of metrics to be reported on a quarterly basis is listed in Attachment 1, while the subset of metrics required on a monthly basis is listed in Attachment 2.

DOE may also gather "real-time" data on implementation issues, challenges, and activities from Grantees as necessary. DOE is sensitive to the fact that these requests for information can be an interruption to the Grantees. DOE will use exercise discretion in making these requests and will minimize their frequency so as to minimize the burden of effort placed upon Grantees. All such requests will be coordinated through the Project Officers assigned to each Grantee for the purpose of grant performance monitoring and coordination.

The monthly program reporting does NOT eliminate quarterly DOE program reporting requirements, as the monthly reporting is only a subset of the quarterly reports. The monthly reporting requirement is in addition to the quarterly DOE program reports and in addition to the OMB quarterly reporting requirements per Section 1512 of the Recovery Act that are submitted through www.FederalReporting.gov.

**Please note:** This guidance is ONLY applicable to ARRA grants. This reporting guidance is not applicable to WAP funds provided through annual appropriations.

#### **5.0 GUIDANCE**

The following sections outline how WAP Grantees will:

- 1. Report Section 1512 data to OMB quarterly
- 2. Report required data to DOE quarterly and monthly
- 3. Summarize the timing and process relationship between OMB and DOE reporting requirements

#### 5.1 QUARTERLY REPORTING TO OMB VIA FEDERALREPORTING.GOV

# 5.1.1 Background

ARRA, in Section 1512, establishes reporting requirements for all grantees. Section 1512 requires, in part, that recipients of Recovery Act funding submit quarterly reports that address (1) the total amount of recovery funds received; (2) the amount of recovery funds expended or obligated to projects or activities; (3) a detailed list of all projects or activities for which recovery funds were expended or obligated; and (4) information on any subcontracts or subgrants awarded by the recipient. Section 1512 can be found in its entirety at <a href="http://www.gpo.gov/fdsys/pkg/PLAW-111publ5/content-detail.html">http://www.gpo.gov/fdsys/pkg/PLAW-111publ5/content-detail.html</a>.

In June 2009, the Office of Management and Budget (OMB) issued guidance on the reporting requirements for recipients of Recovery Act funds (Reference 1) and issued amendments in December 2009 (Reference 2). The OMB Guidance: (1) answers questions and clarifies issues related to the mechanics and chronology of recipient reporting required by ARRA; (2) provides clarification on what information is required to be reported on the central reporting site at <a href="www.FederalReporting.gov">www.FederalReporting.gov</a> and what information presented on <a href="www.Recovery.gov">www.Recovery.gov</a>; (3) instructs grantees on steps that must be taken to meet these reporting requirements, including addressing sub-grantee reporting; and (4) establishes a common framework for Federal agencies and recipients to manage a data quality process associated with these reporting requirements.

#### 5.1.2 OMB Reporting Guidelines for WAP grants

FederalReporting.gov is the central government-wide data collection system for recipients of Federal awards. Grantees must access FederalReporting.gov in order to fulfill their reporting obligations under Section 1512 of ARRA. Grantees are required to submit data on a quarterly basis for grants, loans, and federally awarded contracts funded under the ARRA. Grantees must report the information described in Section 1512 of ARRA using the reporting instructions and data elements provided on-line at http://www.FederalReporting.gov.

A subset of topics at this site include the following (which are also summarized in the instructions at DOE's ARRA Recipient and Contractor Reporting website):

- Who is required to report (responsibilities of the prime and sub-recipients)
- Reporting timeframe and registration
- Overview of the Required Reporting Data Elements and Metrics
- Required jobs reporting
- What information must be reported
- Timetable for submitting, viewing, and editing reports
- Process for downloading and uploading files
- Process for making corrections to reports

#### 5.1.3 Resources to assist grantees with OMB reporting:

- Complete guidance for Section 1512 reporting and instructions is provided at DOE's ARRA Recipient and Contractor Reporting website: http://www.energy.gov/recovery/ARRA Reporting\_Requirements.htm
- DOE has published a central list of codes and other reporting elements by award to assist Grantees in completing their reports. That list can be found at <a href="http://www.energy.gov/recovery/documents/Federal\_Reporting\_Recipient\_Information.xls">http://www.energy.gov/recovery/documents/Federal\_Reporting\_Recipient\_Information.xls</a>
- DOE Recovery Act Clearinghouse: <a href="https://recoveryclearinghouse.energy.gov">https://recoveryclearinghouse.energy.gov</a> or 1-888-363-7289 for answers to questions about OMB reporting requirements
- A full description of these requirements is published on the Recipient Reporting Information section of the www.Recovery.gov Web site.
- FederalReporting.gov User Guide
- Additional training for OMB Recovery Act Reporting is available at: http://www.whitehouse.gov/Recovery/WebinarTrainingMaterials/

#### 5.1.4 Who is Required to Report

Prime recipients of ARRA funds under the WAP Program are responsible for reporting the information required by Section 1512 of the Act and as provided in the OMB Guidance. A prime recipient is defined as a non-federal organization receiving Recovery Act funding (grants, loans, or cooperative agreements) directly from the Federal Government and is equivalent to a Grantee for the purposes of this guidance.

The prime recipient is ultimately responsible for the reporting of all data required by Section 1512 of the ARRA and the OMB Guidance. Prime recipients may delegate certain reporting requirements to sub-recipients. A sub-recipient is a non-Federal entity that expends Federal awards received a prime recipient to carry out a Federal program but does not include an individual who is a beneficiary of such a program. Sub-recipients are equivalent to subgrantees for the purposes of this guidance.

The OMB Guidance does not provide for such a delegation to vendors. A vendor is defined as a dealer, distributor, merchant, or other seller providing goods or services that are required for the conduct of a Federal program.

Complete guidance on who is required to report under the Recovery Act is provided in section 2.2 of Reference 1. The policy regarding delegation of reporting by the prime recipient is further described in Section 2.3 of Reference 1. The responsibilities of prime recipients and sub-recipients are discussed also in section 2.3 of Reference 1.

#### 5.1.5 Reporting Timeframe and Registration

The report to FederalReporting.gov is due no later than ten calendar days after the calendar quarter in which the recipient received this grant and subsequent quarters until full expenditure of funds.

- Reporting through Federalreporting.gov requires recipients to register on the system. To register as a recipient in the FederalReporting.gov, you will need:
  - o Email Address, Award Letter, DUNS Number, CCR Number

- Grantees will be able to submit their reports 1 to 10 days after the end of every fiscal quarter starting with Q4 FY 2009. (i.e. October 1 - October 10, 2009 for work performed in July, August and September 2009)
- Days 11 -21 are available for Grantees to review and edit the data loaded by the 10th

The reporting process is discussed in full in Section 3 of Reference 1.

#### 5.1.6 Overview of the Required Reporting Data Elements and Metrics

For reporting into FederalReporting.gov, recipients will input 31 data elements. For a complete list of all data elements, please see Required Data on page 10 of Reference 1. These elements comprise primarily organizational, financial and jobs related information, and do not include performance metrics, which will be covered in program specific reporting. Some key data elements include:

- Amount of award which is the total dollar amount of Recovery funds received from DOE in Block 13 of the Assistance Agreement.
- <u>Award number</u> which is the identifying number assigned by DOE in Block 1 of the Assistance Agreement.
- <u>Total amount of Recovery Act expenditure</u> which is the cumulative total dollar amount of Recovery Act funds spent on the project.
- <u>Total federal Recovery Act infrastructure expenditure</u> which is the total dollar amount of Recovery Act funds spent on infrastructure project, if relevant
- Total number of sub-awards issued and total amount paid to sub-recipients during the last quarter
  - o Basic data elements for any sub-awards over \$25,000
  - o Total number and amount of sub-awards.
- Total number and amount to payments to vendors < \$25.000
  - o Basic data elements for any purchases more than \$25,000
  - o Total number and amount of payments to vendors less than \$25,000.
- Number and description of jobs created or retained (by both prime and subrecipients)
  - o Included in the description are labor categories, job titles and general descriptions of work to be performed in newly created jobs.
- <u>Primary place of performance</u> which is the place where the majority of the work and activities will be performed for this project.
- Top five highly compensated officers which is the name of the individuals who received the highest amount of compensation in the previous fiscal year, if three conditions are met: \$25 million, 80 percent of all revenues from federal government, no other Federally-required public reporting (e.g. SEC filings).

**Please note:** Submitting information to DOE does NOT fulfill the OMB reporting requirement. DOE cannot forward the information to OMB on the Grantee's behalf – the Grantee must submit the information directly. Significant reporting errors or omissions can be corrected from the 11<sup>th</sup> until the 21<sup>st</sup> of the month following the end of the quarter.

Specific instructions for making these adjustments can be found at the www.FederalReporting.gov site.

#### 5.2 QUARTERLY AND MONTHLY REPORTING TO DOE

# 5.2.1 Reporting Timeline

#### 5.2.1a Quarterly Reporting

Attachment 1 lists all of the metrics that are required to be reported on quarterly basis to DOE. The deadline for reporting these quarterly metrics will be the on the 30<sup>th</sup> of the month following the close of the quarter for which data is being reported (e.g. April 30<sup>th</sup> for data from January-March 2010).

DOE recognizes that as more accurate data becomes available, recipients may need to amend their quarterly reports after submission. Recipients will coordinate post-submission corrections of quarterly reports through their respective Project Officers.

#### 5.2.1b Monthly Reporting

In addition to the quarterly reporting of metrics, a subset of key metrics will be reported on a monthly basis. These metrics, listed in Attachment 2, are required to be reported on a more frequent basis in order to track progress and report success in key areas, to identify where additional assistance may be needed, and to maintain transparency and accountability regarding the use of Recovery Act funds. Monthly reports will be due on the 30<sup>th</sup> of the month following the month for which data is being reported. *The first monthly reporting deadline will be March 30<sup>th</sup>, 2010, reporting data for February 2010.* As all of the monthly metrics overlap with a subset of the quarterly metrics, there will be several instances when both monthly and quarterly figures are required for the same metrics in the same month. In those months where monthly and quarterly reporting dates coincide (e.g. April 2010), both data required for the month and quarter will be submitted.

DOE recognizes that as more accurate data becomes available, recipients may need to amend their monthly reports after submission. Recipients will be able to freely edit monthly reports at any time during the reporting quarter in which the monthly reports are submitted. After the close of this quarter, recipients will coordinate post-submission corrections of monthly reports through their respective Project Officers.

In addition to these reports, DOE has collected projections on monthly outlays and units produced from Grantees. This information, gathered by respective Project Officers, will allow DOE to effectively track grant performance and ensure the ARRA investment is on track with planned activity. Grantees may edit these projections for future months on a quarterly basis through coordination with their respective Project Officers.

#### 5.2.2 Reported Metrics

The two types of metrics below are broad descriptions of the categories in Attachment 1.

#### 5.2.2a Jobs

To ensure the number of jobs is being reported consistently, WPN 10-14 provides detailed instruction on how to calculate and report job creation and retention. Grantees should use the methodology in WPN 10-14 to calculate job creation for quarterly reporting to DOE and quarterly reporting to OMB. Through adherence to this standard methodology, consistency between the jobs figures reported to both DOE and OMB can be maintained. Examples of the types of jobs to be covered by this methodology include (but are not necessarily limited to): Crew member, Crew chief, Record keeper, Auditor, Estimator, Monitor, Program Staff and Administrative Staff.

#### 5.2.2b Standard Programmatic Metrics

This category of metrics allows DOE to monitor progress of work identified by grantees. In accordance with Attachment 2, grantees will report outlays and units weatherized and re-weatherized monthly while subgrantees will report only total units weatherized monthly. All other metrics will be required on a quarterly basis only.

Outlays (i.e., money spent, expended, and/or costed by the Grantee) should only account for the ARRA funds being expended within a budget category for the reporting period. These categories include: administration, training and technical assistance, program operations, health and safety, liability insurance, financial audits, and leveraging activities. In Attachment 1, "Total Outlays" is the sum of all Grantee & subgrantee outlays from ARRA funds while "Total Outlays (by Subgrantee)" is the sum of outlays broken out by subgrantee. Additional funding categories per Attachment 1 will still be required in the Program Quarterly Report but are not included in the monthly reporting requirements.

Per Attachment 2, DOE requires monthly reporting of the total number of weatherized units and re-weatherized units. The demographic information related to housing type and occupancy required by the quarterly reporting per Attachment 1 is not included in the monthly reporting requirements.

#### 5.2.3 Reporting tool

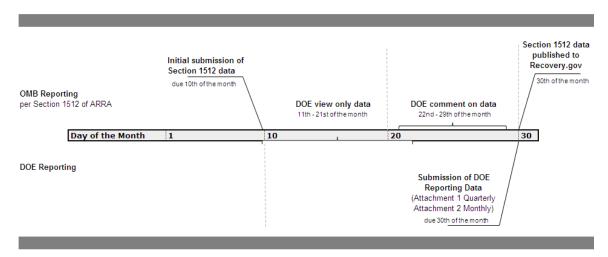
WinSAGA is the windows-based platform currently used by WAP to electronically submit and manage grant performance and financial information. By April 2010, reporting functionality for WAP will be transitioned to The Performance and Accountability for Grants in Energy (PAGE). PAGE is the online site (<a href="www.page.energy.gov">www.page.energy.gov</a>) that will provide all DOE grantees with the ability to electronically submit and manage grant performance and financial information. A host of training tools to familiarize users with PAGE are readily accessible from the front page of

the site, including a weekly webinar series and a number of training videos created to guide recipients through each of the necessary reporting steps.

#### 5.3 TIMELINE AND PROCESS FOR REPORTING TO OMB AND DOE

In accordance with OMB requirements per Reference 1, in the 1-10 day window following the end of the reporting quarter, grantees (and subgrantees as delegated) will enter and edit OMB reporting data as necessary. During this time, DOE will be unable to review the data unless explicitly submitted for review by the recipient. During the 11-21 day window (following submission of OMB not later than the 10<sup>th</sup>) DOE will be able to review the submitted data but not provide official feedback to grantees. In this window, grantees will still be able to freely correct their submissions.

During the 21-29 day window, DOE will be able to review and comment on information submitted to OMB. In this window, submitted reports will not be editable by recipients unless specifically unlocked by DOE via FederalReporting.gov. On the 30<sup>th</sup> day, a separate submission of quarterly data is required to DOE in accordance with guidance above. The respective OMB and DOE reporting timelines are illustrated below:



In one instance, both DOE and OMB are requiring submission of the same data over the quarterly reporting window. The DOE metric "Total Outlays (Recovery Act funds)" and the OMB metric "Total amount of Recovery Act expenditure" are equivalent. Grantees should endeavor to minimize any discrepancy between the reports of this metric made to DOE and OMB. It is understood that as time passes from the close of the reporting period, grantees are able to obtain an increasingly accurate picture of grant performance during the reporting period.

If information on Total Outlays (Recovery Act funds)/Total amount of Recovery Act expenditure is updated after 21<sup>st</sup> of the month, the grantee should contact the Project Officer to coordinate correction of the report submitted to FederalReporting.gov and ensure consistency with the report to be submitted to DOE. In cases where the grantees

(e.g. State agencies) have relegated the ability to report via FederalReporting.gov to a higher authority (e.g. State Recovery Act office) and receives updated information on Total Outlays or Jobs Created through Recovery Act funds, they should request that the higher authority make the necessary changes to the report in FederalReporting.gov.

In any situation, grantees should prioritize the accuracy of data submitted to DOE over the consistency of data being submitted to various sources.

**CONCLUSION:** DOE recognizes the complexity of this challenge and recognizes that there may be elements that will require further clarification. DOE will continue to provide additional updates through Project Officers and, as needed, through Program Notices in an effort to keep the Weatherization network well informed. We appreciate your cooperation and patience as we work through these developments.

It is a pleasure to work with you on this important challenge. I look forward to the growth of this Program and our continued partnership to ensure *Weatherization Works!* 

Claire Brondo Johnson

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Attachment 1: WAP Quarterly Reporting Metrics (Recovery Act)
Attachment 2: WAP Monthly Reporting Metrics (Recovery Act)

# WPN 10-13 Attachment 1: WAP Quarterly Reporting Metrics (Recovery Act)

Metric Activity	Metric
Hours worked	Total hours worked through Recovery Act funds
Hours worked	Total hours worked through Non-Federal funds
Total Outlays	Grantee Outlays (Recovery Act funds)
Total Outlays	Grantee Outlays (Non-Federal funds)
Total Units	Total Units (Excluding Reweatherized)
Total Units	Total Reweatherized Units
Total Outlays (by Subgrantee)	Sub Grantee Outlays (Recovery Act funds)
Total Units (by Subgrantee)	Total Units
Standard Programmatic Metrics	
Metric Activity	
Units by Type	Number of Owner-Occupied Single Family Site Built
Units by Type	Number of Single-Family Rental Site Built
Units by Type	Number of Multi-Family (5 or more units per site) Homes
Units by Type	Number of Owner-Occupied Mobile Homes
Units by Type	Number of Renter-Occupied Mobile Homes
Units by Type	Number of Shelters
Other Unit Categories	Reweatherized total
Leveraged Units	Number of Leveraged Units completed
Units by Primary Heating Fuel	Natural Gas
Units by Primary Heating Fuel	Fuel Oil
Units by Primary Heating Fuel	Electricity
Units by Primary Heating Fuel	Propane/LPG
Units by Primary Heating Fuel	Kerosene
Units by Primary Heating Fuel	Wood
Units by Primary Heating Fuel	Other fuel
Units by Occupancy	Elderly-Occupied
Units by Occupancy	Disabled-Occupied
Units by Occupancy	Native American-Occupied
Units by Occupancy	Children-Occupied
Units by Occupancy	High Residential Energy User
Units by Occupancy	Household with High Energy Burden
Total People Assisted with Grant Funds	Elderly
Total People Assisted with Grant Funds	Persons with Disabilities
Total People Assisted with Grant Funds	Native American
Total People Assisted with Grant Funds	Children
Total Outlays	Total Outlays (Recovery Act funds) by function (Program Operations, Vehicles & Equipment, etc.)

# WPN 10-13 Attachment 2: WAP Monthly Reporting Metrics (Recovery Act)

Metric Activity	Metric
Total Outlays	Grantee Outlays (Recovery Act funds)
Total Units	Total Units (Excluding Reweatherized)
Total Units	Total Reweatherized Units
Total Units (by Subgrantee)	Total Units