

3 How should multiple sub-awards to the same sub-recipient be handled (schools)?	08/20/2009	On the stabilization awards given to the schools, it was discussed that we wouldn't know the exact amount that each school will receive during the life of the stabilization grant. On page 18 of the data definition, under the data element "Amount of Subaward", the definition states, "The anticipated total amount of funds to be disbursed to the sub-awardee over the life of the award." Therefore instead of just placing the current year's subaward amount in the spreadsheet, it looks like they want you to estimate the full award. That amount will probably change from quarter to quarter as the amount you will subaward becomes clearer.	08/20/2009	DLA	Closed
3		Ben wasn't sure but was going to check with Jim Butler. He had his own opinion, which was to treat them as separate sub-awards, showing the total amount awarded to the state and the actual sub-awards to the schools.	08/24/2009	Ben Husch, NASBO	Closed
3		The guidance on Stabilization Funds Reporting has not been cleared for release- so I will answer this question generally. When the guidance is released, there will be more specific details. Generally, the 1512 reporting form asks for the Primes' total allocation - and then also asks for the Primes expenditure(s); this would represent how much the Primes have drawn down to meet the districts' immediate needs/obligations (Ed services) or their/sub-recipients needs/obligations (Gov't Services). Therefore we can generally account for the dollars that the Prime has obligated, matching those amounts with what the subs report. Additionally, since these reports are cumulative, a district should use the data that is available to them at that time- they will have an opportunity to change those figures in future reports. Please let me know if this is helpful. B est, Jim	08/24/2009	Jim Butler, US DOE	Closed

4	Do awards under \$25K have to be reported, even if there are sub-recipients? DLA was originally thinking "no." See See http://www.whitehouse.gov/omb/recovery_faqs/#agg3 . The agg2 question seems to indicate that all with awards to individuals do need to be reported in aggregate.	08/20/2009	Pointed out the "however" clause in the FAQ that makes it sound like all sub-awards need to be reported in aggregate, regardless of the amount. Kelly thought that as well but stated that "Marty thought it meant that primes need to aggregate sub awards under \$25K (not ignore them). His point was, if the prime does not need to report there simply cannot be a report for a sub because without a prime there cannot be a sub.	08/20/2009	DLA	
5	How are Tax Credit Bonds and Build America Bonds to be reported?	08/01/2009	Tax Credit Bonds for Schools were discussed and whether they needed to be reported under section 1512 of the Recovery Act. I found that Qualified school construction bonds (Sec. 1521), Extension and expansion of qualified zone academy bonds. (Sec. 1522), and Build America Bonds (Sec. 1531) are included in Division B of the Act and are therefore NOT required to be reported under Section 1512 of the Recovery Act.	08/20/2009	DLA	Closed
6	How to report administrative costs on the S.1512 reports?	08/24/2009	There is no specific place for administrative costs to be reported. The 0.5% limitation of spending of ARRA dollars and the SWCAP issues are not addressed specifically within the section 1512 reporting.	08/24/2009	Colin Keeler	Closed
7	What is considered a "contract", in reference to the type of template to use.	08/24/2009	Looking for guidance			
8	How to get a correct DUNS number for Isabel school district? The school closed and has an incorrect (8 digit) DUNS number listed.	08/24/2009	Looked on CCR, and found a "Northwest Area Schools" DUNS and gave to DOE.		crk	closed
9	How to report the COBRA premium reduction	08/20/2009	SD DOL isn't following the issue. US DOL is providing conflicting advice. NASBO in dialog with US DOL. The program is clearly part of Division B of the Act. US DOL's comments to this point are that it's a contracted out service, which is not accurate for SoSD. US DOL still working on the issue. (09/03/09) NASBO and OMB reviewing a FAQ that has yet to be issued.			
10	When to report the COBRA premium reduction?	08/24/2009	Since we're not going to access the funds until December, we're just voluntarily providing the benefit and eating the costs ourselves until that time, it could be argued that we haven't received any benefit (although the COBRA employee has).			

11	Specifically in the stabilization information it states that the money cannot be used for athletic buildings, etc. The BOR is wondering if that includes faculty/staff in those areas as well. I would have to look at the specific language of what is excluded but I do know it says athletic facilities. They are concerned about coaches, etc. If it is a problem they will have to go through and filter those out this week before the payroll.	08/24/2009	Reviewed the language of the Act. It does not say anything about coaches or any salaries, only physical infrastructure building and improvements. BOR told to go ahead and include coaches salaries.	08/26/2009	crk	closed
12	Do sub-recipients who receive less than \$25,000 have to register with the CCR?	08/27/2009	2CFR176.50(c): " <i>Recipients and their first-tier recipients must maintain current registrations in the Central Contractor Registration at all times during which they have active federal awards funding with Recovery Act Funds.</i> " DLA notes that the law makes no exception for first tier sub-recipients that will receive less than \$25,000. There could be an audit requirement that might test a sample of first-tier subs including those reported in aggregate and determine if they have a CCR and DUNS number.		DLA	closed
12	Are we sure that sub-recipients who receive less than \$25K have to register with CCR (and as such have a DUNS number)	09/03/2009				
13	What do we put for the top 5 highly compensated officers (as a prime recipient?) -Revisit-	08/28/2009	In the interests of transparency, the State prime recipients need to put their top 5 "officers", typically the cabinet member and other senior members of the agency. Yes, the information is public and on OpenSD but if somebody can't find a "highly compensated officer" for some reason it will appear that SD is not in compliance with the spirit of the Act. Confirmed with Jason again 09/08/09	09/08/2009	crk	Closed
14	What about subrecipient highly compensated officers?	08/24/2009	The guidance states that if the sub-recipient meets 3 criteria (80% gross revenue from feds; \$25M more in fed revenue; and compensation information not already publically accessible) then they need to provide this information. This issue was revisited again on 09/01/09 and the same decision was arrived at: Take the guidance literally.		crk	Closed

15	Should a state agency be treated as a subrecipient if money passes through from another state agency?	09/03/2009	No. All state agencies are prime recipients. "We are maintaining a bright-line rule that all entities within a state government are prime recipients, even if they compete for funds with other entities. A sub-recipient award does not occur until the funds leave the state."	09/03/2009	Daniel Werfel - OMB	Closed
16	Define "Officers" as used in the Data Model explanation stating that the 5 most highly compensated officers need to be listed.	09/03/2009				
17	What to use as the award date for payments to schools made from the SFSF where there was no "application" but instead the funding is passed through as part of the appropriation for State Aid?	09/02/2009				
18	Add new subgrants or increase existing subgrants or estimate final totals of sub grants over the life of the prime's award?	09/02/2009				
19	How is the \$25,000 threshold defined?	09/04/2009	Originally it was read as "per payment". OMB has issued clarification that the \$25,000 threshold applies to payments to a vender in a quarter, not an invoice. They also stated that the minimum \$25,000 threshold only applies to that particular quarter and in future quarters a state will not have to include payments from previous quarters.	09/04/2009	OMB, RATB, GOA, NASBO meeting	Closed
20	What naming convention should we use for saving our reporting templates?	09/04/2009	09/09/09 - Forwarded to NASBO for 9/11 phone call, particularly as it relates to batch submission. For the time being, each agency should use a unique name for each report. We will need to differentiate quarterly reports going forward, so it is recommended to use the Grant ID and include an extension like "_20091001.xls" for the Oct 1 reporting period.	09/10/2009	crk	Closed
21	One of the cells in the reporting template seems to have the formatting incorrect so a long text answer shows up as "####". It's happening in one template with 520 characters, not in another with 510, and still happens in the first when the number of characters is reduced under 510.	09/04/2009	Cannot change the format, other templates with as many characters do not appear this way. The data is in the cell, the XML binding will have to work that way. The contingency will be to re-enter the data onto a clean template and try again. (09/16/09 update: This happens when you enter more than 255 characters. It's a template problem, even in version 1.2)	09/09/2009	crk	Closed

22	Are "administrative" expenses to be included in the "Total Federal Amount of ARRA Expenditure" in line 48 and "Total Federal Amount ARRA Funds Received" in line 31?	09/08/2009	The Data Model states "direct charges for property and services; the amount of indirect expense charged; ..." If allowable direct or indirect administrative expenses are paid with ARRA funds, they should be included here. Do not include administrative expenses associated with the grant which were not paid with ARRA funds.	09/09/2009	crk	Closed
23	If a state agency enters into an agreement with another agency or university to perform a part of what a grant is intended to accomplish, is that agency or university a vendor?	09/09/2009	No, it is not a vendor, it is part of the state performing what the grant is intended to accomplish.	09/10/2009	DLA	Closed
24	What congressional district 2-digit number should be used?	09/16/2009	South Dakota only has a district-at-large. Put "00" in that cell. Or do we put "01"? Conflicting info on different web sites			