



APPROVAL DATE:

3/23/10

APPROVED BY:

Betty Baker, WIB Chair

**COUNTY OF SAN LUIS OBISPO  
DEPARTMENT OF SOCIAL SERVICES**

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**POLICY NO:** 31-08  
**TO:** Service Providers  
**FROM:** Department of Social Services  
**EFFECTIVE:** March 23, 2010  
**SUBJECT:** ARRA Section 1512 Reporting Requirements

**REFERENCES:**

- American Recovery and Reinvestment Act of 2009 (Pub. L. 111-5)
- Workforce Investment Act of 1998 (Pub. L. 105-220)
- Wagner-Peyser Act of 1933, as amended (29 U.S.C. 49 et seq.)
- Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 109-282)
- Code of Federal Regulations, Title 20, Part 652 et al
- Office of Management and Budget Memorandum 09-21 (OMB M-09-21), Implementing Guidance for the Reports on Use of Funds Pursuant to the American Recovery and Reinvestment Act of 2009 (June 22, 2009)
- OMB M-10-08, Updated Guidance on the American Recovery and Reinvestment Act - Data Quality, Non-Reporting Recipients, and Reporting of Job Estimates (December 18, 2009).
- Training and Employment Guidance Letter (TEGL) 1-09, Reporting Requirements under Section 1512 of the American Recovery and Reinvestment Act of 2009, Changes 1 and 2 (August 14, 2009)

**PURPOSE:**

This policy provides guidance for carrying out the Workforce Investment Act (WIA) reporting requirements included in Section 1512 of the American Recovery and Reinvestment Act of 2009 (ARRA).

## **SCOPE:**

This policy applies to all San Luis Obispo County Department of Social Services (DSS) service providers in receipt of ARRA funds through WIA and ARRA funding streams. Service providers are required to comply with federal, State, and DSS expenditure reporting requirements.

## **BACKGROUND:**

The intent of the ARRA is to preserve and create jobs, promote the nation's economic recovery, and assist those most affected by the recession. The ARRA funds for employment and training purposes should be spent concurrently with regular WIA and Wagner-Peyser Act formula funds to increase the Workforce System's capacity to serve workers in need.

Federal efforts to provide transparency in ARRA spending have been underway since the ARRA's inception. Section 1512 of the ARRA sets forth a statutory requirement to make certain information from grant recipients be made available to the public on the internet.

## **POLICY AND PROCEDURES:**

### **General**

All records and documents pertinent to all WIA grants and agreements including financial, programmatic and statistical information, and their supporting documents for each funding period shall be retained for a period of three (3) years following the date on which the annual expenditure report for that period, containing the final fiscal expenditures charged to the program year allotment, is submitted to the State Employment Development Department. This includes hard copies of relevant information stored within the MIS. If at the end of three (3) years there is litigation or an audit involving those records, the records will be retained until the resolution of the litigation or audit.

### **Definition of Terms**

**Data Universal Numbering System (D-U-N-S Number)** is a system developed and is regulated by Dun & Bradstreet (D&B). D&B assigns a unique nine-digit numeric identifier for each physical location of a business entity. D-U-N-S number assignment is free for all businesses required to register with the federal government for contracts or grants. Additional information about D&B, including information on how to look-up or request a D-U-N-S number, is available at the following Web site: [www.dnb.com](http://www.dnb.com). A legal entity, such as a city or county may have multiple D-U-N-S numbers. Subrecipients should provide the D-U-N-S number associated with their authority to receive WIA funds.

**“Doing Business As” (DBA) Name** of an organization may be the same as the organization’s legal name.

**Central Contractor Registry (CRR)** is the primary registrant database for the U.S. Federal Government. The CCR collects, validates, stores and disseminates data in support of agency acquisition missions. Additional information about the CCR is available at the following Web site: [www.bpn.gov/ccr](http://www.bpn.gov/ccr).

**Congressional, State Senate and State Assembly Numbers** can be obtained from a list of congressional districts available at the following Web site: [www.congress.org](http://www.congress.org). Lists of State Senate and State Assembly districts are available at the following Web site: [www.leginfo.ca.gov](http://www.leginfo.ca.gov).

**Primary Place of Performance (PoP)** is the primary address where the majority of the ARRA funded project work is performed.

**Vendor** refers to a dealer, distributor, merchant or other seller providing goods or services that are required for the conduct of an ARRA related project or program. Subrecipients may purchase goods or services needed to carry out the ARRA-related project or program from vendors. Vendors are not awarded funds by the same means as subrecipients and are not subject to the terms and conditions of the federal financial award. The characteristics of a vendor that make it distinct from a subrecipient are summarized below. A detailed definition of “vendor” is available in OMB M-09-21 and TEGL 1-09. A vendor:

1. Provides the goods and services within normal business operations;
2. Provides similar goods or services to many different purchasers;
3. Operates in a competitive environment;
4. Provides goods or services that are ancillary to the operation of the federal program; and
5. Is not subject to compliance requirements of the federal program.

**Nine-Digit Zip Code (ZIP code plus four)** can be looked-up at the following Web Site: [www.usps.com](http://www.usps.com).

### **Required Data Elements**

Each subrecipient is required to provide the Administrative Entity for the San Luis Obispo County Workforce Investment Board with a monthly report as required by ARRA guidance and the Department of Energy. This report is to include:

1. Subrecipients are to provide the types of jobs funded by ARRA funds (job title and job description)
2. Subrecipients are to provide the total staff hours worked that are funded by the project (ARRA/WIA) funds. The following staff information is needed:

- a. Staff name,
  - b. Job title,
  - c. Hours worked for the month
3. Subrecipients are to provide the identification of all vendors paid with project funds, which is to include:
  - a. The “doing business as” (DBA) name of their organization.
  - b. Provide **either** the vendor’s nine-digit D-U-N-S number, **or** the vendor’s name AND the nine-digit ZIP code of the vendor’s headquarters.
  - c. The physical address of the vendor’s organization as listed in the Central Contractor Registry (CCR) or D-U-N-S.
    - i. A street address, including a nine digit Zip code should be provided. A Post Office Box can be provided; however, a street address is also needed.
  - d. Product and service description and payment amount, if applicable
4. Subrecipients are to provide the address, including nine-digit zip code, for the primary Place of Performance (PoP) for their organization.
5. If ARRA funded work is performed at locations in addition to the primary address, subrecipients are to provide the two-digit congressional, State Senate, and State Assembly numbers that correspond to the additional Places of Performance (PoP) address.
6. Subrecipients are to provide the start date of a business location that opened as a result of ARRA funds and provide the end date of a business if it is expected to close at a specific date in the future, if applicable.
7. Subrecipients are to provide the In-kind match as defined in grant application, if applicable.

## **MONTHLY REPORTING REQUIREMENTS:**

**Monthly reports are always due by the 5th of the month following the report period/month.**

**Note:** When the reporting deadline falls on a weekend or holiday, all reports are due by close of business the next working day after the reporting deadline.

Completed reports will be submitted to:

Department of Social Services  
P.O. Box 8119  
San Luis Obispo, CA 93403-8119  
Attention: WIA Administration

**Failure to submit reports by the specified time may result in a delay in reimbursement of expenditures and/or the imposition of corrective actions on the contractor.**

**ACTION:**

The Administrative Entity for the WIB and its service providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

**INQUIRIES:**

Inquiries should be addressed to WIB Admin at [wibadmin@co.slo.ca.us](mailto:wibadmin@co.slo.ca.us).

**REVISION HISTORY:**

<i>DATE</i>	<i>DETAILS</i>
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