

## **COGR: OMB Guidance on Economic Recovery funds**

The Office of Management and Budget on February 18 issued initial implementation guidance to the federal agencies on spending the economic recovery funds -

[http://www.whitehouse.gov/omb/assets/memoranda\\_fy2009/m09-10.pdf](http://www.whitehouse.gov/omb/assets/memoranda_fy2009/m09-10.pdf)

As we have reported in previous messages, NIH and NSF have issued general statements about their plans to use the funds they will receive under the Economic Recovery Act. However, all of the agencies' plans will need to be reviewed and approved by OMB.

Among provisions of interest in the OMB document are those relating to the allocation of grants and cooperative agreements and the extensive new reporting requirements for entities that accept Recovery Act funds. As stated at the COGR meeting today (February 20) we will work with OMB and agency officials to minimize reporting burdens as much as possible, given the requirements of the Act.

### --Guidance on Grants and Cooperative Agreements

Page 32 of the OMB guidance addresses grants and cooperative agreements, noting that although the Recovery Act calls on agencies to spend the funding as quickly as possible, this statement, by itself, does not constitute a sufficient justification to support award of a federal grant on a non-competitive basis.

Agencies are expected to follow the same laws, principles, procedures, and practices in awarding discretionary grants with Recovery Act funds as they do with other funds, and to promote competition to the maximum extent practicable. It adds, Agencies may want to consider the appropriateness of limited competitions among existing high-performing projects versus full and open competitions and formula allocations.

### -Guidance on Significant New Reporting Requirements

Beginning on page 14, OMB describes the detailed reporting requirements for recipients of economic recovery funds.

" As required by Section 1512 of the Recovery Act and this guidance, each recipient, as described above, is required to report the following information to the Federal agency providing the award 10 days after the end of each calendar quarter, starting on July 10th.

These reports will include the following data elements, as prescribed by the Recovery Act:

- (1) The total amount of recovery funds received from that agency;
- (2) The amount of recovery funds received that were obligated and expended to projects or activities. This reporting will also include unobligated Allotment balances to facilitate reconciliations.
- (3) A detailed list of all projects or activities for which recovery funds were obligated and

expended, including--

- (A) The name of the project or activity;
- (B) A description of the project or activity;
- (C) An evaluation of the completion status of the project or activity;
- (D) An estimate of the number of jobs created and the number of jobs retained by the project or activity; and
- (E) For infrastructure investments made by State and local governments, the purpose, total cost, and rationale of the agency for funding the infrastructure investment with funds made available under this Act, and name of the person to contact at the agency if there are concerns with the infrastructure investment.

(4) Detailed information on any subcontracts or subgrants awarded by the recipient to include the data elements required to comply with the Federal Funding Accountability and Transparency Act of 2006 (P.L. 109-282), allowing aggregate reporting on awards below \$25,000 or to individuals, as prescribed by the Director of OMB.

The final guidance issued by OMB for the Recovery Act will lay out in more detail specific reporting instructions and how the data collection for this reporting will work government-wide"

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