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TO: Superintendents/Charter School Directors
School Business Administrators
ARRA Section 1512 Points of Contact

FROM: Dr. Bari Erlichson
Director, Office of Research and Evaluation, NJDOE

RE: Federal OMB Changes to Section 1512 Reporting

DATE: January 26, 2010

On December 18, 2009, Federal OMB Director Peter Orszag issued new rules for the reporting of 'Jobs' data under ARRA, Section 1512 requirements. Although we had already collected jobs and vendor data for Q2 at the time OMB published their guidance, the new regulations require that we must now ask you to revise your submission, if appropriate.

The new regulations promote a more straightforward methodology of calculating jobs. The key changes are the following:

- Districts and charter schools will no longer be required to make a subjective judgment on whether jobs were created or retained as a *result* of the Recovery Act. Instead, only jobs FUNDED with Recovery Act dollars are to be reported. Thus, the option to report "Derived Jobs" has been removed from the jobs table in the collection tool.
- District and charter schools will no longer be required to reported jobs on a cumulative basis. Instead, jobs will be reported on a quarterly basis and during the quarter when the actual work occurred. Please note that jobs are to be reported in Full Time Equivalents (FTE) rather than by position or person. To accomplish this, divide the hours worked under Recovery Act dollars by the hours in a full-time schedule in that quarter (typically 520 hours).

While many districts and/or charter schools may not need to revise their job numbers, we must have assurances from all districts and charter schools that the numbers that have been reported for Q2 comply with the new regulations. To this end, we have re-opened the Section 1512 Collection tool on Homeroom. It will be pre-populated with the data that you submitted for Q2. Please revise, if necessary, and resubmit the data as final. **The deadline for verifying the data as final – and in compliance with the new regulations – is February 10, 2010. Every district/charter school must certify the data to be correct and in compliance with the new guidance even if no changes were necessary.**

We recognize – and have communicated with federal program officers from OMB and the USDE – that this change in the methodology was ill-timed and now requires a “do-over” collection for Q2. We sincerely appreciate your cooperation in revising and re-submitting your data as a failure to comply with the new regulations for Q2 data may subject us all to the termination of Federal funding or curtail our ability to receive federal funds in the future (Orszag Memo, M-10-08, p. 7).

New NJDOE guidance for jobs reporting is attached below. Please review it promptly and direct questions to either your county office staff or to ARRAReports@doe.state.nj.us as soon as possible.

Federal OMB Director Orszag’s Memorandum detailing the new guidance can be found at this link: <http://www.recovery.gov/FAQ/recipient/Documents/m10-08%20Updated%20Guidance%2012182009.pdf>

Recovery Act, Section 1512 Reporting

Revised January 26, 2010

The New Jersey Department of Education (NJDOE) is the “prime recipient” for reporting under the American Recovery and Reinvestment Act (ARRA or Recovery Act) Section 1512 for grants under the Title I, IDEA, McKinney Homelessness and Education Technology programs. In addition, the NJDOE is working with the Governor’s Office, which is the prime recipient for reporting under the State Fiscal Stabilization Fund (SFSF). As the prime recipient, the NJDOE is required to gather data from school districts and charter schools who are deemed to be “sub-recipients” in each of these Recovery Act funding streams and to report that data to the federal government through the web site federalreporting.gov.¹ The NJDOE is required to collect and report on a number of data elements. In an effort to streamline the reporting process to the extent possible, the NJDOE has pre-populated the data collection tool with certain information known to the NJDOE, such as the allocation amounts for each Recovery Act grant, the amount that has been drawn down, and district information, such as DUNS numbers. With respect to those pre-populated data elements, the responsibility of school districts and charter schools will be to verify and confirm that the data is correct.

However, there are other data elements that school districts and charter schools must provide to the NJDOE. These include a count and description of the numbers of jobs created/retained and a count and description of contracts and/or vendor agreements.

On a quarterly basis, the NJDOE is required to provide an aggregate number for the cumulative jobs created or retained FUNDED with Recovery Act dollars in each grant as well as a description of the types of jobs created or retained. In order to meet this federal mandate, sub-recipients are **REQUIRED** to provide jobs counts and a description of those jobs to the NJDOE so that we can tally and report them through federalreporting.gov. Failure to report this information jeopardizes the entire grant funding stream.

In addition, for all vendor contracts with a total equal to and greater than \$25,000 that are funded through the Recovery Act, sub-recipients must provide certain information including the vendor’s name, zip code, contract or purchase order number, and amount of contract.

Guidance on the method to be used to calculate jobs created or retained and of the reporting tool itself is set forth below.

¹ However, districts that receive an ARRA grant directly from the Federal Government, such as “Impact Aid Construction” grants, are the prime recipients for those particular grants.

Reporting on Jobs Created or Retained

A job **created** for the purposes of this reporting is a new position created and filled, or an existing vacant position that is filled, that is funded by the Recovery Act; a job **retained** is an existing position that is now funded by the Recovery Act. A job can only be reported as either created or retained, but not as both.

Please follow these general guidelines in determining whether to report the job under Section 1512.

- A funded job is defined as one in which the wages or salaries are either paid for or will be reimbursed with Recovery Act funding.
- School districts should not attempt to report on the employment impact on vendors from whom they are purchasing materials, equipment or other supplies, except in those instances where the value or quantity of the purchases is so significant as to have an *identifiable* employment impact on the vendor.
- In addition, employees who are not directly charged to Recovery Act supported projects or activities that, nonetheless, provide critical indirect support, e.g., clerical and administrative staff preparing reports and departmental administrators, are NOT counted as jobs created or retained.
- Also, only compensated employment in the United States or outlying areas (e.g., territories) should be counted.

Reporting in Full Time Equivalents: The number of jobs required by the Recovery Act should be expressed as Full Time Equivalents (FTEs), which is calculated as total hours worked in jobs created or retained divided by the number of hours in a full-time schedule, as defined in each school district. The FTE data should be reported in the quarter that the hours were worked.

The formula for reporting can be represented as:

$$\frac{\text{Total Number of Hours Worked and Funded by Recovery Act within Reporting Quarter}}{\text{Quarterly Hours in a Full-Time Schedule}} = \text{FTE}$$

The FTE formula is intended to prevent over-counting of short-term or part-time jobs. For example, if a job is funded by the Recovery Act, but the individual’s employment only lasts for one week, then a full job will not be reported. In this case, the FTE formula will discount the job total to reflect the temporary nature of the job. Only jobs that are funded directly by the Recovery Act are counted as created or retained.

Step-by-Step Instructions

Successful use of the formula is dependent upon correctly inputting the appropriate number of hours in the numerator (or “top” of the formula) and the denominator (or “bottom” of the formula). This section will walk through the steps recipients must take to use the formula to calculate jobs estimates for projects and activities fully funded by Recovery Act funds.

Assume the recipient is Township Public Schools with a standard full-time work week of 40 hours. The district receives a Recovery grant and is able to hire two full-time librarians and one part-time paraprofessional.

First, Township Public Schools assesses which hours worked should be included into the calculation by looking at its payroll. It will only include the hours worked for Washington, Madison and Jefferson whose jobs were funded by the Recovery Act.

Employee Name	Job Title	Funded by the Recovery Act	ARRA Hours worked in the Quarter	FTE to be reported in the Quarter
M. Washington	Librarian	Yes	520	520/520 = 1 FTE
D. Madison	Librarian	Yes	520	520/520 = 1 FTE
T. Jefferson	Paraprofessional	Yes	260	260/520 = 0.5 FTE
TOTAL HOURS FUNDED IN QUARTER			1,300	1300/520 = 2.5 FTE

The district maintains a 40 hour per week full-time schedule. It must represent its full-time schedule in reporting quarters, not work weeks. To do this the district must:

- (a) Calculate how many full-time work hours are in a quarter:
40 hours in a full-time work week schedule multiplied by 13 weeks in a quarter equals 520 total work hours in a quarter.
- (b) The district enters its calculations into the numerator and denominator of the formula to convert its hours worked into FTEs for the estimate of jobs created and retained by its Recovery grant.

$$\frac{1300 \text{ Recovery Act Funded Hours Worked and Funded by Recovery Act}}{520 \text{ Hours in a Full-Time Schedule}} = 2.5 \text{ FTE}$$

The district will report 2.5 FTEs for the quarter.

What's a funded job?

A funded job is defined as one in which the wages or salaries are either paid for or will be reimbursed with Recovery Act funding. Thus, a job that is paid initially with non-Recovery Act dollars may be reported as created or retained as long as such dollars eventually will be reimbursed with Recovery Act funds for the jobs being reported. For example, a recipient may decide to begin hiring new employees as soon they are notified of the amount of their Recovery Act award, but before Recovery Act dollars are received or expended. If, in this situation, the non-Recovery Act dollars that are paying the wages of the new employees were used as an advance on the Recovery Act dollars awarded, the recipient can appropriately report these jobs as created or retained. However, if the recipient does not intend to use its Recovery Act award to reimburse for the previous expenditure of non-Recovery Act funds on wages and salaries, then the hours for such jobs should not be reported in the calculation of jobs created or retained. If the reimbursement occurs after the job is terminated, the recipient only reports the jobs as created or retained during quarters in which the employment actually occurred.

References and Resources

In addition to the guidance found on the NJDOE ARRA website at <http://www.state.nj.us/education/arra/>, these other resources are also available:

www.ED.gov

General uses of funds guidance by program at: ED Recovery Act > Programs
<http://www.ed.gov/policy/gen/leg/recovery/programs.html>

Using Title I, Part A ARRA Funds for Grants to Local Educational Agencies to Strengthen Education, Drive Reform and Improve Results for Students.
<http://www.ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.pdf>

American Recovery and Reinvestment Act of 2009: Using ARRA Funds Provided Through Part B of the Individuals with Disabilities Education Act (IDEA) to Drive School Reform and Improvement.
<http://www.ed.gov/policy/gen/leg/recovery/guidance/idea-b-reform.pdf>

American Recovery and Reinvestment Act of 2009: Using IDEA Part C ARRA Funds to Improve Outcomes for Infants and Toddlers with Disabilities and their Families.
<http://www.ed.gov/policy/gen/leg/recovery/guidance/idea-c-reform.pdf>

All of the United States Department of Education's guidance on Section 1512 report is at: <http://www.ed.gov/policy/gen/leg/recovery/section-1512.html>

Instructions for the ARRA Reporting Tool on Homeroom

1. Begin by contacting your district's Web User Administrator. This person is able to log into the NJDOE's Homeroom web site. This is the log in screen:

The screenshot shows a web browser window displaying the login page for the ARRA Quarterly Section 1512 Reporting tool. The page header includes the New Jersey Department of Education logo on the left and the title 'ARRA Quarterly Section 1512 Reporting' on the right. The main heading is 'Online User Login'. Below this, there are three input fields: 'District ID:', 'User ID:', and 'Password:'. At the bottom of the login section are two buttons: 'Login' and 'Cancel'. A horizontal line separates the login section from the footer, which contains the following text: 'NJDOE: ARRA Quarterly Section 1512 Reporting', 'NEW JERSEY STATE DEPARTMENT OF EDUCATION', 'PO BOX 600', 'TRENTON, NEW JERSEY 08625-0500', and 'arrareports@doe.state.nj.us'. The browser's status bar at the bottom shows 'Done', 'Internet', and '100%'.

2. Click on the ARRA Quarterly Reporting Tool. The screen below will appear:

The screenshot shows a web browser window displaying the NJDOE ARRA Quarterly Section 1512 Reporting tool. The page has a light green header with the New Jersey Department of Education logo on the left and the title "ARRA Quarterly Section 1512 Reporting" on the right. Below the header, the user is logged in as "AZHAO". The main content area features a light blue background with the text "On-Line NJDOE: ARRA Quarterly Section 1512 Reporting". Below this, there are fields for "County: NJDOE", "District: NJ Dept. of Education", and "21 1430". A large image of the American flag and a school building is on the left. To the right of the image are three links: "1. DISTRICT INFORMATION", "2. ARRA INFORMATION BY GRANT PROGRAM", and "Exit System". At the bottom of the page, contact information for NJDOE is provided: "NJDOE: ARRA Quarterly Section 1512 Reporting", "NEW JERSEY STATE DEPARTMENT OF EDUCATION", "PO BOX 500", "TRENTON, NEW JERSEY 08625-0500", and "arrareports@doe.state.nj.us". The browser's status bar at the bottom shows "Done", "Internet", and "100%".

- At the welcome screen, you'll see two choices. Begin by clicking on "District Information." The screen below will appear:

New Jersey Department of Education

ARRA Quarterly Section 1512 Reporting

Main Menu Login User: AZHAO

DISTRICT INFORMATION

County: NJDOE District: NJ Dept. of Education 21 1430

District DUNS No: (must be 9 digits) Congressional Dist.:

DISTRICT CONTACT:

NAME:

EMAIL:

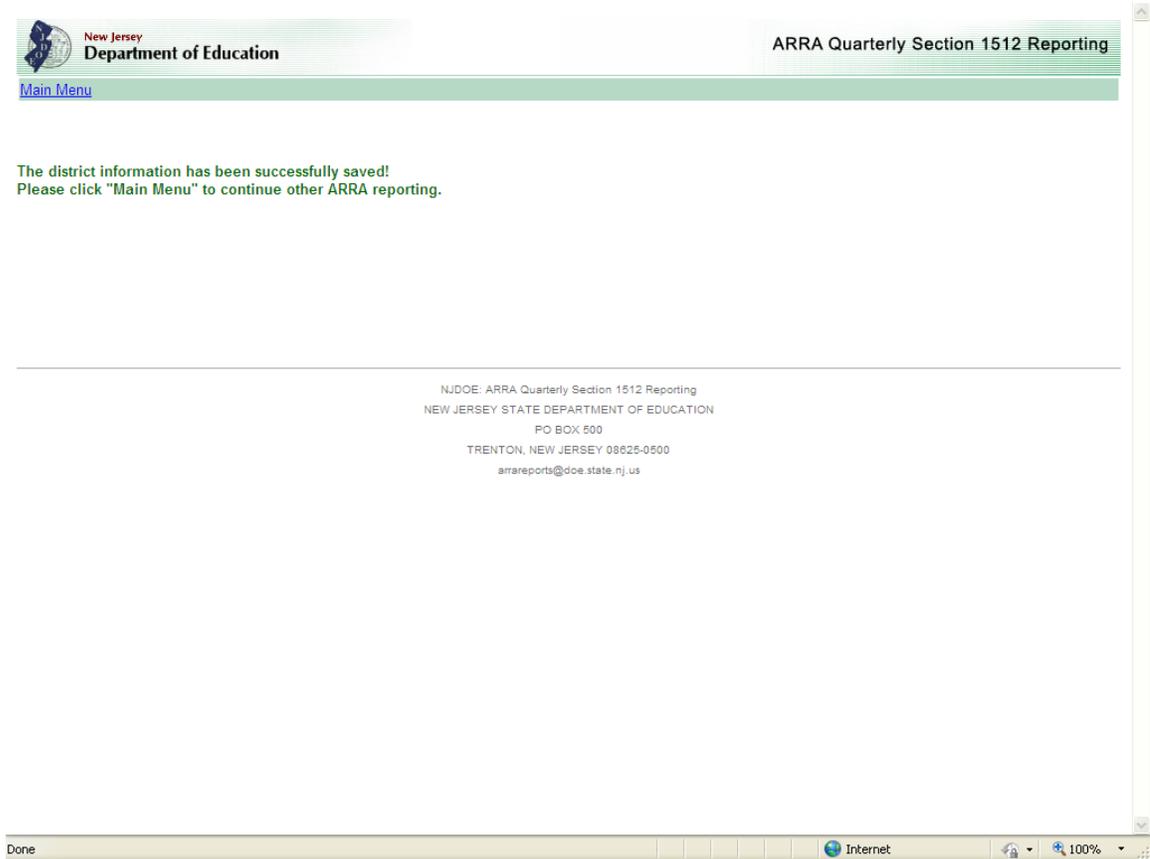
PHONE:

Cancel Reset Save

NJDOE: ARRA Quarterly Section 1512 Reporting
NEW JERSEY STATE DEPARTMENT OF EDUCATION
PO BOX 500
TRENTON, NEW JERSEY 08625-0500
arrareports@doe.state.nj.us

- On the district information screen, you are first asked to verify your district's DUNS number. It is important that this number be correct as it will link all of your reporting and allocations. If it's not pre-populated, please fill it in. It must be in a nine-digit format. If your DUNS number begins with a zero or several zero, be sure to include them. If you need to look up your DUNS number, a look-up tool can be found at:
https://eupdate.dnb.com/requestoptions.asp?cm_re=HomepageB*TopNav*DUNSNumberTab
- The district must also enter the number for your Congressional district. There is a look-up tool at <http://www.house.gov/zip/ZIP2Rep.html> that can help locate the number of your district.
- Next, enter contact information for the person who will be best positioned to take phone or email questions regarding the quality of the data entered.

7. Once this data is entered, click “Save.” The screen below will appear. Click on “Main Menu” in the upper left corner to return to the main menu.



8. On the home screen, now click on “ARRA Information by Grant Program.”

The screenshot shows a web browser window displaying the NJDOE ARRA Quarterly Section 1512 Reporting home screen. The page has a green header with the New Jersey Department of Education logo on the left and the title "ARRA Quarterly Section 1512 Reporting" on the right. Below the header, the login user is identified as "AZHAO". The main content area features a light blue background with the text "On-Line NJDOE: ARRA Quarterly Section 1512 Reporting". Below this, the user's location is set to "County: NJDOE" and "District: NJ Dept. of Education" with the number "21 1430". A large image of the American flag and a school building is on the left. To the right of the image are three menu items: "1. DISTRICT INFORMATION", "2. ARRA INFORMATION BY GRANT PROGRAM", and "Exit System". At the bottom of the page, contact information for NJDOE is provided: "NJDOE: ARRA Quarterly Section 1512 Reporting, NEW JERSEY STATE DEPARTMENT OF EDUCATION, PO BOX 500, TRENTON, NEW JERSEY 08625-0500, arrareports@doe.state.nj.us". The browser's status bar at the bottom shows "Done" and "Internet" with a 100% zoom level.

9. After clicking on “ARRA Information by Grant Program,” the following screen will appear:

ARRA INFORMATION BY PROGRAM

County: NJDOE District: NJ Dept. of Education 99 9999

Catalog of Federal Domestic Assistance (CFDA) Programs:
 (Please click a CFDA# to fill out your reporting data for that program award. Each award received by the district will need to be reported on separately.)

CFDA#	PROGRAM TITLE/DESCRIPTIONS	Need to Report?	Data Reported?	Data Finalized?*	Reported Vendors (Contracts >= \$25,000)
1 84.387	Education of Homeless Children and Youth, Recovery Act	No			
2 84.388	Title I - Grants to LEAs, Recovery Act	No			
3 84.391	Special Education - Grants to States, Recovery Act	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	view/update the vendor
4 84.392	Special Education - Preschool Grants, Recovery Act	No			
5 84.394	State Fiscal Stabilization Fund - Education State Grants, Recovery Act	No			
6 84.397	State Fiscal Stabilization Fund - Government Services, Recovery Act	No			

Note: * By checking, the District is verifying that the data for this program is complete and accurate as of December 31, 2009. Please click the following button for saving the verifying status:

10. On this page, a list of every possible grant available under the Recovery Act will appear. The district is only responsible for reporting jobs and contracts for those grants for which it has received an allocation. This is noted in the column on the right, labeled “Need to Report?” with the word “YES.” Please note: The district is required to report on all grants for which it has been allocated money even if the district has not begun to draw down the moneys.

11. Click on the Catalog of Federal Domestic Assistance (CFDA) number next to a grant for which a district must report. The screen below will appear:

Report Jobs in FTE's: (Convert Part-Time or Temp into FTE's by calculating how many hours are funded by the Recovery Act.)

	CREATED*	RETAINED**
Instructional Staff:	9	9
Administrative Staff:	99	9
Student Support Service Staff:	999	9
Other:	9999	9

Note: * A "Created" job is a new position created and filled or an existing unfilled position that is filled as a result of Recovery Act funding.
 ** A "Retained" job is an existing position that would not have been continued to be filled were it not for Recovery Act funding.

If the the contracts >= \$25,000, please click here to enter vendor information: [Contracts >= \\$25,000](#)

click "Save" button to submit the data.

Cancel Reset Save

NJDOE: ARRA Quarterly Section 1512 Reporting - Q2
 NEW JERSEY STATE DEPARTMENT OF EDUCATION
 PO BOX 500
 TRENTON, NEW JERSEY 08625-0500
 arrareports@doe.state.nj.us

12. This same screen will appear for each grant or CFDA. Notice at the top of the screen that the title of the Grant program is present. At the top of this screen, the NJDOE has pre-populated the cells with information specific to each district and each grant. If this information is incorrect, please send an email to ARRAREPORTS@DOE.STATE.NJ.US

13. The table to be filled in requires districts to report ARRA funded positions:

- Instructional Staff (Function codes 1XX, 2XX, 4XX)
- Administrative Staff (Function codes 230, 240, 25x)
- Student Support Services Staff (Function codes 211 thru 223)

For each of these categories, the number of jobs that were created or retained for this particular grant program should be reported as of the quarter's end. The second quarter ends on December 31, 2009, so information regarding jobs created or retained through December 31, 2009 should be included in the report. The category of "Other" can be used for ARRA funded district employees that do not

fit these particular titles. The intention is to collect a count of jobs that can be traced to a particular position in some way in these categories.

If the district has not awarded a contract or purchase order equal to or over \$25,000 on this particular grant, the district should click on SAVE and return to the main menu to complete these steps again for each grant. If the district has awarded a grant or purchase order over \$25,000, the district should click on the “Contracts >= \$25,000” button. The following screen will appear:

New Jersey Department of Education
ARRA Quarterly Section 1512 Reporting
Main Menu Login User: AZHAO

ARRA INFORMATION BY PROGRAM
CONTRACTS (>= \$25K)

County: NJDOE District: NJ Dept. of Education 25 2105

CFDA: 84.391 Special Education - Grants to States, Recovery Act

CONTRACT INFORMATION (greater than \$25,000)
(Enter data for each Vendor. if you have more Vendor input please click "Add More Vendor".) Add More Vendors

1 Vendor Name: [text box]
Vendor Contract Number: [text box] (P.O. or some other internal # assigned by the district)
NAICS Code: --- Select NAICS Code --- [dropdown]
Vendor DUNS Number: [text box] Vendor ZIP Code: [text box]
Contract Amount (\$): [text box] Contract Paid to Date (\$): [text box]
Jobs Created: [text box] Jobs Retained: [text box]

2 Vendor Name: [text box]
Vendor Contract Number: [text box] (P.O. or some other internal # assigned by the district)
NAICS Code: --- Select NAICS Code --- [dropdown]
Vendor DUNS Number: [text box] Vendor ZIP Code: [text box]

14. For each contract, vendor or purchase order that the district has entered into that will total equal to or greater than \$25,000, the district must fill out the following information for the contract:

- Vendor’s name and zip code
- Vendor’s DUNS number, if available.
- A contract or purchasing order number. This is a number that the district assigns to the contract.
- The total amount of the contract.
- The amount of the contract that has been paid-to-date.
- Choose a NAICS code that best describes the nature of the contract.

- The number of jobs created or retained by the vendor. If this information is not contained in the vendor’s contract, purchase order, invoice or initial proposal, the district should secure a letter from the vendor attesting to the count of FTEs.
15. It is expected that districts will report their tuition contracts to private schools for the disabled on this screen if they are equal to or greater than \$25,000.
 16. If a district needs more space to add contract information, click on the “Add Additional Vendors” button.
 17. After entering this information, click on SAVE to return to the main menu. Now, the “Date Reported?” column will contain a check mark to indicate that the district has reported the necessary data. The screen will look like this:



Complete these steps again until the district has entered information for each grant program for which it has received an allocation.

Lastly, the district must enter check marks in the “DATA FINALIZED?” column in order for the data to be marked as verified for the district.