

ARRA Section 1512 Reporting Data Quality Review Process

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BACKGROUND

As part of the Section 1512 reporting process, ETA is required to develop and implement a timely data quality review process that will be performed in the 8 calendar days following the recipients' submission and review of the reports and prior to publishing the reports on www.Recovery.gov. The web-based reporting system developed by the Office of Management of Budget (OMB), www.FederalReporting.gov, will house the data and the portal for reporting. The web reporting portal will be used to perform the data quality review by recipients and Federal agencies. The risks associated with the new recipient reporting requirements are as follows:

- The 8-(calendar) day data quality review process required of Federal agencies entails no room for slippage in deadline, including week-ends or holidays.
- If each recipient report is not reviewed within the appropriate timeframe, due to internal and external factors, including late reporting on the part of recipients and sub-recipients, the default classification reported to the public will be "Not Reviewed."
- Non-compliance in reporting on the part of the recipients is a violation of terms and conditions of their grant(s).
- Because some grantees, both formula and discretionary, do not complete their routine financial reports within 45 days after the end of the quarter, the risk for untimely recipient reporting is increased with the tight 10-day statutory recipient reporting timeframe for ARRA 1512 reports.

To ensure accurate and timely reporting, ETA has developed the following new internal data quality review plan and process to establish a chain of accountability and roles and responsibilities. In addition, training and additional materials including a "how-to" aid are being developed to assist Federal Project Officers (FPOs) and other staff in completing the review process.

RESPONSIBILITIES

FPOs are responsible for reviewing both prime recipient and sub-recipient (if delegated responsibility) reports to ensure data quality (i.e., accuracy, completeness, and timeliness).

At the Regional Office level, FPOs are assigned one or more States and/or multiple discretionary grantees for which they are routinely responsible. At the National Office, FPOs are assigned one or more discretionary grantees for which they are routinely responsible.

These are the recipients for which the FPOs will be primarily responsible for the ARRA Section 1512 reporting data quality reviews.

Each Regional Administrator and applicable National Office Administrator will ensure that a backup system is in place to ensure that timely reviews of reported data are completed during periods of the absence of the assigned FPO.

PROCESS

The FPOs, and others designated to access the reporting system, will be responsible for registering no later than September 30, 2009, on the www.FederalReporting.gov website, to be able to access recipient/sub-recipient reports. When the FPO and/or other designated individuals register to be a Federal Agency User, he/she will need to provide the following:

- Name
- Phone Number
- Federal Agency Email Address
- Federal Agency Name (A drop down list of agency names will be available on the registration form; the two-digit code for USDOL is “16.”)

The FPOs will also be responsible for notifying all recipients for which they have responsibility of the requirement that they must register on the reporting solution at www.FederalReporting.gov prior to the reporting deadline. They should encourage early registration. The FPO should also remind the prime recipient that it is the recipients' responsibility to get its delegated sub-recipients registered by the reporting deadline.

During the recipient and sub-recipient review period (day 11 to day 21 of the reporting month), FPOs will have access to review the report data in a “view-only mode.” FPOs should conduct an unofficial, preliminary review at this time. By starting the unofficial reviews during this 11 to 21 day window, the FPO is allowed to detect “material omissions” or “significant reporting errors,” keeping in mind that the recipients have until the 21st to fix any errors they find themselves. During this 11 to 21 day window, FPOs have the flexibility to contact recipients to notify them of any detected omissions/errors and allow the recipients to correct their own reports prior to the FPOs' official reviews, which begin on day 22. Summary information may be posted by the Recovery Board on day 11.

During the official agency review period (day 22 to 29 of the reporting month), the FPOs will officially review and classify the reports. The review and classification process should be completed as early in the official agency review period as possible. This will unlock reports if omissions/errors were found and allow recipients time to make corrections and FPOs time to re-review and re-classify the corrected reports – if possible – prior to the 29th day. (As noted below, if a report is unlocked, then corrected and then resubmitted, if the FPO does not have time to re-review – for instance, if the correction and resubmission was on the 29th day – then the default classification of “Reviewed and Resubmitted” is considered appropriate.)

By the end of the agency review period, all reports will be classified in one of four ways:

1. Not reviewed – ETA policy is that FPOs or other designated staff will review all reports from recipients for whom they are responsible. “Not reviewed” should never occur.
2. Reviewed with no comments – This classification will signify completion of the official review process.
3. Reviewed with comments – When the FPO chooses this classification, it will unlock the report for correction. The report submitter should receive an automatic notification from the reporting portal that one or more issues was identified with a particular report although, at least initially, it is recommended that the FPO notify recipients (and sub-recipients as applicable) outside of the www.FederalReporting.gov portal to ensure the functionality of this process. Identifying potential data anomalies or questions at the earliest possible date and notifying submitters as appropriate ensures the maximum time available to correct the problems prior to the 29th day following the end of the quarter and also allows the FPO to re-review the corrected information if time permits. Additional information and examples related to the definitions of “material omissions” and “significant errors” will be provided.
4. Reviewed and resubmitted – This fourth classification was added to account for circumstances where an issue was found with an initial report submission and then addressed and resubmitted by the reporting entity, but agency staff did not have time to re-review during the official agency review period. Reports with this classification should be re-reviewed as soon as possible after the official review period to ensure that the identified issue was addressed. Because the report is cumulative, any issues remaining uncorrected may be addressed during the next reporting quarter.

To the extent the FPO or other reviewer identifies any data that he/she has reason to believe is false or misleading that has not been corrected by the recipient or sub-recipient, such findings must be submitted to recoveryupdates@gsa.gov. The Recovery Board may then make such instances public on the website www.Recovery.gov. Additional guidance on this process, including contact with the Recovery Board and other requirements that result from Section 1512 reporting guidance from OMB, will be addressed separately.

Although the FPOs are responsible for the initial data quality reviews, Administrators must ensure that they have put in place standard operating procedures to ensure the timeliness and quality of the review process. At a minimum, supervisors should conduct a sampling of the reports reviewed for quality assurance purposes. Ultimately, each Regional Administrator and applicable National Office Administrator is responsible for the timeliness and quality of the ETA reviews of recipient/sub-recipient data for their respective offices.

The Deputy Assistant Secretary for Employment and Training will attest to the Director of the Center for Program Planning and Results that the quarterly data quality reviews were performed.