

American Recovery and Reinvestment Act
Frequently Asked Questions (FAQ)
Section 1512 Reporting Requirements
Updated: December 17, 2009

General Requirements

Q: *Is Section 1512 reporting required of grants other than Recovery Act grants?*

A: No. Only grants funded by the Recovery Act have Section 1512 reporting requirements.

Q: *If a grant is awarded for purposes other than job retention or creation, is a sub-grantee required to report Section 1512 data? (For example, if a subgrantee received a Recovery Act grant for training, and no positions are being retained or created, is the subgrantee required to report?)*

A: Yes. Everyone receiving a Recovery Act award from CJCC must report Section 1512 data. There are elements other than jobs data that must be submitted on a quarterly basis. You would skip Step 2 (Jobs Data) on the online reporting form if you have no Jobs data to report.

Q: *How can a subgrantee obtain a certification form for attending the 1512 webinar?*

A: Because attending one of the webinars held on September 24th, September 25th, or December 15 was mandatory, all Recovery Act recipients are required to submit a certification form regarding their participation. The certification form may be downloaded from the website, completed, and submitted to CJCC by e-mail at grants.info@cjcc.ga.gov, or by fax at 404-657-1957.

Q: *For completion of the webinar certification form, where is the grant title located?*

A: Use the title of your grant funded project.

Q: *Can the information submitted for the 1512 report be printed to retain a copy for the sub-grantee's file?*

A: Yes, but you must print each page individually. Select File/Print on your web browser to print the active screen.

Reporting Process

Q: *When completing the quarterly 1512 report, who should complete the certification at the end of the 1512 reporting document?*

A: The person in the organization responsible for reporting Section 1512 data should certify the data. There is no specific requirement as to position in the agency.

Q: *When submitting reports, what should be used as the grant number?*

A: You will use the sub-grant number, which is in the format X82-8-### for Recovery Act grants.

Q: *If I am disconnected from the internet in the middle of completing the 1512 report, was the report submitted or can I begin where I left off before being disconnected?*

A: The form will not be submitted until you complete Step 4. If you are disconnected, you may log back in and pick up where you left off.

Q: *Do I have to register each quarter to complete 1512 reporting?*

A: No. Once you have registered, you will be able to submit reports for all future periods.

Q: *Does the person submitting the Sub-grant Expenditure Report (SER) need to be the same person registered for the 1512 report?*

A: No. This can be a separate person.

Q: *Will sub-grantees receive a report to verify that the process has been completed?*

A: Yes, all sub-grantees will receive a confirmation email.

Reporting Periods and Deadlines

Q: *Can we report before the deadline of the 5th day after quarter end?*

A: Yes. You can report any time before the 5th, as long as your data is complete and accurate through the report period date.

Q: *Is 1512 reporting required monthly or quarterly?*

A: Quarterly. Section 1512 reports are due **5 Calendar Days** after the end of each calendar quarter (October 5th, January 5th, April 5th, July 5th, etc.).

Q: *If an agency has not received a Recovery Act award packet, do we have to report?*

A: No. Only sub-grantees that have received an award packet before or on the report period date are required to report.

Q: *Do Recovery Act Judicial Circuit sub-grantees need to complete 1512 reporting by the January 5th deadline?*

A: Section 1512 data reporting is not required until you receive a grant award with a start date earlier than the current report period date. Circuit plans will have a start date after December 31 and, therefore, will not report until the March 31 report period. Additional training sessions will be scheduled for these grants.

Q: *Is there a deadline to submit the Internal Control Questionnaire?*

A: No. However, Internal Control Questionnaires must be submitted before a sub-grantee is able to receive funding. Please allow time for review and approval by CJCC staff.

General Information - Data Elements

Q: *Is the location of a sub-grantee building required or will a P.O. Box be accepted for the address?*

A: A P.O. Box is acceptable, but your physical location is preferred.

Q: *Is a domestic violence shelter (which does not publish its address) required to submit a physical address? If so, what address do we use?*

A: A P.O. Box will be sufficient. At a minimum, you must be able to provide your city, state, ZIP+4, and congressional district.

Q: *What if a sub-grantee will soon have a change of address? Should the current address or the new address be submitted? If the old address is entered, how should CJCC be notified of the new*

address?

A: Enter the address used during the reporting period. Report the new address for the next reporting period. You should notify CJCC of the address change when the next reimbursement request is submitted.

Jobs Data Reporting

Q: *Once job data has been submitted for the first reporting cycle, should job data be updated every subsequent quarter?*

A: Yes. In subsequent quarters, you will enter the number of hours worked and benefit hours paid for only the quarter on which you are reporting.

Q: *If an organization is still in the hiring process and will not hire by the report period date, should a 1512 report still be submitted? Should steps 2 and 3 be omitted?*

A: Yes. A 1512 report must be submitted for all sub-grantees that receive an award with a start date before the report period date. However, you would not be required to complete Step 2 if no hires were made before the report period date. Step 3 can also be omitted if vendor data is not applicable for the reporting period.

Q: *If funding has not been expensed by the report period date, should job data be submitted? Should Step 1 and 4 be completed?*

A: Jobs data is based on hours worked, not amounts expended. It is possible for hours to have been worked, but not yet paid. If any Recovery Act-funded hours have been worked during the quarter, you must report those hours by completing Step 2. If you have no hours to report, you will still need to complete Step 1 and Step 4.

Q: *Should you enter "N/A" for all jobs data fields if you are not creating or retaining jobs?*

A: No. You would omit Step 2 if no hours were worked during the reporting period.

Q: *If a sub-grantee has hired a contract employee paid solely with Recovery Act funds, should he/she be recognized as an employee with timesheets or as a vendor?*

A: All contract employees must be submitted as created or retained positions for the purpose of Section 1512 reporting and timesheets must be maintained on file.

Q: *How should contract workers be reported who will not be paid more than \$25K?*

A: All contract employees should be reported as a created or retained position in the Jobs Data section. The \$25K threshold applies to vendor payments.

Q: *If a sub-grantee is hiring an advocate for a time-limited position that is not considered an employee, should he/she report them as an employee or a vendor?*

A: A sub-grantee will treat contract/temporary workers as employees for Section 1512 reporting purposes.

Q: *If it was indicated in the budget that a part-time position would work 24 hours per week but the employee worked 30 hours during a pay period, how would this be handled?*

A: A sub-grantee will report the actual hours worked for the period on your Section 1512 report.

Q: *Regarding hours paid on the report form, should hours be counted that have been worked but not yet paid?*

A: Yes. Report all hours *worked* through the report period date, regardless of whether they were paid. You will also add the total Benefit Hours paid to this number.

Q: *Should hours be submitted that will end in the middle of a pay period?*

A: Report all hours that are being funded by the Recovery Act grant that were worked (or benefit hours taken) during the reporting period. It is independent of your pay period cut-off.

Q: *Once positions are created as a result of being awarded the Recovery Act grant, are they to be considered retained for future reporting purposes?*

A: No. Once a position is “created,” it will be reported as such throughout the life of the grant.

Q: *Would an employee whose hours were decreased in 2008-2009 and increased to 40 with Recovery Act funding be created or retained?*

A: Only the hours funded by the Recovery Act grant should be reported. If there was a period of time where the employee was working less than 40 hours and now the employee will be working 40 hours per week due to the Recovery Act, the increase in hours should be reported as “created.”

Q: *Would a part-time position increased to full-time be created or retained?*

A: The hours funded by the Recovery Act grant would be “created.”

Q: *If a sub-grantee received funding to retain a part time position and increase the hours of the same position, should this position be reported as retained or created?*

A: The hours retained should be reported as retained and the hours increased should be reported as created. You will create two records for the employee to accomplish this in the online reporting tool.

Q: *Should an existing vacant position that has been vacant for a year be classified as created or retained?*

A: This position would be classified as created when filled.

Q: *If Recovery Act funding allowed a position to be filled when an employee was previously laid off, should the position be classified as created or retained?*

A: All positions that have a gap in employment are classified as created.

Q: *If a position was increased from part-time to full-time with Recovery Act funding, should all hours worked be reported or only the difference between the part-time and full-time hours?*

A: Only hours funded by the Recovery Act grant should be reported.

Q: *How would a job description for a Victim Assistance/Administrative Assistant be reported?*

A: The closest match should be selected for each position. In this example, the selection would be Administrative/Human Resources.

Q: *Should benefit hours reported include hours incurred or hours utilized during the reporting period?*

A: Only benefit hours utilized through the reporting period date should be submitted. For example, if an employee works 32 hours and charges 8 hours of sick leave to their timesheet, 40 hours should be submitted. Benefit hours include paid sick leave, annual leave, comp time, and holidays. Although the above example is for a one week period, you must report all hours for the given quarter.

Q: *Are there any additional state or federal requirements for hiring a contract employee?*

A: There are no special or additional federal guidelines that relate to Recovery Act hiring. Also note that a vendor is not the same as a contract employee. Contract employee hours should be submitted under jobs retained or created, not vendor data.

Q: *If an organization does not have any job or vendor payments in the amount of \$25,000 or higher, is 1512 reporting required?*

A: Yes. You are responsible for submitting a report even if you have no jobs or vendor data to report, since there is other relevant Section 1512 data to be reported. In addition, all jobs data needs to be reported, regardless of dollar amount. The \$25,000 threshold only applies to vendors.

Q: *If an organization received an award for non-personnel related items (i.e. equipment, supplies, training, etc.) should the Step 2 for jobs data be left blank or should "n/a" be placed in each blank?*

A: In this example, Step 2 of the form should be skipped/left blank.

Time Sheets

Q: *Are timesheets due quarterly or monthly?*

A: Timesheets should be submitted with your Sub-grantee Expenditure Report (SER) – not Section 1512 reporting. SERs are submitted monthly or quarterly, based upon the sub-grantee's selection.

Q: *Will the current CJCC time sheet be adequate to report both regular VAWA and Recovery Act hours?*

A: Yes.

Q: *If an organization has established a timesheet that can document hours and activity during the day, will that be satisfactory or is it required to use a CJCC approved timesheet?*

A: You do not have to use CJCC's timesheet. It can be effective as a guide to ensure your timesheet includes all of the required information.

Vendor Data Reporting

Q: *What is the difference between vendor and contractor?*

A: For the purpose of the Recovery Act, a vendor is a business that supports program activities, but is not a direct, or intended, beneficiary of the program's objectives. Conversely, a contractor is an individual whose hours worked are charged to a Recovery Act grant.

Q: *Should all agency vendors be reported?*

A: Only vendors whose expenses will be charged to the Recovery Act grant should be reported.

Non-Section 1512 Reporting Information

Q: *Where would a list of allowable/billable activities under the Recovery Act grant be located?*

A: Please refer to the solicitation for more information. If you need further assistance with your budget, contact an auditor at CJCC.

Q: Can contract employees receive vacation hours under the Recovery Act?

A: No.

Q: *If the Recovery Act grant allows a person furloughed one day a month to begin working the furlough day, would the Recovery Act funding allow for payment into the retirement system for those days?*

A: Yes. Recovery Act funding allows sub-grantee to pay all standard organizational benefits to an employee who would regularly receive them, as long as the position is allowable according to federal/state guidelines. Benefits such as retirement, health insurance, etc. should be charged to the grant at the same proportion as the employee's salary.

Q: *Are employees paid by Recovery Act grant under a salary freeze? For example, the board of directors approves a 3% increase for all employees in an agency, effective 1/1/10, and the percentage covered decreases slightly to account for the pay increase but the total amount received from the Recovery Act is the same. Is that allowed?*

A: Employees are not under a salary freeze. However, you can only receive reimbursement up to the amount approved by CJCC for the Recovery Act grant. Your award will not increase due to an increase in an employee's salary, though you may fund the increase through other sources.

Q: *Recovery Act funding was awarded to hire a new position. Can the funding be used to retain another position instead?*

A: You will need to submit a budget adjustment requesting a personnel change. The request will be reviewed to ensure compliance with federal regulations, this includes ensuring the positions are allowable for the grant type you were awarded.

Q: *If Recovery Act funding was received after an appeal, where can the Sub-award I.D. and the Amount Received be located?*

A: Once the award package has been processed, they will be mailed to you and the Sub-award Number and the Amount Awarded will be referenced in your cover letter.