



GCAAlert!

Yale University

Grant and Contract Administration

Grant and Contract Financial Administration

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Alerts:

• Guidance on ARRA Section 1512 Reporting

• Telcom Infrastructure Bundle for Transaction Simplification

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“Any charges to federal funds for the Telecom Infrastructure Bundle, which are generally not allowable as a direct charge, must be fully documented and in compliance with University Policy 1403...”

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Guidance on American Recovery and Reinvestment Act Section 1512 Reporting

The Office of Management and Budget (OMB) has recently provided direction on complying with ARRA reporting requirements in *Implementing Guidance for the Reports on Use of Funds Pursuant to ARRA*, dated June 22, 2009 (see M-09-21,

http://www.whitehouse.gov/omb/recovery_default/). OMB also hosted [webinars](#) July 20-23rd, which are now posted on www.Recovery.gov for viewing.

Highlights of the reporting requirement document include:

- First official reporting deadline will be October 10th and cumulative data since the onset of ARRA (February 17, 2009) will be required
- Reporting will be done through a new federal website (www.FederalReporting.gov)
- Project status is to be reported as percentage of completion
- Jobs reporting must include descriptions of the types of jobs created and retained

- Jobs reporting should not include indirect job creation (i.e., administrative positions created to support ARRA reporting and oversight)
- Aggregate reporting of sub-awards less than \$25,000 is required (total number of awards and dollar amount)
- Payments to vendors greater than \$25,000 will require separate reporting
- Percentage of effort applicable to FTEs (full-time equivalents) directly charged to an ARRA award, will be the basis for jobs created and retained reporting. These reports will be cumulative and will include both prime recipients and sub-recipients

Aimed at providing transparency into the use of ARRA funds, the reports from prime recipients of such funds are required to include the following detailed information:

- Total amount of funds received; and of that, the amount spent on projects and activities

- A list of those projects and activities funded by name to include:
 - Description
 - Completion Status
 - Estimates on jobs created and retained
- Details on sub-awards and other payments

Over the past several weeks, we have assembled task groups and have asked other individuals across campus to review these new requirements and assist in developing an implementation strategy for Yale. To aid in the communication of these new reporting requirements and outline Yale’s approach in their application and implementation, a brown bag session will be held on August 12, 2009 from Noon until 1:30 at the Anlyan Center (TAC N107). A question and answer session will follow the presentation.

Important Changes – Telecom Infrastructure Bundle for Transaction Simplification

On July 1, 2009, Yale’s Information Technology Services (ITS) announced the consolidation of core telecommunications services (telephone lines, line appearances, telephone sets and long distance toll calls) to form a “[Telecommunications Infrastructure Bundle](#).” These services are now bundled into a single full time equivalent (FTE) - based rate that will replace detailed billing for these items. The FY10 rate calculations are still being finalized, but you can expect the annual rate to be about \$468/FTE (\$39.00/month). The job classes included in the Telecom FTE base

are Faculty, Clerical & Technical and Managerial & Professional. To learn more about the Telecommunications Infrastructure Bundle select [this link](#).

Any charges to federal funds for the Telecom Infrastructure Bundle, which are generally not allowable as a direct charge, must be fully documented and in compliance with Yale University [Policy 1403 – “Charging of Administrative or Clerical Salaries and Certain Other Expenses to Federal Funds.”](#) and are subject to periodic review by the Office of Research Administration. Only in **limited**

circumstances would these charges be allowable as direct expenses on federal sponsored projects. For example, charges to research centers, projects with extensive data accumulation, or projects that require making a large number of travel arrangements, where there is a **direct benefit to the work of the project** may qualify as appropriate. Please feel free to contact your GCFR representative if you have any questions or need additional assistance.