

11/04/09

**Guidance to Districts on Level of Review -
Stimulus Reporting**

Questions have recently arisen as to the review and approval process for the monthly ARRA jobs reporting. The process requires that the Project Manager review and approve the submittal of employment data related to the ARRA jobs. The training video and guidance relating to this process are unclear as to the expectations for the level of review and assurance.

In at least one instance a contractor was told that they would need to submit their payrolls supporting the monthly jobs reporting. Our inquiries of those responsible for setting-up the reporting process has indicated that the level of review expected is merely a reasonableness check - they do not expect that the monthly submittals will be routinely checked against the supporting payrolls. In addition, requiring contractors to submit these payrolls creates a public records dilemma. While many of the employees included in the monthly reports are reported on the weekly payrolls required by Davis-Bacon, the supervisory, professional and administrative employees are not and contractors have expressed concern that this data is sensitive. Once submitted, these payrolls will become a public record which we would be obliged to release upon request. If concerns should arise as to the veracity of the monthly employment reporting, we should request access to and review the records at the contractor's office rather than requiring their submission.

The following is the example provided by the Inspector General's Office as to the level of review expected for the monthly reporting.

The scope of responsibilities and degree of accountability for District Project Managers are rather limited. Project Managers are simply responsible for conducting a "reasonableness" check of the reported data, since they are not submitting actual project data but serve as a review conduit for the same. Some elementary examples could include:

Example 1:

Total Job Hours Reported: 150
Total Number of Employees: 5
Total Payroll: \$1,300,000
Payroll appears high compared to total employees and total job hours.

Example 2:

Total Job Hours Reported: 15000
Total Number of Employees: 5
Total Payroll: \$2,500
Job hours appear high compared to the total payroll and total employees.

Example 3:

Total Job Hours Reported: 150
Total Number of Employees: 50
Total Payroll: \$2,500
Employees appear high compared to total hours and total payroll.

Please pass this information along to your Project Personnel so they will have a better understanding of the level of review being expected of them for these ARRA projects.

If you have any questions, please feel free to contact either Kim Smith (850-414-4492) or myself.

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