



United States
Department of
Agriculture

Food and
Nutrition
Service March 26, 2010

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Alexandria, VA
22302-1500

SUBJECT: The Emergency Food Assistance Program (TEFAP) Reporting Requirements
Under the American Recovery and Reinvestment Act Of 2009 (ARRA)

TO: Regional Director Regional Director
 Special Nutrition Programs Field Operations
 NERO, SERO, MARO, MWRO WRO
 MPRO, SWRO

Introduction

Please forward this memorandum to all TEFAP State agencies upon receipt, and instruct them to disseminate it, as applicable, to other TEFAP Reporting Entities ("Entities" are TEFAP State agencies, other State agencies that are reporting ARRA information on behalf of TEFAP State agencies, and sub-recipients that were delegated reporting responsibilities under ARRA).

The purpose of this memorandum is to remind Entities that the third ARRA reporting period begins on April 1, 2010, to update and summarize certain guidance that Entities must use when reporting TEFAP ARRA data; and to direct Regional and Entity personnel to become familiar with OMB Memorandum M-10-14, the most recent OMB guidance regarding ARRA reporting [see http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-14.pdf].

Timeline

OMB has modified the reporting/review timeline. The new timeline is as follows:

1. April 1-10 Prime and sub-recipients submit ARRA data.
2. April 11-12 Prime recipients review data submitted by sub-recipients; FNS can review in "view only" [i.e., passive FNS review].
3. April 13-29 FNS review period [i.e., active FNS review].

This information is also available on FederalReporting.gov.

OMB Memorandum M-10-14

On March 22, 2010, OMB issued Memorandum M-10-14, updating ARRA reporting guidance. We have summarized the portions of M-10-14 relevant to TEFAP Reporting Entities below.

1. Recipients that have previously submitted a quarterly report must use the “Copy and Copy Forward” functions on FederalReporting.gov. This process will create and preserve a link from the previous quarter’s report to the new quarterly report to be submitted. Additional details are found in **Chapter 15, Copy Forward and Copy Function** of the Recovery Accountability and Transparency Board’s (RATB) in-bound recipient reporting user manual. The RATB user manuals are available online at www.FederalReporting.gov.
2. Recipients that complete their awards must enter a “Y” in the “Final Report” data field on FederalReporting.gov. To complete its award, a TEFAP State agency must (A) expend all its TEFAP ARRA administrative funds, and ensure that the “Total Federal Amount of ARRA Expenditure” field is equal to the “Amount of Award” field in FederalReporting.gov, and (B) complete all activities scheduled to be funded with TEFAP ARRA administrative funds, and enter “Fully Completed” in the “Project Status field in FederalReporting.gov. No further reports will need to be submitted to FederalReporting.gov for such State agencies.
3. In response to questions from Recipients regarding which data fields are quarterly and which are cumulative, OMB has reiterated that the only field requiring quarterly data is “Number of jobs.” However, when deciding whether to add information in the “Total amount of payments to Vendors less than \$25,000/award” and “Total amount of Sub Awards less than \$25,000/award” fields, Reporting Entities must first determine whether the information exceeds the quarterly threshold (i.e., \$25,000).
 - a. If so, then the Reporting Entity should add that information to what was previously provided, for a cumulative total. For example, if a Reporting Entity previously reported the “Total amount of Sub Awards less than \$25,000” to be \$85,000, and is considering adding information regarding an additional sub-award of \$20,000, then it can add that information (for a cumulative total of \$105,000) because the new amount does not exceed \$25,000.
 - b. However, if the additional sub-award is \$30,000, the Reporting Entity cannot add that information (because the new sub-award exceeds \$25,000).

Regional Director

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Lastly, please remember that OMB and RATB have placed enormous significance on ARRA Recipients submitting complete, accurate, and timely reports to FederalReporting.gov, and that future non-compliance is likely to result in sanctions against ARRA recipients, up to and including rescinding ARRA awards.

for Peggy Cantrell

Cathie McCullough

Director

Food Distribution Division