

Sept. 17, 2009

Recent NACo notice regarding ARRA reporting requirements affecting local governments; please note the specific registration requirement in the notice

1. A state's decision to report section 1512 data on a centralized or decentralized basis relates to its method of carrying-out its prime recipient reporting responsibilities to FederalReporting.gov, not to whether a state plans to delegate sub-recipient reporting responsibility (to FederalReporting.gov) to sub-recipients.

In Virginia, prime recipient reporting to FederalReporting.gov will be performed on a decentralized basis. However, sub-recipients will not be delegated reporting responsibility to FederalReporting.gov for funds received as sub-recipients of ARRA funds flowing through the state.

While local governments may be required to report certain information to state agency prime recipients to support a state agencies' prime and sub-recipient reporting into FederalReporting.gov, no local governments should enter sub-recipient data (into FederalReporting.gov) for ARRA funds received as a sub-recipient from any state agency or institution.

State agencies and institutions are required to enter sub-recipient data into FederalReporting.gov directly, unless they have received an exception from my office. No exceptions have been requested to-date. This policy does not impact ARRA funds received by localities directly from the federal government.

2. NACo has received some additional information about individualized reporting assistance that will be provided to states and some local governments via a federal agency liaison system. Each state will have an identified contact, as will approximately 50 local governments that have received the largest sums of Recovery Act funding.

The list of local governments has not been completed; however, we expect it to include 15-20 counties. We have been told that a federal agency contact will reach out to those jurisdictions, via the county manager/administrator or elected chief executive, late next week or early the week of Sept. 28 with an offer of assistance in meeting the reporting requirements.

3) VERY IMPORTANT: In order to report in accordance with Section 1512 of the Recovery Act, registration with www.federalreporting.gov is required. Registration opened on Aug. 17. NACo strongly encourages you to register ó particularly if you have not done so already. Thank you very much for your patience and attention. Please let us know what we can do to be of further assistance.

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