

**University of Montevallo**  
**Procedures for Management & Reporting**  
**American Recovery and Reinvestment Act (ARRA) Funds**

All funds awarded to the University of Montevallo (UM) under the American Recovery and Reinvestment Act (ARRA) are subject to the same policies and procedures as other University of Montevallo grants. The official University policy governing the administration of grants is available at <http://www.montevallo.edu/faculty/Policies/03050.shtm>. More detailed procedures are available in the University Business Office.

Any ARRA projects (proposed and/or awarded) are monitored by:  
DeAnna Smith, compliance officer  
Michelle Johnston, alternate compliance officer and institutional reporting

**Grant Proposals**

If University personnel are interested in applying for a grant funded by ARRA, please contact the Office of Business Affairs (DeAnna Smith) and the Office of Institutional Research, Planning, and Assessment (Michelle Johnston). A preliminary meeting should be set up to discuss the grant proposal and any specific requirements for the grant proposal. Any proposals submitted will be logged by these offices and submitted in the monthly reports to the state. Any additional reporting requirements will also be reviewed in order for the University to ensure that appropriate procedures necessary for compliance are implemented.

**Reporting**

*State*

No later than the 10<sup>th</sup> business day of each month, the University will submit the *Stimulus Monthly Update Form* according to specifications set forth by the state of Alabama. Within 24 hours of each monthly report submission, the University will update the corresponding information on the University's ARRA website. A monthly update form will be completed for each ARRA project. Additionally, UM will communicate to the state the status of any pending proposals on a monthly basis.

Currently, no ARRA funds are being awarded to sub-recipients. Procedures will be addressed at a later date if ARRA sub-recipient awards are considered by UM.

*Federal*

The University has registered at [www.federalreporting.gov](http://www.federalreporting.gov), the centralized recipient reporting portal. Through this website, the University will complete all requirements for federal reporting on stimulus funds, including the Section 1512 requirements. In addition to any ARRA grants, the University will report on the State Fiscal Stabilization Fund, for which UM is a sub-recipient of the State of Alabama. These reports will be completed no later than the 10<sup>th</sup> day after the close of each quarter.

### *Data & Segregation*

All reports will be prepared using data from the University financial system. Expenditures will be posted in the same manner as other federal projects. However, the State Fiscal Stabilization Funds (SFSF) will be used to fund expenditures of the general fund (unrestricted) allowable by the SFSF regulations. Since these funds are deemed restricted, the reimbursement revenue will be recorded in the restricted funds and the expenditure will be reported as a transfer. The transfer will reduce the unrestricted expenditure (selected as a SFSF funding priority) and record the expenditure in the restricted fund. The transfer will serve as an audit trail and the original expenditure will be subject to audit.

All ARRA projects will be assigned a separately identifiable account structure in the financial system. This will allow the University to separately record, monitor and report on expenditures of ARRA funds. Accounts Payable for all federal projects are processed by one employee. This structure allows for centralization of knowledge regarding allowability of expenditures. As questions arise, the University Comptroller is consulted as well as the Vice President of Business Affairs.

The University will determine an average FTE for the classification of salaries funded by ARRA. For instance, if faculty salaries in summer school are reimbursed with SFSF funds, the total reimbursed will be analyzed based upon the average salary of a faculty FTE. The University will continue to monitor the federal guidance on job retention/creation reporting to ensure that the University's calculations are a good faith effort and are accurate with the data available and current regulatory guidance.

Currently, no ARRA funds are being awarded to sub-recipients. Procedures will be addressed at a later date if ARRA sub-recipient awards are considered by UM. At that time, the University will consider the most appropriate method for reviewing the sub-recipient's data for integrity and accuracy.

During the correction period provided by the federal reporting requirements, the University will monitor any subsequent activities that may indicate the data submitted is no longer accurate. Any necessary corrections will be processed by the Compliance and Alternate Compliance Officer. Any revisions will be updated to the University's ARRA website, if applicable.

If corrections are recommended by a federal agency, the University will work with the agency to process corrections and to ensure proper communication and training occurs to prevent any future issues.

### **Guidance**

The Compliance Officer and Alternative Compliance Officer strive to stay current on all ARRA guidance, requirements and issues. If other ARRA opportunities arise (outside of the SFSF funds), these officers will communicate with appropriate University personnel from proposal, award, and to completion of the project. In doing so, the officers will

review all the requirements prior to proposal submission in order to allow for proper planning and monitoring. A limited number of personnel are involved in the management of ARRA funds. The Compliance Officer has participated in training opportunities and is continually monitoring available guidance.