

Office of the Governor
Florida Office of Economic Recovery
Room 1604 The Capitol
Tallahassee, FL 32399

April 27, 2009

Marguerite Pridgen
Office of Federal Financial Management
Office of Management and Budget
Room 6025, Executive Office of the President
New Executive Office Building
725 17th Street, NW
Washington, D.C. 20503

Via electronic submission by email to mpridgen@omb.eop.gov on Section 1512 Reporting

Dear Ms. Pridgen:

On April 1, 2009, the Office of Management and Budget (OMB) published Standard Data Elements for Reports Under Section 1512 of the American Recovery and Reinvestment Act of 2009, Public Law 111-6 (Recovery Act) and requested public comment.

These comments are submitted in response to that publication and also in consideration of guidance issued by OMB on April 3 regarding reporting requirements under the Recovery Act. We have submitted separate comments on the April 3 guidance. We will not repeat those comments here, other than to say the we urge OMB to construct a comprehensive reporting system that not only is designed to meet the needs of the federal government, but also facilitates the need for states to be able to efficiently report information to federal agencies and also access information from the federal reporting system to be able to transparently report to citizens and stakeholders in state and local jurisdictions about the expenditure of Recovery Act funds.

The reporting elements published on April 1, 2009 provide much of the information needed, but could be improved. In general, we encourage the use of a common set of identifying data elements for recipients and subrecipients. This would facilitate aggregation of funding information in common geographic areas such as states, counties, cities or Congressional districts. Since a city or county might be a recipient of some funds and also a subrecipient of other funds, common geographic identifiers would be advantageous.

On the specific data elements proposed, we offer the following comments:

General Section – Award and Award Recipient Information

Item	Data Element	Comment
ARRA-A	Awarding Federal Agency and Organizational Element	Recommend separating this into two data elements to facilitate identification, sorting and aggregation.
ARRA-F	Recipient Organization	Recommend separating this element into separate elements for recipient name, recipient address, recipient state, recipient zip code, and recipient county to facilitated aggregation of information.
Additional	Additional Recipient Information	Recommend adding all identifying elements used for subrecipients, such as Congressional District. Add sufficient codes such that multi-county, and multi-Congressional District information can be differentiated

Section 1 – Project/Activity Information

No comments submitted on this section.

Section 2 – Project/Activity Information

Item	Data Element	Comment
ARRA-2-04	Narrative description of the employment impact.	Recommend adding numeric fields to capture number of jobs created and number of Jobs retained to facilitate aggregation.

Item	Data Element	Comment
ARRA-2-05	For infrastructure investments, total cost	Recommend separating this element into multiple elements to capture, at a minimum (1) Federal Recovery Act funds, (2) Federal Non-Recovery Act funds, and (3) Non-Federal funds

Section 3 – Subrecipient Information

Item	Data Element	Comment
ARRA-3-09	Sub award Project/ Grant Period	Recommend separating this element into a start date and an end date.
ARRA-3-10	Primary Performance Location	Recommend separating this element into multiple elements for address, county, state, and zip code to facilitate aggregation.

Section 4 – Subawardee or Subcontract Information Aggregated

No comments submitted on this section.

Thank you for the opportunity to comment on these proposed data elements.

Respectfully submitted,

Don Winstead
Special Advisor to the Governor