HSC Human Services Council

The Voice of the Human Services Community

ARRA Reporting Burdens for Not-for-Profit Human Service Providers

With funding from the New York Community Trust, the Human Services Council (HSC) is taking the lead on behalf of the City's human services sector to track the American Recovery and Reinvestment Act (ARRA) as it relates to the sector. Because ARRA funds are being used at the City and State level to plug budget holes and continue existing programs, many human services providers are receiving ARRA funding through established contracts, and are required to report additional data without new funding to support this function. The not-for-profits providing these services now have to comply with additional reporting requirements to receive the same funding they received prior to ARRA. These requirements can be duplicative, arduous, and take needed resources away from direct services. HSC asked our members to send information on the reporting process that occurred at the end of October 2009 for all ARRA funds.

Reporting on ARRA funding will continue for another year or longer. In order to help not-for-profits receiving ARRA funds comply with reporting requirements, we compiled information on the difficulties that organizations faced in complying with these processes. Below is a summary of their difficulties, followed by detailed examples.

- Our members are struggling with new reporting requirements on existing contracts that were replaced with ARRA dollars. Organizations now have to submit separate claim reimbursements and workplans, as well as additional client information not required under the original contract requirements.

- Organizations also expressed that they were unclear what would be expected of them for the next reporting period, and are not aware when they will be required to submit reporting information. Organizations who must comply with ARRA reporting need to be made aware when they will be expected to turn in information far enough in advance so that they can properly comply.

- For organizations receiving ARRA funding through replaced funds, every effort should be made to streamline reporting to reduce redundancies and the burden of compliance. Organizations are not receiving additional funding, and so added reporting requirements take staff, time, and money away from program delivery.

Below are examples of programs receiving ARRA funding and the difficulties with reporting requirements.

- **Fatherhood (DYCD):** The ARRA Reporting process doubled the steps that needed to be taken to comply with quarterly reporting obligations. Prior to receiving ARRA funds, the reporting process consisted of a single transmittal form, registration form, and program summary form. With ARRA, organizations must now duplicate this process by submitting the above mentioned forms for ARRA along with previously required quarterly reports. In addition to these forms, two additional forms are now required to track ARRA Young Adult

Internship Program (YAIP) referrals. Unique to these forms was the requirement to include client's names, a reporting procedure that was not a requirement prior to ARRA funding.

- **Out of School Time (DYCD):** Existing contracts were supplemented with ARRA funds, requiring organizations to submit a separate workplan for those funds, detailed PERS reports, as well as separate claims for reimbursement and closeouts. Additionally, programs ranging from $3,000 to $13,000 are now subject to three separate audits.

- **NYCALI (DYCD):** Organizations are required to submit a separate work scope for additional dollars and file separate claims for reimbursement.

- **Work Incentive Program (DYCD)**: Since starting the contract in May, organizations have experienced computer database software problems, which took a month to resolve. Additionally, the three password log-in process makes it time-consuming to enter the system. Staff are now required to enter details (new, saved, or N/A) and expense information through a series of multi-screens. After each month's claims are completed, they must be approved by DYCD before another month can be entered. This procedure posed a major issue when data processing was several months behind.

- **Head Start (DYCD):** Organizations are grantees so receive these funds directly. Child Development Support Corporation reported that they were told in mid-summer that they needed to sign up on recovery.gov to provide information on how they were using funds. After registering on the site, CDSC received no information about what would need to be reported, nor were they told that they needed to register with the Central Contract Registration site, CCR.gov. In October they were finally told that they needed to submit a report for September, and once CDSC contacted the service desk, they were then alerted that they need to register with CCR.gov. The CCR process took two days to complete and an additional two days for registration confirmation. CDSC was then locked out of the reporting process due to the registration delay and could not submit the required report to recovery.gov. CDSC is concerned that the "failure to report" that will now show on their file will be detrimental to their grant. As of December 1, 2009 they had not received any information about when the next report was due or what information would need to be included in the report.

- **Homebase (DHS):** Contracts were supplemented with ARRA dollars and include two new quarterly reporting requirements: Jobs and Outcomes and Services. The new reporting is taking place while staff and administration implement a full administrative overhaul of the program. While they continue to provide the same services prior to ARRA, the following is changing: how services are provided, new definitions of allowable expenses, clients have to meet new program requirements, clients need to be certified every 90 days, new data elements have to be collected, and new termination of services. To meet required reporting HMIS data needs to be collected. This resulted in collecting new client information and collecting documents that meet the ARRA guidelines. For example, acceptable proofs of income, proofs of identity, and proofs of address.

  - The Jobs Reporting involves completing a spreadsheet on all employees and organizations found the reports hard to understand and very time consuming. The Outcomes and Services reporting is being done manually at this time using an excel spreadsheet because DHS does not have a database that meets the ARRA HMIS requirements – the current database does not collect all of the new data elements that DHS has to report and until the new database is implemented all data is collected manually. The new database is not expected until February or March 2010 requiring at least two to three more of these manual reports. The reporting is complicated by the fact that the design of the program is changing amid a new type of reporting at the same time. For example, the program had three client levels: brief, full and conversion. Brief clients did not require an intake. Effective July 21, 2009 all clients must be only full cases, which requires a full intake. The first Outcomes and Services Reporting made this a more difficult task because DHS did not require service plans or cases to be closed on brief cases, but organizations had to report on them for this report and/or figure out which cases to close before the reporting was due. Staff had a lot of manual back-tracking to do to complete the first report on an excel sheet that DHS is using to collect the data.

  - Another specific change is that in reporting on closed cases there is now an Exit Reason with 11 choices and a Destination Reason with 24 choices – both an exit reason and a destination must be selected. Prior to ARRA there were less than 5 choices for a case closing reason. In order to properly report staff also has to learn and understand the new definitions of program activities as defined by ARRA/HPRP to complete the quarterly report. They also have to understand the new definitions of allowable client related financial expenditures to enter it into the database correctly so it is reported on accurately. For example, in the past any back rent owed was considered rental arrears; the ARRA definition is the back rent must have been accumulated prior to the intake date to be considered an arrears payment.

- **DftA**: For ARRA funding that is administered as a pass-through on DftA contracts, providers are still awaiting guidance from DftA as to what, if any, additional reporting requirements are needed. Contractors have been asked to sign ARRA amendments that contain a general clause stating that additional record-keeping may be required. However, no additional information has been provided and contractors are concerned that they will be asked to produce records that are not currently being maintained. This is especially troubling for ARRA amendments that are retroactive to July 1.

Organizations are happy to comply with additional requirements in order to receive funding for vital programs. Every effort should be made to ease the burden of reporting so that funding and staff time are dedicated to running programs. As future reports are due, it is important to inform not-for-profits far in advance of what will be expected of them. Furthermore, the City, State, and federal government should work together to merge reporting requirements, requested documents, and audits whenever possible to ease administrative burdens. Organizations understand the need for transparency and compliance, but need to be given the time and resources in order to properly comply.

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