

To the MIT Research Community:

We want to give you an update on where we are with the ARRA funding at MIT.

### ***Update***

Each day, the number of American Recovery and Reinvestment Act (ARRA) awards at MIT grows. To date, MIT Principal Investigators have received more than 80 awards totaling approximately \$62 million in ARRA funds.

### ***Required reporting***

When accepting an ARRA award, Principal Investigators are accepting responsibility for submitting quarterly reports with prescribed data elements within ten days of the end of each Federal fiscal quarter. **The first report must be submitted to FederalReporting.gov on Friday, October 9.** Information reported will be made public on Recovery.gov no later than 30 days following the end of the quarter.

### ***Our approach***

The reporting requirements call for quarterly submission of more than 400 pieces of data for each award – an onerous task. Once the reporting requirements were established, we convened an ARRA working group comprised of a subset of the Assistant Deans and Provosts and representatives from the offices of the Vice President for Finance, Sponsored Programs and Internal Audit. The group quickly identified a need to develop a system to facilitate the collection and reporting of this information, much of which exists in various MIT systems (SAP, Coeus, and Data Warehouse). Recognizing that the majority of MIT's Principal Investigators use Coeus Lite to submit their financial Conflict of Interest disclosures, a decision was made to utilize the existing architecture to integrate and display the data. Several PIs participated in usability review of this new system and their feedback has been incorporated into the new My ARRA module of Coeus Lite which will be released in time for the submission of the first quarterly report.

### ***High compliance standards, significant consequences***

Because ARRA funds are intended to create economic impact, ARRA reports call for data related to spending, employment impact, and progress towards scientific goals. **If the spending is not consistent, progress is not being made or if a PI is not compliant with the reporting requirement, the awarding agency can take remedial actions necessary to ensure compliance including withholding funds, termination, or suspension and debarment.**

Because of the significant financial and reputational risk associated with non-compliance, we are developing a system to facilitate the collection and transmission of this data. Additionally, we have set a very high standard for reporting compliance. For this reason, we are also developing a proactive email system to facilitate meeting compliance standards on a timely basis. However, if a Principal Investigator does not complete his/her ARRA report by the morning of the deadline, the account will be put into restricted status and no additional spending will be allowed until the report has been completed. We recognize that this step may seem draconian

– it is reflective of the seriousness of non-compliance, and the risk to MIT if the sponsor withholds payment on awards.

***Next steps***

ARRA award recipients and their DLC administrators will receive additional details by email regarding policies, procedures, and an invitation to attend a session on either September 29th or 30th that will review the policies and reporting timelines and include a demonstration of the My ARRA reporting tool in Coeus. A “Guide to My ARRA” page will also be published on the OSP website and additional training sessions will be provided to the community as needed.

Sincerely,

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