



22.0 Federal Stimulus Funds

Introduction:

The American Recovery and Reinvestment Act of 2009 (ARRA) was signed into law on February 17, 2009, advancing an ambitious plan to revitalize the nation's economy. Recipients of funds under the ARRA are subject to quarterly reporting requirements and oversight by Federal agency inspectors. The General Accounting Office has selected Georgia as one of the targeted states in which it will conduct its oversight activities.

Note: More information on the ARRA can be found in Section 22.9, starting on page 12.

The University System of Georgia (USG) is responsible for maintaining financial and other information in order to facilitate Federal reporting as required by the ARRA for reporting in conformity with existing Federal agency and program requirements, for compliance with any additional reporting requirements that may be issued by the Federal government relating to specific grant awards and for reporting to the executive management of the State.

Topics include:

- Budgeting
- Accounting
- Reporting
- Reconciliation
- Purchasing
- Internal Controls
- Transparency
- Reporting Fraud, Waste, and Abuse
- The American Recovery and Reinvestment Act (ARRA)
- Application Letter for Stabilization Funds
- Internal Control and Risk Assessment for the State Fiscal Stabilization Fund Worksheet



22.1 Budgeting

Federal Stimulus funds must be amended into each institution's budget, and must be separately identified in the BudgetNet system. For FY2010, HB 119 includes \$92.6 million in stabilization funds for USG institutions. These funds supplant an equal amount of state funds at each institution. The Board of Regents has approved the allocation of \$92.6 million in stabilization funds, along with the corresponding reduction in state funds.

In accordance with the revised instructions received in June 2009 from the Office of Planning and Budgets (OPB), the Federal Stimulus stabilization funds for FY2010 must be expended in July and August 2009. The Federal Stimulus stabilization funds will be used to support payroll expenditures for the months of July and August. Institutions should amend their budgets in the first quarter of FY2010 to reflect this revision. Please note the following:

1. The president of each institution will make an application by letter to the Governor for the institution's portion of the stabilization funds by May 20, 2009 for the FY 2010 funds. The application letter will certify compliance with the rules regarding the stabilization funds as required by the state of Georgia.
 - **Note:** A template letter has been prepared by the University System Office to ensure consistency in the application and certification process. A sample of this letter is shown in Section 22.10, starting on page 14.
2. Each institution will provide a detailed breakout of the budget for the stabilization funds for FY 2010 by May 20, 2009.
3. The original budget for FY2010 submission from each institution will include a section on the Federal Stimulus funds.
4. The original budget for FY2010, to be approved by the Board of Regents on June 10, 2009, will include the Federal Stimulus funds in the expenditure section.
5. The Vice Chancellor for Fiscal Affairs will provide the following to the Governor's Office of Planning and Budget by June 1, 2009:
 - Applications from all 35 institutions;
 - Details of budget; and,
 - Budget summary in the BudgetNet system.
6. Institutions may amend the stabilization funds as necessary during the course of the fiscal year.
7. The Budget to Actuals report for the year will incorporate the revenues and expenditures for the Federal Stimulus funds.



22.2 Accounting

All USG institutions must ensure that transactional data is maintained in such a manner to fulfill all financial reporting requirements. In order to track the Federal Stimulus funds from a system standpoint, new Funds, Class Code, and Revenue Accounts have been created. Additional accounting policies and procedures currently are under development, in concert with the State Accounting Office.

22.2.1 Funds

10900 APPROPRIATIONS – FEDERAL STIMULUS

This fund will be used for all Federal Stimulus funds that are received through the State Appropriation process.

20000 SPONSORED – FEDERAL STIMULUS

Although not new, this fund will be used for all Federal Stimulus funds that are awarded as grant or project funds. The grant/project must be further identified with the Federal Stimulus funds class code, as noted below, and a unique project identifier for each CFDA number.

22.2.2 Class Code

FS010 FEDERAL STIMULUS FUNDS

This Class Code will be used in FY2010 for all Federal Stimulus funds received through the State Appropriation process, as well as Federal Stimulus funds received as Restricted Funds/Grants in FY2010. For other years, the Class Code will be **FSYYYY**, with **YYY** representing the last three digits of the fiscal year.

22.2.3 Revenue Accounts

421500 Federal Stimulus

This account will be used for all Federal Stimulus funds received for sponsored programs that are classified as operating revenues.

491900 Federal Stimulus (ARRA)

This account will be used for all Federal Stimulus funds received through the State Appropriations process, as well as Federal Stimulus funds received as Restricted Funds/Grants that are classified as non-operating revenues.

22.2.4 Notice of Award

Upon receipt of an approved award of Federal Stimulus funds, and prior to recording transactions relating to the grant, an institution must perform the following set-up activities:



1. Determine the description, which must include the title of the grant.
2. Select the Fund type: **Federal**.
3. Enter the **CFDA number** assigned by the grantor agency.
 - **State Fiscal Stabilization Funds CFDA Number – 84.394**
4. Assign a **Project number** to account for the grant activity in accordance with the grant award.



22.3 Reporting

22.3.1 Reporting Mechanism

Institutions will report on Federal Stimulus funds on a quarterly basis.

Please note the following:

1. All institutions must submit the preliminary information by May 20, 2009, including:
 - Amount of stabilization funds;
 - CFDA number;
 - Budget; and,
 - Research, capital, or other funds applied for directly by the institution to the corresponding federal agency.
2. As a measure of internal controls, the Office of Fiscal Affairs at the University System Office will confirm that the stabilization amounts reported by every institution are in conformity with the authorized allocation by the Board of Regents by reconciling this information with the institution information reported on a quarterly basis*.

*** Note:** For institutions using the Georgia*FIRST* model of the PeopleSoft Financials software, the reconciliation will be based on data obtained from the consolidated PeopleSoft Financials database. Institutions not using the Georgia*FIRST* model of the PeopleSoft Financials software must submit a report to the Assistant Vice Chancellor for Fiscal Affairs/Accounting & Reporting by the 15th day following the quarter end. Instructions will be provided concerning the content and format of this report.

Additional reporting policies and procedures currently are under development, in concert with the State Accounting Office.

22.3.2 Definitions

The definitions for Positions Retained and Positions Added and the FTE calculation methodology are as follows.

1. **Positions Retained:** The number of existing employees paid with the respective Federal Stimulus funds during the month reported, expressed as FTEs.
2. **Positions Added:** The number of new employees paid with the respective Federal Stimulus funds during the month reported, expressed as FTEs. In FY2010, count positions filled that were vacant at the beginning of the fiscal year as positions added.
 - **Note:** Do not count normal turnover in a position as a position added when it is filled. Report normal turnover as a position retained.



3. **FTE:** Full-time equivalents should be calculated for part-time faculty and staff as all hours worked by an employee divided by the total number of hours in a full-time schedule. Full-time faculty and staff should be counted as 1 FTE.

Institutions should reconcile reported Positions Retained and Added back to their original budget on a quarterly basis, to ensure positions have been classified and reported correctly.

22.3.3 Fiscal Year End Reporting

Annual Financial Report (AFR): The AFR was amended to report Federal Stimulus revenues separately. Institutions will report Federal Stabilization and Federal Stimulus Grant revenues on separate lines within the Statement of Revenues, Expenses and Changes in Net Assets (SRECNA).

Budget to Actuals Report (BTA): The BTA was amended to report Federal Stimulus revenues and expenditures separately. Institutions will report stabilization funds received from the State under the **General Funds** section as **Federal Stimulus Funds (ARRA)** and related expenditures as **State Appropriations – Federal Stimulus – Personal Services** and **State Appropriations – Federal Stimulus – Operating Expenses**. All other Federal Stimulus grants will be reported under the **Sponsored Projects** section as **Sponsored Funds – Federal Stimulus**.



22.4 Reconciliation

Institution personnel are responsible for reconciling the Federal Stimulus information reported to the Office of Fiscal Affairs at the University System Office against the institution's financial records on a quarterly basis.*

*** Note:** For institutions using the Georgia *FIRST* model of the PeopleSoft Financials software, the reconciliation will be based on data obtained from the consolidated PeopleSoft Financials database. Institutions not using the Georgia *FIRST* model of the PeopleSoft Financials software must submit a report to the Assistant Vice Chancellor for Fiscal Affairs/Accounting & Reporting by the 15th day following the quarter end. Instructions will be provided concerning the content and format of this report.



22.5 Purchasing

All state entities must comply with the provision of the State Purchasing Act for the purchase of goods and/or services governed by that act. The use of federal funds does not create an exemption to the State Purchasing Act.

Federal law regarding the appropriate use of ARRA funds has the following procurement process implications:

1. Building solicitation specifications and requirements must be prepared so that they adhere to ARRA regulations, such as the Buy American provision. Section 1605 of the ARRA imposes a mandate that certain manufactured products must be produced in the United States. Projects for the construction, alteration, maintenance, or repair of a public building or public work must use iron, steel and manufactured goods produced in the United States.
2. ARRA-imposed wage rate requirements must be kept in mind. Section 1606 of the ARRA imposes a requirement that all laborers and mechanics employed by contractors and subcontractors must be paid wages at not less than prevailing rates on projects of similar character in the locality.



22.6 Internal Controls and Risk Assessment

The Federal Stimulus funds are subject to the same level of stewardship as is exercised for all state, federal, and other funds received by the USG. This requires the maintenance of appropriate internal controls as is done for all other funds to ensure timely and accurate reporting and compliance with all requirements of the ARRA.

Please note the following:

1. All institutions will complete the Agency Self Assessment Questionnaire developed by the State Accounting Office. This is similar to the self-assessment questionnaire that institutions complete each year for all state and federal funds.
2. The Office of Fiscal Affairs, in consultation with the institutions, has developed an **Internal Control and Risk Assessment for the State Fiscal Stabilization Fund** worksheet for each objective under the stabilization funds for all USG institutions. This worksheet, shown in Section 22.11 starting on page 17, incorporates the objectives of the stabilization funds and for each objective, outlines the risk factors, and details the controls to mitigate risk. It will be used by all institutions to satisfy the requirements of the Georgia Department of Audits and Accounts for stabilization funds.
 - **Note:** Institutions that receive Federal Stimulus funds through the federal grant process must also complete a separate **Internal Control and Risk Assessment for the State Fiscal Stabilization Fund** worksheet related to these funds.
3. Institutions receiving Federal Stimulus funds in addition to the stabilization funds will be required to complete the **Internal Control and Risk Assessment for the State Fiscal Stabilization Fund** worksheet for all non-stabilization funds.



22.7 Transparency

In order to maintain public trust and promote transparency in government, an ethics policy has been established by Governor Perdue to ensure the highest ethical standards within the State of Georgia. Reporting for Federal Stimulus funds received by the State of Georgia and its agencies will be included on the **Open Georgia** website (www.Open.Georgia.gov), which serves as a gateway for obtaining information and key documents about how the State of Georgia spends tax dollars and other revenues to provide services to Georgians.

Please note the following USG-specific items:

1. The financial systems of the 31 (out of 35) USG institutions that use the Georgia*FIRST* model of the PeopleSoft Financials software are currently being consolidated into a single database to increase the efficiency of central reporting. The projected implementation date for the consolidated database is July 1, 2009.
2. For FY2010, the Office of Fiscal Affairs will develop a system-level detailed report of expenditures by institution for the Federal Stimulus funds by institution*.

The detailed report of expenditures will include the following:

- Expense Account
- Vendor or Employee
- Amount
- Purchase Order Number
- Invoice/Voucher Number
- Check Number

*** Note:** For institutions using the Georgia*FIRST* model of the PeopleSoft Financials software, the Office of Fiscal Affairs will prepare the report using data obtained from the consolidated PeopleSoft Financials database. Institutions not using the Georgia*FIRST* model of the PeopleSoft Financials software will be required to provide the same report from their individual databases to the Office of Fiscal Affairs.

3. The detailed report of expenditures will be made available by month on the USG website, with the appropriate link to the state's website.



22.8 Reporting Fraud, Waste, and Abuse

The Board of Regents has implemented a Hotline for reporting non-compliance, or waste, fraud, and abuse in business, financial, ethical, or other matters at USG institutions. The same hotline will be available for reporting similar issues with the Federal Stimulus funds. Call toll-free 24 hours a day, 7 days a week: **1-877-516-3466**. All reports are confidential.

Further information is available at: http://www.usg.edu/fiscal_affairs/.



22.9 The American Recovery and Reinvestment Act (ARRA)

This section provides suggested sources of information and pertinent excerpts from the American Recovery and Reinvestment Act (ARRA) itself, including State Fiscal Stabilization Fund prohibited expenditures and ARRA general reporting requirements. In accordance with ARRA, such reports are due no later than ten (10) days after the end of the calendar quarter. Although the Federal reporting requirement is quarterly, USG institutions must report Federal Stimulus activity on a monthly basis as required by the State of Georgia.

The American Recovery and Reinvestment Act (ARRA) may be viewed or downloaded at the following website:

http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=111_cong_bills&docid=f:h1enr.pdf.

The Office of Management and Budget's ARRA Implementation Guidelines may be viewed or downloaded at the following website: <http://www.recovery.gov/sites/default/files/m09-15.pdf>.

Excerpts from the ARRA are shown below.

1. SEC. 3. PURPOSES AND PRINCIPLES.

(a) STATEMENT OF PURPOSES.—The purposes of this Act include the following:

- (1) To preserve and create jobs and promote economic recovery.
- (2) To assist those most impacted by the recession.
- (3) To provide investments needed to increase economic efficiency by spurring technological advances in science and health.
- (4) To invest in transportation, environmental protection, and other infrastructure that will provide long-term economic benefits.
- (5) To stabilize State and local government budgets, in order to minimize and avoid reductions in essential services and counterproductive state and local tax increases.

(b) GENERAL PRINCIPLES CONCERNING USE OF FUNDS.—The President and the heads of Federal departments and agencies shall manage and expend the funds made available in this Act so as to achieve the purposes specified in subsection (a), including commencing expenditures and activities as quickly as possible consistent with prudent management.

2. TITLE XIV—STATE FISCAL STABILIZATION FUND; SEC. 14004. USES OF FUNDS BY INSTITUTIONS OF HIGHER EDUCATION.

(a) IN GENERAL.—A public institution of higher education that receives funds under this title shall use the funds for education and general expenditures, and in such a way as to mitigate the need to raise tuition and fees for in-State students, or for modernization, renovation, or repair of institution of higher education facilities that are primarily used for instruction, research, or student housing,



including modernization, renovation, and repairs that are consistent with a recognized green building rating system.

(b) PROHIBITION.—An institution of higher education may not use funds received under this title to increase its endowment.

(c) ADDITIONAL PROHIBITION.—No funds awarded under this title may be used for—

- (1) the maintenance of systems, equipment, or facilities;
- (2) modernization, renovation, or repair of stadiums or other facilities primarily used for athletic contests or exhibitions or other events for which admission is charged to the general public; or
- (3) modernization, renovation, or repair of facilities—
 - (A) used for sectarian instruction or religious worship; or
 - (B) in which a substantial portion of the functions of the facilities are subsumed in a religious mission.

3. TITLE XV—ACCOUNTABILITY AND TRANSPARENCY; Section 1512; Reports on use of funds:

(c) RECIPIENT REPORTS.—Not later than 10 days after the end of each calendar quarter, each recipient that received recovery funds from a Federal agency shall submit a report to that agency that contains—

- (1) the total amount of recovery funds received from that agency;
- (2) the amount of recovery funds received that were expended or obligated to projects or activities; and
- (3) a detailed list of all projects or activities for which recovery funds were expended or obligated, including—
 - (A) the name of the project or activity;
 - (B) a description of the project or activity;
 - (C) an evaluation of the completion status of the project or activity;
 - (D) an estimate of the number of jobs created and the number of jobs retained by the project or activity; and
 - (E) for infrastructure investments made by State and local governments, the purpose, total cost, and rationale of the agency for funding the infrastructure investment with funds made available under this Act, and name of the person to contact at the agency if there are concerns with the infrastructure investment.
- (4) Detailed information on any subcontracts or subgrants awarded by the recipient to include the data elements required to comply with the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109–282), allowing aggregate reporting on awards below \$25,000 or to individuals, as prescribed by the Director of the Office of Management and Budget.



22.10 Application Letter for Stabilization Funds

DRAFT

May 20, 2009

Governor Sonny Perdue
State of Georgia
Office of the Governor
Atlanta, GA 30334

Dear Governor Perdue:

As part of the state's allocation of \$92.6 million of stabilization funds (from the American Recovery and Reinvestment Act) to the Board of Regents, _____(institution name) has been allocated \$____. In addition, our institution has also applied for research grants in the amount of \$__ and capital requests in the amount of \$__ to the appropriate agencies for federal stimulus funds. Information on all three categories (stabilization, research and capital) is provided below.

Section I – Stabilization Funds

Use of the funds:

We plan to use the funds primarily in support of our core mission of teaching, research and service. Specifically, the funds will be used for (fill in details; faculty salaries, staff salaries) etc. Since these funds are supplanting state funds of an equal amount, new jobs will not be created, however, the total full-time-equivalent (FTE) budgeted from these funds is ___ and will be reported as “jobs retained.” The Office of Fiscal Affairs (at the System Office) has the full FY 2010 budget for our institution, including the budget expenditure details on the stimulus funds.

Prohibitions on use of Stabilization funds:

The funds **will not** be used for the following:

- To increase endowment
- The maintenance of systems, equipment or facilities
- Modernization, renovation, or repair of stadiums or other facilities primarily used for athletic contests or exhibitions or other events for which admission is charged to the general public
- Modernization, renovation or repair of facilities used for sectarian instruction or religious worship or in which a substantial portion of the functions of the facilities are subsumed in a religious mission
- New construction
- Restoring or supplementing a “rainy day” fund



Section II: Research and Capital Requests for federal stimulus funds:

Our institution has made applications for the following research and capital projects from the respective agencies for federal stimulus funds:

Research grants applied for through May 18:

#	Title	Agency	Amount

Capital projects applied for through May 18:

Any project funded in this category will comply with (1) a recognized green building rating system and (2) American iron, steel, and manufactured goods requirements under ARRA.

#	Title	Agency	Amount

Accounting and Tracking for all categories of federal stimulus funds:

In accordance with the requirements of ARRA for accounting and reporting, we will do the following:

1. Maintain records that separately track and account for the Education Stabilization funds. The system office has provided us with the appropriate accounting codes against which the funds are to be charged.
2. Maintain accurate, complete and reliable records that track the use of funds.
3. We have reported the stabilization funds and proposed use of funds on the state Department of Audits' website for reporting Schedule of Expenditures of Federal Awards (SEFA). We have also reported applications for research grants or capital requests for any federal stimulus funds, in accordance with ARRA reporting requirements and OMB Circular A-133.
4. All expenditures are subject to the same internal controls and procedures outlined in the Business Procedures Manual as all other state and federal funds received the institutions.

We also understand that the University System of Georgia and the Technical College System of Georgia will be working together to create and enforce pathways for student transfer between institutions and systems by forming comprehensive articulation agreements that clearly establish procedures governing the transfer of credits from one institution or system to another.



Thank you for your assistance. Please let me know if you have any questions.

President

CC: Chancellor Erroll B. Davis, Jr.
Chief Operating Officer Rob Watts
SVC Tom Daniel
AVC Shelley Nickel
VC Usha Ramachandran
OPB Director Trey Childress
OPB Div. Dir. Teresa MacCartney



22.11 Internal Control and Risk Assessment for the State Fiscal Stabilization Fund Worksheet

The Office of Fiscal Affairs, in consultation with the institutions, has developed an **Internal Control and Risk Assessment for the State Fiscal Stabilization Fund** worksheet for each objective under the stabilization funds for all USG institutions. This worksheet, shown on the following pages, incorporates the objectives of the stabilization funds and for each objective, outlines the risk factors, and details the controls to mitigate risk. It will be used by all institutions to satisfy the requirements of the Georgia Department of Audits and Accounts for stabilization funds.

Note: Institutions that receive Federal Stimulus funds through the federal grant process must also complete a separate **Internal Control and Risk Assessment for the State Fiscal Stabilization Fund** worksheet related to these funds.

Institutions receiving Federal Stimulus funds in addition to the stabilization funds will be required to complete the **Internal Control and Risk Assessment for the State Fiscal Stabilization Fund** worksheet for all non-stabilization funds.



**Board of Regents of the University System of Georgia
State Fiscal Stabilization Fund – CFDA 84.394
Internal Control and Risk Assessment**

Objective	Risks	Mitigating Controls	Risk	Risk Mitigation Action
1. Funds are awarded and distributed in a prompt, fair, and reasonable manner	Program goals not met.	<ul style="list-style-type: none"> Funds will be distributed within 2 business days of draw down from Treasury. Each institution designated uses for the stabilization funds through the budgeting process. 	Low	<ul style="list-style-type: none"> Quarterly actual spend compared to budget monitored at the System Office level.
2. The recipients and uses of all funds are transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner	a) Stabilization funds are comingled with other fund sources.	<ul style="list-style-type: none"> Fund 10900 has been added to track <u>only</u> Education Stabilization funds. Class code FS0xx has been added, further designating Stabilization funds as an ARRA funding source. 	Low	<ul style="list-style-type: none"> Monitoring at the institution level to ensure correct and consistent use of new chart fields.
	b) Reporting for Stabilization awards and expenditures will be inaccurate.	<ul style="list-style-type: none"> Tone from the Top has been set. Institution Presidents have signed off in an application letter to the Governor: 1) the planned use of the funds; 2) the unallowable expenditures as stated in Section 1512; 3) the method of tracking and internal control. Template provided for institutions to document the transfer of FY2009 personal services to spend against FY2009 Stabilization funds. 	Low	<ul style="list-style-type: none"> Reporting accuracy of awards will be monitored at the System Office level through review of the ARRA web application. Reporting accuracy for revenues and expenditures will be monitored at the



Objective	Risks	Mitigating Controls	Risk	Risk Mitigation Action
		<ul style="list-style-type: none"> New section added in the Business Procedures Manual for Federal Stimulus Funds that contains tracking and reporting requirements for reference. 		<p>institution level by responsible designate on at least a quarterly basis, reconciling amounts reported on the ARRA web application to the institution's financial records.</p>
	<p>c) Reporting for Stabilization funds will not meet State and Federal due dates.</p>	<ul style="list-style-type: none"> Training session, conducted by Dept. of Audits, was provided to USG institutions on May 11, 2009 on the ARRA Web application. The session included how to create an account, what information needs to be reported and the monthly deadline for reporting. 	<p>Low</p>	<ul style="list-style-type: none"> System Office will monitor that institutions have submitted to the ARRA web application by the monthly deadline.
<p>3. Funds are used for authorized purposes and instances of fraud, waste, error, and abuse are mitigated</p>	<p>a) Stabilization funds will be spent on unallowable costs.</p>	<ul style="list-style-type: none"> Federal Stimulus Funds section added to BPM outlining allowable/ unallowable expenditures and instructions on how to minimize risk when spending Stabilization funds. Stabilization funds will only be used for Staff and Faculty Personal Services. 	<p>Low</p>	<ul style="list-style-type: none"> Institution level monitoring by responsible designate to ensure personal services expenditures are appropriate (e.g. contains no registered lobbyists; contains no Research positions; appropriate amount of split-funded positions



Objective	Risks	Mitigating Controls	Risk	Risk Mitigation Action
				are charged to Stabilization funds, etc.)
	b) Stabilization funds will be misused or wasted.	<ul style="list-style-type: none"> State of Georgia purchasing guidelines already in place also apply to ARRA funds. This ensures use of statewide contracts for proven vendors and competitive bidding for goods and services. Stabilization funds will only be used for Staff and Faculty Personal Services. 	Low	<ul style="list-style-type: none"> Institution level monitoring by responsible designate to ensure personal services expenditures are appropriate.
	c) Audit findings related to Federal funding sources are not corrected, possibly resulting in fraud, waste, error, and abuse.	<ul style="list-style-type: none"> Quarterly reporting system in place for all findings, including action plans and implementation status. 	Medium	<ul style="list-style-type: none"> BOR Internal Audit incorporates the quarterly findings database of open findings into its audit plan for the year. System Office will monitor uncorrected findings and assist with accelerating resolution if needed.
	d) Qualified personnel are not in place, which could result in fraud, waste, error and abuse.	<ul style="list-style-type: none"> Stabilization funds are an additional funding source for programs already in place. Impact on current staffing levels is considered marginal. Overall quality of staffing at USG institutions is high, as evidenced by FY2008 unqualified 	Low	<ul style="list-style-type: none"> System Office will continue to monitor and assist those institutions with staffing challenges.



Objective	Risks	Mitigating Controls	Risk	Risk Mitigation Action
		opinions on all USG audits and overall accuracy of consolidated USG financials.		
4. Projects funded under this Act avoid unnecessary delays and cost overruns	Not applicable for Stabilization funds.	N/A	N/A	N/A
5. Program goals are achieved, including specific program outcomes and improved results on broader economic indicators	a) Positions Retained number will not be reported consistently or accurately by institutions.	<ul style="list-style-type: none"> • Positions Retained clearly defined in BPM, including calculation methodology. • Positions that are being retained have already been identified in the budgeting process. The reported Positions Retained should be reasonably close to the budgeted number and reconcilable back to the budgeted number. 	Low	<ul style="list-style-type: none"> • Institutions will reconcile reported Positions Retained back to their original budget and document any variances. This reconciliation will be performed at least quarterly.
	b) Positions Added number will not be reported consistently or accurately by institutions.	<ul style="list-style-type: none"> • Positions Added clearly defined in BPM, including calculation methodology. • Vacant positions that are planned to be recruited have already been identified in the budgeting process. The reported Positions Added should be reasonably close to the budgeted number and reconcilable back to the budgeted number. 	Low	<ul style="list-style-type: none"> • Institutions will reconcile reported Positions Added back to their original budget and document any variances. This reconciliation will be performed at least quarterly.



Objective	Risks	Mitigating Controls	Risk	Risk Mitigation Action
	c) Tuition and fees will increase due to inadequate funding.	<ul style="list-style-type: none"> • State of Georgia agreed in its application for Stabilization funds that it will maintain funding for public Higher Education at the level of FY2006 funding, at a minimum. • Furloughing staff and faculty is an option to assist in bridging any gaps. 	Medium	<ul style="list-style-type: none"> • System Office will develop contingency plans for lower levels of State funding, down to the FY2006 level.