

The attached Q&As were transcribed from the OMB Webinars on 1512 reporting by the Dallas Regional Office of the U.S. Department of Labor. While they are not “official,” they are a useful resource until more definitive guidance is published. The section 1512 reporting reflects the section of the ARRA that requires reporting by primary recipients and sub-recipients of ARRA funds on October 10, 2009, and includes spending and jobs created.

General Overview Forum 1 Q & A

1. Infrastructure in the guidance is not well defined. Can you clarify the definition of infrastructure for us? Does it include work on public buildings, state houses, town halls, DOT sheds, toll booths, etc?

My answer to this question, first of all looking at the Law in 1512, the infrastructure investments made by state and local governments, there's a separate data requirement, where if you do have an infrastructure investment, you do have to provide a total cost and rationale for the funding of the infrastructure investment, the name of the person to contact in the agency if there are concerns with the infrastructure investment itself. To the extent the guidance does not currently answer your question in terms of where you have a project that is infrastructure or not that is something, the way to approach that, is that we don't have a one size fits all definition that gives you that litmus test. For example, your question on whether toll booths or traffic lights are infrastructure. What you need to do in that situation is where ever you receive the funds from, whatever relevant agency, in this case it seems like it's the Dept of Transportation. Then the answer here is to go to your contact point at the Dept of Transportation, the granting agency in this case, and to provide them the specifics of the situation and they can let you know whether this reporting is infrastructure and its primary trigger. (Not sure exactly what was said here.)

2. If they are in a state agency, how do they know if the state wants them to enter ARRA data?

As I was reading the question I realized I might have left off an important part of the presentation table in the discussion points. One of the questions that has come up is this. When a state as a prime recipient or a prime recipient in general is reporting, does that reporting have to emanate from one source within the prime recipient? Let's just use the state as an example in this case. And the answer to that question is no. The state can decentralize reporting at the prime recipient level by having multiple organizations and point of contacts within a state report. So for example, this state wants to establish

reporters in both the states' Dept of Transportation, the State Dept of Education, the State Dept of Health, the state does have the authority and flexibility to establish multiple reporters within the state. But this question raises a good point. And it is how do I know if my state wants me to enter data or not? And this is where the state or the prime recipient has a very important responsibility. It runs parallel to the responsibility we talked about earlier with the subrecipient. Just as the state has the responsibility to make sure that the subs know when they've been delegated, who they are and that they have the responsibility to register, so to must the state make sure that the people within the state who are required to report know who they are so they can register into the system. So if John Smith in the State Dept of Transportation and James Smith in the State Dept of Education are both expected to report information under the Recovery Act the state must have a coordinating office in place to make sure that John Smith and James Smith know that they are responsible for reporting and need to be told they are responsible for registering in the system. Also, it becomes critically important to the state, for the prime recipient to set up a control framework around making sure that double counting doesn't occur. Because if John Smith enters the data on an award and then closes it out in the system and James Smith goes in later and enters information on the same award, there's a risk of double counting occurring. So the state needs to communicate with the people at the state level that they are expected to report so they know to register, they know what awards they are responsible for putting in. There really should be a consolidated roster, I believe, that the state maintains of both subrecipients and state level reporters with clear lines of responsibility for whose reporting what.

3. Workforce Development Board has multiple locations of area of performance for every worker. Is it the expectation to capture every place a worker is located?

Another good question. This really goes to how you are collecting information. I don't necessarily, in reading the question, I don't necessarily want to give anyone the impression that the location of the worker is as important in terms of understanding the job impact generally. But as funds are flowing into local environments the important process here is to ask the right questions to the right recipients to know what the job impact has. But you don't have to go down to levels beyond, you don't have to go down to the very final level. Going back to the example of the bus company, it's the state's responsibility to ask the bus company; because you signed a contract for 200 new clean fuel buses, how many extra people did you hire? There's not a requirement to go and ask the bus company, then go to the suppliers of the materials and ask, because we are now ordering more supplies from you, how many jobs did you require? So it's a degree. The cutoff here is not, does not go to suppliers, then does not branch out that deeply into the environment. The prime recipient basically has to ask the subrecipient or the

vendor that it's directly dealing with to let them know how many jobs were created by the transfer of funds to those entities.

4. It sounds like all subrecipients must register in the CCR even though the prime recipient will be doing all the reporting. Is that correct?

The subrecipients have to register for DUNS only. The prime recipient has to register in CCR and DUNS.

5. Are individual purchase for >\$25,000, or purchases totaling over \$25,000, aggregated by vendor?

Another good question. It's on a purchase by purchase basis. So if I understand the question correctly – let's say vendor A has gotten 3 purchases over the past quarter. One for \$20,000, one for \$15,000 and one for \$10,000. So when you add all 3 purchases together, then that vendor is receiving more than \$25,000 in a quarter. That still under our reporting framework would not trigger a reporting requirement. The reporting requirement would only be triggered if that vendor received an individual payment >\$25,000 in a quarter.

6. Can we clarify subrecipient? Can a subrecipient be something other than a local municipality?

Yes, a subrecipient can certainly be something other than a local municipality. A subrecipient is any entity that is receiving funds from the prime recipient where the purpose is to carry out the underlying federal mission of the program and that there is an associated agreement attached and responsibilities that flow down from the prime recipient to the sub. A great example of that is one that's outlined in the guidance with respect to a research grant to a university. So if you have a university that receives a grant from the federal government and you do research and it is funded by the Recovery Act. Then that university says that I'm going to do some of the research by myself at this university. But also I'm going to subaward some of the money to a second university to do additional research that supplements our research. Well, then that university is not a local municipality, it's another entity but it's another entity that is carrying on essentially the same federal mission as that first university. There will be an associated agreement and terms and conditions of that second university that they'll have to use the money in a way that's consistent with the underlying program regulations. They'll be just like that first university in terms of what they're responsible for in meeting the federal mission. That is another example of a subrecipient. That is to be distinguished from the university example. That first university purchases scientific equipment from a company. They are not subawarding to another university to do additional research. But they are purchasing equipment from a company to help with their own research. That company is not a subrecipient.

7. Where can we access Help as we input data for the first time? Is there a help desk?

Yes, there is definitely going to be a help desk. We are working to put that in place now. We're going to be providing a lot of additional data and contact numbers on the help desk process. The help desk will be set up such that it will try to trouble shoot an answer. Technical questions such as, you know, if the system is acting slow, your user password and ID for some reason aren't working or there's a problem with the spreadsheet download, those types of questions, the help desk will really, that will be a sweet spot for where the help desk will really be of good use. If you're asking questions like "I'm a recipient of transportation funds and I'm not", just going back to that other question as an example, "I'm not exactly sure whether this project fits the definition of infrastructure or not." That is something that if you call the federalreporting.gov help desk with that, they will route you to another, to the federal agency. They will route you to the Dept of Transportation and the right contact point there. So we plan to arm the help desk with a list of key contacts because if there are questions that are more policy substance in nature, we'll make sure the help desk gets you to the right person to help answer that question.

8. Will the prime know if the federal agency flags an error for the sub in the reports?

Yes, they should know the answer, they should be able see if the agency flags the information. That will be transparent on federalreports.gov.

9. Does the review status that is published on the 30th refer to the federal agency's review status or the prime's review status?

The answer to that is that it refers to the federal agency's review status. So the public will be able to know if the information has been reviewed by the federal agencies. It does not align to the prime recipient review.

10. Can you please confirm job data from subrecipients will not be collectible in the Recovery Act recording format? Prime recipients will need to collect this data on the side directly from subs?

That is exactly correct. The system is not, when you are delegating down to the subrecipient, the system is only creating those data reporting elements that are under the Transparency Act data elements. For the prime, you are collecting information directly from subs and vendors. That happens outside federalreporting.gov framework.

11. If a state has received a notice of award prior to Oct 1, 2009 but has not actually spent or drawn down any of those funds, are they still required to submit reporting on Oct 10, 2009?

The answer to that question is yes they are. The triggering point for the responsibility to report under 1512 is not the actual receipt of funds but the consummation of the award. So once the award has been made, that, and the agreement has been finalized, the grant agreement in this case, that triggers responsibility to report. So when you get into federalreporting.gov, let's say you've been awarded funds but you haven't received any. They haven't been obligated or you haven't drawn them down, then you would indicate who you are, the award, describe the award, the award number, the award amount, but in terms of funds expended there, you would issue zero. Funds received would be zero. But once the award is consummated and there's a grant agreement in place, or a loan agreement, or a cooperative agreement, that starts the responsibility for the recipient to report in, even before funds are expended or received.

12. We will be creating temporary positions with the Recovery Act funds. This was briefly mentioned but it was not clear if these are to be reported or not. Will this to be discussed in the jobs reporting webinar, or can you please clarify?

Yeah, I'll clarify now and then we'll discuss it in the Jobs Reporting webinar. The way this works is you're reporting total hours on a quarter by quarter basis. So if you have 10 people that are working full time and 5 people that are working part time then you're basically normalizing that data to a 40 hour work week and reporting the total. Once that person is no longer working anymore, so in a subsequent quarter, you lose those hours and therefore your cumulative job creation total at the bottom of your table goes down to reflect the fact that a worker is no longer working for you or the hours are no longer in play. We'll walk you through that table. There's a table in the guidance that shows this. The table has multiple benefits to it. By normalizing it and basically adding all the hours and dividing by the appropriate number to get the number of jobs created you take into account part time workers. Because you're only adding in hours for the part time employee. But it also takes into account temporary, because once that worker is gone, and it's a cumulative chart, you're eliminating the hours that you had in the last quarter and your job numbers will go down. So at the end of the day, temporary workers will count as a job creation while they're employed, but once they're no longer employed, the number will adjust. So that's one of the reasons why it's so important to look at the job creation numbers over time as this process moves forward.

13. Must subrecipients always provide DUNS numbers to the prime recipient even when only the prime is reporting?

In that case, if there's been no delegation and there's no associated responsibility to report a DUNS to the prime. That DUNS responsibility is triggered upon the delegation of responsibility from the prime to the sub.

14. You stated recipients only have to report first tier subrecipient data, but you later stated that the recipients are responsible for reporting all jobs created retained by gathering hours to define FTEs. Please clarify if jobs data should be collected past the first tier subrecipient.

That's a very good question. I will do my best to clarify what the responsibility is. We are trying to capture the full job impact and the way I will describe it and we're going to issue an FAQ in the near term to further clarify this. Is the prime recipient required to go its subrecipient and its vendor and ask the question about the job impacts of the money that's been provided? I've given a couple of the examples that's been provided of the education and the clean fuel buses as examples. That essentially is the requirement however, with the following caveats and exception. If going down to the subrecipient and to the vendor you're missing a huge part of the job creation impact then there is the expectation that you will extend down to the level of reporting to get the major job impact. The other caveat here is you don't need to go into suppliers and indirect impacts, but you do need to find the basic impact of the recovery dollars at that first level. Let me walk you through, as this is a tough one. That example again with the clean fuel buses because I think it helps clarify it. So you're the state and you've purchased 200 clean fuel buses from a bus manufacturing company. That's pretty straight forward because you can go to that bus manufacturing company and ask straight up how many jobs were created or lost as a result of you getting this contract for 200 new buses. Whatever the answer is, is what you go with. You don't have to go to the suppliers. But let's say you ask, the way the deal is structured, you went through a dealer and the dealer provided you 200 buses from a given bus manufacturing company. In that case, knowing that the dealer was really not aware of the major job impact would occur. We would expect you to recognize that the job impact is really when I purchased buses, it's really the purchases, the job impact is most likely to have its critical mass at the manufacturing company. So to the extent you can question down to the manufacturing company, that is what we anticipate you to do. But the problem with this type of data reporting element and the question, is the challenges that we've had here at OMB and in working with the Recovery Board, it's very difficult to establish a bright line response in a way that says always go down to just the first tier. Go down 2 tiers or 3 tiers on this job situation because every situation will present a kind of different nuance to it. So the basic premise here is we're relying on the prime recipient in some cases to use its best judgment and actually to figure out where the highest level job impact is on an intuitive basis and collect information from that source. That's basically the requirement. Something that we'll have to work

through over time to make sure we are troubleshooting or answering questions in unique circumstances. Hopefully the clean fuel bus example is informative and multiple other examples. But this is an area where I encourage the community to ask a lot of questions back to the federal agency, back centrally to OMB about different situations so we can help work together to find the right data collection point.

15. When is funding considered received?

That is one of those situations where there's a lot of different funding mechanisms, but I'll use the example a formula grant. The funding is received when it is drawn down. So that reflects that the money is now available for expenditure on your part. Just the fact that the federal government is obligated doesn't necessarily trigger receipt. Receipt means that it's now available for obligation by the recipients themselves.

16. On slide 18 we referenced reporting of vendor job impacts. However, slide 10 reporting requirements for vendors, does not include job impact. Can you please clarify?

That's another good question. The responsibility in the reporting framework for vendors and the federalreporting.gov framework is that if you're a prime recipient and you make a payment >\$25,000 that in the system itself, you are collecting the name or identity, the purchase amount and the purchase description. But as I mentioned in the response to an earlier question the job impact framework is not embedded into the federalreporting.gov solution. There's a variety of different reasons why we didn't embed the data elements in. We could consider doing it in the future. Essentially we don't anticipate, that in all cases, the recipient will be directly asking that first vendor for the job impact. The example I've provided with the dealer is the best example I can come up with on that front. Because again if there's a vendor out there that you are utilizing, but in utilizing that vendor you know the job impact is happening at a kind of subsequent point in the process. We didn't want to create a stringency that you're only asking from that primary vendor. Again, this is one of those challenging areas where we're going in one direction and has some benefits but also has some drawbacks. We will continue to look at this. But the answer to the question is, the questioner is right, there are vendor requirements beyond what was listed on Slide 10 and that one requirement is to work with the vendor to understand what the job impacts are. Again, another reason here is how you ask the question could depend on the nature of the situation in terms of gaining that job impact. Whether you're asking about the manufacturer underlying a dealer, or you're asking other types of questions. We have not at this time have been able to fashion into one size fits all way of capturing job information in the reporting framework. That's why its more flexible model that we are moving towards that is outside of the federalreporting.gov framework.

17. Talking about flexibility, the phrase authority and flexibility suggests that states may elect not to treat their individual agencies as the prime recipients. Is this accurate? May states use their consolidated DUNS numbers on all their Recovery Act funding awards?

That's a good question. The answer to the question is actually the first question. The states do not have the authority and flexibility to call other state entities within the executive branch of the state as a subrecipient. All entities at the executive branch of the state are prime recipients. So if you get an award for education funds and whether it's received in some central location and then moved into the State Dept of Education, the State Dept of Education is not a sub. They are a prime recipient. Again, all entities at the state level are prime recipients.

18. A state, as a recipient, is funding multiple activities projects statewide that will be carried out by subrecipients. Our understanding is that the state as a recipient provides a general description of projects and activities but will be carried out by subrecipients. Is this accurate?

That's correct. The state is providing the statewide view. So if you have some heterogeneity in what is going out to your subrecipients in terms of projects and activities, your job is to not reflect all the different variations of projects but to summarize and generalize the basic nature of state funding of the projects across the board. Once the funding is spent out to a subrecipient, now the subrecipient, whether its been delegated, can step in and do the transparency act project description and then you start to get more detail and a more unique view of what the activity is in that locality. When you're reporting at the state level, even if there's a lot of projects and a lot of activities that go along with a broad range of different types of activities and projects, your job as the state is to provide that generalized description which might require to be at a high level, education, mineral enrichment or things that are just general across the board. Meanwhile as you get down to the localities you can start to see a better understanding of what the specific areas is. But that would happen at the subrecipient reporting level.

19. Where can we find these slides for this webinar? I can go ahead and answer that for you Danny. The webinar slides that have been presented this morning are available for download at www.whitehouse.gov under blog. Under the blog posted titled online forum: "For Better Understanding the Recovery Act's Transparency Guidelines."

Basic Principles and Requirements of Recovery Act Recipient Reporting Forum 2 Q&As

1. Please give a detailed description on what constitutes a project activity as it relates to Section 1512 reporting. For example, if a state agency receives funding for a state energy plan and uses such Recovery Act funds on ten different projects throughout the state, what is the prime recipient required to report on, the overarching energy plan or each individual project?

The prime recipient is the state in this example. The state is responsible for reporting a statewide view of describing the projects or activities. So here, the project or activity should be described with a statewide energy plan in mind. Not with the individual project. The point at which the funds are distributed to a subrecipient for an individual project, it's at that time where the Transparency Act data elements should provide the appropriate description surrounding the specific project. But again, the state, when it's reporting, even if there's a broad range of different individual projects within the larger domain of the state's activities, the goal here is for the state to provide that broad description across the many activities even though there are some unique elements in each individual project directive.

2. It is our understanding that administrative expenditures are excluded from total funds expended. Is this correct?

When a prime recipient receives its funds from the federal agency, the reporting model that we have issued as part of this guidance really asks the prime recipient to look at two different buckets of spending and to track funds associated with those two buckets. The first bucket is subrecipient, any subawards that are made, and the second bucket is payments to vendors. To the extent there are additional buckets of funding out there, such as incidental expenditures for administrative activities, salaries and expenses, those funds are not captured by this reporting framework. If the prime recipient contracts with a vendor for greater than \$25,000 for administrative services, then that would be captured. But the incidental expenditures or other expenditures associated with administering the Recovery Act, if it's not in the form of a subaward, or it's not in the form of a payment higher than \$25,000, then it is not captured in this reporting model. However, when reporting the total amount of expenditures made, the aggregate total would include all Recovery Act expenditures. For the detail, you're only required to track funds to the subrecipient and to vendors. But we're reporting the overall total expended. That's when you include all the Recovery Act dollars spent regardless of the recipient.

3. How do we identify for which programs we need to complete Recovery Act reporting? Will there be new CFDA numbers specific to the Recovery Act program? Why do only some of the programs in Supplement 1 of Memorandum M-09-21 have CFDA numbers while others do not? Can we assume that if a program is not listed in Supplement 1 that Recovery Act reporting is not required?

Supplement 1 is our attempt to list all of the programs that are subject to 1512 reporting. That includes federal financial assistance programs as well as federal contract programs. So, as you're looking at Supplement 1, you'll notice that some programs do not have CFDA numbers. Those programs are most likely the ones that are federal contracts. As I mentioned during the slide presentation, Supplement 1 is still an evolving supplement. We are working with federal agencies and the public, receiving and reviewing the comments on that particular supplement and are targeting the end of July to have that supplement completed. Likewise, the CFDA website is also in the process of updating all the Recovery Act programs to that website. And again, the CFDA website would be pretty much predominately limited to the federal financial assistance programs and will not include federal contracts in that website.

I believe I have answered one of the other things that I believe you had asked: Are the specific CFDA numbers specific to the Recovery Act program? Predominately, yes. Federal agencies did request new CFDA numbers for the majority of the Recovery Act programs separate and distinct from existing programs that may be doing the same functions as the ones provided by the Recovery Act funding.

4. Is the recipient account number the same as the pass or program source code?

No, I do not believe so. The recipient account number, I believe, is a specific number between the federal agency and the recipient. And, I'm going to read from the supplement, too, which gives the actual specific data elements the recipient internal account number for the project or award. The account number or any identifying number assigned to the recipient of the award. This number is strictly for the recipient's use only and is not required by the awarding federal agency. So this is not the Treasury Appropriation Fund Symbol of the federal entity. This is an account specific to the recipient.

5. If the recipient is a state agency, what top five officer names and compensations should be reported? Is the governor the top official, is the commissioner of the agency the top official?

The requirements of the top five officials comes from the expansion of the Transparency Act. It was an amendment in 2008 to the Transparency Act. It requires that, if the public does not have access to information about the compensation of the senior executives of the entity through periodic reports filed under a section of the SEC, then they are to report this information. We can come

back and we can double check and get back to you. But, I believe that if the compensation for the state employees are already in the public domain and that will not be required to be reported separately. But we can reach back out to you separately and make sure you have a definitive answer from us.

6. Is the \$25,000 aggregate payment to a vendor for the vendor payments within a quarter?

It's based on the purchase amount of an individual purchase rather than how much a given vendor receives. So you could have a situation in which an individual vendor receives five payments each of \$20,000. So the vendor overall through the quarter received \$100,000. But that would not trigger the requirement to report the additional detail on the vendor identity purchase description or purchase. The only thing that would trigger those additional data elements, is if that vendor received a single purchase of over \$25,000. So for the other five purchases, those would go into the larger aggregate total of all purchases made under \$25,000, where you're simply reporting the total expenditures made to vendors under \$25,000.

7. Are there any fields on federalreporting.gov that are not required? For example, congressional districts where a prime recipient is head of the state.

Yes, there are several fields that are not mandatory. The data model indicates whether the field is mandatory or optional. When recipients log into federalreporting.gov the system will help them identify which fields are mandatory or voluntary. The data model that's been published as part of M-09-21 of the guidance also provides clarification on those points.

8. When you said if a state decides to delegate reporting within itself, does that mean that a state is permitted to centrally submit all its reports using the state's central DUNS number?

Yes. For each award you will have to submit one report but you can use the central DUNS number for a state.

9. If all state agencies are prime recipients can there be more than one prime recipient for state stabilization when more than one state agencies are receiving the funds?

No, there is only one state recipient. I think I understand the context of this question. In some cases, a state will receive that primary set of funds for state fiscal stabilization fund amount. Then there will be transfer of those funds from state agency A to state agency B. For example, they might receive \$100 million for state fiscal stabilization funds for the state. Then that state entity is transferring from the State Dept of Education to the State Dept of Transportation for certain activities that will be carried out with those funds. In that case, all the

state agencies in the executive branch are prime recipients. The subrecipient is not a trigger until the funds leave the executive branch of the state and they're paid out to an additional source outside the executive branch of the state.

10. Do I understand it correctly that if a prime chooses not to delegate reporting, they must report all information about vendors, whether they be the prime vendors or the subvendors? If prime delegates reporting, the sub only has to report identification of the vendor and zip code of the headquarters of the subvendors?

I think that you are correct. If the prime does not delegate reporting to the subrecipients, then the prime is responsible for reporting not only their reporting requirements, but the data elements for the subrecipient, and the data elements for the prime vendors as well as the subvendors. If the prime does delegate to the subrecipient, the subrecipient will be responsible for the subrecipient's data elements and the applicable subrecipient vendor information. The subrecipient vendor information is limited to just the DUNS number or the zip code, a name and zip code of the headquarters for that subrecipient vendor.

11. If your vendor is a general contractor on a large project, are we to report on all associated subcontractors? For example, their expenditures, jobs retained and created?

There's two parts to the answer to that question. If you are a participant recipient, assuming this question is coming from a prime recipient like a state, and you hire a general contractor on a large project and all that is required is for you to report if it is a vendor, the name, the purchase description and the purchase amount for that vendor. In terms of the discussion of payment to that vendor, those are the three key data elements that are required. Again, assuming this is a prime recipient making a payment to a vendor. Beyond that contractor that you're describing, there are not additional reporting requirements with respect to following the funds beyond that primary contractor to the subcontractor.

The second part of this answer relates to jobs retained and created because it's on a different convention than the expenditure issue. As we discussed earlier, the prime recipient in keeping with this example of the state is responsible for requesting information from the contractor in this case about jobs created. It sounds like, in this case, it would most likely be sufficient and appropriate for the prime recipient state or entity to ask the general contractor to report the job impacts for that general contractor. It does not sound like from this example that there would be a situation at play where that contractor really isn't having any meaningful job impacts or would expect to have any meaningful job impacts and you would have to go down to the subcontractors in order to get it. This is different for the example of the bus construction where you're dealing with a dealer that's kind of an intermediary. Here you're actually dealing with a contractor that is working a project. And, therefore it is both intuitive and expected that there will be a job impact of some import from the contractor itself.

Here, just to repeat, for the vendor/contractor on the spending side of the house, identity, purchase amount and description, assuming the purchase price is higher than \$25,000. On the job site, in most cases, it will be sufficient just to ask the general contractor to report the job impact according to that general contractor's purview. In limited cases, based on this example, I do not think it will come up that often. In limited cases, it may be appropriate to move beyond the general contractor to the subcontractor to collect additional job information. If for some reason that general contractor and the circumstances at play was really not intended to be the critical area for where jobs are created. For example, that general contractor is really acting more as an intermediary rather than conducting and coordinating the work themselves.

12. Don't understand explanation of a state agency which is a prime recipient, Agency A, which then gives Recovery Act funding to a second state agency, Agency B. Is Agency A the prime and Agency B the sub, or are they both considered prime recipients? If both are considered prime, how is the reporting split between Agency A and Agency B?

When a federal agency provides federal awards to a state, the state in general is considered the prime recipient. Therefore, if you have multiple agencies within a state that are going to be reporting into federalreporting.gov, that is how they are also considered part of the prime recipient. It is upon the state to coordinate and make sure that the roles and responsibilities between its various organizations are coordinated in such a manner that there is no duplicate reporting or that some program is not reported on by the different organizations within that state. I believe in your example, if the state of Michigan received Recovery Act funding and multiple awards, and one award goes to the State Dept of Education and another award goes to the State Dept of Transportation, the central organization within the State of Michigan can have the Dept of Education and the Dept of Transportation each separately report into federalreporting.gov on their respective awards. However, we still consider that to be the prime recipient. What you have done is just aggregate the reporting for the prime recipient. In the situation in which the State of Michigan were to subaward to a particular county or local government, that is what we consider then a subrecipient, that local or county government would be a subrecipient. Just to clarify one more time, I believe the situation that you described in which two different agencies within the state are going to be reporting separately, that is just what we consider an aggregated way of reporting for the prime recipient. Both of you are considered to be the prime recipient and you will have to establish clear roles and responsibilities of which organization is going to report on which award in the central reporting solution.

13. If a state is submitting information via XML feed from a central state system, should recipients and subrecipients also register in the federal system?

No, registration is solely for the purpose of report submission. If you're not reporting, you don't need to register. If the prime is reporting, they need to register. That's the whole purpose of the registration.

14. Will the system be available for reporting on Oct 10th through 11:59pm?

Yes. The request is do not wait until 11:59pm. We will be open for business.

15. Reporting on jobs created and/or retained, are these two separate numeric values that are to be captured or are the numeric values combined?

The final spreadsheet will not have two separate fields. The values will be combined. To answer your question, there will be one numeric value for jobs created and retained, not two separate values.

16. Your powerpoint describes the FTE calculation as total hours worked in the quarter divided by total hours in a full time schedule. Is this done on a cumulative basis or quarter by quarter? If the latter, how do we reflect teacher employees in the summer quarter?

It is cumulative. As I walked through when I was talking through the example, you'll be adding from the first quarter in which the project works, you'll be adding the hours worked in each quarter will be additive. You're also looking at total hours on a full time schedule cumulatively from the first quarter in which hours are worked on the project activity. Just based on your question how do we reflect teacher employees in the summer quarter. If they start working in Q3 you would add the total, you would start looking at the cumulative hours in a full time schedule in that quarter. In my example that would have been 520. You would add up the total hours worked by those teachers in that quarter. Divide the total hours worked by the total hours of a full time schedule and you would get your number of FTE. All that would be done cumulatively if some of those hours were also worked in the next quarter as well.

17. In cases where recipients halt funding to subrecipients or vendors, you state that these recipients will provide estimates of the jobs created or retained by those entities. Will you expect subs and vendors to report actual jobs to the recipient?

Yes, the guidance clarifies that the prime recipient's effort to generate job estimates, they should be directly counting jobs and the impact of their dollars from subrecipients and vendors to the extent that sampling is used as described, then the collection will not be universal among all subrecipients and vendors but on an appropriately sampled subset of those entities. What will be important is when the agency issues supplemental guidance on jobs reporting, the intent here is to clarify the types of direct job counts that are appropriate in given scenarios. They might not always be identical. Let me give a quick example. We talked a little bit about this subject in the morning session. I may have touched on it

earlier in this afternoon's session. Distinguishing between transportation and education. In the education job impact it may be appropriate for the state at the prime recipient to reach out to the various school districts receiving funds under the Recovery Act and to ask them about their budget outlook through the Recovery Act and post Recovery Act. From that changing budget outlook get a reflection of changing plans for the size of the school district's workforce. Pre Recovery Act the district may have anticipated a layoff rate of about 10% lets say. Post Recovery Act the budget picture changed after receiving an infusion of recovery funds the associated change in their layoff rate may be 2% instead of 10%. In that regard the state will be required, if they're not using a stat sampling methodology, to collect that type of information from every school district in its domain, and in its jurisdiction, and aggregate that information into an estimate of jobs retained in that case, or created if they actually see more jobs being created. At the end of the day more jobs are created as a result the changing budget outlook. The Dept of Education will be providing supplemental guidance to explain and offer assistance on the type of job information that can be collected to support these types of sampling.

Contrast that with the Dept of Transportation award, where the state, rather than sending money to school districts, is instead sending money to vendors to do statewide construction projects and localities to do local level construction projects. In that case we don't a comparable potential budget projection and workforce projection that was organized and coordinated by the county level. Instead we're going to actually go project by project and the asking associated vendors involved that as a result of gaining this work, construction or otherwise, how this change will make up their employment of that particular vendor. Did they hire more people to do the work and how many hours? Did they retain more people as a result of getting the project? A different type of query to the recipient based on the different program involved, in that regard, that's where it will be important that the agencies provide supplemental guidance to describe the type of jobs information that should be collected from the program area.

18. We reviewed the XML schema for jobs created and retained. It did not appear to have a description field in the XML schema. The XML schema only appeared to have a number field. When do you plan on republishing the XML schema?

The end of July.

19. Jobs created by grants, loan or contract to another entity, your slide states that the recipient will provide an estimate of jobs created or retained. Does this mean that neither the prime recipient nor the vendor/subrecipient needs to apply the hours worked methodology described at page 35 of the OMB guidelines?

No, that's not the intention. The law requires us to "estimate the job impact." In developing our guidance, we looked at a lot of different public comment and a lot of different alternatives for how to construe the word "estimate" there. Ultimately

the way our guidance reads was the way to carry out the congressional objective of this requirement and that is, to where possible, collect direct counts from vendors and subrecipients in order to generate the estimate. Even with collecting direct counts we still think there potentially could be some variation in the overall totals. But we still think it is an estimate of sorts. Of course, as it's described, there is the possibility of doing a stat sample and collecting a subset of information. Whether you're doing a stat sample or not, you're still collecting job count information from the locality involved with the subrecipient or vendor. This is distinguished from other types of estimates that were provided in public comment, and debated and dialogued with various stakeholders. For example, some came in and felt the estimate could be generated by having the prime recipient do some kind of multiplier and indicate for every certain amount of dollars that are expended by the prime recipient can provide an estimated job total. That is a different type of estimate. But that is one that we considered and decided not to pursue in the interest of working through this issue with a variety of different inputs we determined that the direct job count was feasible and stat sampling was not. That's the best approach that meets the congressional objective of this requirement.

20. To count jobs as jobs retained, do we need evidence that the employer had planned layoffs or is the goal to capture all labor that is being funded by the Recovery Act, whether those are created or retained jobs? We are concerned that the first methodology will undercount jobs.

Yes, you would be looking at all of the hours that are funded by the Recovery Act, so that everybody working on a Recovery Act project would get paid with Recovery Act funds. You would be aggregating all the hours for all those employees.

21. Can multiple state agencies select one reporter to do prime recipient reporting?

Yes. It's up to the state whether they want it centralized or aggregate the reporting for that state. When a state uses the approach of having multiple reporters at the state level, which is well within the state's authority and capacity to do that, we have asked that the states take due care in really making sure that there is clear instructions and a clear framework for who has been provided that reporting responsibility for what awards. There should be to the maximum extent practicable, a very clear roster of the responsibilities for reporting. The goal here is to avoid double counting or confusion. We don't want a situation where John Smith is reporting information on a particular broadband award, for example, and James Smith, a few hours later, mistakenly reports information on that same award. To prevent that, this is something that the states or the prime recipients have the responsibility to do, is to make sure that both John and James Smith have clear understanding of when and who is reporting what. This is part of the responsibilities associated with decentralizing reporting at the state level. We encourage to find on a level that just requires due care in making sure the various

players involved in reporting know that they need to register on federalreporting.gov, that they each need a user ID and password and then know whose reporting what and when so that reporting is coordinated overall.

22. Is CCR just for contracts vs. grants?

No, CCR registration is for both federal financial assistance as well as contracts. In the interim final guidance that was issued in April regarding federal financial assistance we do require that prime recipients register in the CCR. We also indicate that sub recipients will also register in the CCR. We are currently in the process of reviewing all the comments that came in on the internal final guidance and we will issue a final guidance as soon as practicable. Yes CCR registration does apply to grants as well as contracts.

23. Can you clarify which programs require 1512 reporting and which ones do not?

If you're looking a specific detailed list as to which programs are subject to 1512 reporting, we are compiling Supplement 1 which is on OMB's website with the latest memorandum and guidance issued by our director. It's on Recovery.gov as well. Supplement 1 is a list of programs that are intended to be not only federal financial assistance programs but also programs that will involve federal contracts as well. Supplement 1 is a compilation of the programs subject to 1512. If you remember in the earlier slides we talk about some general exceptions to 1512 reporting which include mandatory programs, includes programs in which individuals are the recipients and also includes loan guarantees unless 100% financed by the Federal Financing Bank.

24. In our state we have full time work week hours of 35 and 40 hours a week. How do we calculate the FTE hours for our jobs?

In order to avoid any errors as you move from quarter to quarter, I would recommend that you calculate all of the hours worked on the 35 hours. Find the people that have a 35 hour work week time schedule and divide that out to get your FTE number. Then do all the people who have 40 hour per week full time schedule, calculate that FTE number. Then you should be able to add those FTE numbers to get the total.

25. For reporting on jobs created and retained, prime site must include the job numbers for itself and its subsites. Does prime also have to include all job titles and descriptions for all jobs created and retained at each subsite or do we just fold in their numbers?

We described two separate fields for job reporting. There's a narrative description and there is a numeric field. With respect to the numbers, there's not a requirement to disaggregate all the different pieces of your overall estimates. So if you're reporting, let's say, 30 jobs created in a quarter for a specific award.

You believe those 30 jobs came from a variety of different activities, you don't have to assign separate amounts within that 30 to each activity, if you just report the 30. But in reporting the 30 you should generally describe in your narrative the types of activities generally that led to the creation of those 30 jobs, the retention of those 30 jobs. So to recap, the overall number must be reported. In the narrative you can reflect what was input in that number. But you don't have to give a specific subcount for the 30 for where that 30 comes from in terms of all the various projects and activities.

26. Many of the examples are geared towards the construction field or very expensive pieces of equipment. How does a state agency capitalize or calculate the job creation or retention when the agency is purchasing approximately 20 computers, one at a time, via the internet from a large computer company where no contract is needed?

If you are more in a retail environment like what you're describing here, there is not a significant expectation for us to be able to capture job impact for individual transactions. Going back to the bus example, if the state has signed a contract with a manufacturing company to purchase 200 buses, this is a significant event for the manufacturing company in question and for local economy where that manufacturing company resides. Therefore, it becomes more relevant and appropriate to pursue a meaningful job impact for that type of event. But if one bus is purchased from the manufacturer, it's much more difficult at that point to recognize an overall project activity or job count. So there, it's another case where best judgment is needed. The expectation would be that where you have recipients doing more or less of what you're describing as minor retail purchases, there should be some level of inquiry regarding whether these more smaller individual purchases are having a job impact. Where we want you to make sure you are focusing your energy are on those areas where there is critical mass where you expect the job impacts to be great. In the example I provide, spend more time and more focus working with the vendor of a large contract for either a significant amount of equipment as you described what you called a large expensive piece of equipment, spend some time working to understand if there is any job impact on smaller retail purchases. That time has to be moderated by the value of pursuing that information knowing that it is often difficult to capture job impact from these types of smaller transactions.

27. Would you please clarify whether or not data elements, total federal Recovery Act expenditure, total nonfederal Recovery Act expenditure, and total non expenditure following the total infrastructure in expenditure line items are related to infrastructure expenses? Do these data elements fall within the infrastructure expenses and infrastructure congressional review?

I think we're going to have to digest that question a little more indirectly. Our early impression in looking at the data model, is the answer to the question is yes. But we will to get your contact information and connect back with you. If we

find that this question has broader applicability, we'll do FAQ's to define and clarify to the rest of the people.

28. If you are a public institution of higher education responsible for the state and under the state but receive Recovery Act grants directly from the feds for sponsored research, who is the prime? The assumption is the public institution is. Who would be responsible for the reporting? Both the public institution and the state?

The challenge with answering this question is we need more facts around a given situation to understand how best to answer the question. I will offer this to you. If the institution of higher education is a state run university and they are the first entity to receive the funds. Take for example the State University of New York at Buffalo, if that, which is a state run university, receives a research grant directly from the federal government, they are the prime recipient. Whoever they sub to, whether it's a traditional university or otherwise, would be the subrecipient. In the event that the state government, the governor's office's State Dept of Education or some state level entity receives funds under the Recovery Act, if they transfer to the state run university, the answer to that question is whether the state run university is a subrecipient or continues to be a prime recipient is one that needs to be sorted out on a case by case basis. We've got questions on this and depending on the nature and relationship between the state university in question and the state government we come to different conclusions based on a variety of factors that are in play. What we have decided to do is we can't give a global answer that in all cases the state-run university is a sub or that state-run university is a prime. Where that scenario is in existence and you have the state run university receiving some kind of award from another state entity that was the primary recipient. What we need to do is circle that issue with the relevant federal agency that issued the award. We'll likely need to ask you some questions about the relationship between the state university and the state itself. There's certain legal questions that I understand some of the involved lawyers want to work through before we can distinguish that situation. But it's a much easier question if the state university, like in my example, receives the funds directly from the federal agency and it does not come through another state entity. In that case, it is very clear that the state run university is the prime recipient. In other cases, it depends on the circumstances involved, the relationship of that state university to the state government itself.

29. Will reporting on jobs be done with the financial reporting act on federalreporting.gov or will there be a separate outlet created for reporting on jobs?

Yes and no. The overall job number, your total job number completed in the numeric field in describing your narrative that is reported through federalreporting.gov. But the mechanism by which you populate that number, particularly the communication that you have as a prime recipient with your

vendors or subrecipients, that will not be mechanized through federalreporting.gov. There are a variety of reasons why we determined that to be the approach. What we are doing is evaluating, and a lot of them have to do with the variety of different avenues by which recipients will be collecting that information, whether it's through stat sampling or types of information they might be collecting. Like the example I provided with the school districts vs. construction projects. At the time that we finalize the data model for federalreporting.gov, we made a judgment call and determined it's not best suited at this time to standardize that and collect that information through the system. But we are open to doing that on a go forward basis. We will be considering modifying the reporting model if we get public feedback and expressions of support for that for the recipient community but it will be challenging in that there's not a one-size-fits-all way to describe and implement and initiate that data collection. In particular, one point I point out is the way the process works that Dana walked through, subrecipients and prime recipients are reporting on the same day. You're all reporting in advance of Oct 9th and 10th, the reporting deadline. There's a timing challenge in getting the information through federalreporting.gov from the subrecipients to the prime recipients. Also, vendors are not in the system. So there are several logistics issues that would need to be worked out before we can utilize federalreporting.gov as a mechanism for collecting job information to the prime from the sub or vendors.

30. Does the total hours worked for the FTE calculation include actual hours worked including overtime hours or do you just use how many hours that employee should have worked given their full time or part time status?

You should just count the total number of hours worked. Hypothetically, even if you have just one employee working on a project, it is technically possible that you could have more than one FTE working on that project. For instance, if they were 1 ½ times a full time schedule you could report that as 1.5. Just count that as total number of hours that are actually worked on the project by that employee.

31. Are vacation and sick leave hours counted as hours worked?

Yes, they are.

32. Are cumulative job estimates from July 1 or from the Recovery Act passage date?

You'll start counting the cumulative total in the first quarter in which any hours are worked on the project. You don't go back to any arbitrary date. You just look at whatever the first quarter in which any hours are worked and you start counting all the cumulative in that. We will, within the system, look at how things align but from your perspective you should be just calculating the FTEs starting in the first quarter in which that project activity started.

33. Are you reporting all employees that worked on the project or just the new employees that have joined the company?

You're looking at the total hours that are worked by the employees of the company. If they existed at the company before and are now being funded by the Recovery Act or if they just joined the company you don't need to distinguish between that for these purposes given that companies do move employees onto different projects. Sometimes they use employees in shifts and hire to backfill them so we're not making those kinds of distinctions. Just look at the total hours of the employees are working on the project.

34. Do you cap full time employees at 520 even though that one employee worked 630 hours for the quarter?

No, there is no cap for this little number of hours in the period. It can be more than the number of hours in a full time schedule.

35. Can you go back and change the report if you discover an error or can you just modify the current quarter's estimate?

Yes, it depends on when in the sequence this happens. Days 1 – 10 you can update the report and resubmit and it just replaces the data on that particular file. Days 11-21 after the end of the quarter that replaces the report but is version controlled. The previous versions still exist for audit purposes. Of course, the report needs to be submitted by the 10th. Days 22- 29 the system is essentially locked and you can't update the information unless an agency, during the review process, identifies an issue and unlocks that report for you. After day 30 we're considering those submissions final and the update would happen in the next reporting cycle. The next quarter you would just make the adjustment with your cumulative report.

36. How would a state determine the top five officers? Is this determined strictly by salary?

This is going back to the Transparency Act amendment which is what the subrecipients and recipients are required to comply with. It talks about senior executives of the entity. It doesn't go more into specifics. I would think that specifically the more senior you are, your pay is usually paralleling the status within the organization. From the question before, people in the public realm, their salaries are usually already available to the public in one manner or another. But if they are not, yes I would go ahead and see who the top senior executives are. They would probably be the highest salaried people within the organization.

37. Are prime recipients expected to report vendor purchases under \$25,000 in the aggregate? If so, where in the data model does this go? Or is it included in the general expenditures when reporting fields?

Yes, prime recipients are expected to aggregate vendor purchases under \$25,000. The data model included in Supplement 2 currently has a field for subawards less than \$25,000. As we indicated before, Supplement 2 is still under some slight revisions which at the end of July which you will see the final data model or in the data elements in Supplement 2. You will find a separate field which will have a place holder for a number for the dollar amount of purchases under \$25,000 for vendors. It will have a field for dollar amount for subawards less than \$25,000. It will also contain a dollar field for payments to individuals.

38. Should a reporting entity obtain a separate CCR for individual awards?

I'm not sure we fully defined at what level CCR registration has to take place. There is some discretion and flexibility within that. At the individual award that seems perhaps a little too detailed. I will leave that to your discretion. We don't necessarily indicate at which level the CCR registration has to be filled out for respective recipients.

39. For jobs retained, should we report all personnel paid on the grant, or just those which we qualified as received due to the grant?

You'll be reporting the total hours worked that are funded with granted funds. You don't need to try and bucket people like that. Just report on the total hours worked that are funded.

40. What happens to the bus company in the example used earlier who finishes the buses in quarter 3 so there are 0 FTEs in quarter 4? Do the number of jobs ramp down or are we only reporting on active projects?

It is ok if the number of jobs go down based on those kind of activities. As the reporting progresses and some activities ramp down, the total FTE impact will, in some cases decline, as it does in the example we provided.

41. For purposes of calculation of jobs created or retained, will you please define supplier?

It is used synonymously with vendor. In the guidance in this case it would be a company from whom you are buying goods or services.

42. What penalties are imposed, if any, to the subrecipient when job reporting is not submitted?

The reporting on jobs is also included in the terms and conditions of the federal award. Any kind of noncompliance with that federal award could be subject to termination of that particular award. It could be subject to professional debarment depending on the severity of the noncompliance. The federal agency would

definitely need to be involved as to discussions with you as to why you are not compliant with the terms and conditions. It includes jobs reporting.

43. For higher education, many professors only charge a portion of their salary, say 10% of their salary, to grants and contracts during the academic year. If only such a marginal portion of their salary is paid from Recovery Act funds is it ok to still assume that their job has been retained because they were paid with these funds?

The guidance right now has an example of a specific educational institution that clarifies that if there is a portion that is funded by that you can take a percentage against the total hours worked. In that case you would take 10% of the total hours worked. There is going to be supplemental guidance that is going to be coming out on this. There is consideration that for reporting simplicity there's going to be a 50% threshold. I can't answer that right now if we're going to put a 50% threshold in place. For those of you that have this issue, you should watch out for additional guidance on this. But the general concept that you can take proportional funding is in the guidance now.

44. Is there a reporting requirement for certification that the program goal has been achieved? What if the incentive performance objective was actually achieved as required by OMB Director's Memo of Feb 18, 2009?

We'll have to look into that. Every federal agency is looking at the performance reporting requirements. The actual 1512 data elements right now don't include some of those performance requirements. We generally are looking at the reporting of performance being done by federal agencies. If you're a recipient and you're having those questions, contact the individual at your federal agency who are responsible for the grant or contract award.

Recipient Process Overview

Forum 3 Q&As

1. How do we ensure only authorized individuals register during the registration process?

Ok. We did hit on that a little bit in the presentation but to give a little bit more discussion on this is warranted. The overall sensitivity of the information contained within the federalreporting.gov's system is considered fairly low. The information is ultimately public and will be public in a matter of days after. In the event somebody puts in information that is erroneous, this information will also be transparent. If somebody puts something up there that's inappropriate, or that shouldn't be in there that's probably going to be realized either through one of the review processes or through public review. So, it's fairly low in terms of sensitivity. However, there are some safeguards to mitigate that. For instance, the use of the DUNS number and the award registration, although not absolute, does help identify the registrant in affiliated with the organization that gave the award. Additionally, the agency is going to have to have agency DUNS numbers and agency email addresses. So there is some check there. There are also some internal controls in the system that are going to help mitigate that.

2. What if a registrant's organization does not have a CCR or DUNS number?

Yeah, on that one you definitely have to get those in advance of registration. CCR registration is mandated, is a mandatory element for primes and all registrants have to be registered for DUNS.

3. This afternoon's webinar, from an agency's perspective, we assume that means the federal agency. Please confirm.

I'm a federal employee so I cut out the federal because I assume it's an agency. Yes it is federal agency. Pretty much any time I use the term agency in this presentation, it means federal agency. I recognize there are state agencies and primarily state agencies for this would be part of prime recipients.

4. With regard to reporting itself will the report submission, will there be confirmation of the report's submissions?

Yeah, the system will confirm that. The first step in the report submission is when a recipient clicks submit they will get a confirmation that the report is submitted. They will get a confirmation email back that the information was in valid form. So essentially it's a 2 step process. You get an immediately submission that the report was submitted then you get a confirmation that the

structure of the data was valid, was able to be consumed by the data system, that it was able to be consumed by system. If it doesn't, it will return an error message that we are working on some plain language, error descriptions of where the problem is for the information submitted. That's because the error messages system tend to kick out, it would be pretty technical and pretty tough to track down.

5. In registration on federalreporting.gov can reports be submitted under a centralized state office under one DUNS number for multiple reports for multiple programs?

Yeah, I believe so. If the question is asking if the state office is the prime they can submit multiple reports for multiple programs. They are essentially multiple reports so you can't have a prime with multiple awards, so I think, if I'm reading that accurately, yeah.

6. When reviewing the information submitted via federalreporting.gov how will the data from the prime be compared to subrecipients data, are you looking for prime disbursements to the sub to be equal sub expenses when aggregated? If so, what happens to the grant if it loses funding?

Great question. The review information, the reviewing capability in federalreporting.gov is going to be pretty basic. The primes will, the information will be available for them. In terms of the prime reviews, it's going to be up to the prime recipients to look at that and do their own evaluation. There won't be any specific review capability at that level of sophistication. With that said each agency has a separate, in fact they will have, separate data quality review criteria that they run the data through. So we're going to make the raw extracts from the data that's submitted, the reports for view, those are going to be grouped by agency and by program and then they can run the appropriate data quality reviews based on whatever kinds of criteria the individual agencies apply. That could look at those kinds of comparisons, the comparisons about, it could be the expenses, match the gross value, those kinds of things. It's possible the agencies may view that as a criteria for evaluation. The OMB M-09-01 does include guidance relative to a quality review. The quality presentation later this week will probably talk a little bit more about how agencies are going to do that evaluation.

7. Can you talk about how the process will work in states that choose a central system with XML upload. How will the process be different and how will error handling be performed?

The process is very similar in the XML abstract as it is for the excel spreadsheet. The excel spreadsheet solution is essentially a single report, whereas the XML extraction can be multiple. The XML extract is intended to be for sophisticated recipients who have both systems capability and internal technical capability to produce an extract from the solution that uses excel. It's formatted consistent

with the XML schema of the recipient reporting solution. We're going to include in the updated data model that information and also valid data fields. So the web solution and the excel solution, there will be dropdown menus that identify valid data fields and they identify that. In the XML piece it will be technically specific and will identify the specifics associated with doing that. But the configuration in the system will be a lot different. Now error handling is key. The information needs to conform with the XML standard. We are developing a validation system so all the reports that are submitted will go through this validation service. That's that separate email confirmation that I was mentioning earlier. We're also developing this validation service that operates separately from the formal submission, so people who choose this option can generate their XML extracts from their system. Then come to federalreporting.gov and run it through this validation service and identify any potential errors ahead of time. So that you can essentially reconfigure for your system's reports so that you have a high degree of confidence that they will validate when the final report is submitted. So that's what we're looking at for error handling. In terms of the messages, we're looking at not going with the heavily technically oriented errors. But something a bit more language and user friendly and is easier to troubleshoot. Where there may be issues within the report service.

8. Can we correct data on line if we use XML to submit data?

No. If you have an issue with your XML extract then you get an error back. It doesn't validate. You'll get the error message that identifies where the problem was and then you correct that and then resubmit it and it will in days 1 through 10 it will update that particular file. After day 10 if you do an update after day 10, what will happen it will be logged as a conversion.

9. Who can access the information once its posted to recovery.gov?

Once its posted to recovery.gov its pretty much public information so anybody can get that information and download it and use it for whatever purposes they need. That's part of the basis for that is the separated inbound and outbound reporting architecture design, philosophically speaking. The key take on that question also is that the information will be, may be publicly available for public review prior to public review cycle. So after day 10 there has been interest expressed in making that available as soon as its been submitted. So it could be available ahead of the review site, but once it's on recovery.gov that's the public view. Of course, within the system itself the prime recipients will be able to see their subrecipient data information; the agencies will be able to see the agency award specific information. There is some bounding in the system prior to it going forward into the public.

10. If we will be receiving more than one grant award, will we need to register more than once?

No, you won't. The registration process is solely for getting access to the system. That aligns you as somebody who is associated with that particular organization for reporting purposes. Once you register with the system, you are registered for the system and can submit reports as you need to. Of course you will want to coordinate that with the rest of the people.

11. Is there any reason to register prior to receiving an award?

It's very proactive. If you think the award is imminent and you want to be proactive on it, you could. No, if you don't have an award in hand you don't need to be registered.

12. Can you report data earlier than the 10 day period in the quarter?

No. The reporting won't be available until Oct 1st, the first day of the reporting period and part of that is technical. The timeline is very, very tight on all of this. But also because the reporting needs to cover the preceding quarter. So the quarter has ended, the reporting necessarily wouldn't be valid. It would predate the entire reporting period.

13. When you register, is your registration immediate, or do you have to wait until the next day when the system updates? Basically, is it real time?

I believe its real time. When you register, it validates and it will send you the --- I should say, it's not exactly real time. It's effective when you receive a confirmation.

14. Where will questions, both technical and programmatic be posted?

The help desk may be good, but he's asking about where can those questions be posted in advance of that. There is a contact desk at the recovery.gov website. The email address escapes me off the top of my head. There is an email address for questions and issues.

Kim – is it recovery@omb.gov?

Yeah, we could go with that. There are still another one that has a GSA address. There's a couple of places where you could send them. Most of the OMB inquiries have been finding their way to me, so that would be fine.

15. What is the different between award description and project description?

When you look at the data model the way its currently described, they are in fact very similar. The award description is asking for the purpose of each funding action, the title of the project. It's essentially a summary of what the award is for. The project description is a very similar piece. Honestly on that particular item

we'll have to talk to the program people who are familiar with those particular fields. We'll have to get a better example of what goes into each of those. I know that we have some samples descriptions for each of those. I think that the award description tends to be more open ended. The project description tends to be more tied more specifically with elements associated with the award. There's a description within the pieces of the award that describes what's going on with that. But that's not a fully satisfying answer.

16. On Slide 18, what is the subaward number, can you clarify?

The subaward number is a number that is established by the prime recipient to uniquely identify the subaward. If a prime recipient gives an award to a subrecipient, it's their number for indicating that. It's essentially a unique identifier for the subaward. Now, that in conjunction with the prime recipient's award number can uniquely identify that particular report.

OMB 1512 - Federal Agency Report Review Forum 4 Q&A

1. What reporting is required for 2nd tier subrecipients who receive funding from a subrecipient?

I think this essentially means that it's a 3rd tier recipient, so there's the information that the prime recipient gets, who would be 1st level recipient that's the prime, that prime then gives money to the subrecipient, so they have to report, and both the prime and the sub have to identify any vendors that are associated with each of those. But, I don't think reporting goes below the subrecipient for recovery act reporting, certainly for this quarter.

2. Will the federalreporting.gov solution allow a central state agency, for example, a governor's office, to review multiple state agencies' prime recipient reports during the October 11 through 20 review period in federalreporting.gov?

I don't think it will allow it to be done, so essentially what we have is, if I understand this question, we have sort of a super prime, the governor's office wants to have oversight of delegated prime agencies, who have been delegated the role of prime recipient. So the prime recipient in generic terms would be able to look at the awards that are associated with that, so they can look at all of the awards associated, subawards that are associated with that particular piece. But, if the governor's office hypothetically gives the authority the prime recipient responsibility to a sub agency, then there isn't a connection back to the governor's office. Then the governor's office would have to coordinate with that delegated prime recipient to get a view.

3. Is there a standard for which agencies will unlock recipient reports during the 3rd phase of the reporting period, say if, no error is found, but if the recipient has more accurate data to submit?

No. If issues are identified then the agency can unlock that particular recipient report. I can imagine that one way you could get around that would be if the recipient identified, hey I made a big mistake on this, I want to correct it, they could potentially contact their agency and say, which is sort of self report an issue, have the agency unlock it, make a notation and then correct it. But, recall after day10, all those changes are logged. So that would be the only way that I could see you would get around it, if it's not a substantial. No, I want to stay away from that, that's a policy question.

4. Please address how the timeline will work for the centralized solution at upload, XML data? What happens between day 11 and 21 given this scenario?

Yes, so please address how the timeline will work for centralized solution that uploads XML data, what happens between day 11 and 21 given the scenario, we assume correction will be by resubmission of the XML extract is that correct?

Yes, that is correct. So, if you have information that needs to be updated, it can be through resubmission of the XML extract. It could be just the XML, for that particular report. So it would tie back to award identified. It would essentially replace the previous report with the information from the previous version and still be available, still be in the system.

5. Will the data shown on recovery.gov be in XML format, so that investigators can conduct data analysis on the data in recovery.gov?

Yes. The data that will be shown on recovery.gov will be in multiple formats. There will be summary reports. There will be some visualizations. There will be some discussions going on in the very near future about what kinds of visualizations those will be. And, also raw data will be available. I'm not sure if all of the data will be available. I'm not sure that it will be one big data base, or it may be a series of separate data bases. It depends how big the file ends up being. But yeah, absolutely the public external oversight groups, internal oversight groups can use the data to do data analysis. Absolutely. It's the nature of transparency. Transparency and accountability.

6. I know you already answered a question on time for reporting. Is the cutoff time on October 10, Eastern, or recipient's local time?

I think it's gonna be Eastern time. I know it's not going to be sort of a rolling wave as the earth turns, just from a system's perspective, we're gonna need to say, as of this time, I think it's gonna be Eastern Standard Time. But, I think that's a great question that we need to followup on, on a FAQ.

7. When reports are unlocked after federal review and comments in days 22 through 29, will they be unlocked at the recipient level, the award level, the detailed record level, and for how long will they be unlocked?

It would be for the particular report that is identified. So, it would be for that particular award, so a report is submitted for an individual award or subaward. If the comments were on the subaward, it would be that subaward report that would be unlocked. If it was for the entire award, it would be for the prime recipient report. And, in terms of how long it would remain unlocked, I believe the logic for that, is that it is unlocked until resubmitted. So, you have an opportunity to update that information, or until the end of the reporting period, which would be day 30. So, day 30 we couldn't change it anymore and just go in as there was an issue and the issue wasn't addressed. I think there's one important take away from that, that I think it's something I hit on through the presentation, and it bears repeating again. This is the expectation, is that the reports are accurate and

complete by day 10. And so, this is a tight timeline, but it's a timeline that's set in law. So, it needs to be pretty much the best information that we can have in there with minimum opportunities for change. Additionally, it's important not to rely on these subsequent reviews, either prime recipient review or the agency reviews. Most importantly the agency reviews. Since that's what we're talking about here, as the sole data quality mechanism for this. There may be issues with information that gets through that agency data quality review.

8. To avoid reporting errors, will the federal reporting.gov or recovery.gov present a list of error types or conditions within the reporting data elements, and which will trigger an error condition?

Yes, we didn't talk a whole lot in the reporting process relative to prime recipient or subrecipient reporting. I may not have the question right, I hope I'm getting it right, but information that's submitted, needs to validate. The XML needs to validate. The data quality reviews is the total. Here's a hypothetical. Does the total of the subawards exceed the value of the prime award? The system doesn't specifically look at that. That may be something that an agency reviews externally, but not something that we look at within the system itself. Certainly, not this quarter. But in terms of, is the data properly structured for the web form, there's not a problem. There will be online validation of those individual fields and they won't be able to submit a poorly formed XML. For the excel spreadsheet, the spreadsheet will be locked as long as people enter the information where they're supposed to, and don't try to mess with the excel spreadsheet structure. That information should validate as well. It'll be checked prior to submission. There will be automatic validation function that makes sure that the information is properly formed. Then for the XML extracts that are coming from bulk, from the recipients' information systems, there is a same validation process, but also a separate validation service that will be available on federalreporting.gov to pretest that information. So, for people using the XML extract option, they'll be able to configure their systems, pull out that information and then they can take some sample data, run it through this validation service in advance of the actual reporting time so that you can have greater confidence that your system is producing the report in a way that will be accepted. Now, for reports that do not validate, there will be exception handling. So, there will be error reports that say, a particular field did not properly validate. And we're working on not just giving the system specific error messages, which can be fairly cryptic to many, but a little more user friendly kinds of responses.

9. Will a prime recipient be able to download data reported to federalreporting.gov?

Yes and no. The data will be available for download from recovery.gov once it's published to recovery.gov. Prior to that point, it will be accessible through federalreporting.gov. So, once it's released, I think that's the right answer, the only possible modification to this is the copy forward option, but I think that primarily applies to the individual web based form entry. I think it's within

federalreporting.gov that you can access there, and then the data itself will be available for download from recovery.gov.

Prime Recipient Reporting Forum 5 Q&As

1. When you were talking about the data elements, how is a project direct activities defined for a school district?

That's going to be one of those content questions that's out of my depth. I'm not actually sure how that happens, how that would be categorized. I mean, you've got the content in the data model that describes what goes into that. One of the things we're looking at to help answer these kinds of content specific questions, are to come up with some sample entries for how to answer each of those elements. That would probably be an issue that would be addressed by the Department of Education.

2. How tight are the spreadsheet locks? Will we be able to cut and paste from other spreadsheets or import data into excel as allowed by the products?

I think you will. As long as the underlying structure of the spreadsheet isn't modified you should be able to cut and paste, and import data. The key piece here is that there are XML bindings that are associated with it. It's a little bit technical, from a technical perspective it's not all that sophisticated, but if those get disconnected somehow and you get information in that doesn't perform with that XML structure. I showed that last page that had that snippet. What XML code looks like, if somehow the tags that are associated with the blocks in excel get messed up, it won't match up with our back end data source. It'll get a whole bunch of errors. So, if you could do something without modifying the structure of the excel spreadsheet itself, you should be good. But, if whatever you're looking at has to modify that structure, you're probably getting into trouble.

3. How do you handle more than one award from different agencies? Are they listed and reported individually?

Each award requires a separate report. It's possible within the XML extract, to submit multiple reports with a single upload. But, every award will need separate, at least one prime recipient award report. And, if there are any subrecipients associated with that, then each of the subrecipients will need to report with it. Each one requires a separate award. You can't combine those into a single report. And that goes back to that traceability, back to the other kinds of data elements, which we talked about early on in the presentation.

4. Just to confirm, recovery act awards that come in the form of contracts will not be included in reporting through this mechanism, is that correct?

The solution that we just went through now is primarily tied to the M-09-21 guidance, that is specifically not looking at contracts. However, the process is in the data requirements that have been identified in the FAR are very, very similar to this, and we're looking at using a centralized reporting solution for all of the recovery act solutions. I think that there may be some adjustments, and that's one of the areas that's a little bit in question. But, we are looking at a centralized reporting solution. And, this is a centralized reporting solution.

5. For activity code data elements, are prime recipients always required to provide a six digit nix code, or will a four digit be acceptable, if activities are funded by a federal award and fall into multiple six digit nix?

I don't know. That's one of those content pieces specific to the formation of that. I think it would be the primary nix code, but that's one we're going to have to check on.

6. Can a recipient have multiple people registered on federalreporting.gov?

Absolutely. There is no technical limit on the system for how many people a recipient wants to have registered. The big constraint is how many do you need, and how many can that particular recipient manage effectively internally, because the coordination of recipient reporting responsibilities, is not something that's handled directly within the system registration process, if you access in the authority and in the ability to submit reports, but yes, in fact I think it's probably a very good idea to have multiple recipients pre-registered just in case the person who you want to have do that registration, if something happens and they're not available.

7. David has an understanding that only primes can enter key data, such as jobs created. If this is the case what will subs be required to report on?

There are some key data elements, such as jobs created that needs to be coordinated outside the system selection of those particular numbers and the descriptions of how those numbers were generated. There may not be for a particular recipient. It's just a piece of functionality that was requested by a variety of recipients that we try to accommodate in the system. It may be that for some elements the management of that particular award. And, in that particular award is not handled very much at all by the prime recipients. The prime recipient has just general information about it and delegates responsibility for managing large portions of that subaward down to the subawardee, and it may just be more convenient. And, it may also be a mechanism for distributing some workload. But, the value is, I think, going to be a determination based on the recipient delegation themselves.

8. How does communication take place after the report is submitted, if changes are needed? Is it done through the system or outside the system?

The review can happen either within the system where you can look at individual reports, or not. The review is essentially a separate process. If the identification of issues are handled within the systems, so the agency will review the reports, and if they identify an issue that they need to communicate to the recipient, be it the prime or sub, they will mark that in the system and a screen will appear and it will pre-populate with the report submitter's information so the recipient reporting agency, who submitted that report, their email and contact information will pre-populate in the form. And then, the reviewer's information, their contact information, their name and their email information will pre-populate in the form. And, then they will have a text box that allows them to describe what the issue is associated with that report. They will click, they will submit that, they will send that message to the intended recipient and that will do several things concurrently. Several things will be triggered as a result of that. The comment, the issue that was identified, that will be attached to that particular file so that in the future there is the ability to go back and see whether the correction was made or not. What the issue was, who identified the issue, and then be able to see through future version control whether it was addressed. The second thing is, is that it will unlock the report, now in days 11 through 21 when prime recipients are sending their comments to sub recipients it's not a problem because the reports aren't locked, but on days 22 through 29, the only way to unlock that system is by the identification issue. And this is the mechanism that unlocks that. Then it will also transmit that message via email to the recipient. Now, if it goes to the subrecipient, it will also cc the prime recipient.

9. Where do we go to register with CCR? Is the location different than registering with federalreporting.gov?

It is. The Central Contracting Registration system is a separate system for all government awards. I don't have that location off the top of my head. It probably is ccr.gov. This is the site that many, most in fact, prime recipients will probably already be registered with. This is the site where you register in order to do business with the federal government. So, yeah it is separate. You will have links to it from within federalreporting.gov and we'll have some instructions about what to expect when you get there. But, CCR has a pretty easy to follow registration method, as well. I've been out there and I looked at it and it's not too bad.

Sub-Recipient Reporting Forum 6 Q&A

1. Has a date been set for when the XML and XLS files will be available for download?

Yes, we're targeting the end of July to get that done which is not that far away. We've been working very hard on it and one of the holdups for finalizing those templates, the XML and XLS files, is that we really want to run this through the actual systems to make sure there aren't any gotchas after that. We really want to try to avoid having multiple formats of this to cause confusion about which version to use for online submissions. We really need to get this right and so the target date is for the end of July. If we move a little into August I hope you will understand that it's really critical for us to get that right the first time. Because I think once we have a couple of different versions out in public domain it's going to be really tough to get people to use the right one.

2. Once the report is flagged as final, do the primary recipients continue to report in subsequent quarters?

The final report flag is actually a prime recipient question rather than a subrecipient question. In the prime recipient data elements there is a – I'll answer the final one just in case, to make sure we're getting it the two ways. So if it's flagged as a final report by the prime award recipient, that data element, that would be the last report for that award that we would accept for that. So that should have the total funding award or funding level. That would be my assumption on the report. If you're talking about in terms of the monthly cycle which you'll be reporting, that could apply to the subrecipient report. So the final report status at the end of the 29th day, so on day 30 that's the final report, so that essentially becomes the final report until the next reporting cycle. So 90 days past after the end of that quarter which ends that quarter's cycle, the next quarter begins, the cumulative reports are new reports are now required. We are planning on including in the system copy for ward function, so hopefully in subsequent quarters the burden on reporting will decrease as we'll already have posted information and you're just updating the changes to the information, which conveniently will be most of the information. You'll need to go in and take a look at it, check it and make sure it's still current. But a lot of the information will be carried forward.

3. When a subrecipient reports via the excel workbook, will they only fill in the worksheet titled subrecipients?

Yes, it should be very clear. It will either be very clear in the instructions. We've had some discussions with the technical group about how to make that as clear as

possible about which pieces need to be submitted. So, as the subrecipient, there will be some very basic information that needs to be put in for the subrecipient. As a subrecipient reporter, you just fill in the subrecipient tab. That information will be uploaded into the system. The relationship will mean that subrecipient report will be established based on award ID and subaward ID between the subrecipient and the recipient entity so there's a parent/child relationship there. We can handle that without having to doing the additional piece. It will be at least as clear as unique tabs for each of those elements.

4. Will the XML validation services be available for use prior to Oct 1st?

Yes. You've got to have that function available, so that you can figure your systems, so that you have some confidence that you're getting the information out on time. Our target date for that is the end of August. We'd like to have all of this information as complete as we possibly can. There are a lot of pieces to this. Our target date is to have that done by the end of August so that you will have September to work out any issues. Hopefully, that means that you can work on configuring your output in advance, looking at how the data elements match back to your information systems. Trying to match that up with that as best as you can. Work with the schema as best as you can up until that point. So between now and the end of August and then have the end of August to look for any kind of errors running through there and then take a look at the error reports and make adjustments as you need to.

5. Can a prime recipient modify subrecipient's reports that a subrecipient has reported?

No, they can't. They can comment on it back to the subrecipient, but the report is owned by the subrecipient. They've delegated that reporting authority. The subrecipient owns that and the prime recipient would coordinate with the subrecipient to make those changes. That's a very similar relationship as the funding agency is to the prime recipient. There's that hierarchy that I talked about earlier in the presentation. That's part of how that's structured.

6. Can you clarify exactly what would require a subrecipient to register with CCR?

At the beginning of this conversation we talked about the CCR and if you've heard conflicting information, I think that's probably something that we need to get back together and validate. Once again, there are a lot of moving pieces on this. I'm going to answer this question from a technical perspective, not a policy perspective. It's possible from a policy direction there's a different answer on this.

From a technical perspective we can make the connection between the subrecipient and the prime recipient in the parent DUNS and those issues. We can establish those relationships through award and subaward information. I

think that you raised this question and we're going to have to circle around it to make sure that we make that clear. There really are a lot of issues on that subject. Sometimes we think we've got it straight and we may not. So we will circle back on that and make sure. Thanks for the question. Thanks for raising it.

7. Once we register with federalreporting.gov can we report for multiple Recovery Act awards without having to register again for each individual award?

Yes. The key to registration is that it gives you access to the system. Once you register for the system, as long as you're affiliated with those awards, you can report on those awards. You can do it in any available roles. The roles are once again, the prime recipient, the prime recipient reporting for the subrecipient, and then as a subrecipient. Those roles are designated in the relationships between the prime recipients and subrecipients outside the system.

8. Is it possible to download the excel spreadsheet before registration to the website is open so we can use it as a template to collect data from our subrecipients for us to enter in as the prime recipient? We will not delegate reporting authority to the subrecipients but we would like them to use the template to collect the data from.

Our target date for getting the excel spreadsheet completed is the end of July. I think we're shooting past that to have that ready to go current with the update of the data model. It could bleed over a little bit into August but I think we want to make any of this information available as early as we possibly can. So if we have final versions of that we'll post it and make that available. Right now the hard date on that I don't have, but we are shooting for the end of July. We'll try to get that up as soon as possible. Yeah, you can absolutely download it without registration. That's going to be a function that will be available.

9. If we use the XML transmission method, can one state office consolidate reports from multiple prime recipients across the state?

Yes. That shouldn't be a problem. Each award would constitute a separate report, but the information could be consolidated in a central location and that particular person who's registered on the system will essentially be acting as an agent for all the awards. As long as you have one recipient reporting for each award then you're fine. As long as we're not splitting awards. Consolidating into multiple reports by a single entity is fine.

10. We have many questions on the date and time. You note that Oct 10th falls on a Saturday. Does that mean that we can or cannot file the reports on Saturday?

Yeah, we'll take reports on a Saturday. I'm just trying to save your weekend in my own selfish interest in trying to encourage you to report early. I like the way you put it, we'll definitely be taking reports all the way up to 11:59.59 on Saturday. We'll be in here, so think of us.

11. Unclear about the relationship between DUNS number and the CCR. Knows multiple DUNS numbers can exist within those CCRs but not sure how they relate. Can you expand on that relationship?

The key is that the DUNS number, that as a prime recipient, the prime recipient will need to be registered in the CCR. The DUNS number that's used needs to be the DUNS number that is associated with the award. That's probably the closest that I can get on that. If you have multiples you should pick the one that is associated with the award.

12. Can you demonstrate a working example of the XML extract method for reports?

Probably can't. That's going to be essentially the way we would be consuming that file would be just the data itself. The way the extract would work is really dependent on the recipient's information systems and technical capabilities that they have to generate an extract that conforms with that schema. That's not a capability that we'll be able to support internally. That's something that will have to be done on the recipient's side. It all depends on the information system that's involved. If your organization has the technical capability to do it, then do it. If not, then you'll probably have to go with a different reporting.

13. Can a prime recipient who makes multiple subawards delegate some reporting to some subrecipients and fulfill the rest of the reporting themselves?

The way the system is configured for this reporting period, no. It has to be either a prime recipient who is reporting as a subrecipient, which means that they would include reporting for all of the subrecipients or they would delegate subrecipient reporting out to the subrecipients for that award. Now that's based on an award-by-award basis. If you have one award where you decide that the prime will report for the subrecipient and a separate award where the prime chooses not to, that's ok, if the prime is the same. But within awards it needs to be one or the other.

Data Quality Control Forum 7 Q&As

1. How does this reporting relate to payments requested and letter of credit drawdown?

Not sure what the reference here is, if you could submit a further question with additional information. We're not sure what you're referring to here.

2. Will indirect costs charged to programs for services from state employees have to be reported as payments to individuals in the aggregate?

No. Indirect costs charged to programs for services from state employees need to be reported as payment individually.

3. If prime recipients are not going to delegate reporting to the subrecipient will the sub still need to correct their data during the correction period?

The answer to that would be yes. Because in that time period the federal agency may have noted that there is an error in the data and the prime may have to go back to the subrecipient for clarification on that. If there's no validation to the subrecipient then in that case the subrecipient has not registered into federalreporting.gov and it's not part of your overall framework. In that regard if there's an error identified with respect to a subrecipient data element, but that data element was reported by the prime recipient then the relevant parties involved would be the agency and the prime recipient in getting the data corrected. In particular the prime recipient would correct the data. The agency may be the flagger of the error.

4. If you delegate as a prime to a subrecipient, isn't the governor still responsible for the data?

The governor is the state, it seems like this question has a primacy that the state is the prime recipient. If there is a delegation to the subrecipient, then that delegation does not transfer responsibility for timely and reliable reporting from the state. So the answer to that question is yes. The Executive Branch of the state as the prime recipient is ultimately accountable to make sure that data is provided. The delegation helps the state meet administrative challenge of providing that information and create partnership between the recipient and the subrecipient who's delivering that information timely, and reliably. But the prime recipients still has responsibilities, and as Karen mentioned, failure to meet those responsibilities could result in a variety of different administrative actions and otherwise. The subrecipient also has responsibilities, as well, for their own data. It's a shared responsibility. Both can be subject in the event of a noncompliance

or systemic problems with data reporting. Both can be subject to the various administrative and other types of sanctions Karen mentioned. Whether it be termination of the award, whether it be suspension and debarment or other types of issues. But the penalties on those issues will likely come in place for major instances of noncompliance or chronic and systemic instances. And all the normal traditional due process approaches for noncompliance of federal requirements will be in play.

5. Karen, during your presentation you referenced the data model. Could you just provide that link to the data model?

The data model is Supplement 1 to the M-09-21 guidance, which was issued on June 22nd. It is on the OMB website at www.omb.gov. If you go over to the upper right hand corner you'll see agency information as one of the selections. Click on that and you'll be presented with a page. Click on where it says memoranda, you'll come up with memoranda for 2009. And March 29th is the third memorandum down. You'll see MO-29, and then you'll see the two supplementals. The first supplemental is the program listing. The second supplemental is the data model.

6. Please distinguish what you mean by prime as opposed to award? You referenced this on your slide entitled review requirements, cont'd.

I believe what you're referring to is the third bullet which reads, "establishing control totals". For example, total number of projects subject to reporting, total dollars allocated to projects and verify that reported information matches the established control totals. What we're talking about here is that an award has been made either to a prime recipient or a subrecipient. Under that award there could be several projects for activities that need to be accomplished. One of the data elements for recipient reporting is a description of the project and/or activity that is being performed. Again, there could be more than one and the percentage of completion under those projects or activities. So that's an activity that could be under an individual award. An award may have a single project or activity. It might have multiple. It depends on the federal program in which you receive the dollars.

7. How are subrecipients to report percent complete? The current guidance as of June 22nd indicates percent complete is reported as a funding award model. Can you clarify how to calculate percent complete?

I do not believe that the subrecipients are required to report project completion status. The way the data reporting model works is that the first set of data that the prime recipient has to report on are those within Section 1512 of the Act, which include who they are, the amount of funds they've received, the description and name of the projects or activities that they're funding, and the completion status, and the job impact. That's all at the prime recipient level. With respect to the

payment the prime recipient takes down to the subrecipient, that data now you align down to the transparency act data element, which do not include a project completion status as part of the reporting. So, that's a good point of clarification that the reporting that the prime recipient does about the award it receives from the federal government is a different set of data then the prime recipient reports on for the award it makes down to the subrecipient. Again we would direct you to the second supplement to the guidance which is the recipient reporting data model version 2.0.1 and in there you'll see the separate data elements for prime recipient, for subrecipient, and then for vendors.

8. Could you define what you mean by a limited data quality review?

Not sure what you're referring to, but let's take a look at what our timeline is in which we are reviewing the data. In reviewing the data, some of you agencies, some prime, may have hundreds of reports to review. It is up to the reviewer, so whether we're talking about the federal agency, the prime recipient, or the subrecipient to determine what the most optimal method is going to be to allow you to be able to review that data on a timely basis, and to be able to say with confidence that you have that confidence level in that data being reported. Now that may be that some of the questions that we got at the federal agency town hall, could you use some statistical sampling. Certainly, that may be a possibility, but as in any case the advisement would be not to use that in and of itself, to use that in conjunction with other checks and balances that you would be performing in order to do that data quality review.

9. Is it technically possible for a subrecipient to submit data to federalreporting.gov if this reporting responsibility has not been delegated to the subrecipients or the prime recipients?

The answer is that it should hopefully be technically impossible because if the prime recipient does not delegate to the subrecipient, then that subrecipient should not be logging in to federalreporting.gov for that purpose. However, the reality of the situation is that the system itself might likely not have the ability to automatically control for the scenario in which the subrecipient who has not been delegated logs on and reports on the award. But, therefore the answer to the question is it technically possible for it to happen. Therefore, it is important for the prime recipient to have some of the data quality tools in place that Karen mentioned earlier. In particular having a complete and up to date roster of the subrecipients that have been delegated, that can be crossed checked against those subrecipients reporting in. If you have a subrecipient reporting in that is not on your roster for a given award you know you have a situation where you have a subrecipient mistakenly reporting in and we could have a situation of double counting, if you've also reported as a prime recipient on that same information. In that case, the data will need to be flagged and corrected for the subrecipient. In this case, should be required to eliminate the data fields or withdraw the data, if they have not been appropriately delegated. So, the answer to the question is it is

technically possible. We need to be on the look out for it because it's one of those areas where the data quality of the review is most critical.

10. Will prime subrecipients get additional time if the dates to submit and review data fall on weekends?

No. In the previous webinars, Jim had pointed out many times that the time for submission of the reports on October 10th will go through 11:59.59 p.m. Eastern time.

11. If the prime recipient has delegated reporting to the subrecipient, can the prime recipient see what the subrecipient has reported from day 1 through 10? Or is it only during day 11 through 21?

The prime recipient will not have view access to any data until the 11th day of the reporting period.

12. Since the CCR is the data element for subrecipients, can you clarify whether subrecipients must register in the CCR?

We'll double check that. The CCR is not contingent to be a data element for subrecipients. The CCR is a data element for recipients. If our data is modeled with it as a subrecipient data element, then we will make that correction, but we don't think it does.

Looking at the data model what is required for a subrecipient is a subrecipient DUNS number. You are required as a subrecipient to get a DUNS number. As a subrecipient, you are not required to register in CCR. Now, there can be an exception to that, because as a subrecipient on one award you might be a prime recipient on another award. So you may have to register in CCR because you are a prime recipient on another award. There is no requirement for subrecipients specifically, as a subrecipient to register in CCR. However, you must register with Dun and Bradstreet and receive a DUNS number.

13. Will recipients or subrecipients be required to provide documentation of review processes developed, and if yes, will said documentation be submitted to the federal agencies?

The answer to that question is that our guidance in M-09-21 does not specifically establish a documentation requirement associated with the data quality process. With that said, recipients and subrecipients should employ basic standard practices for implementing federal programs. In particular, all programs are all subject to oversight and audit, and to the extent that you are subject to audit, whether it's a single audit or other federal oversight activities. The indication is that you will be prepared to describe policies and procedures that you have underway to meet basic federal requirements. Thus documenting your standard

processes for meeting compliance requirements is often a specific requirement of the program. It's also a fundamentally good practice in terms of being prepared for any type of data request for audit or investigation, or federal activities to oversee funds. The end question is basically documentation of the process is important and is likely required by your programs regulations or likely required just based on the fact that the program is subject to audit. Specifically, delineated in our standards and in our memorandum here I do not know of any specific requirement to submit that documented process to the agency unless asked.

14. Does the agency review the record and notify the recipients of error via federalreporting.gov?

In federalreporting.gov, once an agency would review the record and then in finding a material omission or significant reporting error, would mark the report as such, that its been reviewed and an error has been found. That would turn on the record available for correction. However the agency would be doing direct outreach to the recipient to notify them that the data needs to be corrected. If I understand correctly, the system assists the process by providing the reviewer with an applicable point of contact email address or other relevant point of contact. You do not communicate the request to review data or correct data through the system itself. You go through a separate email or other type of contact. There's no formal workflow capability that's going to be in federalreporting.gov. Not at this time. It's a solution that we're actually looking at for future versions of what the system would essentially do. Right now it facilitates the communication by providing the contact info.

15. If federal agencies identify problems during the initial review period, day 11 through 22, can they contact recipients?

Absolutely. The earlier that you initiate that communication and get that data corrected, the better it is for all involved in reporting.

16. Do prime and subrecipients report on expenditures incurred in the quarter, or on the federal funds drawn by the end of the quarter?

The answer to that question is yes, that prime and subrecipients report on expenditures incurred in the quarter. Are the federal funds drawn by the end of the quarter? I think that actually applies to two different data elements. I think both are applicable. You need to report on the federal funds received and on federal funds expended. I think both of those data elements are incorporated into the data reporting model.

17. Do grantees still have to complete the standard federal reports in addition to uploading the data onto federalreporting.gov? Also, should the expenditures reported be on a cash or accrual basis for the reporting period?

In response to the first question, yes, grantees will still have their normal program reporting responsibilities to the agency in which they were awarded those dollars in addition to reporting on federalreporting.gov. As to the second question, I'm not sure we can answer that question because it's not clear whether you're referring to the expenditures on your traditional standard federal reports, the SEFA, the Statement of Federal Expenditures, or you're referring to the requirements under 1512. If the question is whether expenditures are reported on a cash or accrual basis for 1512, we need to go back and reconfirm with the accounting team. We have your name and contact information. We will reach back at you and provide that answer. We can also incorporate that into FAQ if we find it could be an important point clarified through the rest of the community.

18. Can you just clarify the publishing of the data? Will the data be published after the 10th and before the 21st on recovery.gov or on federalreporting.gov as well?

The important point here is that the Recovery Board, not OMB, is responsible for making determinations on what is published on recovery.gov. OMB and the Recovery Board have had many questions about their specific plans for what they're going to report on the 11th of the month once they get the initial submission from the recipients. It is my understanding that they're considering several different options at this time what to report. They are considering reporting raw data that comes in, so that the public and citizens have access to that additional report that can be compared to the final report a few days later. They're also considering providing summary data on the 11th. I do not think they have reached a final determination on exactly the form and intent of what will be reported on the 11th. So stayed tuned for more information from the Recovery Board on their plans for what goes on recovery.gov for the 30th. What is very clear that is on the 30th all of the reports will be published and final as that is required by law.

19. If a federal agency classifies a report as with material omissions, will the recipient or sub have enough time to correct prior to submissions to recovery.gov?

Let's talk about the timeline again. The agency formal review period is from the 22nd to the 29th of the month. However, the data that has been submitted by recipients and/or subrecipients, as appropriate, is available to the agencies as early as the 11th reporting day of the month. The same time that prime recipient and subrecipients are doing their data quality reviews, agencies can be initiating their data quality reviews considering the timeline for their formal review period is very short. It is hoped that in pre-review of that information it can actually speed up the process. Sure, there could be an instance where something is found on the last day. That can always happen and in the case that it can't be corrected in time for the submission, then it would be corrected in the next quarterly reported submission.

20. Are there plans to publish guidelines for vendors? If so, when?

The M-09-21 guidance refers specifically to assistance, grant funds, cooperative agreements, etc. and not to contracts. Direct federal contract requirements are done through the FAR, the Federal Acquisition Regulation. There is an interim final rule that is in place for direct federal contracts that is moving to direct final. We've gotten a lot of comments and we're incorporating those into a final regulation. The timing of that is likely within the next 3 to 4 weeks.

21. Will agencies be able to register an unlimited number of agency staff to review records on federalreporting.gov?

I never want to commit to unlimited because everything has a limit. But there is no specific quota or numeric limit that we're placing on federalreporting.gov registration. If an agency determines it necessary to have multiple reviewers then the system should be able to accommodate that.

22. Can you clarify, when is the final report due to OMB?

The reports do not come into OMB. The reports under 1512 are due into federalreporting.gov. They are provided into a data warehouse that is used by the Recovery Board to populate recovery.gov. OMB is not centrally collecting this information. The Recovery Board is. OMB is helping to facilitate that collection through data collection requirements, such as the ones we're talking about. Of course, the date that the report is due, the 10th of the reporting month is when the reports are due. Then they are finalized by the 30th of the reporting month.

23. How will federal agencies know when an incorrect report has been corrected? And how do categorizations change to review with no omissions or errors?

The federal agency will know because in their view access they can monitor the reports. They will be able to see when data is corrected. The federal agency will have the ability to change the designation of reports based on the review status. So those types of issues, in terms of when data is being corrected, is something that federalreporting.gov systems has tools associated with it that let us track when data has been changed. That helps to provide the federal agency with insight and information as to when such information has been changed.

24. Could you provide us with the definition of subawards to individuals?

There's two parts to that definition. First we have to make sure that everyone is on the same page of what a subaward is. A subaward is when the recipient of federal funds transmits those federal funds, or a portion thereof, to another entity. That other entity is intended to carry out the underlying mission of the federal program. The terms and conditions of the award carry down to that recipient, as well as the requirements to comply with basic federal regulations. That is

distinguishable from other types of payments a recipient might make. For example, a recipient might use federal funds to purchase a good or service from a vendor. That vendor is not receiving a subaward, because that vendor is not being brought into the federal program in terms of being required to meet programmatic requirements. That vendor is just providing a vendor service. But a subawardee is required to meet the underlying mission of the programs. The question then becomes, what is a subaward to the individual. A subaward to an individual is funds that are awarded down, but instead of being awarded down to an organization, a locality, a municipality, a nonprofit, you're actually awarding it down to an individual. The classic case for that is in loans where you might see a situation in which SBA for example, or one of our loan making agencies provides funds to an intermediary. That intermediary in turn subawards loans to individuals for the purpose of a variety of different activities, whether it's small business or farm related or education related, whatever the situation may be. In that case, you have a subaward down to an individual. That individual is signing some type of agreement, a promissory note. Some type of contract in which it is agreeing to comply with federal regulations/requirements associated with that award. It's critically important to understand what a subaward is, to distinguish from other payments. There are situations in which subawards do not just go to entities, but go to individuals. The classic case of that would be a loan program.

25. I understand the state administrative agency is reporting on program dollars and activities only and administrative funding is not included. Is that correct?

There are a lot of elements in that question that are correct. What we have done in this recipient reporting guidance is we have clarified two different types of buckets of spending that need to be tracked under 1512. Subawards are funds paid down to another entity to carry out the federal program mission. Funds paid to a vendor greater than \$25,000 have their own sense of requirements. Funds paid to vendors less than \$25,000 need to be aggregated and reported as a sum total. Other types of payments, administrative, incidental, salaries and expenses, do not have to be tracked, but they are reported as part of the expenditures made by the recipient. The recipient does have to report an overall expenditure amount that includes all the payments they make, whether subaward, payment to vendor, or an administrative expense. But where they have additional reporting responsibilities is subawards, and vendor payments in particular.

26. Can you please explain the difference between a sub and a vendor, and give an example of each?

I think a great example is one that is outlined in the guidance. It's the example of the university. University A receives a research grant funded with recovery dollars from a federal agency. In this case, University A, the first entity that receives the funds from the government. Therefore, they are the prime recipient. Let's say the amount that they received is for \$100,000. So University A is going to carry out research to support this federal program. They are not going to carry

out all of the research by themselves. They are going to ask University B to carry out some of the research as well. So they send to University B \$50,000 of the \$100,000 that they had received. In that case University B is a subrecipient. University B is required to carry out the underlying federal mission of the program, research, and they are receiving federal recovery funds to do it. They are a subaward. Going back to University A, they collect \$50,000 less and they are planning to do their own research as well that works in ownership with University B's research. And University A, to support that research, goes out and buys a piece of scientific equipment from XYZ Corporation. In that case, XYZ Corporation is not a subrecipient, like University B. XYZ Corporation is a vendor. The XYZ Corporation is not carrying out any research. They're not subject to all the various reporting and compliance requirements associated with a federally funded research program. All XYZ Corporation is doing is providing a piece of equipment they may have manufactured to the University A in exchange for funds. We feel it's important that the taxpayers know where those funds are going and that XYZ Corporation received that purchase. So we've asked University A to report on that payment to XYZ Corporation. That's essentially the difference. The subaward or subrecipient is carrying on the federal mission in concert, in partnership, on behalf of the prime recipient. The vendor is simply providing a good or service, but is not involved in carrying out the underlying federal mission.

27. What kind of data am I required to report if the funds have been utilized to hire employees?

The funds fall into two basic buckets that need to be tracked, subaward and vendor payments. You do not specifically have to delineate the funds that are being paid to employees although you will report, as the prime recipient, the job impact. You will report number of people that you've hired, as part of your job impact, as well as other job impacts that money may be having, if it's going to be more than just hiring. The way the process works is the prime recipient reports the total amount of expenditures with anything the funds, ranging with subawards to vendor payments to salaries and expenses. In terms of tracking additional information about those funds, that's where you really need to look at subawards and vendor payments. Salaries and expenses don't need to be tracked in that way, other than one caveat. If you are hiring additional people or using those funds to retain people, then you would include the impact of those dollars on your job estimate impact.

28. Is it possible for multiple users of the system to flag errors for correction on a single unique record?

I believe the answer to that question is yes.

29. Yesterday in the webinar we were instructed that the recipient will be required to list the top five officials and their compensations. Does this refer to the elected officials or the appointed staff?

If I understand the law correctly, it does not distinguish between elected or appointed. I think you need to go to the top five compensated officials in the organization regardless of elected or appointed. I do not believe the law makes a distinction there. In fact, I do not believe the law makes a distinction between public sector or private sector. It simply indicates the top five compensated individuals of the organization, which could include a corporation or a government entity. That requirement does not kick in if the information on compensation for a government entity is already publicly available and widely available.

30. How should costs for oversight internal control planning etc. be reported?

Similar as other questions asked on administrative costs. The totals are reported into the overall expenditure amounts but do not need to be tracked on the specific 1512 data elements, the same manner as subawards and vendor payments. The exception to that based on this question is, if you hire an accounting firm to do internal control work for you, and you pay them more than \$25,000. That would be a vendor payment that you would capture.

31. Can an entity report as both a prime and a subrecipient with a single registration at federalreporting.gov? Or, are separate registrations required?

I believe the answer to that question is you can do it through a single registration process.

32. Will state responsible offices be allowed to register in federalreporting.gov and be allowed security to review data submitted by all prime recipients state agencies? Or must state responsible offices conduct all of their oversight responsibilities for data collection to ensure quality, completeness and timeliness of data submissions outside of the reporting systems?

The review will take place inside the reporting system. The state should have the ability to review globally all the prime recipient reports reported out of that state even though it has multiple users. If you have users in your State Department of Education, your State Department of Transportation etc. the mechanism and the ability for the state to see all the various reports that are coming in even though the state has decentralized the reporting to multiple users. In fact, the state has a responsibility to coordinate such efforts to make sure that people aren't double counting, people know which reports they're responsible for in both issuing corrections and submitting data. But, there's no separate review level.

33. Some organizations receive awards under multiple DUNS numbers. Will a registrant be able to submit under more than one DUNS number even though their registration is associated only with a single number?

We're going to have to get back to Paul, and if we see a need do a broader FAQ, we'll do it.

34. If the prime recipient is not a state entity, such as recovery act money going directly to a municipality, is the state still responsible for accuracy of reporting? Or does that responsibility shift to the non state prime recipient?

It does shift to the non state prime responsibility, because it is the prime recipient who is responsible for the reporting and review of the data.

35. We've talked about administrative costs, but can you please clarify what administrative costs can be paid with recovery funds at the agency level and recipient level and how each would be reported?

There's no way to clarify a single bright line rule on administrative costs that can be paid with recovery funds. These programs follow the same requirements that other federal programs do with respect to allowable administrative costs, whether allowed for direct charge or indirect charge. The formal processes, for example, developing a slide cap and negotiating with the Department of Health and Human Services identifying the appropriate thresholds for administrative costs are all still in play. There has been additional OMB guidance that's been provided regarding how we can accelerate the reimbursement of administrative costs by encouraging states to work with HHS in a way that using estimates or monthly billing rates allow them to recue administrative dollars earlier in the process capacities. There are certain administrative costs that can and can't be paid. Those fall along very specific, unique situations that each recipient, in this case, state recipient is working out as part of their administrative cost plan.

36. Are all versions of a report, whether it's corrected during the 11th through the 21st day, or after the agency "unlocks the report during the 22nd through the 30th". Are all versions of a report going to be published through recovery.gov or will only the latest version publish?

Let's clarify what data is going to be published on recovery.gov. The final submission on the 30th, all reviewed and any corrected data, is going to be published on recovery.gov, for the reporting month after the end of the quarter. The Recovery and Transparency Board is considering several alternatives and whether or not to display the raw data, or maybe the summary of that raw data, as early as the 10th of the reporting month. That's the day we go into formal review period for prime and subrecipients. Let's take the example where the board has decided they're going to publish some form of the data. That data in its raw form would be published on the 10th and on the 30th the actual review data would be

published, so in that example, it would be twice. If the board decides not to go down that route, to publish any interim data, there would be only one final version of the report, and that would be the one that is submitted on the 30th of the reporting month.

37. Will documentation of the review process performed by the recipient be submitted to the federal agency?

The guidance does not require any formal documentation. However, as part of the agency's program reporting and evaluation process they may be requiring certain pieces of documentation to be submitted to the agency. That really is more on an agency and program by program basis.

38. Will OMB's excel template have built in logic tests to avoid the reporting of illogical results?

No. The template will have certain fixed fields associated with it. We're looking a variety of pre-population options going forward. I think it would be ideal if we could structure a template that would have those types of internal controls, but we don't have that one at this time. However, the XML schema and the online reporting capability would be able to have such controls. But an excel spreadsheet unfortunately, and the capability is not quite there.

39. What constitutes a subaward? Can you give examples?

Ok, I think we've already answered that question. So, I'll move on to a different question.

40. Will federal agencies be able to extract report data as of October 11th?

Yes.

41. Is it expected that what is reported through federalreporting.gov has to reconcile to the amount of payments requested through the electronic payment system?

I think that is a good reconciliation tool to use. I don't know if I'm comfortable answering at this time, that it's always going to be a precise exact. It depends on the program how funds are received. There may be situations in which it should be impossible for the two values to differ. But 300 different programs impacted by Section 1512 and the funding mechanisms for them are very different. I think the question raises a very good best practice for looking at your accounting records or your basic records of what's been drawn down through any automated payment system and matching that up to your expenditure amount and seeing what the differences may be. There might be explainable differences, but it's still a good way to assess, at least from a data point standpoint, whether there's a mistake or an omission going on.

42. If there are multiple Points of Contact (POCs) and data issues were flagged by the federal agencies, will all POCs be notified or just one?

Federalreporting.gov will be able to facilitate once a record is marked that it needs correction by the prime recipient or subrecipient and a notification will pop up with the contact information. It is entirely up to the agency who is doing the review in their protocol if they would contact everyone or they would contact, maybe, the top two.

43. Regarding the salary with regard to the top five highly compensated individuals, how would this be noted on the reports in the data field provided?

If it's not currently coming across clear in the data reporting model it will be clear in the final excel spreadsheet and in the screen shot data field if you're keying in the information. We will certainly provide data to submit that information clearly.

44. When reporting on the excel workbook, if a prime is reporting subrecipient data, does each subrecipient part of an award need to be uploaded separately?

Again, I'm going to defer that question. We're getting into a lot of different questions on the technical elements of the solution. It's probably better to defer those questions just because we have the data quality team in here, but we don't have the technical team in here. So, I think it's appropriate to just to defer.

45. Don asks in the answer Danny just gave, that the state would have access for oversight, exactly the opposite of the information, we need clarification. It was stated that in a previous webinar there was no mechanism for super prime review?

There is no separate layer of review. Although the data can be extracted and looked at, it's hard to gage exactly what type of super prime review is being envisioned by the questioner. The system itself, I don't think there's a screen you can click on that aggregates all the prime recipient reporting that the system would generate. Although the system allows data extract of the raw data, that would allow that type of review. Two points here. It would be appropriate for the prime recipient where you are decentralizing to various reporters to do that type of layers view. How you do it we're not going to prescribe. The other thing I just want to make clear about is there's no super prime view of all activity within a given state. You will not be able to see all of the activity at the prime level, at the state level, and if there's primes within your state that are not at the state level, there's no separate review of that either.

46. How will the XML validation service work? Will it be available 24/7? When an XML file is submitted to the validation service, is the response available

immediately or overnight? When corrected information is submitted, does it go through the validation service? How do we get access to the validation service edit?

Without getting too technical, how an XML schema works, is that the schema itself allows you to build in validation. For example, one of the previously asked questions, you can build into the schema a cross validation that a total expenditure reported does not exceed the total award reported. You can do that kind of cross validation between the two different fields. You can also build in validation that makes sure the field's value isn't looking for a numeric vs. a text field. It is available within the schema itself as you enter that information and build the file for that information. That in itself is available 24/7. When you submit an XML schema what's also going to happen is that as the software takes in that schema, it's also going to be running some basic validation. That's going to happen every single time you submit the schema. As you submit the schema, if an error is then found subsequently upon review by an agency in federalreporting.gov and then you would need to correct and resubmit the schema. It's going to go through the exact same edits again and pass. A system has a hard time to tell the difference between an error and a mistake that can validate for certain static validations.

47. How will state oversight agencies have access to the data in reporting.gov? Will they have to have approval from the prime recipient?

There's not going to be any formal super framework process in federalreporting.gov. There is data submitted by the prime recipient and/or in the cases of delegation to the subrecipient. Then that review is performed. Just let me make a comment about the state oversight agency having access to the data. State oversight agencies are not a prime recipient or a subrecipient, would not be a valid entity to go into federalreporting.gov. The state oversight entities can play a role in a variety of different ways. In particular, reviewing the process by which the state has set up to oversee and coordinate data collection registration efforts, data quality review. As part of that process, it may be appropriate, and of course this is something that we can't weigh in on in a case specific basis. It may be appropriate as part of that review for the state chair of the prime recipient to provide information that's extracted from federalreporting.gov to the state oversight agency, as appropriate, as worked out between those two entities.

48. We've receive many questions regarding the spreadsheets and technical assistance. I understand that we will have access to the help desk? Will the help desk be available?

I think the question is will it be available 24 hours. I do not think we are going to be available on a 24/7 basis. There will be a help desk. We are certainly focused on making sure that that help desk is user friendly and can answer as many questions as quickly as possible. We're going to invest a lot of time and energy

into making sure that if any logistic issues come up with federalreporting.gov that we're on top of it.

49. Can you please clarify the difference between the activities description field and the project description field as described in the M-09-21 guidance data model?

We went, in fact, and verified in the data model they are two distinct fields. The overall project description, what the particular set of steps that are going to be performed under the subaward. Again, there could be one project where there could be multiple projects from a research grant standard. There could be several different pieces of the research that have to be put together and those are tracked on separate projects. In relation to an activity, activity is typically something that is a subpart of a project. There might be many activities that lead up to the culmination of the results in that project. That's the distinction to those two fields. Activity may not at all be pertinent to the particular project or the work that is being done under an award or subaward. That particular field as I'm looking at it is not mandatory. An activity may or may not apply to a project. The best way to think of an activity is over the subsets that would then lead up to the culmination of the results of the project.

50. The term subaward is meant to mean payments actually made on a subaward, or amounts awarded which would not necessarily have been paid in full by the recipient?

A subaward is only meant to reflect a payment made from a prime recipient to a subrecipient. Regardless of its size or amounts, subaward again is a payment from a recipient to a subrecipient. We spent some time talking about this, the definition of the subrecipient. Which is also by the way, provided in the guidance and definition of the subrecipient vs. the vendor.

51. Will the October 10, 2011, be the final report date? Will federalreporting.gov then be shut down permanently?

No, the 10th day of the reporting month, in the examples that I gave, October in the first month we're going to be reporting recipient data. The 10th is the initial submission date. When data entry is complete and now it's available to review. What this means is, is that triggering events that agencies will be able to begin doing their informal review processes of that data. It could also mean that as the Recovery and Transparency Board is deciding whether they may want to publish the interim data at that point. However, there still is the period for the 11th through the 29th to do data review and corrections. It's only on the 30th day of the reporting month is the "final" report that's going to be done.

I think the date provided the question to 2011, in terms of when we're going to sunset this process. We have not yet determined a sunset for 1512 reporting or

the system. As we move out in through 2010, fiscal year 2010, as more of the recovery act funds move into local economies, and project completion statuses start to increase, the money gets fully expended, it's that time when we will make an assessment of the appropriate sunset of the reporting requirements in the system itself.

52. Keeping along the questions with states, if an agency reviews on the 29th day, then the agency flags an error on the 29th day, does the recipient only have the remainder of that day to correct?

Unfortunately, yes. In that case, if we run out of time then the information will simply be corrected in the subsequent quarter. That's why we encourage you to begin your, particularly at the agency level, to begin your review when the data is initially available on the 10th day of the reporting month.

53. When does a vendor payment be aggregated and reported separately, when a payment is greater than or equal to \$25,000? Or, when a purchase is greater than or equal to \$25,000? Were purchase and payment being used interchangeably in this guidance? And, we have a lot of questions regarding the \$25,000 threshold.

First, I must clarify. It's correct when it's greater than or equal to \$25,000 triggers additional reporting requirements. The question on whether it's a payment or a purchase, it really is a good question. To clarify, it's really the procurement or purchase of something greater than \$25,000. If you purchased seven different things from an entity and each of the seven things are each \$20,000 then it does not trigger the reporting requirements. Later on you might be paying a bill back for that entity and it might be a payment greater than \$25,000, because you owe more than \$20,000, not \$25,000 because you bought seven different things from them. But the triggering point is if the individual purchase is greater than \$25,000.

54. If a vendor is given a contract for goods and services, the vendor will invoice monthly over multiple quarters, should that vendor be reported once for the contract or multiple times for each invoice?

That's a good follow up to the previous answer I gave. When you essentially consummate the deal with the vendor, or the contract with the vendor, you defer the obligation to pay for something more than \$25,000, that's when you report. You don't ordinarily report subsequent if you've worked out some kind of payment plan. The issue is that you agreed to pay XYZ Corporation \$50,000 reported at the point that it occurs.

55. Each state agency will submit information on the grant it's responsible for administering. How do all of the state agency information been rolled up on recovery.gov?

Again, the Recovery Board is looking at a variety of different options to figure out to how best report to information to the public. At a minimum, I know they are strongly being encouraged to, and I think are committed to reporting the raw data. In terms of the aggregation of that data in regards to format, and the presentation, how it's searchable, all of that is currently under development by award. They're operating on a guiding principle of being as transparent as possible, user friendly as possible, airing as many citizens' questions. I would imagine that there's going to be a lot of different ways to cut and shape the data that's coming in. On the issue of the form and content of recovery.gov, we really can't. It's premature to kind of articulate exactly what those presentations will look like beyond knowing that the raw data piece will be available.

56. In the event that a program is not in the supplemental list, but there is information available which indicates that the program will have reporting requirements per 1512, should they contact OMB or the federal agency?

Both. It's really important that we get that list right. If we're missing a program on that list, contact the federal agency, contact us. You can contact us at recovery@OMB.eop.gov. But that's a very helpful thing that the public or federal agencies can do is help us make sure that we have the full list of programs. We've gotten several good input on the list. The list has been up a few times since it's been published. It's been pretty static since a few weeks ago. We think we've gotten the right list now. But if we're off the program that's good to know.

57. For states that intend to centralize reporting from a recovery office or the governor's office, how do you envision any data corrections will be made? Will the state recovery office be able to allow the individual state agencies to be logged into the reporting.gov make corrections or will files have to be resubmitted from the centralized reporting entity?

Actually I think that goes back to earlier questions that were asked. It goes back to who is the prime in this instance. If it is the state that is the prime and where their protocol for data quality is to centralize that reporting to that one office, and that one office only is responsible for input of the data in the federalreporting.gov as long as they are the prime. Again, in Danny's earlier response, if the state is not the prime, they will not have access for either data entry or review of that data.

58. Can you address how you want activity reported in your system for awards received by one state agency and expended by another state agency?

If a state is receiving an award from a federal agency, in other words, they are the prime recipient, and they pass that money to their Department of Transportation or their Department of Education, that department does not become a subrecipient. It's still in the arena of being a prime recipient. You really need to as a prime recipient go back to the federal agency and the program office and

whom you're working with when you received that award as to the type of information that they are particularly looking for on the activity or the project for that award. Because they are the first line of response because it is their program and they're going to be reviewing that information. So you really need to go back to the agency in which you received the award.

59. This information does not distinguish the XML upload options from the direct input options. How will the XML options be different? For example, corrections will be by resubmission rather than entry of corrected the data?

First of all, there are three ways to submit data in the federalreporting.gov. One is through an XML spreadsheet for those that don't have the technology or don't want to sit there in front of the screen and data enter all of the information. Secondly, for those reporters who do have the technology, an XML schema will be available. That allows you to take all of your information, be able to do some edits, and you will submit an upload through a defined methodology. Third, is the direct data entry method for those that may have just minimal information to be reported and how your information is submitted when you have to correct information. You typically would resubmit it in the same method that you had done it originally. Now one thing that we would need to get clarification for from our technical team, is if you submitted...this seems logical, but we want to clarify this...if you submitted the XML and there's only one record of , let's say, 5,000 that have been submitted that you would be able to access it online via the data input screen, then you would be able to correct that online. But we need to confirm that with our technical team.

60. Can we confirm if the data that they are submitting will be in cumulative form or not be cumulative?

The data reported will be cumulative. Absolutely.

61. Where might be recipient's DUNS number associated with an award be found? Should we be getting the number from the federal awarding agency? Will reports be rejected if this number is inaccurate?

First question is where is the DUNS number associated with the award? When the award is made, specifically one of the data elements that's part of that award would be the DUNS number. It is a definite requirement in most contracting vehicles, whether federal, state or local. It is in the interim final in federal award assistance. A recipient would register with DUN and Bradstreet to receive a DUNS number. Then a prime recipient must also register in the Central Contractor Registry. In order to register in CCR, you must have a valid DUNS number and CCR will validate that number. As far as the second part of the question, should we be getting the number from the federal awarding agency. No. The federal awarding agency would not have a DUNS number. The recipient or subrecipient would have their DUNS number. Will the report be rejected if the

DUNS number is inaccurate? We have to confirm this, but to my knowledge they are intending to validate the DUNS number information. Because in getting that valid DUNS number information, it does give us a whole lot of additional information that is available to us. But we will confirm that we are validating from the DUNS number in federalreporting.gov.

62. Is it possible for a funding award to contain multiple CFDA's? If so, is this reported as one data element or multiple?

This really needs our grants experts for that. My understanding is that there is an award would be made to a single CFDA number. But again I would defer to our grant experts. So we can follow up on this one. And this one may actually be one that we put out as an FAQ.

63. Is programmatic updates, a data element being reported?

I'm not sure what the terminology for programmatic updates is referring to. There is not a data element under recipient or subrecipient that has that connotation. You might be referring to the regular reporting programmatic reporting that is required under federal awards assistance for a particular program. And, if so, again as we earlier specified, you would still be responsible for performing that reporting, as well as Section 1512 Recovery Act recipient reporting requirements.

64. Do corrections have to be made in the same manner as the report was initially submitted? For example, if the excel report was submitted, do the corrections have to be done in an excel report?

Again, our technical experts are not in the room. It seems logical that you would be able to access your information in the online transaction screen as a single record is being updated. However, I would recommend that if you have several records that have to be updated, that it's probably much more expedient and it's probably better internal controls to correct then on the way you originally submitted that data whether it's in excel or XML schema. In particular if you're doing the XML schema, because it does have more built edits in there.

65. If each state agency is a prime recipient will the governor designee have access to the information with this in data quality review?

If state is the prime recipient, then anyone that you've designated as a registrant on federalreporting.gov, we have a similar question earlier that had multiple registrants for a single prime recipient, then, yes they would be able to access and review that information. But again I want to point out that there is no formal review method that would be at the overall state level. Again and only if that state is a prime recipient.

