



Department of Housing and Community Development
American Recovery and Reinvestment Act of 2009
Reporting Requirements Frequently Asked Questions

December 2009

Q: What reporting is required under Section 1512 of the American Recovery and Reinvestment Act of 2009?

A: As the prime recipient of several ARRA grants, DHCD's basic reporting requirements include:

- Total amount of funds received
- For each project/activity:
 - The amount of funds spent
 - A description of the intended outcomes
 - An update on the completion status
 - An estimate of the number of jobs funded with Recovery Act dollars
- Details on sub-awards and other payments

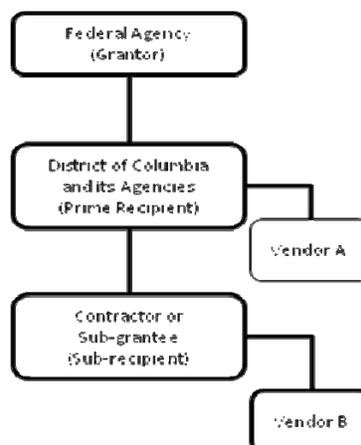
Q: What are "projects" and "activities?"

A: The terms "projects" and "activities" are used interchangeably within the reporting system. For DHCD, the grant award itself is the project.

Q: What project/activity level data must be reported?

A: Each quarter DHCD must provide project description, project status, and activity code information. The project description is the name of the grant award. The project status is determined by the percentage of funds obligated. For each project, a "Project Status" must be selected from among the following options: "Not Started," "Less than 50% completed," "Completed 50% or more," or "Fully Completed." DHCD must also select an activity code(s) from the National Center for Charitable Statistics' database that describes the grant award. A searchable code list is available at <http://nccsdataweb.urban.org/PubApps/nteeSearch.php?gQry=all-core&codeType=NPC>.

Q: For reporting purposes what are the relevant entities and how do they relate to one another?



Term	Definition	Example
Prime Recipients	Non-Federal entities that receive Recovery Act funding in the form of grants, loans, or cooperative agreements directly from the Federal Government. The prime recipient is considered the direct grantee.	DHCD
Sub-recipients	Organizations that receive grants from the prime recipient (direct grantee).	Community-based organizations (CBOs)
Vendors	Contractors that operate in a competitive environment and provide goods or services that are ancillary to the operation of the federal program	Companies

Q: Who is responsible for reporting data under Section 1512?

A: The prime recipient is ultimately responsible for reporting all data required by Section 1512 of the Recovery Act, including the Federal Funding Accountability and Transparency Act (FFATA) data elements for sub-recipients. As the prime recipient, DHCD will require sub-recipients to submit their FFATA data elements required under 1512(c)(4) and to report information on any sub-recipient vendors on a monthly basis. Sub-recipient and vendor reporting will mostly be performed in the DC Government's web-based reporting system: <http://reporting.dc.gov>. For these sub-recipients and vendors, DHCD will enter contact information for the person designated by each sub-recipient or vendor to complete the monthly reports and an invitation will receive an email with instructions on how to create an account, log in, and enter data. For any project that DHCD has elected to collect electronic reports outside of the web-based system, instructions will be provided to the sub-recipients and vendors on an alternate process in keeping with all mandated deadlines and rules.

Q: Are any of DHCD's ARRA grants not subject to Section 1512 reporting requirements?

A: Yes, the Tax Credit Exchange Program also known as Section 1602 is not required to submit the same data on a monthly basis as the other ARRA grants received by DHCD. Nevertheless, Section 1602 sub-recipients will be required to submit data on a quarterly basis to Georgette Benson, the grant manager for Section 1602 using a spreadsheet that will be provided.

Q: What are the reporting requirements for sub-recipients?

A: Sub-recipients must report the following (also referred to as FFATA Data Elements):

- Sub-Recipient DUNS number
- Sub-Award Number
- Sub-Recipient Name, Address, City, State, Zip Code
- Sub-Recipient Congressional District
- Sub-Recipient Type
- Amount of Sub-Award
- Ultimate Value of Sub-Award
- Sub-Award Date
- Sub-Award Period Start Date
- Sub-Award Period End Date
- Sub-Recipient Place of Performance
- Sub-Recipient Place of Performance-location code
- Sub-Recipient Place of Performance-ZIP code
- Sub-Recipient Place of Performance- Congressional District
- Sub-Recipient Area of Benefit
- Sub-Recipient Highly Compensated Officer Name (If Applicable)
- Sub-Recipient Highly Compensated Officer Compensation (If Applicable)
- Amount of Recovery funds expended by project

- Number of jobs funded with Recovery Act dollars

*All agreements for ARRA-funded grants executed with DHCD contain these requirements.

Q: Do I need to register in FederalReporting.gov?

A: No. DHCD, as the prime recipient, will report in FederalReporting.gov on behalf of sub-recipients.

Q: Do I need a DUNS number?

A: Yes. Each entity (except individuals) that receives Recovery Act funds directly or indirectly must have a DUNS number. The DUNS number is a unique nine-character number provided by Dun & Bradstreet that identifies each physical location of a business organization. DUNS numbers are free for all businesses required to register with the U.S. Federal government in order to receive contracts or grants. The federal government uses DUNS numbers to identify business organizations and to track the distribution of federal monies. Please visit the Dun & Bradstreet (D&B) online registration (<http://fedgov.dnb.com/webform>) to obtain a DUNS number. You will need the following information:

- Name of organization
- Organization address
- Name of the CEO/organization owner
- Legal structure of the organization (corporation, partnership, proprietorship)
- Year the organization started
- Primary type of business
- Total number of employees (full and part time)

Q: Do I need to register in the CCR database?

A: Yes, recent federal guidance requires that all sub-recipients must register in the CCR database in addition to having a valid DUNS number. CCR is the primary contractor database for the federal government. Information required for CCR registration includes the entity's DUNS number, an Employer Identification Number (EIN), statistical information such as average number of employees and average annual receipts, and electronic funds transfer (EFT) information. If you are not registered in CCR, please do so immediately as the registration process can take several weeks. Registration is available at <https://www.bpn.gov/ccr/>.

Q: How will sub-recipients meet their ARRA reporting requirements?

A: DHCD will require sub-recipients to enter data on a monthly basis beginning on the first of every month. Reports will be due by close of business on the fifth day and the remaining five days will be used by DHCD to review and amend data where incorrect before the monthly deadline on the tenth day of the month. All reports are cumulative to the signing of the Recovery Act continuing through the end of the prior month. For example, the January reporting period will include all performance data through the end of December since the Recovery Act was signed on February 17, 2009. Please consult the Data Dictionary available at <http://www.recovery.gov/?q=content/recipient-reporting> for definitions of reporting terms.

Q: When is the first report due?

A: The first report is due October 10, 2009 for all activity through the end of September 2009. A sub-recipient or vendor is not required to report until a grant agreement or contract has been executed using Recovery Act funds. Thus, the first report would be due at the end of the first ten days of the month immediately following the month in which the agreement or contract was executed. For example, if your organization signed a grant agreement with DHCD in October, your organization would be required to report beginning on November 1 for activity that took place in October.

Q: Do I have to report if I have not yet received or spent any ARRA funds?

A: Once you have received ARRA funds you are required to report, even if you have not spent those funds.

Q: What are my job-related reporting requirements?

A: Sub-recipients are responsible for calculating the number of jobs funded with Recovery Act dollars and for drafting descriptions of the type of jobs (e.g. teacher, administrative assistant) funded. According to recent guidance published on December 18, 2009 by the federal Office of Management and Budget (OMB), sub-recipients will now report jobs on a single quarterly basis rather than cumulatively across multiple quarters of data. Actual hours worked will be reported into reporting.dc.gov on a monthly basis and DHCD will then submit this information on a quarterly basis as part of the agency's quarterly report to the federal government. The calculation then begins anew at the start of the next quarter and so on. In addition to reporting their own job information, sub-recipients must collect and report job estimates from any vendors with employees directly charged to projects or activities funded by Recovery Act funds. The full text of the new guidance can be found here: http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf.

Q: What are DHCD's job-related reporting requirements?

A: As the prime recipient, DHCD is responsible for estimating all jobs funded with Recovery Act dollars whether the funds are expended directly by DHCD-received or sub-awarded. DHCD must collect and submit employment data from its own vendors and from sub-recipients and their vendors. DHCD will enter job estimates and narratives in FederalReporting.gov.

Q: How do I calculate jobs funded with Recovery Act dollars?

A: Reporting.dc.gov will be updated in December to reflect the simplification of the job reporting requirements as published in OMB's December guidance. Job information will still be reported as two separate fields—a numeric field and a separate description field. DHCD will collect information on jobs funded with Recovery Act dollars from sub-recipients and vendors using a standard calculation that translates both full and part time employees into “full-time equivalents.” The job calculation is performed by adding the total number of hours worked by all employees funded with Recovery Act dollars divided by the total hours in a full-time schedule. Recipients must report jobs funded on a monthly basis in <http://reporting.dc.gov> unless otherwise authorized to report outside the system by the grant manager. Each position for which actual hours are calculated must be entered into the system as a “resource.” Recipients must only report job information for the particular month. For example, if a sub-recipient reports 2.5 FTEs for the first month and those employees continue to be funded with Recovery Act dollars, the recipient would continue to report 2.5 FTEs in the following month.

Q: How can sub-recipients ensure the quality of data submitted to DHCD?

A: Sub-recipients should:

- Own sub-recipient and sub-recipient vendor data
- Initiate appropriate data collection, data review, and reporting procedures to ensure that Section 1512 reporting requirements are met in a timely and effective manner
- Implement internal control measures to ensure accurate and complete information

Examples include:

- Document policies and processes for collecting and reporting data in accordance with ARRA reporting requirements
 - Determine acceptable values and ranges for information to identify outliers and potential inaccuracies
 - Establish monitoring protocols and data sampling methodologies
 - **Assign data collection and reporting responsibilities to specific, trained staff members**
- Review sub-recipient information for material omissions and/or significant reporting errors

- Make appropriate and timely data corrections

Q: Whom should sub-recipients contact with ARRA related questions?

- A:** **DHCD ARRA Coordinator** – Brad Hicks, bradley.hicks@dc.gov, (202) 442-7265
Tax Credit Exchange Program (Section 1602) – Georgette Benson, georgette.benson@dc.gov, (202) 442-7284
Tax Credit Assistance Program – Oke Anyaegbunam, oke.anyaegbunam@dc.gov, (202) 442-7142
Homelessness Prevention & Rapid Re-housing Program – Guyton Harvey, guyton.harvey@dc.gov, (202) 442-7140
State Fiscal Stabilization Fund –Janice Blassingame, janice.blassingame@dc.gov, (202) 442-7295
Community Development Block Grant-Recovery –Jim Thackaberry, jim.thackaberry@dc.gov, (202) 442-7141
Lead Hazard Reduction Demonstration Grant – Usen Bassey, usenobong.bassey@dc.gov, (202) 442-7206
Neighborhood Stabilization Program – Martine Combal, martine.combal@dc.gov, (202) 442-7285

**KEY STEPS EVERY SUB-RECIPIENT SHOULD TAKE
TO PREPARE FOR THE FIRST REPORTING DEADLINE**

DHCD encourages all sub-recipients to:

- 1) Confirm and/or obtain a DUNS number.
- 2) Designate the individual(s) responsible for collecting and reporting ARRA information to DHCD.
- 3) Review the reporting guidance available on <http://reporting.dc.gov>.
- 4) Verify you have an appropriate recordkeeping system to separate track and report grant expenditures.
- 5) Develop a plan to gather information about jobs funded with Recovery Act dollars.
- 6) Design your data quality review methodology and internal controls to ensure accurate, complete, and timely ARRA reporting.