

Reporting Requirements under the Recovery Act

HHS Policy: The expectation is that **all** Contractors receiving ARRA funds **must** submit a report in www.federalreporting.gov covering the period from the date of award through the end of the calendar quarter even if no work has been performed. Contractors shall report the information in FAR clause 52.204-11.

Reporting Cycle: (due dates)

- Oct. 10
- Jan. 10
- April 10
- July 10

Who must register in www.federalreporting.gov?

- Contracting Officers (COs) awarding contract actions (contracts, orders, mods. etc.) funded in whole or in part with ARRA funds
 - Necessary to monitor submission of reports and conduct review
- Contractors (Prime Recipients) in accordance with FAR 52.204-11
 - Must be registered in Central Contractor Registration (CCR) database
 - Also responsible for reporting for first-tier subcontractors
- Registration prior to Oct. 1 recommended for contractors and COs

Reporting Process/Data Quality Review

- Days 1 – 10**
- * Contractors submit reports
 - * Deadline is midnight Pacific Time on the 10th
 - * Report must be entered as an Initial Submission otherwise contractor considered non-compliant (only Draft Submission submitted)
 - * After Day 10, new initial reports require a justification for lateness (online) – only in rare instances
 - * No new initial reports accepted after Day 21
- Days 11-21**
- * Contractors may make corrections
 - * COs shall review database to validate that report was submitted
 - CO may review report for significant errors and material omissions. If identified, CO shall notify the contractor offline of any significant errors and/or material omissions. The CO must document the nature of the significant error and/or material omission and retain this document in the contract file.
 - * Upon completion of Day 21, reports become locked and transitioned to Final Submission Status Phase
- Days 22-26**
- * COs shall document their review of the contractors report on the Checklist for Contractor Reports (**Attachment L**).

- * CO shall review report for significant errors and material omissions. If the CO identifies significant errors and/or material omissions, the CO must include his/her comments on the nature of the significant error(s) and/or material omission(s) on the Checklist for Contractor Reports.
- * The CO's comment(s) on the contractor's report shall not be submitted in www.federalreporting.gov until approval has been received on the Checklist for Contractor Reports at least one level above the CO.
- * CO must comment on report to unlock report for contractor edits
 - If no comment, CO shall indicate that the report was reviewed with no comments
- * Comments are made at the report level not on individual data elements
 - * Comments should be as specific as possible
- * System will notify contractor of comment(s) received and will trigger a notification to the original comment submitter
 - * Notification is sent from DoNotReply@FederalReporting.gov to the User's email address
- * Although COs may submit comments through Day 29, COs are encouraged to submit comments by the 26th to allow time for Contractor edits
- * System does not require the contractor to make corrections or for the CO to approve of the report before system finalizes it
- * Notational status of review available to public:
 - Reviewed with No Comments
 - Reviewed with Comments,
 - Not Reviewed, or
 - Reviewed and Resubmitted

Days 27-29 * Contractor may make corrections to report

Day 30 * System posts all reports as final and makes information available to public at www.Recovery.gov – Report considered Published

Contractors may not change a report after Day 29 but may update and revise information in the next quarterly report since the reports are cumulative.

Significant error - data that is not reported accurately and where such erroneous reporting results in significant risk that the public will be misled or confused by the contractor's report. Examples of significant errors include, **but are not limited to:**

- The cumulative invoiced amount reported is in excess of the obligation;
- The contractor incorrectly selects *fully complete*, to describe an incomplete project; or;
- The contract award/obligation amount was for a relatively small dollar amount, such as \$100,000, and the contractor reports the number of jobs created and retained cumulatively as 100,000.

Material omission is defined as data that is not responsive to a specific data element. When reviewing for material omissions, the agency reviewer should do so with the goals of transparency in mind. For instance, where the contractor is required to provide a narrative description, it must be sufficiently clear to facilitate understanding by the general public.

Note: www.federalreporting.gov will provide the entire report, including comments, responses, and report revisions to the Recovery Accountability and Transparency Board who will determine how report information will be publicly displayed.

Helpful links: User Guide

<https://www.federalreporting.gov/federalreporting/downloads.do#docs>

FAQs for Contractors on Reporting

http://www.whitehouse.gov/omb/recovery_faqs_contractors/

FAQs for Agency Review of Contractor Reports

http://www.whitehouse.gov/omb/recovery_faqs_agency_review/

General FAQs

http://www.whitehouse.gov/omb/recovery_faqs/