

# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **Are Recovery Act CDFI Program and NACA Program Awardees required to report to both the CDFI Fund and FederalReporting.gov at the end of each quarter?**

- A Yes. Recovery Act CDFI Program and NACA Program Awardees (Awardees) are required to report to the CDFI Fund using the Quarterly Institution Level Report (QILR) Excel workbook and to FederalReporting.gov on a quarterly basis. Both quarterly reports are due no later than 11:59 p.m. Eastern Standard Time (EST) ten (10) days after the end of each calendar quarter. Submission deadlines for the QILR and FederalReporting.gov are as follows:

| Quarterly Reporting Deadlines |            |
|-------------------------------|------------|
| For every quarter ending on:  | Deadline:  |
| December 31                   | January 10 |
| March 31                      | April 10   |
| June 30                       | July 10    |
| September 30                  | October 10 |

### **When will FederalReporting.gov and the QILR be available each quarter?**

- A Awardees can submit reports through the FederalReporting.gov portal beginning on the first day of each reporting period. The QILR Excel workbook will be emailed to the authorized representative listed in the Awardee's myCDFIFund account for the Recovery Act award and/or made available for download on the CDFI Fund's Recovery Act webpage (<http://www.cdfifund.gov/recovery>) on or before the first day of each quarterly reporting period.

### **Do Awardees have to report quarterly even if none of the Recovery Act award has been spent?**

- A Yes. If your organization received a Recovery Act award, you must report to both the CDFI Fund and FederalReporting.gov per your Assistance Agreement.

### **Do Awardees have to make quarterly report revisions requested by the CDFI Fund?**

- A Yes. Awardees that demonstrate systemic or chronic reporting problems and/or otherwise fail to correct such problems as identified by the CDFI Fund are non-compliant. Failure to comply with any provision of the Recovery Act, quarterly reporting requirements, or any other award term may be considered an event of default pursuant to Schedule 1, Section 6.1 of the Assistance Agreement and will become a part of the recipient's performance record.

### **Are Awardees still required to submit annual Institution Level Reports to the CDFI Fund?**

- A Yes. Awardees are required to report annually to the CDFI Fund through the Community Investment Impact System (CIIS). Except as expressly articulated in *Reporting Outreach for Awardees*, the Assistance Agreement, by and between the Awardee and the CDFI Fund, remains in full force and effect in accordance with its terms.

# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **Are Awardees required to submit Unaudited Financial Statements to the CDFI Fund?**

- A The CDFI Fund requires quarterly Unaudited Financial Statements from non-depository and non-profit depository institutions. (Awardees that are Insured Credit Unions, Insured Depository Institutions, or Depository Institution Holding Companies are not required to submit Unaudited Financial Statements; instead, the CDFI Fund will obtain the necessary financial information from publicly available sources.)

Awardees should submit Unaudited Financial Statements via e-mail to [CCME@cdfi.treas.gov](mailto:CCME@cdfi.treas.gov) with "Recovery Act Unaudited Financial Statement" in the email subject line.

### **What are the deadlines for submitting Unaudited Financial Statements to the CDFI Fund?**

- A Quarterly reporting deadlines for the submission of Unaudited Financial Statements will be one quarter after the QILR deadline for that quarter no later than 11:59 p.m. EST. The following table shows the dates by which quarterly Unaudited Financial Statements are due to the CDFI Fund. Submission deadlines are as follows:

| Unaudited Financial Statements Deadlines |            |
|--|------------|
| For every quarter ending on:             | Deadline:  |
| December 31                              | April 10   |
| March 31                                 | July 10    |
| June 30                                  | October 10 |
| September 30                             | January 10 |

### **Are Awardees required to submit an A-133 Single Audit?**

- A Awardees that are non-Depository Institutions and non-profit Depository Institutions are required to submit an A-133 Single Audit, if applicable. Awardees must submit the A-133 Single Audit as described in the Assistance Agreement<sup>1</sup> and OMB Guidance M-10-14 ([http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-14.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-14.pdf)).

### **Where do Awardees find the QILR Excel workbook?**

- A The QILR Excel workbook will be emailed to the authorized representative listed in the Awardee's myCDFIFund account for the Recovery Act award and/or made available for download on the CDFI Fund's Recovery Act webpage (<http://www.cdfifund.gov/recovery>) on or before the first day of each quarterly reporting period.

### **How do Awardees submit the QILR Excel workbook?**

- A Once completed, Awardees should save the QILR Excel workbook with their organization's name (e.g. "OrganizationName"). Awardees must submit the workbook electronically via email to the CDFI Fund at [QILRSubmissions@cdfi.treas.gov](mailto:QILRSubmissions@cdfi.treas.gov) by the deadlines provided below. Only submissions received through this address receive the CDFI Fund's official electronic time and date stamp. By submitting the workbook via email, the Awardee certifies that the QILR is complete.

---

<sup>1</sup> See Schedule 6-B for deadlines.

# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **Who needs to register on FederalReporting.gov and what information is required?**

- A The representative responsible for submitting the report to FederalReporting.gov must register on the FederalReporting.gov website. To register as a Recipient User of FederalReporting.gov, the representative must know the DUNS number associated with the organization's award and have a valid email address. The representative will receive an email confirmation once they have successfully registered as a FederalReporting.gov user. To help ensure delivery of emails from FederalReporting.gov, add "FederalReporting.gov" as a safe recipient in your email inbox.

### **Can multiple individuals at an Awardee organization register on FederalReporting.gov?**

- A Yes. However, steps must be taken to coordinate activities to ensure that only one report is submitted on behalf of the Awardee to both the CDFI Fund and FederalReporting.gov.

### **Should Awardees "Copy Forward" the previous quarter's FederalReporting.gov report?**

- A To minimize errors and to ensure a link between each quarterly report in FederalReporting.gov, Awardees are encouraged to use the "Copy Forward" function in FederalReporting.gov to copy the report submitted last quarter. Please see Chapter 10: Copy Forward and Copy Functions of the FederalReporting.gov User Guide found here: <https://www.federalreporting.gov/federalreporting/downloads.do>. (Please note that some Awardees have noted that though several individuals may register on FederalReporting.gov using the same DUNS, the login used to submit the previous quarter's report must be used to "Copy Forward" to the next quarter.)

### **Will an expired CCR registration prevent an Awardee from submitting or correcting a report in FederalReporting.gov?**

- A Yes. In order to report to FederalReporting.gov, your organization must maintain its CCR registration. An expired registration will prevent you from submitting and correcting reports. You must renew and revalidate your registration within 12 months from the date you previously registered. If you do not renew your registration, it will expire. We strongly encourage you to check your organization's CCR registration status as soon as possible. This will ensure your DUNS number has not already expired, does not expire just prior to a reporting deadline, or during the agency review phase.

### **How does an Awardee check the organization's CCR registration?**

- A Go to [www.ccr.gov](http://www.ccr.gov) and click "CCR Search" located at the top of the page. Search by using your DUNS number or name/address information and click "search". The top of the page will show your "Current Registration Status."

### **Does the information listed on the Awardee's Quick Reference Card have to match the information reported to FederalReporting.gov?**

- A Yes. The information provided on the Quick Reference Card must be identical to the information reported to FederalReporting.gov. If you need an additional copy of your organization's Quick Reference Card or if you have questions or concerns about the information listed, please contact a member of the CDFI Fund Recovery Act Team immediately.

# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **What should Awardees enter for Award Type, Awarding Agency Code, Funding Agency Code, Program Source (TAS), Sub-Account for Program Source (TAS), CFDA Number, and Award Date in FederalReporting.gov?**

|   |                                |                                 |
|---|--------------------------------|---------------------------------|
| A | Award Type                     | Grant                           |
|   | Awarding Agency Code           | 2066                            |
|   | Funding Agency Code            | 2066                            |
|   | Award Date                     | <i>See Quick Reference Card</i> |
|   | CFDA Number                    | 21.020                          |
|   | Program Source (TAS)           | 20-1882                         |
|   | Sub Account for Program Source | [leave blank]                   |

### **Do Awardees have to provide a “Zip Code+4” on FederalReporting.gov?**

- A Yes. The “Zip Code+ 4” must match the address reported and will be used to verify the Congressional District provided in FederalReporting.gov. If you do not know your organization’s “Zip Code+ 4”, you can look it up using the Zip Code Look-Up feature on U.S. Postal Service website (<http://zip4.usps.com/zip4/welcome.jsp>).

### **Who qualifies as a beneficiary and who qualifies as a sub-recipient/vendor? Is it necessary to report sub-awards?**

- A According to the Office of Management and Budget (OMB), an entity or individual receiving a loan is a beneficiary and not a sub-recipient. Thus, CDFI borrowers do not need to register or report on FederalReporting.gov. Awardees must report as the Prime Recipient on behalf of all of their beneficiaries, unless an Awardee is a bank holding company. Loans and investments made by CDFIs are not sub-awards. Therefore, the sub recipient tab on the FederalReporting.gov template must be left blank. Prime recipients are required to report an estimate of jobs funded by the Recovery Act.

### **For reporting to FederalReporting.gov, how must an Awardee report on loans/investments originated with more than one place of performance (i.e., loans made to multiple locations) since the “Primary Place of Performance” is a mandatory data element requiring recipients to identify a single geographical location?**

- A In the event that it is not possible to determine a single address that is receiving a majority of the award funds, the Awardee must use the organization’s primary address listed at the beginning of the FederalReporting.gov report.

### **Is it necessary to answer infrastructure related questions on FederalReporting.gov?**

- A No. Questions relating to infrastructure are not applicable to Awardees; therefore, Awardees should leave infrastructure questions blank.

### **Can an Awardee modify the FederalReporting.gov and QILR spreadsheets?**

- A No. The spreadsheet or XML data fields will not register properly if an Awardee changes the formatting.

# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **Where can Awardees identify the Congressional District code corresponding to their address?**

- A You can find the Congressional District corresponding to the Zip Code+4 reported by using a) the U.S. House of Representative's look-up tool: <https://writerep.house.gov/writerep/welcome.shtml> or b) the U.S. Census Bureau's look-up tool <http://factfinder.census.gov/home/cws/main.html>.

For addresses in states with only one Congressional District (Alaska, Montana, Delaware, North Dakota, South Dakota, Vermont, and Wyoming), FederalReporting will allow the selection of "00" or "0". Those addresses represented by a non-voting member of Congress (Puerto Rico, Washington D.C., and Guam), FederalReporting.gov will allow the selection of "98".

### **Do Awardees have to use the NAICS or NTEE-NPC code provided for Activity Code 1 on the Quick Reference Card for FederalReporting.gov?**

- A Yes. Awardees must enter the NAICS or NTEE-NPC code listed on the Quick Reference Card in FederalReporting.gov. Activity Codes 2-10 should be left blank.

### **Which NAICS should Awardees use when completing Tables 15 and 16 of the QILR?**

- A Awardees should select the appropriate 2-digit NAICS that corresponds to the principal type of business establishment in which the jobs are to occur. For a simple two-digit NAICS chart see: <http://www.census.gov/cgi-bin/sssd/naics/naicsrch?chart=2007>.

### **Which of the FederalReporting.gov data fields are a quarterly and which are cumulative?**

- A The only field in FederalReporting.gov requiring quarterly data is "Number of Jobs." The remaining fields are cumulative. (Other fields, i.e., "Total amount of payments to Vendors less than \$25,000/award" and "Total amount of Sub Awards less than \$25,000/award" have a quarterly threshold (below \$25,000) for inclusion in the data element, but again the amount reported is cumulative for the award.) Awardees should refer to the information available on FederalReporting.gov, including the reporting templates and the *Recipient Reporting Data Model*.

### **What is a job funded by the Recovery Act?**

- A Per OMB Guidance M-10-08 ([http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-08.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf)) released on Friday, December 18, 2009, a job funded by the Recovery Act is one in which the wages or salaries are either paid for, or at some point reimbursed, with Recovery Act funding.

### **What is the difference between a "job created" and a "job retained"?**

- A Per OMB Guidance M-10-08 ([http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-08.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf)) released on Friday, December 18, 2009, a job created is a new position created and filled, or an existing unfilled position that is filled, that is funded by the Recovery Act; and a job retained is an existing position that is now funded by the Recovery Act. It is important to note that a job must be counted as either retained or created. Awardees continue to report jobs created or retained in each quarter.

# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **Can I report to FederalReporting.gov the jobs NOT funded by the Recovery Act (e.g. associated with loans and investments that were made as a result of Recovery Act funding making a balance sheet improvement)?**

A No. Per OMB M-10-08, only salaries and wages paid for with Recovery Act funding can be reported to FederalReporting.gov.

### **Can I report in the QILR jobs NOT funded by the Recovery Act?**

A Yes. Tables 15 and 16 of the QILR collect information on jobs retained and created at the businesses, respectively, and provide rows for Awardees to capture data on three categories of jobs:

- 1) "FTEs Funded by the Recovery Act"  
(e.g. lines of credit and working capital loans for operations for paying wages and salaries)
- 2) "FTEs Resulting from Use of Recovery Act Funds"  
(e.g. capital investments and other lending that do not pay wages and salaries)
- 3) "FTEs Resulting from Leveraged Use of Recovery Act Funds"  
(e.g. loan loss reserves and capital reserves that strengthen the balance sheet and support lending to meet the goal described in Assistance Agreement Performance Goals and Measures above)

Only "FTEs Funded by the Recovery Act" can be included as part of the Number of Jobs reported to FederalReporting.gov.

### **Does a completed QILR provide the Number of Jobs I will need to report to FederalReporting.gov?**

A Yes. To assist Awardees with calculating the Number of Jobs, the "# of Jobs for FederalReporting" tab of the QILR workbook aggregates the number of FTEs funded by the Recovery Act at the organization (Question 14) and in businesses (Tables 15 and 16) during the reporting quarter. The Number of Jobs reported to FederalReporting.gov must be identical to the total provided by this tab of the QILR.

The FederalReporting.gov Description of Jobs Created/Retained narrative should minimally describe the types of jobs created/retained and funded by the Recovery Act as reported in Number of Jobs. It is acceptable to describe additional job impacts where wages and salaries are not paid for by Recovery Act funds provided the description clearly indicates that these are not funded by the Recovery Act. The description should rely on job titles, broader labor categories, or the Awardee's existing practice for describing jobs as long as the terms used are widely understood and describe the general nature of the work.

### **Where can I find more information about jobs reporting?**

A Please refer to OMB Guidance M-10-08 ([http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-08.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf)) released on Friday, December 18, 2009, which provided updated instructions for reporting jobs on FederalReporting.gov. More CDFI-specific information on jobs reporting is available in the *Reporting Outreach for Awardees* available on the CDFI Fund's Recovery Act webpage at [www.cdfifund.gov/recovery](http://www.cdfifund.gov/recovery).

# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **Should an Awardee list all the transactions its portfolio in Table 17 of the QILR?**

- A No. Table 17 (Loans/Investments Originated During the Performance Period) only captures information on loans and investments the organization has originated during the Performance Period with Recovery Act funds by a) Use of Recovery Act funds, b) Transaction Type, and c) Purpose.

For each row, select whether the loan or investment reflects a direct use of Recovery Act funding or a leveraged use of Recovery Act funding. Examples of a direct use of Recovery Act funding: lines of credit, working capital loans, capital investments, other lending. Examples of leveraged use of Recovery Act funding: loan loss reserves and capital reserves that strengthen the balance sheet and support lending to meet the Performance Goal described in the Assistance Agreement. For each row, you will also select the Transaction Type and Purpose. See *QILR Instructions*.

### **How does Question 18 relate to Table 17?**

- A Question 18 seeks information on the subset of Recovery Act loans/investments reported in Table 17 that were originated in the organization's Approved Target Market. As a reminder, an approved Target Market is any Target Market(s) designated in an active CDFI Program Assistance Agreement or the Organization's most recently approved CDFI certification. See *QILR Instructions*.

### **Can reports be modified during the reporting period after they are submitted?**

- A Yes. Reports can be revised during Days 1-12 of the reporting period, but changes are tracked for auditing purposes through version control. Beginning on Day 13 and through Day 29, reports are locked by FederalReporting.gov and can only be unlocked for corrections by the CDFI Fund. Recipient reports are published and made available to the public on Recovery.gov on Day 30. After alerting the CDFI Fund's Recovery Act Team of the need to make corrections, Awardees may also make changes during the continuous correction period (Days 33-75).

### **If Awardees can modify submitted reports, are reports submitted prior to 10 days after the end of the quarter considered draft?**

- A No. Reports are expected to be complete and accurate when submitted. While some changes are possible after this date, not all fields may be revised and all changes are logged and may be used for audit purposes.



# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **When has an Awardee satisfied the quarterly reporting requirements for FederalReporting.gov?**

A Per OMB Guidance M-10-14 *Updated Guidance on the American Recovery and Reinvestment Act* ([http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-14.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-14.pdf)) issued on March 22, 2010 and as described in the CDFI Fund's *Reporting Outreach to Awardees*, Awardees will indicate a final report in FederalReporting.gov if the report is considered final and no future reports will be submitted. Awardees are no longer required to submit reports to FederalReporting.gov under the following circumstances:

- The award period<sup>2</sup> has ended; and
- All Recovery Act funds are received (through draw-down, reimbursement or invoice) and project status is completed per agency requirements and/or performance measures; or
- The award has been terminated or cancelled.

The CDFI Fund's award period concludes upon disbursement of funds to Awardees. Since all Awardees have received their Recovery Act awards, Awardees need only to satisfy the CDFI Fund's requirements for selecting project status as "Fully Completed". The CDFI Fund's requirements for selection of "Fully Completed" are as follows:

- 1) Funds Expended on Authorized Uses of Financial Assistance<sup>3</sup> equals Amount of Award; and
- 2) Awardee determines no additional FTEs will be funded by the Recovery Act; and
- 3) Narratives are consistent with both of the above.

Indication of a final report on FederalReporting.gov does not replace any other closeout procedures required by the recipient or Federal agency. Except as expressly articulated in *Reporting Outreach for Awardees*, the Assistance Agreement, by and between the Awardee and the CDFI Fund, remains in full force and effect in accordance with its terms. In particular, please note that the requirements in Schedule 4, Section II, part 2, Quarterly Institution Level Reports and Unaudited Financial Statements, will continue to have a quarterly reporting obligation despite Awardee's selection of "Fully Completed" in the FederalReporting.gov report.

---

<sup>2</sup> Award period should not be confused with Performance Period described in the Assistance Agreement. Performance Period means the period beginning with the Date of Notice of Award and includes an Awardee's three full consecutive fiscal years after the Date of Notice of Award, during which the Awardee must meet its Performance Goals, or such other period as may be established by the CDFI Fund.

<sup>3</sup> See Schedule 5-B of Assistance Agreement.



# FREQUENTLY ASKED QUESTIONS

## AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

### **Do CDFI and NACA beneficiaries have to comply with Davis-Bacon Act requirements?**

- A Yes. As stated in the Assistance Agreement, the Davis-Bacon Act prevailing wage requirements apply to all Recovery Act Awardees that use their award funds for construction related contracts in excess of \$2,000. Davis-Bacon Act wage requirements apply when laborers and mechanics are engaged to provide services for the construction, alteration, repair, or rehabilitation of structures and infrastructure including painting and decorating of the Awardees' facilities. Awardees must operate under the assumption that Davis-Bacon Act wage requirements will apply to all uses of the Recovery Act funds – uses include, but are not limited to Awardee operations, direct loans, loan guarantees, grants to borrowers, and equity investments.

The general Davis-Bacon Act requirements can be found in Schedule 4 or your organization's Assistance Agreement. These requirements are applicable to uses of both Financial Assistance (FA) and Technical Assistance (TA) award funds. The Department of Labor's wage determinations are available to the general public online at [www.wdol.gov](http://www.wdol.gov). Additional rules concerning the administration and enforcement of the Davis-Bacon Act labor standards are provided in 29 CFR Part 3 and other sections of 29 CFR Part 5. The Department of Labor's Davis-Bacon and Related Acts Provisions and Procedures are available at [http://www.dol.gov/dol/allcfr/Title\\_29/Part\\_5/29CFR5.5.htm](http://www.dol.gov/dol/allcfr/Title_29/Part_5/29CFR5.5.htm).

### **How will Awardees show compliance with the Davis-Bacon Act requirements?**

- A The Awardee can expect the CDFI Fund to request copies of up to date Certified Weekly Payroll statements for all laborers working on construction projects assisted in whole or part by the Awardee. The Awardee can expect the CDFI Fund to request copies of all Recovery Act Award-related loan documents including loan agreements, loan applications, project descriptions, and American Institute of Architects (AIA) forms.

### **Who must I contact if my question is not addressed in this FAQ or by the *Reporting Outreach for Awardees on the CDFI Fund website?***

- A Please contact the CDFI Fund Recovery Act staff listed on the Recovery Act section of the CDFI Fund's website: <http://www.cdfifund.gov/recovery/>