

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

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

I think this essentially means that it's a 3<sup>rd</sup> tier recipient, so there's the information that the prime recipient gets, who would be 1<sup>st</sup> 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 3<sup>rd</sup> 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 day 10, 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 federalreporting.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.