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 federal reporting.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 federal reporting.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 CFDAs? 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 programmatical 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.