

**HHS/OFFICE OF THE NATIONAL COORDINATOR FOR HEALTH IT  
ARRA RECIPIENT REPORTING FREQUENTLY ASKED QUESTIONS (FAQs)**

**REPORTING BASICS**

- **Do I need to prepare a report if my Notice of Grant Award is signed on or prior to December 31, 2011, yet the project period start date is after December 31, 2011?**

Yes, with few exceptions (e.g. awards less than \$25,000) recipients of ARRA contracts, grants, or cooperative agreements signed on or before December 31, 2011 must submit a recipient report, as required in Section 1512 of the Recovery Act, for the period of October 1, 2011 –December 31, 2011, regardless of the project start date.

- **I submitted a report last quarter. Do I need to re-enter all of my award data this quarter for the same award?**

No. Recipients who have previously entered reports into FederalReporting.gov should use the “Copy Forward” feature of the system to ensure the award data that was previously entered is automatically used for this quarter’s report. It is important, however, that any previous errors are corrected on the previous quarter’s report, before the “Copy Forward” function is implemented. The FederalReporting.gov Users Guide, Chapter 10, Copy Forward and Copy Functions, provides more information about these functions.

- **I am a Prime Recipient and delegated reporting responsibilities to my sub-recipients. One of my sub-recipients submitted their report through FederalReporting.gov on October 2<sup>nd</sup> for the quarter ending September 30 (calendar quarter 3). On October 4<sup>th</sup>, I used the Copy Forward feature to being preparing my September 30<sup>th</sup> report. When conducting the Copy Forward feature, I did not see the sub-recipients October 2<sup>nd</sup> calendar quarter 3 report submission. Instead, I saw the sub-recipient’s calendar quarter 2 submission for the previous quarter ending June 30<sup>th</sup>. How can this be resolved?**

Because the sub-recipient submitted their Q3 report before the Prime Recipient completed the Copy Forward function, the sub-recipient’s updated Q3 data did not transfer during the Copy Forward process. As such, the following actions will need to be taken:

- Prime recipient notifies the sub-recipient that, in view of the aforementioned timing circumstances, the sub-recipient’s Q3 report will need to be deleted and the sub-recipient will need to resubmit their Q3 report once the Prime recipient completes the Copy Forward function
- Prime recipient or sub-recipient deletes the sub-recipient’s Q3 report
- Prime recipient opens their previous quarter’s Q2 report
- Prime recipient completes the Copy Forward function
- Sub-recipient re-enters their Q3 report data

To preclude the aforementioned scenario, when applicable, Prime Recipients should advise sub-recipients, to whom they have delegated reporting responsibilities to not submit their report in FederalReporting.gov until such time the Prime Recipient completes the Copy Forward function. That said, Prime Recipients should complete the Copy Forward function early in the Initial Submission reporting cycle and promptly notify sub-recipients, thereby providing sub-recipients sufficient time to submit their reports.

- **I submitted a report last quarter and created my report for this quarter without using the Copy Forward feature. Therefore, a link was not established between the current period report and the report from the last quarter. What should I do?**

If you reported last quarter, and created a new report for this period without using the Copy Forward feature, you must link the current report to the previous report. The FederalReporting.gov Users Guide,

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Chapter 10, provides information about the Link function, which enables recipients to link a report from the current reporting to a report submitted in a prior reporting period.

- **Do I need to register in the CCR and Obtain a DUNS Number?**

Prime recipients and sub-recipients, to whom reporting responsibility has been delegated, will need to obtain a DUNS Number and register with CCR. Sub-recipients that received \$25,000 or more in Recovery Act funding will need a DUNS Number even if they have not been delegated reporting responsibility. Further information on CCR registration is available at: <http://www.ccr.gov/FAQ.aspx>. Please allow 10 business days to complete registration. *CCR registration only lasts for one year. As such, Prime Recipients and applicable Sub-Recipients will need to renew their CCR registration on an annual basis. Additional information on obtaining a DUNS Number is available at: <http://fedgov.dnb.com/webform>.*

Please Note: Erring on the side of caution, prior to development of FederalReporting.gov protocols, HHS' Standard Terms and Conditions for ARRA awards states "Recipients and their first-tier recipients must maintain current registrations in the Central Contractor Registration ([www.ccr.gov](http://www.ccr.gov)) at all times during which they have active federal awards funded with Recovery Act funds." However, as noted above, sub-recipients, to whom reporting responsibility has not been delegated, do not need to register with CCR for ARRA reporting purposes. Similarly, sub-recipients receiving less than \$25,000 do not need to register with CCR.

- **How do I obtain the FederalReportingPIN (FRPIN) for my organization?**

When a member of your organization registers in FederalReporting.gov, your organization's CCR POC is automatically registered in FederalReporting.gov and receives the FRPIN. This is achieved by matching the DUNS number entered into FederalReporting.gov, at the time of registration, with the DUNS reported in the CCR. Members of your organization must, in turn, must request the FRPIN from the CCR POC or the CCR POC's designee (the DUNS Administrator). More about this process can be found in the FederalReporting.gov Users Guide -- Chapter 3, FederalReportingPIN, and Chapter 4, Point of Contact and DUNS Administrator.

- **For what period of time do I need to report?**

With the exception of the "Number of Jobs" field and "Description of Jobs Created" field, ARRA data is reported cumulatively from the date of award through the end of each calendar quarter. Information relative to jobs is not reported cumulatively but, rather, reported based upon the number of employees funded with ARRA dollars during the reporting quarter.

- **I received a supplement to an ARRA-funded parent award. Do I submit one report for the parent and supplemental award or do I submit two separate reports?**

One report is submitted for the parent award and supplement(s). For example, if the parent award was \$100,000 and the supplement is \$50,000, the entire \$150,000 would be reflected in one report submission. In doing so, recipients should use the award number and the award notice issuance date of the parent award. Financial reporting is cumulative across the parent and all supplements.

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- **I, as the Prime Recipient, issued a sub-award in the amount of \$2M on May 15, 2010. The sub-award was later amended to reflect an increase to \$5M. All other sub-award data remained unchanged, including the sub-award number. How do I reflect this increase on the sub-recipient worksheet?**

Given that the changes to the sub-recipient agreement were in the form of an amendment, as opposed to a new agreement with a new award number, the Prime Recipient should change the “Amount of Sub Award” field from \$2M to \$5M. The “Sub Award Date” would reflect the date that the initial sub-award was issued – that is, in this case, May 15, 2010.

- **How should quarterly reporting be conducted when an award is transferred from one recipient to another recipient?**

The initial recipient (Prime 1) should submit a Final Report through [FederalReporting.gov](http://FederalReporting.gov). The “Amount of Award” field should be reduced to reflect the Federal amount of ARRA expenditures; for, presumably, the difference between the Prime 1 original award amount and Prime 1 Federal expenditures is the amount that was transferred to the new recipient (Prime 2). Prime 2 will submit their first report for the quarter in which the award was transferred. The Prime 2 “Amount of Award” field should reflect the monies transferred from Prime 1 which, again, is presumed to be the difference between the Prime 1 original award amount and Prime 1 Federal expenditures. In sum, absent any supplements provided to Prime 2 during the quarter, the “Amount of Award” reflected in the Prime 1 Final Report plus the “Amount of Award” reflected in the initial Prime 2 report should total the original amount awarded to Prime 1

- **I am a Prime Recipient and will have a sub-award and a contract with a sub-recipient and vendor, respectively, at some point in the future. While the identity of the sub-recipient/vendor and agreement provisions are known, a binding agreement has not been created during the reporting period. As such, should the reported sub-recipient and vendor data include these pending agreements?**

No. Inclusion of sub-recipient and vendor information should only be included at such time a binding award/agreement has been executed.

- **The Initial Submission period is the first 10 days of the calendar quarter (e.g. January 1 through January 10) and the Late Submission Period is days 11 through 14 (e.g. January 11 through January 14). I submitted my timely report on January 10 and was advised by ONC on January 11 that a correction needs to be made. If I make the correction during the Late Submission Period, will my report be deemed late even though I submitted my initial report on time?**

Yes, under the aforementioned scenario, the recipient’s subsequent submission would be deemed late, for [FederalReporting.gov](http://FederalReporting.gov) identifies the status of each report based on the recipient’s last submission. That said, to date, OMB has not identified any consequences for late report submissions. However, the recipient may opt to make the correction during the Agency Review period, which requires ONC to enter a Comment in [FederalReporting.gov](http://FederalReporting.gov), thereby unlocking the recipient’s report.

Please note that, for most quarters, OMB no longer has a Late Submission Period and, instead, has an Extended Submission Period, covering days 11 through 14 of the reporting month. Reports submitted during the Extended Submission Period are not deemed late.

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- **I wish to make a change during the continuous quality assurance period. Does the Agency need to enter a Comment in FederalReporting.gov to unlock my report, thereby enabling me to make the change?**

No. During the continuous quality assurance period, reports are unlocked and recipients can directly make changes to their reports – that is, agencies do not need to enter a Comment in FederalReporting.gov and unlock a report for a recipient to make a change.

- **On December 18, 2010 it came to my attention that an error was reported in my October 2010 report submission. Can my October 2010 report be unlocked, thereby enabling me to change the report?**

No. The continuous quality assurance period for the October 2010 reporting period ended on December 6, 2010 and, therefore, the October 2010 report cannot be unlocked. Instead, changes to the October 2010 report (and any other previously submitted reports) are conducted in accordance with Chapter 16 of the FederalReporting.gov User Guide entitled How to Request a Change to a Prior Quarter Report.

Change requests are either approved or denied by ONC and, if approved, actual changes are made by the Recovery Act Transparency Board (RATB). Given the role of the ONC and RATB, it is imperative that change requests be as detailed as possible – that is identifying the specific data that requires a change, a detailed articulation of the new data, and justification supporting the change. In addition, approved change requests are typically limited to final report submissions for, with the exception of number of jobs, other data fields are reported cumulatively (e.g. expenditures) and, therefore, can be corrected by reporting accurate cumulative figures in the subsequent quarter. The data change requested process, articulated in Chapter 16, does not permit changing jobs numbers, even for final reports.

- **How and when can I deactivate a report?**

Upon entering FederalReporting.gov, launch the My Reports “Prime Recipient” or “Sub Recipient” link, whichever is applicable, and search for the report in question. Once the report is opened, click “Deactivate”. Reports can be deactivated during the Initial Submission, Recipient Review, and Agency Review phases of the current reporting quarter only. To that end, reports cannot be deactivated during the Continuous Quality Assurance phase. Please note that your report must be unlocked by an agency Comment in order to deactivate the report during Agency Review phase.

- **What are the consequences if I fail to submit a report or I experience difficulties precluding the submission of a timely report?**

On April 6, President Obama released a memorandum to Federal Agency Heads on Combating Noncompliance with Recovery Act Reporting Requirements (<http://www.whitehouse.gov/the-press-office/vice-president-biden-announces-release-presidential-memorandum-tightening-enforceme>). On May 4, 2010, OMB issued a memorandum entitled, Holding Recipients Accountable for Reporting Compliance under the American Recovery and Reinvestment Act. Both of these documents reinforce the Administration’s commitment to ensure the timely submission of recipient reports, thereby promoting transparency of Federal expenditures.

Within this context, HHS makes a distinction between a non-compliant recipient and a non-filer. A recipient is deemed non-compliant if they willfully fail to submit a report by the established deadline. Consequences for non-compliance may include, but are not limited to, withholding of payment, award termination, and/or Government-wide suspension or debarment. A recipient is deemed a non-filer if they demonstrate a good faith effort to submit a report and provide documentation to support their efforts. A non-filer must submit

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a corrective action plan to ONC identifying the measures that will be taken to preclude a non-filer status in the subsequent reporting period.

Instances of non-compliance and non-filers are reported to the Department and OMB and posted on FederalReporting.gov. Moreover, such instances lower ONC, HHS, and Government-wide success rates, thereby inviting public scrutiny and criticism.

### ASSISTANCE TOOLS/DATA VALIDATION

- **What is the Recipient Reporting Data Model, and how do I use it?**

The Recipient Reporting Data Model indicates the attributes for each of the data elements encompassed in recipient reports, thereby promoting complete, consistent, and accurate report submissions. The Recipient Reporting Data Model can be downloaded from the "Downloads" tab of FederalReporting.gov. As a supplement to OMB's Recipient Reporting Data Model, ONC has created a Data Dictionary, a streamlined version of OMB's data model tailored to reflect ONC's data reporting requirements. ONC's Dictionary can be found at <http://healthit.hhs.gov/arra>.

- **Has HHS prepared any resources that will assist recipients in preparing their reports?**

Yes, HHS has prepared a Recipient Reporting Readiness Tool that can be found at: <http://taggs.hhs.gov/ReadinessTool/>. The tool provides grant-specific information to assist recipients in the preparation of their data for reporting to FederalReporting.gov. If there are discrepancies between the data retrieved via the Recipient Readiness tool and other source documentation (e.g. your Notice of Award), contact your Project Officer.

- **Has ONC prepared additional resources to assist recipients in preparing reports?**

Yes, ONC developed a recipient reporting toolkit at: <http://healthit.hhs.gov/arra>. When launching this URL, a series of hyperlinks appear on the right side of the screen one of which states "Recipient Reporting". When launching the "Recipient Reporting" hyperlink, the toolkit appears, including these FAQs, recipient reporting tip sheet, recipient readiness checklists, ONC data dictionary, sample reports, and a slide presentation. Toolkit content is updated on an iterative basis; therefore, recipients are encouraged to check this URL periodically for new information and updates.

- **Are there any tools or resources available to help ensure the accuracy of my report submission?**

#### **The FederalReporting.gov Users Guide**

(<https://www.federalreporting.gov/federalreporting/downloads.do#docs>) offers the following information to help ensure the accuracy of report submissions:

- Appendix B Error Messaging, identifies error messages (which will not allow a user to submit a report) and warning messages (which will allow a user to proceed with report submission) that may appear upon attempting to submit a report if data is missing and/or possibly erroneous.
- Chapter 10 and the Copy Forward Quick Reference Guide, provide information regarding the Copy Forward, Copy, and Link functions, thereby promoting the accuracy of reporting both within and among reporting periods.

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FederalReporting.gov includes data quality checks to help ensure the accuracy of data. For example, if a recipient enters a DUNS number that has less than nine characters, FederalReporting.gov will preclude submission of the report.

In addition to FederalReporting.gov tools, ONC conducts a quality control review process on all report submissions. ONC's quality control review process entails a thorough review of key data elements (e.g. correct award amount, correct award date) to minimize the existence of omissions and errors.

- **I am a Prime Recipient and received a \$2M grant and, to date, have reported \$1M in cumulative expenditures and no jobs have been created or retained. I have been advised by my awarding agency that an "Under-reported Jobs" error has been generated, yet the figures I reported are accurate.**

The Under-reported Jobs error is triggered when a recipient has been awarded more than \$500,000 and expended more than \$500,000 but has not created or retained any jobs. If a recipient has expended more than \$500,000 but has not created or retained jobs, a written statement must be submitted to the awarding agency [ONC] confirming that no jobs have been created or retained. The awarding agency will review the statement and, if deemed acceptable, the recipient reporting error will be lifted, accordingly.

### REPORTING RESPONSIBILITIES

- **What is the difference between a Prime Recipient, Sub-Recipient, and Vendor?**

**Prime Recipients** are non-Federal entities that receive Recovery Act funding as Federal awards in the form of grants, loans, or cooperative agreements directly from the Federal government. Federal agencies are not considered prime- or sub-recipients.

A prime recipient can make payments of Federal award dollars to (i) sub-recipients and (ii) vendors.

A **sub-recipient** is a non-Federal entity that expends Federal awards received from another entity to carry out a Federal program but does not include an individual who is a beneficiary of such a program. Specifically, sub-recipients are non-Federal entities that are awarded Recovery funding through a legal instrument from the prime recipient to support the performance of any portion of the substantive project or program for which the prime recipient received the Recovery funding. Additionally, the terms and conditions of the Federal award are carried forward to the sub-recipient.

A **vendor** is defined as a dealer, distributor, merchant, or other seller providing goods or services that are required for the conduct of a Federal program. Prime recipients or sub-recipients may purchase goods or services needed to carry out the project or program from vendors. Vendors are not awarded funds by the same means as sub-recipients and are not subject to the terms and conditions of the Federal financial assistance award.

The characteristics of a vendor that make it distinct from a sub-recipient are summarized below. A vendor:

- (1) Provides the goods and services within normal business operations;
- (2) Provides similar goods or services to many different purchasers;
- (3) Operates in a competitive environment;
- (4) Provides goods or services that are ancillary to the operation of the Federal program; and
- (5) Is not subject to compliance requirements of the Federal program.

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Examples that may assist in rendering the determination between a sub-recipient and a vendor are identified as follows:

<b>Subrecipient Relationship</b>	<b>Vendor Relationship</b>
If a non-profit organization issues a call for health information technology papers to be presented at a grant-supported conference, funding provided to a university for development of a paper(s) would be characteristic of a subrecipient relationship.	If a non-profit organization wants 1,000 copies of the conference proceedings, the transaction would be characteristic of a vendor relationship, because the services are commercial services, and performance would be measured on the number and quality of documents delivered -- not the accomplishment of the program objective -- which is to further the state of the art in health information technology. This would be true even if the grantee provided funds to another non-profit to produce copies of the proceedings.
If Organization A is required as part of its approved scope of work to obtain input from local jurisdictions and funds one of those jurisdictions to assemble representatives to discuss health information technology issues, this would be characteristic of a subrecipient relationship, since the local jurisdiction does not offer such services in the commercial marketplace and the subrecipient's performance will be assessed on how well it contributes to carrying out the project.	If Organization A provides funds to Organization B to conduct an independent evaluation of the project, the agreement would be characteristic of a vendor relationship, because Organization B would be responsible for designing and carrying out that project as it does for other customers in the commercial market.
If a State agency issues an award to a local agency for outreach to, and training of, community health care providers, the transaction would be characteristic of a subrecipient relationship since such activities would further the mission of the local agency.	If a State agency issues an award to have an organization train its staff in project management, the transaction is characteristic of a vendor relationship.
Organization A is to conduct a survey as part of its approved scope of work and wants it to be administered through physicians' offices. If Organization A funds Organization B to help administer the survey within its geographical area, the transaction would be characteristic of a subrecipient relationship, as long as Organization B has ongoing relationships with physicians as part of its day-to-day responsibilities.	If Organization A awards a contract to Organization B to develop the survey based on Organization B's performance of survey design services in the marketplace, the transaction would be characteristic of a vendor relationship.

- **State Agency XYZ is the Prime Recipient of an ARRA award. State Agency XYZ, in turn, awards ARRA monies to a State funded university to implement a substantive part of the grant program. Under this scenario, is the State funded university considered a sub-recipient?**

Yes, State funded universities or institutions of higher education should be treated as a sub-recipient when receiving ARRA funds from a State agency.

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- **Can a State agency be a sub-recipient or vendor of another State agency in relation to Section 1512 reporting?**

No. Movement of money between State agencies would not be separately reported in FederalReporting.gov.

- **In our state, a central office is submitting all state agency reports to FederalReporting.gov. How does this impact my reporting responsibilities?**

If you are a state agency Prime Recipient and a central state office is reporting on your behalf, then your agency will not need to register in FederalReporting.gov and obtain a FRPIN. However, you will still need to register in CCR, obtain a DUNS number, and provide your DUNS number and all required Prime Recipient, Sub-Recipient and Vendor data elements to the central reporting office in advance of any internal deadlines.

Should corrections be required to your report, ONC will contact the Prime Recipient directly (not the central office). The Prime Recipient may then need to work with its central office to ensure that the requested corrections are made in a timely fashion.

- **Can I delegate reporting responsibility to some sub-recipients and not to others?**

No, according to OMB, the prime recipient must delegate reporting to all sub-recipients or to none of them (not including sub-recipients that receive less than \$25,000 which are reported by the prime recipient in the aggregate). This “all or none” delegation determination can be changed each reporting period.

Please note that even if a Prime Recipient delegates reporting responsibility to sub-recipients, the Prime Recipient is still responsible for collecting job information from sub-recipients and sub-sub-recipients for inclusion in the Prime Recipients’ report.

- **I am a Sub-Recipient. Do I need to report?**

A Prime Recipient has the option of reporting on behalf of their sub-recipients or delegating reporting responsibilities to their sub-recipients. As such, you will need to work with your Prime Recipient to identify your reporting responsibilities.

- **Are sub-sub recipient data elements reflected on ARRA recipient reports?**

With the exception of “Number of Jobs” and “Description of Jobs Created”, which are captured on the Prime Recipient’s report, data elements for sub-sub recipients are not included on quarterly ARRA reports.

- **I am a Prime Recipient and have delegated reporting responsibility to my sub-recipients. How does my report, as the Prime Recipient, become linked to each of my sub-recipients’ reports?**

The sub-recipient’s report includes a section entitled “Reporting Information” comprised of three fields—“Award Type”, “Award Number”, and “Recipient DUNS Number”. It is imperative that the Prime Recipient provide this information to each sub-recipient at the time of delegation. When the sub-recipient populates their report, FederalReporting.gov will automatically incorporate the sub-recipients’ report into the Prime Recipients’ report by matching the “Award Type”, “Award Number”, and “Recipient DUNS Number” fields. As such, it is critical that the Prime Recipient and all sub-recipients correctly report these three data fields to ensure an appropriate match.

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- **As a Prime Recipient, when will I have the opportunity to view and review sub-recipient reports submitted by sub-recipients to whom I have delegated authority?**

Prime Recipients can view sub-recipients reports upon submission during the Initial Submission period and provide input to sub-recipients, outside of FederalReporting.gov, accordingly. Prime Recipients can comment on sub-recipient reports, within FederalReporting.gov, during the Prime Recipient Review period.

- **I am a Prime Recipient and use a purchase card to make incidental purchases on a daily basis. We pay our credit card company (e.g. XYZ Bank) each month for all of these purchases. For ARRA reporting purposes, do we need to account for each individual vendor, from which an item has been purchased (e.g. Paper Supplier ABC, Computer Company BBB), or, since the payment is made to XYZ Bank, do we just reflect XYZ Bank as the vendor on the ARRA report?**

Each vendor, with whom the Prime Recipient conducts business (e.g. Paper Supplier ABC, Computer Company BBB etc.) needs to be tracked separately for ARRA reporting purposes. XYZ Bank serves as the “middleman” with respect to vendor transactions but is not deemed the actual vendor, for it is the underlying businesses (e.g. Paper Supplier ABC, Computer Company BBB etc.) with whom the Prime Recipient is conducting business and advancing the objectives of the cooperative agreement.

### **SPECIFIC DATA ELEMENTS**

- **“Award Type” – I accidentally selected “Contract” rather than “Grant” as my “Award Type” and submitted the report through FederalReporting.gov. How can I change this field?**

To change an award type, the report needs to be recreated and resubmitted in its entirety. Upon receiving a confirmation of a successful transmission, the incorrect submission, reflecting “Contract” as the “Award Type”, should be deactivated.

- **“Award Number” – I entered the wrong Award Number in my report. How do I correct this error?**

Upon entering FederalReporting.gov, launch the My Reports “Prime Recipient” or “Sub Recipient” link, whichever is applicable, and search for the report in question. Once the selected report appears, click the “Change Key” box, enter the correct Award Number in the “Change To” portion of the screen, and then click the “Confirm Change Key”.

- **“Award Date” – What date do I enter in this field (e.g. project start date, date award was signed by ONC etc.)?**

The date the award was signed by the Awarding Agency Official.

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- **“Total Federal Amount of ARRA Expenditure”** – I was awarded an ARRA cooperative agreement during the reporting period but did not receive or expend ARRA cooperative agreement funds during the reporting period. However, during the reporting period, I started expending non-ARRA funds, including hiring staff, issuing sub-awards, and making payments to vendors, to advance the objectives of the cooperative agreement. In a subsequent reporting period, ARRA funds will be used to reimburse for these expenditures. Should these expenditures be included in the “Total Federal Amount of ARRA Expenditure” field?

Yes, under the aforementioned scenario, monies paid by recipients, including payments to Vendors and awards to Sub-Recipients, would be reflected in the "Total Federal Amount of ARRA Expenditure" field.

- **“Total Federal Amount of ARRA Expenditure”** – I was awarded an ARRA cooperative agreement and returned some of the monies back to the agency with the expectation that the returned monies will be available at a later date – that is, the award amount was not reduced. In the interim, during the reporting period, I started expending non-ARRA funds, including hiring staff, issuing sub-awards, and making payments to vendors, to advance the objectives of the cooperative agreement. In a subsequent reporting period, the returned ARRA funds will be used to reimburse for these expenditures. Should these expenditures be included in the “Total Federal Amount of ARRA Expenditure” field?

Yes, under the aforementioned scenario, monies paid by recipients, including payments to Vendors and awards to Sub-Recipients, would be reflected in the "Total Federal Amount of ARRA Expenditure" field.

- **“Number of Jobs” and “Description of Jobs Created”** - I was awarded an ARRA cooperative agreement during the reporting period but did not receive or expend ARRA cooperative agreement funds during the reporting period. However, during the reporting period, I started hiring and retaining positions, aligned with the cooperative agreement, utilizing non-ARRA funds. In a subsequent reporting period, ARRA funds will be used to reimburse for these expenditures. That said, should these ARRA created/retained positions be included in the “Number of Jobs” and “Description of Jobs Created” fields for the current reporting period?

Yes, ARRA positions, created or retained this reporting period, should be reflected in the “Number of Jobs” field and “Description of Jobs Created” field for the current reporting period as long as these positions will ultimately be reimbursed/funded with ARRA monies.

- **“Number of Jobs”** - Should overtime and paid vacation time, for ARRA positions, be included in the FTE calculations when deriving “Number of Jobs”?

Yes, recipients should include overtime and paid vacation time for all hours funded or eventually reimbursed with ARRA monies.

- **“Number of Jobs”** – My cooperative agreement commenced in the middle of the reporting period. For purposes of calculating number of jobs, would the denominator be 520 hours (or grantee’s equivalent full-time hours for a quarter) or should the 520 hours be prorated to reflect the portion of the reporting period in which the cooperative agreement was in affect?

The denominator for the job calculation always remains at 520, irrespective as to the start date of a grant agreement; for job calculations are based on the jobs created or retained for the entire quarter even if the grant was not in effect the entire quarter.

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- **“Number of Jobs” - When computing Number of Jobs, can the recipient’s cost-share/match dollars or program income be used to fund ARRA positions, be included in the computation?**

No. A funded job is defined as one in which the wages or salaries are either paid for or will be reimbursed with Recovery Act funding.

- **“Number of Jobs” - When computing Number of Jobs, should induced jobs be included? For example, students graduating and attaining employment as a result of an ARRA-funded grant training program.**

No. Only positions directly funded with Recovery Act monies by a prime recipient, sub-recipient, sub-sub recipient, or vendor should be included in the “Number of Jobs” calculation. In the example, students obtaining a job after completing an ARRA-funded grant training program are *not* included in the Recovery Act jobs total.

- **“Number of Jobs” - When computing Number of Jobs, should indirect jobs be included? For example, if a department within a university (e.g. biology department) receives Recovery Act funding and uses a portion of the funding to pay for the university’s central services, such as accounting and legal services, would the portion of the funding used for central services be included in the “Number of Jobs” calculation?**

No. Recipients should not attempt to report the employment impact upon central service providers. In this example, the hours spent by the individuals providing central services are not counted in the Recovery Act jobs total.

- **“Number of Jobs” - When computing Number of Jobs, should indirect jobs be included? For example, if a vendor, Computer Company ABC, provides computer software to a recipient, should Computer Company ABC’s activities be included in the “Number of Jobs” calculation?**

No. Recipients should not attempt to report the employment impact upon *material suppliers*. In this context, it is important to recognize the distinction between a material supplier and a service provider. Specifically, if a vendor provides a *service* to a Prime Recipient and/or Sub-Recipient, and uses ARRA dollars to fund the positions to conduct the service, the number of ARRA-funded hours would be included in the “Number of Jobs” field in the Prime Recipient’s report.

- **“Number of Jobs” - If a recipient hires a consultant to help carry out the activities of a Recovery Act grant or cooperative agreement, should the recipient include the consultant’s hours in the jobs total?**

If a recipient hires a consultant or other type of vendor and the consultant’s hours are *funded with Recovery Act dollars*, the recipient should include those hours in the jobs funded calculation.

- **“Total Federal ARRA Infrastructure Expenditure” and “Number of Jobs” – When I submit my report, an error message appears that states, “If Number of Jobs is greater than 0, it should not equal or exceed Total Federal ARRA Infrastructure Expenditure”. What does this mean?**

This message means that the recipient has entered a value for the “Number of Jobs” that is greater than or equal to “Total Federal ARRA Infrastructure Expenditure.” Since ONC recipients do not have any Infrastructure Expenditures, this field should be blank rather than entering "\$0.00" or any other value.

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- **“Recipient Congressional District/Sub-Recipient Congressional District” vs. “Congressional District” - What is the difference between the “Recipient Congressional District/Sub-Recipient Congressional District” data field and “Congressional District” data field?**

The “Recipient Congressional District/Sub-Recipient Congressional District” data field is the two digit congressional district aligned with the address and DUNS identified on the award. The “Congressional District” field, under the Primary Place of Performance section of the Prime Recipient and Sub-Recipient reports, represents the congressional district where the actual work to advance the goals of the cooperative agreement is taking place.

- **“Congressional District” (Primary Place of Performance) – The work performed under my ARRA grant takes place in more than one congressional district. In this instance, how do I complete the “Congressional District” field?**

If the recipient’s primary place of performance spans more than one congressional district, the recipient should select the district that is the most greatly impacted by the Recovery Act award.

- **“Total Federal Amount of ARRA Expenditure” - Does the Total Federal Amount of ARRA Expenditure include both direct and indirect costs?**

Yes, expenditures include both direct and indirect costs expended during the reporting period.

- **“Total Federal Amount of ARRA Expenditure” - Does the Total Federal Amount of ARRA Expenditure include recipient-matched funds?**

No. The recipient’s share of any match requirements is not included in this field.

- **“Total Number of Sub-Awards to Individuals” and “Total Amount of Sub-Awards to Individuals” - How is an “individual” defined?**

An individual, as defined by OMB, is a single person.

- **“Total Number of Payments to Vendors Less than \$25,000/award” and “Total Amount of Payments to Vendors Less than \$25,000/award” - Does the \$25,000 threshold for vendor payments apply to payments, the award amount, or the invoice amount?**

Aggregation is based on payments under \$25,000 and not on awards or amounts invoiced. For example, if a recipient paid a vendor 26 payments of \$1,000 each within the reporting period, the payments can be reported in the aggregate in the Prime Recipient section of the report or separately in the Vendor section of the report, but not both, since no single payment exceeded \$25,000.

- **“Total Number of Payments to Vendors Less than \$25,000/Award” and “Total Amount of Payments to Vendors Less Than \$25,000/Award” - Are the number and amount of sub-recipient payments to vendors of less than \$25,000 included in the prime recipient data?**

No., OMB issued clarifying guidance OMB M-10-34, dated September 24, 2010, which addresses the reporting of payments to vendors. Specifically, the guidance states:

Total Number of payments to vendors less than \$25,000/award

- *Clarify that number only includes payments made by the prime recipient.*

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*Total Amount of payments to vendors less than \$25,000/award*

- Clarify that amounts reported are cumulative for the award and only include payments made by the prime recipient. Comments added to indicate payments that exceed the \$25,000 threshold are reported in the vendor Section of the report.
- Given this guidance, there is no data field to accommodate payments of less than \$25,000 made by a sub-recipient to a vendor.

- **Reporting Vendor Payments for Employee Travel – When an employee travels under a grant agreement they typically incur expenses (e.g. hotel, airlines etc.) for which a receipt is obtained and a vendor is readily identifiable. Other, typically smaller, travel expenses incurred by employees are reimbursed on a per-diem basis (e.g. meals, taxis etc.) for which a receipt is not required and, therefore, a vendor is not readily identifiable. How should these travel expenses be reflected on my report as the Prime Recipient?**

Employees will be treated as a vendor for payments made to employees to reimburse for travel expenses for which a receipt was not required and, therefore, a vendor is not readily identifiable. That said, the number and amount of travel payments to employees and vendors, less than \$25,000, will be reflected, in the aggregate, on the Prime Recipient's report. Travel reimbursement payments made to employees and travel payments made to other vendors (e.g. airlines, hotels etc.), \$25,000 or greater, will be reflected individually on the Prime Recipients Vendor worksheet. However, it is unlikely that a single payment of \$25,000 or greater would be made to an employee to reimburse for travel expenses, for such a large amount would typically require a receipt, thereby making the vendor identifiable. Under all of the aforementioned scenarios, Prime Recipients and sub-recipients should continue to follow their local travel policies regarding the requirements for obtaining a receipt for travel expenses.

- **Reporting Student Tuition Reimbursement and Stipends – As the Prime Recipient, we use ARRA grant monies to reimburse students for tuition and/or other fees. We also use ARRA grant monies for student and faculty stipends. How should these payments be reflected on my ARRA report?**

Such payments should be treated as vendor payments. The number and amount of such payments, less than \$25,000, will be reflected, in the aggregate, on the Prime Recipient's report. Payments \$25,000 or greater will be reflected individually on the Prime Recipient's Vendor worksheet.

- **“Quarterly Activities/Project Description” – Should progress and activities be reported even if Federal monies have not been received and/or expended?**

Yes, this field has been under scrutiny by the Government Accountability Office and, therefore, should be as robust as possible. Specifically, the field should reflect anticipated/actual deliverables, outputs, outcomes, and results, irrespective of the source of monies used to pay for these activities. Suggested language, if applicable, may include “Although Federal grant funds have not been received or expended, to date, grant activities have commenced. Such activities include ...”

- **“Amount of Sub-Award”, “Sub-Recipient Award Funds Disbursed” and “Vendor Payments” - For reporting sub-awards disbursed to Sub-Recipients and payments to Vendors, should the report reflect sub-award disbursements and payments for which ARRA reimbursement was received as of the reporting end date (e.g. June 30, 2011) or should the report reflect all sub-award disbursements and payments, regardless as to whether the recipient has been reimbursed for these sub-award disbursements and vendor payments?**

Reporting sub-recipient awards, total sub-award funds disbursed and vendor payments (both number of sub-awards/payments and total amount of sub-awards/payments) should include actual sub-awards, sub-

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award disbursements, and vendor payments, regardless as to whether these disbursements and payments were reimbursed by the Federal Government. This premise applies whether sub-awards/payments are less than \$25,000, or greater than or equal to \$25,000. The difference in the dollar threshold reflects the manner in which these sub-awards and payments would be reported. That is, the number and dollar value of sub-awards and vendor payments less than \$25,000 are reflected, in aggregate, on the Prime Recipient and sub-recipient disbursements are not captured. Sub-awards, sub-award disbursements, and vendor payments \$25,000 or greater are reflected in the Sub-Recipient's data or Vendor's data, respectively.

- **“Amount of Sub Award” – I am a Prime Recipient who entered into a three-year sub award agreement on January 1, 2011 in the amount of \$300,000. We did not give the sub recipient the entire \$300,000 at once. Instead, we provided a \$50,000 pre-payment and then intend to reimburse the sub-recipient for actual expenses incurred. Given this scenario, what amount should be reported in the “Amount of Sub Award” field -- \$50,000 the amount of monies actually disbursed to the sub-recipient, to date, or the entire \$300,000?**

The entire \$300,000 should be reported in the “Amount of Sub Award” field. OMB defines this field as “Anticipated total funds to be disbursed to the sub recipient over the life of the award”. Reporting the entire \$300,000 is consistent with this definition.

- **“Total Sub Award Funds Disbursed” – I am a Prime Recipient who entered into a sub award agreement in the amount of \$300,000. To date, we have disbursed \$50,000 to the sub-recipient and the sub-recipient has spent \$40,000. Given this scenario, what amount should be reported in the “Total Sub Award Funds Disbursed” field – the \$50,000 disbursed to the sub-recipient or the \$40,000 spent by the sub-recipient?**

\$50,000 should be reported in the “Total Sub Award Funds Disbursed” field. OMB defines this field as “Cumulative amount actually provided to the sub recipient” – not the amount of monies expended by the sub-recipient. To that end, reporting \$50,000 is consistent with OMB's definition.

#### **ONC SPECIFIC**

- **What is my Funding Agency Code?**

7500

- **What is my Awarding Agency Code?**

7500 The Awarding Agency Code governs to which agency a report is directed through FederalReporting.gov. As such, it is critical that recipients enter the correct Awarding Agency Code to ensure receipt by HHS.

- **What is my Program Source Code (TAS) Code?**

75-0131. The Program Source Code (TAS) determines to which component within an agency a report is directed. As such, it is critical that recipients enter the correct TAS Code to ensure receipt by ONC.

- **What is my CFDA Number?**

Select as follows for each of ONC's grants programs:

- Regional Extension Centers – 93.718

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- State Health Information Exchange – 93.719
- Community College Consortia to Educate HIT Professionals – 93.721
- Competency Examination for Individual Completing Non-Degree Training – 93.721
- Curriculum Development Centers – 93.721
- University-Based Training for HIT Professionals – 93.721
- Beacon Communities – 93.727
- SHARP – 93.728

- **What is my Activity Code (NAICS or NTEE-NPC)?**

Selection of the Activity Code is at the recipient's discretion. However, when searching for an appropriate code, recipients may wish to evaluate the "E" codes which pertain to health. Within this realm, recipients are further encouraged to evaluate the E06 Series (Health Care Issues) and E09 Series (Patient Care/Health Care Delivery) for possible options.

- **Who should I contact if I have question regarding recipient reporting?**

**FederalReporting.gov Transmission/Other System Issues**

Questions regarding FederalReporting.gov transmission issues or other system issues should be directed to the FederalReporting.gov Service Desk. The contact for Service Desk is as follows:

Phone: 877-508-7386

TTY: 877-881-5186

Email: [Support@FederalReporting.gov](mailto:Support@FederalReporting.gov)

Chat: [LivePerson Online Support](#)

- **Report Content and Timing**

For Prime Recipients, questions regarding the timing and content of reports should be directed to the ONC Project Officer assigned to the cooperative agreement award. Sub-recipients should contact their Prime Recipients with questions.

- **ONC's Office of Oversight**

ONC's Office of Oversight has overall responsibility for ARRA Recipient Reporting. To that end, if the FederalReporting.gov Help Desk and/or Project Officer are unable to address a question, then the inquiry should be directed to Tracey Mock within ONC's Office of Oversight. The inquiry can be provided via-email to [tracey.mock@hhs.gov](mailto:tracey.mock@hhs.gov) or by phone at (202) 205-4411.