



# Updated CDBG-R and NSP2 Guidance On Reporting in FederalReporting.Gov

**December 28, 2010**

## **FederalReporting.gov: The Next Quarterly Reporting Period Draws Near!**

Reporting will cover the period Jan 1- 10, 2011, which allows for only 6 business days to report. There will be an "extended" reporting period from Jan 11-14<sup>th</sup>, but grantees should provide the reason for reporting late, so we encourage you to report by the Jan 10th. Section 1512 of the Recovery Act requires that all recipients, sub-recipients and contractors of Recovery Act funding report on a number of data elements, such as jobs and dollars spent. Timetable references to sub recipient reporting refer to situations where the grantee (prime recipient) has delegated direct reporting responsibility in FederalReporting.gov to sub recipients. When a grantee is handling all Federal Reporting data entry itself, the grantee is to review and verify the information provided to them by their sub recipients prior to data entry. Grantees also need to enter or update their environmental review information in RAMPS.

### **Expected Timetable:** (Subject to change by OMB)

<b>Jan 1-10</b>	Grantees and sub recipients report in FederalReporting.gov HUD will be able to "view" prime recipients' reports and contact non-reporting recipients starting the week of Jan 1st. (Note- only 6 business days to report)
<b>Jan 5</b>	Deadline to report Environmental data into RAMPS <u>for this quarter</u> (Grantees' ability to enter data is ongoing)
<b>Jan 11-14</b>	Extended Reporting Cycle - Grantees should provide the reason for reporting late.
<b>Jan 14</b>	HUD submits quarterly report on the status and progress of funded activities to Council on Environmental Quality, using RAMPS data
<b>Jan 15</b>	Grantees review data submitted by sub recipients; grantees and sub recipients revise data; HUD has 'view only' access to data.
<b>Jan 16-29</b>	HUD data review and comment period for data entered by grantees and sub recipients
<b>Jan 30</b>	Recovery Act Transparency Board posts as-reported data to Recovery.gov
<b>Jan 31-March 3</b>	System re-opens to make error corrections to reports that were created from Jan 1 – Jan 10. HUD comments on grantee reports; grantees review sub recipients' reports; prime recipients and sub recipients correct reports

Deadlines are as of midnight Eastern Time

## Guidance is Forthcoming Regarding “Project Title” and “Primary Place of Performance”:

A recent GAO report, “Opportunities Exist to Increase the Public’s Understanding of Recipient Reporting on HUD programs”, recommended that HUD provide more clear guidance to grantees on reporting the **“Project Name or Project/Program Title” and “Primary Place of Performance”** in FederalReporting.gov. HUD will send out guidance shortly on the new definitions, though this guidance may or may not be finalized in time for the January quarterly reporting cycle. You can see the GAO report at: <http://www.gao.gov/new.items/d10966.pdf>

## Provide Clear and Descriptive Narratives:

Grantees need to provide greater clarity in their Award, Project and Job descriptions in Federal Reporting.gov. As outlined in OMB memorandum 10-17 and 10-34, there is a greater need for transparency in Federal Reporting. CDBG-R, NSP2 and NSPTA grantees’ “Award Description” and “Quarterly Activities/Project Description” and “Quarterly Job Description” fields must provide clear, complete narratives that facilitate an understanding by the general public. If you have not already amended your narrative descriptions, please review them in FederalReporting.gov during the January Federal Reporting cycle to ensure that they provide concise, clear and detailed information before submitting your report. At a minimum, the narratives should include:

- a. Clear and complete information on the award’s purpose, scope and nature of activities, outcomes, and status of activities;
- b. Explanation of all abbreviations or acronyms must be spelled out, that may be unfamiliar to the general public;
- c. The names and location of specific projects, so it is clear how and where ARRA funds are being spent, within the character limitations; and,
- d. The grantee’s website address and any additional websites that provide detailed grant or project level information will be listed.

If you need to update your descriptions - below is suggested language with some notations throughout the descriptions (these are the highlighted) of where you should add your grantee’s information. This suggested language is not meant to be all inclusive. Please provide as much detail as possible to reflect the work/progress of your grantee’s CDBG-R or NSP2 funds. Once you revise the Award Description you should not have to update this quarterly, only the Quarterly Description/Project Description will need updating each quarter.

## Below is a sample Template:

<u>Award Description</u>	<b>The Community Development Block Program Recovery (CDBG-R) / The Neighborhood Stabilization Program2 (NSP2)</b> funds will invest in [Name of Project(s)]. The purpose of this project(s) is to _____.
<u>Quarterly Activities/Project Description</u>	CDBG-R /NSP2 funds will assist xx [enter the number of projects CDBG-R /NSP2 is funding] projects throughout the city/state [if possible provide the cities, or at least some of them if there are too many locations then perhaps list counties] A listing of all xx projects receiving [CDBG-R/NSP2] funding is

posted to our website at [provide website of where you have posted your CDBG-R/NSP2 projects].

[You should describe what your Agency accomplished/worked on during the quarter. Provide as much detail as possible. For example - ] This quarter, \$xx,xxx were committed to xx of projects, \$xx,xxx were expended for xx of projects, xx of written agreements were finalized, work began on xx of projects [list the project names], work is continuing at [list the project names], work was completed at [list general location of the projects].

<u>Quarterly Job Description</u>	[CDBG-R/NSP2] funds were used to create/retain _____ FTE jobs this quarter. [Name type of jobs and the number of FTE jobs that were funded with ARRA dollars] If no jobs were created, state this and the reason.
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These reporting requirements represent an unprecedented transparency and accountability effort. Accordingly, we recognize that many grantees may encounter challenges and delays in the reporting process, and we appreciate your continued commitment to working with HUD toward the important goal of economic recovery.

#### **Amendments to Approved CDBG-R Programs:**

A number of CDBG-R grantees have apparently amended their programs after initial approval, but have not provided HUD with a revised activity spreadsheet. Please take a minute to check HUD's Recovery Act website, [http://portal.hud.gov/portal/page/portal/RECOVERY/programs/COMMUNITY/CDBG\\_Proposed\\_Activities](http://portal.hud.gov/portal/page/portal/RECOVERY/programs/COMMUNITY/CDBG_Proposed_Activities), to see if your posted spreadsheet is current. (Grantees whose spreadsheet has been revised since initial posting appear on this page with a dash after the grantee name.) If we do not have your current spreadsheet of activities posted, please submit your revised spreadsheet, in Excel spreadsheet format only, by email to [CDBG-R@hud.gov](mailto:CDBG-R@hud.gov) and to your field office.

#### **Expiring Central Contractor Registrations (CCR):**

Grantees may be unaware that their CCR registrations expire and must be renewed. Grantees must maintain current, active registration at CCR in order to receive federal grant funding from HUD and to submit required reports to FedReporting.gov. HUD recommends that all grantees check to see when their current registration expires, and update their registration in a timely manner before the expiration date. HUD HHQ staff has directly notified CDBG-R and NSP2 grantees that have Central Contractor Registrations which will expire in the next few weeks. Please ensure that your CCR is renewed if it expires before January 15, 2010.

Grantees can check the status of their CCR registration quickly and easily (without logging in) at CCR by going to <https://www.bpn.gov/ccr/default.aspx>, selecting "CCR Search"—the second tab from the left, then entering their DUNS number under the "Simple Search."

If all information contained in the CCR record is still valid and accurate, you may simply select "Renew." If any information has changed please update it, then submit. Please note that CCR changed its login procedure in December 2009. If you have not logged in since December, you may need to create a User Account and link it to your Agency Profile in CCR. CCR has developed a [helpful user guide to creating a User Account](#) that is available on the "Help" pages of the CCR web site.

Please update or renew your city's CCR as soon as possible and no later than next week to ensure there will be no disruption to your grant payments or your ability to report. If you are unable or unsure how to update your record, you can print out the [CCR user guide](#) or contact the Federal Service Desk between 8am and 8pm Eastern Time at 866-606-8220 or 334-206-7828. If after consulting these resources you still have difficulty, please call HUD's Office of Departmental Grants Management and Oversight at 202-402-3964.

## How to Avoid Saving a "Draft" Report Instead of a "Final" Report

Before hitting the 'submit' button, make sure that the report is not showing up as a 'draft' report! The system will generate a "successfully submitted" message, but a draft report will not actually be sent to HUD. To ensure that you are submitting a "Final" Report, you must do the following: As a Prime Recipient, go to the Prime Recipient tab to submit your Initial Submission and do the following: Click "Submit." If there are any errors in your report, you will receive an error notification. Correct the errors and click "Submit." You will be prompted to enter the FRPIN for the DUNS number for which you are reporting. Enter the FRPIN in the FRPIN field. Click "Submit" to submit your report as Initial Submission status.

Similarly, hitting the 'submit' button for a report that contains incorrect data (like a wrong grant number or wrong Awarding Agency Code) will generate a "successfully submitted" message, but the inaccurate data may prevent the report from being sent to HUD, or HUD may not be able to identify which grantee the report belongs to.

Once your report has been submitted, you will receive the Report Submission Confirmation page. **Note that there is no requirement for you to enter data as Draft.** If you have all of the data you need for Initial Submission, you can bypass the Draft status and submit your report directly as Initial Submission at any time prior to the end of the Initial Submission phase of the January reporting cycle.

## Reminder to Correct Data Errors prior to using the 'Copy Forward Feature'

1. The 'Copy Forward' feature allows grantees to use the previous quarter's report to populate the next report. Instructions on how to use this feature can be found on FederalReporting.gov at: <https://www.federalreporting.gov/federalreporting/documentation/FR-Gov%20User%20Guide%20Chapter%2010%20Copy%20Forward%20and%20Copy%20Functions.pdf>. This document also contains instructions on the 'Change Key Business Information' function that allows grantees to change key grantee data like the Award ID number or DUNS number for the current reporting period.
2. Grantees that did not correct error messages during the correction period will get a new round of the same error messages for their January reports. All grantees should go into FedReporting and review any review comments/error messages that HUD sent on their October report to ensure that these errors are not copied forward to the January report. Special attention should be focused on data errors that are not open to debate, like grant number, CFDA number, award amount, etc. We suggest that the grantees make the necessary corrections before copying forward if possible, or if not, correct before sending the new report.
3. Updated OMB instructions indicate that grantees must use the copy forward feature if they've reported in a prior quarter and are reporting again now. This is particularly important if a grantee is making any changes to the award ID or DUNS number. However, if they are correcting the award type (Contract to Grant), they cannot use the copy forward feature. Note that the recipients will now be asked to confirm that the new report is intended to be a "continuation" of the prior report. Recipients can ONLY copy

forward reports from the most recent quarter. (Recipients who reported in April but failed to report in October will need to create a new report.)

4. If a grantee accidentally de-activates its "correct" report instead of de-activating an incorrect or duplicate report, the grantee should immediately contact HUD's Recovery Act Reporting help desk. A grantee cannot recover a de-activated report on its own.

### **Minimizing Reporting Errors in FederalReporting.gov:**

Among the most common – and easily avoidable – errors observed are:

- Submitting duplicate reports (*or failing to deactivate an erroneous report upon submitting a corrected report*)
- Entering an Invalid Award Type (*incorrectly reporting as a contractor rather than as a grantee*)
- Entering an Invalid Award ID, (*entering something other than your grant number, or mistyping the grant number, e.g. entering '001' instead of '0010'*)
- Entering an Invalid Award Amount, (*e.g. the 'Amount Received' does not match the amount of your CDBG-R grant*)
- Incorrectly computing or entering job creation/retention figures
- Entering an Award Date other than the one on your Grant Agreement
- Entering an incorrect DUNS number
- Entering the wrong Catalog of Federal Domestic Assistance (CFDA) number, Treasury Accounting Symbol (TAS) number, or Awarding Agency Code number
- Checking 'Yes' on the Final Report Indicator even though all activities are not completed and all funds have not yet been drawn down

HUD has provided an Excel spreadsheet, "Grantee Specific Data for CDBG-R", with pre-populated standard data elements for all grantees, to assist grantees in reporting the correct information, and to reduce the frequency of errors. Please contact your HUD Field Office CPD staff if you have not seen this spreadsheet.

- Before submitting their January report, grantees should ensure that the information on this spreadsheet is correct, and should compare this information with what the grantee reported in their October report.
- Blank data cells on this spreadsheet represent situations in which grantee data was missing at the time the spreadsheet was prepared in December. Grantees should verify that this information is now correctly entered in their report. If a grantee already entered the missing data for their October report, nothing further needs to be done.
- If a grantee feels its data is in error, contact the FederalReporting.gov help desk or HUD's Recovery reporting help desk for assistance in changing information.

### **Correcting Errors in FederalReporting.gov :**

Grantees should keep the following pointers in mind as they prepare their January reports.

1. There is now a post-reporting-deadline 'Continuous Quality Assurance Period'. All October reports were "unlocked" from October 1- Dec 6th for grantees and federal agencies to perform Quality Assurance (QA) checks and error corrections. The same process will be available during Jan 31- Feb 3. This Quality Assurance Period has now become the principal time period for grantees to correct reports; the January grantee data review period is only two days.

2. During the Agency review period and again during the Quality Assurance Period, HUD may enter review comments on grantee reports. Some comments will note an erroneous entry that the grantee needs to fix; other comments may concern data flagged as possibly inaccurate. Grantees should check FederalReporting.gov for any HUD error messages during these periods. If you have received an error message comment, please post an appropriate response comment, either verifying that the information is correct as entered or acknowledging that the erroneous entry will be corrected.
3. Grantees cannot de-activate a duplicate report during the Quality Assurance Period. After the Jan 15 initial grantee data review day ends, only OMB can de-activate duplicate reports. Please contact the HUD Recovery Reporting call center should you need a report de-activated after Jan 15.
4. There is no way to correct a report that has been inaccurately submitted with the Award Type of 'Contractor' instead 'Grantee' after the initial submission phase of the reporting cycle has ended (Jan 10). Because the reporting requirements for grantees and contractors are fundamentally different, the only thing a grantee can do is to make sure they report as a Grantee during the next Reporting Cycle.

### **Sub-Recipient Reporting – Need to Ensure Correct DUNS number:**

Grantees need to ensure that their sub recipients have entered their correct DUNS numbers or that their DUNS number has not expired. If a sub recipient's number is incorrect or expired, then that one sub recipient's DUNS number jeopardizes the remaining sub recipients from being able to submit their data in Federal Reporting (due to the inability to perform an Excel bulk upload). Please ensure that your sub recipients are current in maintaining their DUNS numbers. Also, we have cases where the sub recipients' DUNS number is not linked to their prime recipients. It is important that they are linked to ensure that we don't end up with "orphan" sub recipient reports.

Payments to 1<sup>st</sup> tier vendors (direct contract with HUD prime recipient) less than \$25,000 may be reported in aggregate, as a single number on the Prime Recipient Tab, so there is no need at this time for the vendor to have a DUNS registered in CCR. Note that the ARRA requirement addresses payment size, not total payment in a quarter. Even if a vendor received 26 separate payments of \$1000 in a quarter, those payments could still be reported in aggregate on the prime recipient tab.

### **Final CDBG-R Reports and Grant Closeouts:**

Grantees should keep in mind that their grant is not entirely completed if their project activity does not reflect that. For Federal Reporting purposes, a CDBG-R report cannot be final until:

- CDBG-R activities are physically complete and are input as "100% complete" under "project status" in Federal Reporting.
- All FTE jobs created or retained with Recovery funds must be reported in FederalReporting.gov
- All CDBG-R funds must be expended or if there are unspent funds in LOCCS (which will be returned to the Department of Treasury), then a note should be sent in the FR comment box that no more money will be spent and that the report is indeed final.
- All CDBG-R activities have been entered into IDIS and complied with all program requirements.

Keep in mind that if a grantee has unspent CDBG-R funds, the Federal Reporting system will most likely flag it as "Not Final" because their award amount and their "Total Federal Amount ARRA received/invoiced" will not be the same. As long as the grantee posts a comment in Federal Reporting, indicating that they are indeed finished, no further error messages will be sent. HUD will issue final program specific "close out" procedures to ensure that each grantee has properly met their program requirements.

### **Invitation for CDBG-R and NSP2 to Post ARRA feedback**

Please find here the "HUD Ideas in Action" website, with a new invitation for ARRA recipients to post feedback from their implementation experiences:

<http://hudideasinaction.uservoice.com/forums/55040-feedback-on-hud-s-final-strategic-plan>

### **For additional help:**

HUD's Recovery Act Reporting Call Center, **1-800-998-9999**, is available to answer a wide variety of CDBG-R reporting questions. The call center is available 8:30am to 5:30pm EDT, Monday to Friday, with expanded hours Jan 1-10 and for late reporters, Jan 11-14. You may also e-mail the help center at [recovery@comcon.org](mailto:recovery@comcon.org). HUD has posted a variety of resources about reporting on the HUD Recovery Act website:

<http://portal.hud.gov/portal/page/portal/RECOVERY/Reporting>

This site also provides links to other resources, such as the CCR registration website and the Dun & Bradstreet registration website.

**FROM THE OFFICE OF BLOCK GRANT ASSISTANCE,  
HUD HEADQUARTERS**