American Recovery and Reinvestment Act (ARRA) Reporting Requirements

By now, we are all aware of the American Recovery and Reinvestment Act (ARRA) and the goals for creating/saving jobs, spurring economic activity and providing accountability and transparency in government spending. This newsletter will provide basic information on the reporting process for contracts awarded using ARRA funds. Please note that the following information applies to federal contracts only, not federal grants or loans.

Section 1512 of the Recovery Act cites Federal Acquisition Regulation (FAR) 52.204-11 (American Recovery and Reinvestment Act Reporting Requirements) which states that any prime recipient of a federal government contract funded in whole or in part by the Recovery Act must file online quarterly reports. The data requested by this reporting requirement provides valuable information about the types of work and number of jobs created and/or saved as a result of ARRA. A few examples of information being captured through these reports are the amount of recovery funds invoiced, a list of significant services performed or products delivered, a narrative description of the employment impact on the contractor's workforce and information gathered from prime contractor's first-tier subcontractors. To read the clause in its entirety the FAR may be accessed online at https://www.acquisition.gov/FAR

Failure to provide accurate and timely reporting may negatively impact a company's performance evaluation which may affect receipt of future federal government awards. Failure to submit reports will also cause a company to be in default of the terms of the contract. An agency could withhold payment until the reporting is complete as a means to ensure compliance with the law.

Submission of reports is done electronically through www.FederalReporting.gov. From this site companies will manage account(s), submit reports, view and comment on reports and update or correct report information. Users will be able to download report templates, user's guides and other documentation, as well as access system help and Frequently Asked Questions (FAQs).

A one-time registration is required to use the site. For companies reporting on federal government contract awards, registration is for prime contractors only. It is the responsibility of the prime contractor to include data on their first-tier subcontractors. However, subcontractors must provide information to the prime contractor as required by FAR 52-204-11.

To register, you must have a valid email address, DUNS number and be active in Central Contractor Registration (CCR). The registration also involves requesting a FederalReporting PIN (FRPIN) for the DUNS number you are reporting under. A step by step registration guide is located at https://www.federalreporting.gov/downloads.do.

Reporting is required every quarter after the award is issued. These reports are due to be filed in January, April, July and October. The next reporting period began April 1, 2010. The five phases of the reporting cycle are, initial submission, recipient review, agency review, quarterly reports published and continuous quality assurance. Timeframes

Upcoming GACO Seminars

April 27, 2010 – Federal Government Contracting for Veteran-Owned Businesses, DoubleTree Hotel, Monroeville, PA
October 20, 2010 – Procurement Opportunities Fair ’10, Holiday Inn Meadowlands, Washington, PA
for reporting are as follows:

**Day 1-10:** From the 1st to the 10th of the reporting month, contractors will prepare their report for submission. The report must be submitted prior to the 10th day to meet the requirements of FAR 52.204-11 and Section 1512 of the Recovery Act.

**Days 11-21:** From the 11th to the 21st day of the reporting month, reports will be reviewed by the government office that issued your contract and you will be contacted if any corrections need to be made. All corrections must be completed by the 21st.

**Days 22-26:** From the 22nd to the 26th day of the reporting month, the government office that issued your contract will make the formal review and comment on the reports. The comments will be noted either as “Reviewed with no comments” or “Reviewed with comments.”

If you receive notification that comments have been made, corrections must be completed by Day 26 of the reporting month. At that time, a final review will be made of reports which require correction.

**Day 30:** On the 30th day, the system will post all reports as final and no further corrections can be made.

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**Top 10 Tips for Users**

1. **First-Time Reporters** – You must register in order to report. Read Chapter 2 of the User Guide on the Downloads page for specific registration instructions.

2. **Returning Reporters** – It is important to read Chapter 10 of the User Guide on the Downloads page before you begin to report. It provides detailed instructions for Copy Forward which allows you to link a report from the previous reporting cycle to the current reporting cycle.

3. Your **User ID** to log on to FederalReporting.gov is the email address you provided when you registered.

4. **FederalReporting.gov cannot change your Point of Contact information.** The FederalReporting.gov Point of Contact and their contact information is directly from Central Contractor Registration (CCR). If your organization changes its POC information in CCR for the Primary Government Point of Contact or Primary Electronic Business Point of Contact, it will take **48 hours to sync up between CCR and FederalReporting.gov.** When FederalReporting.gov receives the change from CCR, the POC user will receive an email with the FRPIN and temporary password.

5. In order to report, **you need to have the Federal Reporting Personal Identification Number (FRPIN) for your DUNS Number** and your organization must be registered with Central Contractor Registration (CCR) if you are reporting as a prime recipient.

6. Much of the data you need to report should be on your **award document** such as the Award ID, awarding agency, CFDA number or Government Contracting Office. Questions regarding your award document should be directed to your awarding agency because the FederalReporting.gov Service Desk operators do not have access to your award document.

7. The Service Desk operators can’t answer policy-related questions. These questions are referred to your awarding agency, OMB, or the Recovery Board.

8. If you need more help in understanding how to report, **Download the User Guide** from the Downloads page of FederalReporting.gov.

9. **Check the FAQs page** for more frequently asked questions.

10. **Need more help? Please have the following information ready before calling the Service Desk at FederalReporting.gov:**

    - **Are you already registered?**
      - If yes, what is your User ID (email address)?
      - If yes, are you a POC? Is this email address the one registered with CCR?
      - If no, what problems are you having in registering?

    - **Are you an Award Recipient or a Federal Agency?**
      - If you’re a Federal Agency User, what Agency are you with?
      - If you’re an Award Recipient, which agency gave you the award?

    - **Having trouble reporting?**
      - What problems are you having?
      - Did you receive any type of error message?