

Recipients of Recovery Act Funds -- Time to Register!

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Effective August 17, 2009 recipients (and sub-recipients) of American Recovery and Reinvestment (ARRA) funds are required to begin to register at FederalReporting.gov. This is the Federal government's website that acts as a central government-wide data collection system for both Federal agencies and recipients of Federal awards under Section 1512 of ARRA. Recipients (and sub-recipients) are required to register on the site, and then to enter required data on a quarterly basis for Recovery Act grants, loans, and contracts they have received. The first reporting period will begin October 1 and end October 10, 2009. Effective October 11, 2009 the public will be able to view information via the

Recovery.gov

website. But prior to registering at the FederalReporting.gov website, recipients must first jump through a few hoops. Prime recipients (those that receive funds directly from the Federal government) must first do the following steps prior to registering:

1. Have a valid email address.
2. Obtain a 9-digit DUNS number from the Dun & Bradstreet website [here](#).
3. Register in the Federal government's Central Contractor Registration (CCR) database [here](#).

For sub-recipients (those that receive funds from a prime recipient) the pre-registration steps are identical to those for prime recipients. For reporting, the subs will need to also know their prime's DUNS number and Award number.

This is a bold experiment in Federal contract transparency, and it is likely there will be some initial "bumps" as the process is implemented. To help ease the strain, the Recovery Accountability and Transparency Board has created a "Recipient Reporting Data Model" to standardize reporting data. The Recipient Reporting Data Model can be downloaded from the "Downloads" tab of FederalReporting.gov and is also accessible via Recovery.gov.

There are other interesting challenges involved in entering and reporting use of Recovery Act funds. For example, GovExec.com reports that "The 28 federal agencies that have distributed the stimulus funds also must sign up at FederalReporting.gov to review information submitted by recipients and discuss with them any errors or corrections. While agencies can view the information, only recipients will be able to change the data once it is submitted, and only for a short period of time after the Oct. 10 reporting dead-line.". The same article also notes that "The [Recovery Accountability and Transparency] board expects 150,000 to 200,000 recipients to file reports by the Oct. 10 deadline."

Recipients and sub-recipients should begin the registration process now and get familiar with the Recipient Reporting Data Model, in order to ensure that they are reporting accurate information on time, and in the right format, beginning October 1st. Although it is not clear whether the Federal government will be able to identify those recipients who fail to report, it is a near certainty that those recalcitrant recipients that are identified may be accused of breaching the terms and conditions of their Recovery fund award, and that may lead to a "rough ride" that is otherwise completely avoidable. Just as importantly, recipients and sub-recipients must ensure that they have implemented internal accounting and other operational control systems to track how their Recovery Act funds are used.