

FREQUENTLY ASKED QUESTIONS

AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 CDFI PROGRAM AND NACA PROGRAM AWARDEE REPORTING

Are Recovery Act awardees required to report on both myCDFI Fund and FederalReporting.gov at the end of each quarter?

- A. Yes. Recovery Act CDFI and NACA awardees are required to report to the CDFI Fund using the Quarterly Institution Level Report (QILR) and to FederalReporting.gov on a quarterly basis. Both quarterly reports are due no later than 11:59 p.m. Pacific Time ten days after the end of each calendar quarter. Submission deadlines are as follows:

QILR Deadlines	
For every quarter ending on:	Deadline:
December 31	January 10
March 31	April 10
June 30	July 10
September 30	October 10

Does the information provided on my Quick Reference Card have to match the information I report to FederalReporting.gov?

- A. Yes. The information provided on the Quick Reference Card must be identical to the information reported to FederalReporting.gov. If you need an additional copy of your organization's Quick Reference Card or if you have questions or concerns about the information listed, please contact a member of the CDFI Fund Recovery Act Team immediately.

For what period of time do awardees need to report?

- A. The first reporting period started at the date of the award and included data through September 30, 2009. All subsequent reports will correspond to the previous calendar quarter.

Does an awardee have to report if none of the award has been spent?

- A. Yes. If you received an award, you must report the award amount. If you have not spent any of the funds, you are still required to report and will enter "\$0" for funds expended.

Are awardees still required to submit annual Institution Level Reports to the CDFI Fund?

- A. Yes. Awardees are required to report annually to the CDFI Fund through the Community Investment Impact System (CIIS). In addition, awardees must report quarterly to both the CDFI Fund and FederalReporting.gov regarding Recovery Act awards.

Who is required to submit Unaudited Financial Statements to the CDFI Fund?

- A. Recovery Act awardees are required to submit Unaudited Financial Statements via e-mail to cme@cdfi.treas.gov, with "RA Unaudited Financial Statement" in the email subject line. CDFI Fund will require quarterly unaudited financial statements from non-depository and non-profit depository institutions. Awardees that are Insured Credit Unions, Insured Depository Institutions, or Depository Institution Holding Companies are not required to submit Unaudited Financial Statements; instead, the CDFI Fund will obtain the necessary financial information from publicly available sources. Awardees that are non-Depository Institutions and non-profit Depository Institutions are required to submit A-133 audits, if applicable, and annual audited financial statements to the CDFI Fund based on their Fiscal Year End (FYE).

Quarterly reporting deadlines for the submission of Unaudited Financial Statements will be one quarter after the QILR deadline for that quarter. The following table shows the dates by which quarterly Unaudited Financial Statements are due to the CDFI Fund. Submission deadlines are as follows:

Unaudited Financial Statements Deadlines	
For every quarter ending on:	Deadline:
September 30	January 10
December 31	April 10
March 31	July 10
June 30	October 10

Are A-133 audits required for Recovery Act Awardees?

- A. Only Recovery Act Awardees that are non-depository institutions and nonprofit depository institutions are required to submit A-133 audits annually.

Who needs to register on FederalReporting.gov and what information is required?

- A. The representative responsible for submitting the report to FederalReporting.gov must register on the FederalReporting.gov website. To register as a Recipient User of FederalReporting.gov, the representative must know the DUNS number associated with the organization's award and have a valid email address. The representative will receive an email confirmation once they have successfully registered as a FederalReporting.gov user. To help ensure delivery of emails from FederalReporting.gov, add "FederalReporting.gov" as a safe recipient in your email inbox.

Do I have to provide a "Zip Code + 5" on FederalReporting.gov?

- A. Yes. The "Zip Code + 5" will be used to verify the Congressional District provided in FederalReporting.gov. If you do not know your "Zip Code + 5," you can look it up using the Zip Code Lookup feature on U.S. Postal Service website (<http://zip4.usps.com/zip4/welcome.jsp>).

Can multiple individuals at an organization register as a recipient on FederalReporting.gov?

- A. Yes. However, steps must be taken to coordinate activities to ensure that only one report is submitted on behalf of the awardee to both the CDFI Fund and FederalReporting.gov.

When will FederalReporting.gov and myCDFI Fund reporting be available each quarter?

- A. Awardees can submit reports through the FederalReporting.gov portal beginning on the first day of each reporting period. The CDFI Fund Quarterly Institutional Level Report (QILR) workbook will be emailed to the authorized representative listed in the awardees' myCDFIFund account and must be submitted via email to qilrsubmissions@cdfi.treas.gov for the first two quarters.

In subsequent quarters, the QILR must be submitted electronically through the CIIS, which awardees access through the myCDFI Fund system. Please note that awardees must report separately to CIIS and FederalReporting.gov each quarter and still submit an annual Institution Level Report.

What do I enter for Award Type, Awarding Agency Code, Funding Agency Code, Program Source (TAS), Sub-Account for Program Source (TAS), CFDA Number, and Award Date in FederalReporting.gov for CDFI and NACA Awardees?

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|--------------------------------|--|
| A. Award Type | Grant |
| Awarding Agency Code | 2066 |
| Funding Agency Code | 2066 |
| Announcement Date | 06/29/2009 (CDFI FA) & 07/1/2009 (NACA) |
| Award Date | Enter date Assistance Agreement was signed |
| CFDA Number | 21.020 |
| Program Source (TAS) | 20-1882 |
| Sub Account for Program Source | [leave blank] |

Who qualifies as a beneficiary and who qualifies as a sub-recipient/vendor? Is it necessary to report sub-awards?

- A. According to the Office of Management and Budget, an entity or individual receiving a loan is a beneficiary and not a sub-recipient. Thus, CDFI borrowers do not need to register or report on FederalReporting.gov. CDFI and NACA awardees must report as the Prime Recipient on behalf of all of their beneficiaries, unless an Awardee is a bank holding company. Loans and investments made by CDFIs are not sub-awards. Therefore, the sub recipient tab on the FederalReporting.gov template must be left blank. Prime recipients are required to report an estimate of jobs funded by the Recovery Act.

For reporting to FederalReporting.gov, how must an Awardee report on loans/investments originated with more than one place of performance (i.e., funds are distributed in various locations) since the "Primary Place of Performance" is a mandatory data element requiring recipients to identify a single geographical location?

- A. In the event that it is not possible to determine a single address that is receiving a majority of the award funds, the awardee must use the organization's primary address, which you also provided at the beginning of the FederalReporting.gov report.

Is it necessary to provide infrastructure related questions on the FederalReporting.gov template?

- A. No. Questions relating to infrastructure are not applicable to CDFI and NACA awardees. Awardees must leave all infrastructure related questions blank.

Can an Awardee modify the FederalReporting.gov and QILR spreadsheets?

- A. No, the spreadsheet or XML data fields will not register properly if an Awardee changes the formatting.

Where do you find my congressional district code?

- A. 1) Reference the webpage of the Congress member (House of Representatives) that represents your town/city or 2) Visit the following website: <http://factfinder.census.gov/home/cws/main.html>.

Do I use the NAICS or NTEE-NPC code for FederalReporting.gov and the QILR?

- A. You must enter the code for FederalReporting.gov that was provided on your Quick Reference Card. For the QILR, you will enter the appropriate 2-digit NAICS code that corresponds to the jobs created and retained.

What is the difference between a "job created" and a "job retained"?

- A. Per the Office of Management and Budget's most recent jobs guidance released on Friday, December 18, 2009, a job created is a new position created and filled, or an existing unfilled position that is filled, that is funded by the Recovery Act; and a job retained is an existing position that is now funded by the Recovery Act. A job funded by the Recovery Act is one in which the wages or salaries are either paid for, or at some point reimbursed, with Recovery Act funding. It is important to note that a job must be counted as either retained or created. Awardees continue to report jobs created or retained in each quarter.

Can I report the impact of loans that were made as a result of Recovery Act funding making a balance sheet improvement to FederalReporting.gov?

- A. No. Per the Office of Management and Budget's most recent job guidance released on Friday, December 18, 2009, only salaries and wages paid for with Recovery Act funding can be reported to FederalReporting.gov. The CDFI Fund will provide more detailed information regarding jobs created or retained as a direct impact of Recovery Act funding.

Where can I find more information about jobs reporting?

- A. The Office of Management and Budget released new jobs guidance on Friday, December 18, 2009 which provided updated instructions for reporting jobs on FederalReporting.gov which can be found here: http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-08.pdf. More information will be available on the CDFI Fund's Recovery Act webpage at www.cdfifund.gov/recovery.

Can reports be modified after they are submitted?

- A. Yes. Reports can be updated 10 days through 21 days after the end of the quarter but changes are tracked through version control. After day 21, reports can only be unlocked by the CDFI Fund based on identified issues.

If recipients can modify submitted reports, are reports submitted prior to 10 days after the end of the quarter considered draft?

- A. No. Reports are expected to be complete and accurate when submitted. While some changes are possible after this date, not all fields may be revised and all changes are logged and may be used for audit purposes.

Do CDFI and NACA beneficiaries have to comply with Davis-Bacon Act requirements?

- A. Yes. As stated in the Assistance Agreement, the Davis-Bacon Act prevailing wage requirements apply to all Recovery Act Awardees that use their award funds for construction related contracts in excess of \$2,000. Davis-Bacon Act wage requirements apply when laborers and mechanics are engaged to provide services for the construction, alteration, repair, or rehabilitation of structures and infrastructure including painting and decorating of the awardees' facilities. Awardees must operate under the assumption that Davis-Bacon Act wage requirements will apply to all uses of the Recovery Act funds – uses include, but are not limited to Awardee operations, direct loans, loan guarantees, grants to borrowers, and equity investments.

The general Davis-Bacon Act requirements can be found in Schedule 4 or your organization's Assistance Agreement. These requirements are applicable to uses of both Financial Assistance (FA) and Technical Assistance (TA) award funds. The Department of Labor's wage determinations are available to the general public online at www.wdol.gov. Additional rules concerning the administration and enforcement of the Davis-Bacon Act labor standards are provided in 29 CFR Part 3 and other sections of 29 CFR Part 5. The Department of Labor's Davis-Bacon and Related Acts Provisions and Procedures are available at http://www.dol.gov/dol/allcfr/Title_29/Part_5/29CFR5.5.htm.

How will the CDFI Fund awardees show compliance with the Davis-Bacon Act requirements?

- A. The awardee can expect the CDFI Fund to request copies of up to date Certified Weekly Payroll statements for all laborers working on construction projects assisted in whole or part by the awardee. The awardee can expect the CDFI Fund to request copies of all Recovery Act Award-related loan documents including loan agreements, loan applications, project descriptions, and American Institute of Architects (AIA) forms.

Who must I contact if my question is not addressed in this FAQ or in the QILR guidance on the CDFI Fund website?

- A. Please contact the following CDFI Fund Recovery Act team with additional questions:

Candace Coram, Portfolio Manager, coramc@cdfi.treas.gov or (202) 622-5043
Kimberly Panicek, Portfolio Manager, panicekk@cdfi.treas.gov or (202) 622-8955
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