

CARES ACT QUARTERLY REPORTING

Communication for U.S. Department of Education grantees regarding CARES Act Funds follows.

SUBJECT: UPDATE ON REQUIRED CARES ACT QUARTERLY REPORTING

Section 15011 of Division B of the Coronavirus Aid, Relief, and Economic Security (CARES) Act requires that a grantee which receives more than \$150,000 report to the U.S. Department of Education (Department) on a quarterly basis. The Department, after consultation with the Office of Management and Budget, currently interprets this CARES Act quarterly reporting requirement to be satisfied through existing federal reporting mechanisms. Specifically, CARES Act quarterly reporting requirements are considered to be met under the more frequent, monthly reporting requirements of the Federal Funding Accountability and Transparency Act of 2006 (FFATA), Pub.L. 109-282, as amended by the Digital Accountability and Transparency Act (DATA Act), Pub.L. 113-101.

FFATA is aimed at empowering citizens with information needed to hold the government accountable for the award of taxpayer funds to individual grantees. Towards this end, FFATA requires that information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website, which is www.USASpending.gov.

Through the FFATA Subaward Reporting System (FSRS), federal prime awardees (i.e., prime contractors and prime grants recipients, including CARES Act grantees for the programs listed below) capture and report subaward and executive compensation data regarding first-tier subawards to meet FFATA reporting requirements on a monthly basis. The following data elements are collected through FSRS about subawards greater than \$25,000:

- a. Name of entity receiving award
- b. Amount of award
- c. Funding agency
- d. North American Industry Classification System (NAICS) code for contracts / Catalog of Federal Domestic Assistance (CFDA) program number for grants
- e. Program source
- f. Award title descriptive of the purpose of the funding action
- g. Location of the entity (including congressional district)
- h. Place of performance (including congressional district)
- i. Unique identifier of the entity and its parent
- j. Total compensation and names of top five executives (same thresholds as for primes)

CARES Act grantees under the following programs must meet their *monthly* reporting requirements under FFATA to meet their Section 15011 requirements under the CARES Act for quarterly reporting:

- Higher Education Emergency Relief Fund (CFDA 84.425E, 84.425F, 84.425J, 84.425K, 84.425L, 84.425M and 84.425N)
- Governor's Emergency Education Relief Fund (CFDA 84.425C)
- Elementary and Secondary School Emergency Relief Fund (CFDA 84.425D)
- Gallaudet University Grant (CFDA 84.910B)
- Howard University Grant (CFDA 84.915A)
- Education Stabilization Fund – Reimagine Workforce Preparation Discretionary Grant (ESF-RWP) (CFDA 84.425G)

- Education Stabilization Fund – Rethink K-12 Education Models Discretionary Grant (CFDA 84.425B)
- Project School Emergency Response to Violence (Project SERV) (CFDA 84.184C)
- Education Stabilization Fund Program Outlying Areas-State Educational Agency (CFDA 84.425A)
- Education Stabilization Fund Program Outlying Areas-Governors (CFDA 84.425H)

The entity that receives federal funds is ultimately responsible for completing FFATA reporting; prime grantees are responsible for following required processes and procedures to enter data into FSRS, which may include identifying the appropriate State, local, or institutional office or individual charged with meeting FFATA requirements. In meeting their reporting requirements under Section 15011 of the CARES Act, prime grantees should review their FFATA reporting to ensure the data they submit is complete, accurate, and of high quality.

For more information on FFATA, please visit <https://www.fsr.gov/>.

In accordance with Recipient's Funding Certification and Agreements executed by grantees for CARES Act funding, the Secretary of Education is planning to specify additional forms of reporting on a less-than-quarterly basis (such as on an annual or semi-annual basis) to ensure full CARES Act compliance and full implementation of the signed agreements. This reporting will likely include collecting recipient jobs data (e.g., number of jobs created or retained). Any additional reporting through this process will be announced in the Federal Register and the public will have the opportunity to comment on it.