

## **OMB Issues New Agency Guidance on Holding ARRA Recipients Accountable for Compliance with Reporting Requirements**

On May 4, 2010, the Office of Management and Budget (OMB) issued new guidance to federal agencies entitled "*Holding Recipients Accountable for Reporting Compliance under the American Recovery and Reinvestment Act*" (M-10-17). The guidance was issued in response to an April 6 Presidential Memorandum, which directed federal agencies to identify and hold accountable ARRA recipients who have failed to comply with the government-wide quarterly reporting requirements. The OMB guidance requires federal agencies to:

1. Contact new recipients no later than 10 business days prior to the beginning of each reporting period to remind them of their reporting obligations and the consequences of non-compliance.
2. Prior to the beginning of a new reporting period, contact existing recipients who were non-compliant in the prior period and follow-up with them throughout the reporting period to pursue compliance.
3. Use available tools to actively monitor recipients during the quarterly reporting period and contact those that have not filed required reports at least 3 business days prior to the close of the report submission period.
4. Inform recipients about the potential consequences of non-compliance, provide assistance to ensure compliance in the next reporting period, and if the recipient is non-responsive, take appropriate actions including draw-down restrictions and/or additional sanctions and remedies applicable to non-compliant grant recipients.
5. Report non-compliant ARRA recipients to OMB within 5 business days of the close of the quarterly agency review and comment period, which follows report submission by the recipient.

Health centers can access the full guidance . As of this date, the Bureau of Primary Health Care (BPHC) has not issued guidance on interpretation for and application of the OMB memorandum to health centers. Given that the next reporting deadline is July 10, 2010, however, it is advisable for health centers to review the OMB memorandum and to check the [website](#) for updated reporting guidance.