

Federal Reporting Requirements

Frequently Asked Questions and Answers

Why are we being asked to change our expense report timeline?

The federal granting agencies that provide funding for DHS-administered programs have notified DHS we need to work together to bring our deadlines for federal reporting closeout in to compliance. The required expense reporting that allows DHS to make sure you are reimbursed is occurring beyond the federally required period. This is based on the 2 CFR [§ 200.343 \(a\)](#). By changing our expense reporting period, we can record payment before the federal closing deadlines. This will ensure DHS meets all federal requirements and will reduce any risk of federal disallowance. This means our partners can be reimbursed. Not reporting your final numbers on time could mean the door could close on your funding. We don't want that to happen.

What does the federally required period in the [CFR § 200.343 \(a\)](#) mean to me?

Code of Federal Regulations (CFR) 2 CFR [§ 200.343 \(a\)](#) refers to the reporting of “no later than 90 calendar days after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the federal award.”

How will my organization meet reporting during this transition?

We are providing advanced notification of this change so you can plan. You may need to evaluate and implement changes to internal processes and practices to adhere to the requirements.

How will DHS support organizations with finding resources to manage this transition?

DHS will process properly submitted expenses in a timely manner to ensure payment is made based on the Community Aids Reporting System (CARS) Processing Schedule. The CARS Team can assist with processing expenses, entering contract document type details, and making payments. DHS Contract Administrators can assist with handling contract and programmatic level questions and issues.

Does this change affect contracts that only contain federal funding sources?

The reporting requirements are dictated by the program and its funding source. In general, if a federally funded program does not have specific reporting requirements, it must adhere to 2 CFR [§ 200.343 \(a\)](#) which requires DHS to report all applicable and allowable expenses within 90 days.

Is Medicaid part of this new reporting requirement?

Medicaid has more-specific reporting requirements and therefore does not adhere to the requirements under 2 CFR [§ 200.343 \(a\)](#).

What about FoodShare? Does this program need to adhere to the 45-day requirement?

The reporting requirements are dictated by the program and its funding source. In general, if a federally funded program does not have specific reporting requirements, it must adhere to 2 CFR [§ 200.343 \(a\)](#) which requires DHS to report all applicable and allowable expenses within 90 days. FoodShare does not have specific reporting requirements and therefore must adhere to 2 CFR [§ 200.343 \(a\)](#).

I am looking for some clarification on the final 2018 expense reports for the State County Contract. My understanding is that effective with the 2018 contracts, the final reports are due by February 14, 2019 based on the CARS processing schedule. The contract states final reports are due March 25, 2019. Can you provide some clarification on the final expense reports due dates?

The programs and services contained within the State County Contract are either Medicaid, or are not required to meet the federal reporting guidelines within [§ 200.343 \(a\)](#). Therefore, the reporting date within the SCC is accurate for the Profiles and Programs contained.

DHS is diligently working to develop a crosswalk to align each CARS Profile to its CFDA and corresponding Final Report Due Date. We plan on having this published on or before 2/1/2018. We are hopeful that this crosswalk report will address many of the questions on when a final report is due based on Profile, Program, and Funding.

Can you speak to the CY2017 closeout period? Do we need to adhere to the 45 days for December reporting? (Does this mean we need to submit all reconciled expenses by February 15th of the following calendar year?)

Medicaid has more-specific reporting requirements and therefore does not adhere to the requirements under 2 CFR [§ 200.343 \(a\)](#). For federally funded programs, future closeout periods beginning with CY2018 will need to adhere to the reporting requirements defined in 2 CFR [§ 200.343 \(a\)](#). Please refer to your contractual grant agreements for final reporting requirements.

What if we fail to meet the final expense-reporting deadline?

DHS makes every effort to process properly submitted expense reporting which meet all federal requirements. If an expense report is submitted outside of the reporting requirements, the agency may not receive their payment.

When does the new reporting language take effect?

Beginning January 1, 2018, DHS is requesting CARS agencies to submit their FINAL expenditure report for federally funded programs within 45 days of the approved CARS contract period end-date. DHS will need the reporting of all remaining allowable expenditures on Form [F-00642](#), Community Aids Reporting System Expenditure Report. The expenditure report should be submitted via email to DHS600RCARS@dhs.wi.gov and should be noted as FINAL.

I have a current agreement to administer a federally funded program. How will the information on reporting requirements be incorporated in to my Agreement?

Agreements ending 12/31/2017 will be required to include the new reporting period at the time of the agreement renewal for 1/1/2018 agreement start date. Agreements ending after 12/31/2017 will require a bilateral amendment executed to require the use of the new reporting period by 1/1/2018.

Agencies have sub-contracted entities that need to report expenses. Our sub-agreements have reporting periods that are outside of the 90 days. Will we need to have the agreements amended to adhere to the federal CFR?

Yes. Sub-grantees need to report federally funded expenses to the agency in a manner that allows the agency to meet the reporting requirements defined in 2 CFR [§ 200.343 \(a\)](#). Language relating to sub-granting is contained within the DHS Grant Agreement. Please refer to your contractual grant agreements for final reporting requirements.

Who should I contact regarding my contract?

Contact your DHS program area Contract Administrator as specified in your grant agreement.

Why are Final reports the most important?

Submission of all remaining allowable expenditures on the CARS expense report form F-00642 within 45 days of the approved CARS contract period end-date will mitigate any federal disallowance of claiming and ensure the agency will receive payment for all remaining allowable expenses for that contract period.

What are the CY2017 closeout dates?

Medicaid has more-specific reporting requirements and therefore does not adhere to the requirements under 2 CFR [§ 200.343 \(a\)](#). CY2017 reconciliation should be consistent with last year's reconciliation period.

Will our internet and CARS site have reminders of the importance of timely payments?

The [CARS Processing Schedule](#) is published on the DHS CARS Homepage. We are providing advanced notification of this reporting change so you can plan and submit expense reporting per the processing schedule prior to the new requirements being effective 1/1/2018.

What are the benefits of staying within the federal timelines?

Submission of monthly expenditures on the CARS expense report form F-00642 and based on the CARS Processing Schedule will reduce payment processing time by 30 days, meaning agencies will receive payment sooner.

Will DHS deny my agency's expense reporting if submission is late?

We expect that organizations will continue to provide services as defined in their signed contracts. We will make every effort to process properly submitted expense reporting which meet all federal requirements. The CFR also allows DHS to submit extension, but the approval of an extension is at the discretion of the federal reporting agency. If an expense report is submitted outside of the reporting requirements, the agency risks the possibility of not receiving payment.

How will I be notified of these changes?

You will start receiving communications on 9/1/2017. The [CARS Processing Schedule](#) is published on the DHS CARS homepage. Additional information regarding this reporting change can be found online at www.dhs.wisconsin.gov/cars/index.htm.

Why is DHS changing their reporting standards? The Department of Children's and Families isn't making this change.

The Department of Children and Families (DCF) has implemented an alternate system for community aids payments that can process a payment in a more effective manner. DHS is actively exploring all alternative system solutions to CARS to ensure compliance with all federal reporting requirements and for enhanced and more-timely community aids payment processing.

Can you clarify the 1/1/2018 implementation date in relation to the 45-day requirement?

All current contracts that end prior to 1/1/2018 will not be subject to the 45-day FINAL report submission. If you have a contract that ends after 1/1/2018, please contact your Contract Administrator to determine whether a bi-lateral amendment is required to implement the 45-day requirement.

For federally funded programs, future closeout periods beginning with CY2018 will need to adhere to the reporting requirements defined in 2 CFR [§ 200.343 \(a\)](#). Please refer to your contractual grant agreements for final reporting requirements.

The 45-day reporting period may be unmanageable. Can it be revised to 60 or 75 days?

The 45-day reporting requirement will ensure that agencies will receive reimbursement for all allowable expenses and provides enough time for DHS representatives to report the final expenditures to the Federal agencies. A longer time period would not allow for this to occur.

When will CARS be replaced?

DHS realizes CARS is a legacy system and does not meet the standards of today's reporting needs. DHS is actively exploring all alternative system solutions to CARS to ensure compliance with all federal reporting requirements and for enhanced community aids processing.

Additional FAQs added on November 15, 2017:

Regarding reporting requirements: The reporting requirements are dictated by the program and its funding source. In general, if a federally funded program does not have specific reporting requirements, it must adhere to CFR [§ 200.343 \(a\)](#) which requires DHS to report all applicable and allowable expenses within 90 days of grant end.

Medicaid has more-specific reporting requirements and therefore does not adhere to the requirements under CFR [§ 200.343 \(a\)](#). Hopefully, this addresses the majority of your questions and concerns.

However, you may still have federally-funded programs that need to adhere to 2 CFR [§ 200.343 \(a\)](#). We are providing advanced notification of this change so you can plan, evaluate and implement any changes to internal processes and practices to adhere to the requirements.

Regarding reporting and fiscal years: Many grant periods and their corresponding CARS Contracts do not align with a state or federal fiscal year. CARS contracts for Medicaid are calendar year based. As noted in the first paragraph, DHS is required to report “all applicable and allowable expenses within 90 days of grant end.” Since Medicaid specifically does not adhere to CFR [§ 200.343 \(a\)](#), they should not cause a problem.

Regarding length of time to process claims through the CARS system: DHS realizes CARS is a legacy system that does not meet the standards of today’s reporting needs. DHS is actively exploring all alternative system solutions to CARS to ensure compliance with all federal reporting requirements and for enhanced and more-timely community aids payment processing.

Federal granting agencies that provide funding for DHS-administered programs have notified DHS that we need to bring our deadlines for federal reporting closeout in to compliance. Current CARS grant agreements include either 60- or 90-day final reporting periods, which do not provide enough time for DHS representatives to report the final expenditures to the Federal agencies. The 45-day reporting requirement will ensure that agencies will receive reimbursement for all allowable federally funded expenses and provides enough time for DHS representatives to report the final expenditures to the Federal agencies. A longer time period would not allow for this to occur.

Regarding late invoicing from providers (hospitals/clinics): Items regarding Medicaid billing relate to Medicaid, which does not adhere to the requirements under CFR [§ 200.343 \(a\)](#).

Regarding sending in expense reports during reconciliation: Is it Medicaid or is it something else? If items are related to Medicaid (for example, CLTS), then agencies do not need to adhere to the reporting requirements under CFR [§ 200.343 \(a\)](#). If the item in question relates to other federal program and funding, then agencies may need to evaluate and implement changes to ensure adherence to the federal reporting and audit requirements.

What about pass-through agencies and areas reported away from DHS? What are the due dates for these? The reporting requirements are dictated by the program and its funding source. In general, if a

federally funded program does not have specific reporting requirements, it must adhere to 2 CFR [§ 200.343 \(a\)](#) which requires DHS to report all applicable and allowable expenses within 90 days. FoodShare does not have specific reporting requirements and so must adhere to 2 CFR [§ 200.343 \(a\)](#).

Sub-grantees need to report expenses to the agency in a manner that allows the agency to meet the reporting requirements defined in 2 CFR [§ 200.343 \(a\)](#). Language relating to sub-granting is contained within the DHS Grant Agreement.

DHS is working to develop a Final Reporting Due Date by Profile report, and is committed to having this report published and available by February 1, 2018 for all CARS Profiles.

Regarding concerns about the financial impact of working with the new deadlines: DHS expects that organizations will continue to provide services as defined in their signed contracts. DHS will make every effort to process properly submitted expense reporting which meet all federal requirements.

Regarding questions on reimbursing counties for expenditures past the due date: The CFR allows DHS to request and submit extensions, but the approval of an extension is at the discretion of the federal reporting agency. If an expense report is submitted outside of the reporting requirements, the agency risks the possibility of not receiving payment.

The submission of your FINAL expense report will need to be per the CARS processing schedule. We are hopeful this advanced notification will allow time for internal policy adjustments that will alleviate challenges in the end-of-year reconciliation process.