

## ReConnect Program: Frequently Asked Questions

Updated February 12, 2021

### *Reporting and Compliance: General Inquiries*

**Question: Will the R&C system take the place of DCS for existing RUS borrowers who have also received a ReConnect award? Or, will we have to submit reports into both systems?**

**Answer:** If you have one or more ReConnect awards, you will use R&C to report on those awards, and on any other active awards from RUS Telecommunications sub programs, including:

- Broadband Initiatives Program
- Community Connect
- Distance Learning and Telemedicine
- Rural Broadband Access
- Telecommunications Infrastructure

Thus, existing RUS borrowers who have also received a ReConnect award will use R&C as of January 1, 2021 to report on all awards, including awards from other sub-programs administered by the RUS Telecommunications Program, even if activity has not started on the ReConnect award yet.

However, if you are an RUS Electric Program borrower, you will file your ReConnect award reports in R&C, and continue to use the Data Collection System (DCS) to file reports associated with the Electric Program loans.

**Question: When do reporting requirements start?**

**Answer:** The ReConnect reporting requirements start after the release of funds.

**Question: What are the consequences if a report is submitted late?**

**Answer:** Unless an extension has been granted by the Portfolio Management & Risk Assessment (PMRA), the entity would be in violation of their legal agreements with USDA, and USDA may take action in accordance with the legal agreements. These actions could include (but are not limited to): refusal to make further advances on the account, or a requirement for the award to be rescinded and/or paid back.

Additionally, the entity's reporting and compliance history will be recorded and may be referenced on future financial assistance requests.

**Question: How do we request an extension, if needed?**

**Answer:** To request an extension, contact the Portfolio Management and Risk Assessment (PMRA) Division. An extension must be approved by PMRA. While R&C does not restrict submission after the deadline has passed, it is important to submit reports on time and/or work with PMRA to request a deadline extension prior to the report deadline.

**Question: What if I need help?**

**Answer:** The Rural Development Reporting & Compliance User Guide provides a comprehensive overview of the R&C system and reporting requirements. The Guide is available on the ReConnect website, or directly here: <https://www.usda.gov/sites/default/files/documents/rural-development-reporting-compliance-user-guide.pdf>.

A variety of resources are also available and accessible on the ReConnect Reporting and Compliance web page: <https://www.usda.gov/reconnect/reporting-compliance>. The ReConnect Reporting and Compliance web page provides links to relevant forms and resources, as well as a recording of the webinar hosted by RUS to help ReConnect Program awardees gain a better understanding of the Reporting and Compliance process and requirements.

If you still have questions after reviewing the above resources, please contact your local Telecom General Field Representative (GFR). A list of GFRs, their service areas, and their contact information can be found here: <https://www.rd.usda.gov/contact-us/telecom-gfr/all>. Additionally, you can contact the ReConnect Help Desk by completing the form located on the ReConnect website, or directly here: <https://www.usda.gov/reconnect/contact-us>. For questions related to R&C, select "Reporting" from the subject dropdown list and complete all fields on the form. Please include the user's contact number at the end of the message in the Question box so that USDA can contact the user for additional details. This form is also directly linked in several places within the R&C system. Just click any of the "Contact Us" links.

## *eAuthentication (eAuth) Inquiries*

**Question: I don't have a verified eAuth account. How do I create an account?**

**Answer:** Follow the instructions on the USDA eAuth website: <https://www.eauth.usda.gov/home> to create a verified eAuth account or upgrade an existing account to "verified." Many users will already have a Level II eAuth account. A Level II eAuth account qualifies as a verified account and can be used to access R&C.

**Question: I forgot my eAuth login credentials. How do I recover my username and password?**

**Answer:** Go to the USDA eAuth website at <https://www.eauth.usda.gov/home> and click the "Manage Account" tab at the top of the page. Then, use the "Forgot Password" or "Forgot User ID" option to recover your account information. You also have the option to make updates to your eAuth account information by using the "Update Account" or "Change Password" options.

**Question: I have several eAuth accounts. Which credentials do I use?**

**Answer:** Use the verified eAuth ID account that contains your most up-to-date information. Make sure the Representative Signature Certifier (Rep Sign Cert) or Administrator for your entity knows which eAuth ID you want to use for R&C.

**Question: If we have multiple companies or several awards, can we use one eAuth account?**

**Answer:** A USDA eAuthentication (eAuth) account cannot be created at the entity level. If you have multiple companies or awards, you will need a separate eAuth for each.

Each individual user that will be accessing R&C must have their own verified eAuth account. Additionally, all users for an entity who will be accessing R&C must be assigned a security role, and each user can only have one security role per entity.

Once the ARR has been submitted establishing at least the Representative Signature Certifier (Rep Sign Cert), the Rep Sign Cert or Administrator(s) can add, edit, or remove users from the entity's account.

## *Authorized Representative Request (ARR) Inquiries*

**Question: My entity submitted an Authorized Representative Request (ARR) and linked the account to our employees and consultants in the ReConnect Program Online Application System. Do we need to submit another ARR for R&C?**

**Answer:** Yes. In the ReConnect Program Online Application System, all users, except Consultants, were tied to a single entity's account via a unique eAuth ID. They could not use the same eAuth ID for multiple entity accounts. In R&C, users can be associated with multiple entity accounts by using a single eAuth ID. Therefore, all entities must re-authorize the users who will be accessing R&C on their behalf.

**Question: Does the ARR submitter need to be a company employee?**

**Answer:** The ARR must be submitted by either the Representative Signature Certifier (Rep Sign Cert) or Administrator who is identified in the ARR resolution. The Rep Sign Cert and Administrator security roles are both limited to employees of the entity.

**Question: I am trying to submit my ARR, but the system isn't recognizing my entity's Tax ID Number (TIN) and DUNS Number. What should I do?**

**Answer:** If your entity cannot be found when entering the TIN and DUNS combination, please try again checking for accuracy as you enter the numbers. If the issue persists and your entity has received an award, please [Contact Us](#) to report the issue and receive the necessary assistance.

**Question: I am trying to add the same person as the Rep Sign Cert and Administrator on the ARR. Is this allowed?**

**Answer:** Each user can only have one security role per entity assigned in R&C. The Rep Sign Cert automatically has all the permissions of an Administrator so there is no need to assign both roles to the Rep Sign Cert as part of the ARR.

**Question: How do I fill out the ARR Resolution on behalf of my Entity?**

**Answer:** Tips and sample ARR resolutions are available in the ARR Resolution Instructions and Samples, which is available on the ReConnect website under Forms and Resources, or directly here: <https://www.usda.gov/reconnect/forms-and-resources>.

**Question: We have started a Community Connect Grant. Are we required to submit a separate ARR for ReConnect R&C? Our Reports Dashboard currently states: "Nothing to Do for Now."**

**Answer:** If your entity has a current approved Authorized Representative Request (ARR) from the Community Connect subprogram, you are not required to submit a new ARR for the Reporting and Compliance (R&C) system.

Please note, if your organization is required to submit reports for the fourth quarter of calendar year 2020, these reports will be generated at the end of the quarter and available on your Reports Dashboard in early January 2021. Additionally, ReConnect awardees will be required to submit 2020 Q4 reports for other RUS Telecommunications awards in R&C regardless of whether work has begun on the ReConnect award.

### *R&C System Inquiries*

**Question: Is there a way to import reporting data into the system?**

**Answer:** This functionality is not currently available in R&C.

### *Account-Level Report Inquiries*

**Question: What are Account-Level reports and when are they due?**

**Answer:** Account-level reports are required at the entity level. They are not specific to any particular award within the entity's portfolio. They provide information about the entity's financial condition and operations. The variability and frequency of account-level reports are based on the award agreements executed between the entity and RUS. Please note, USDA reserves the right to adjust frequencies and deadlines for the required reports at any time. The following are Account-Level reports specific to ReConnect awards:

- Financial
  - Reporting Frequency: Quarterly
  - Creation Date: First day of the next calendar year quarter
  - Due Date: 30 days after creation date
- System Data
  - Reporting Frequency: Annually
  - Creation Date: First day of the calendar year

- Due Date: January 31
- Audit
  - Reporting Frequency: Annually
  - Creation Date: First day of the entity's next fiscal year
  - Due Date: Based on audit review type (7 CFR 1773: 120 days after creation date; 2 CFR 200: 276 days after creation date)

**Question: When will the first Financial report be due?**

**Answer:** The Quarterly Financial Report is generated by R&C on the first day of the calendar year quarter after funds are available for expenditure and is due 30 days after the report creation date. The R&C system will automatically generate the report once it becomes required, and the report must be completed by the awardee before the deadline.

**Question: Is the Financial report for the company overall or just for the ReConnect grant area?**

**Answer:** The Financial Report is an account-level report that is used for reporting the current financial performance of the entity's entire operations.

**Question: Does the quarterly financial report need to be on a consolidated or a standalone basis?**

**Answer:** The reporting requirements related to the Financial Reports depend on the structure of the Awardee. If the entity required to submit the Financial Report is a parent company, the parent company must report its Income Statement, Balance Sheet, and Statement of Cash Flows on a consolidated basis. If the entity required to submit the Financial Report is a subsidiary, the subsidiary must not report its Income Statement, Balance Sheet, and Statement of Cash Flows on a consolidated basis.

For the Audit Report, if the entity required to submit this report is a parent company, the parent must report on a consolidated basis. The Audit Report must include consolidating schedules of the parent and its subsidiary(ies) along with eliminating entries that add up to the consolidated totals. This requirement can either be satisfied by being presented on the face of the consolidated financial statements or included as supplementary schedules. If the entity required to submit the Audit Report is a subsidiary, the subsidiary must submit a standalone audit even if the award was guaranteed by its parent company.

Regardless of whether an entity is a parent or a subsidiary, the entity should not submit its subscriber information (Subscriber Data Schedule) on a consolidated basis.

**Question: What are the definitions of Non-Operating Revenue and Non-Operating Expenses?**

**What are examples of each?**

**Answer:** Non-Operating Revenue refers to income arising from transactions or activities not related to the furnishing of telecommunications service. Examples of Non-Operating Revenue could include grants, gains from investments, and income from subsidiaries or affiliates.

Conversely, Non-Operating Expenses are any expenses incurred from transactions or activities not related to the furnishing of telecommunications services. Examples of Non-Operating Expenses could include losses from investments or losses on sale of subsidiaries or assets.

**Question: When entering subscriber data into the Subscriber Data Schedule, how are customers with multiple accounts counted? How are customers with a single account used in multiple locations counted?**

**Answer:** If a telecommunications provider is delivering services (data, voice, and/or video) to a single residence or business location but is providing service offerings to different accounts, treat each account as a separate subscriber. For example, residential subscribers residing in different apartments within an apartment complex should be treated as separate subscribers. Similarly, businesses that share a building but provide different business services in different office spaces would be treated as separate subscribers because they are different business accounts.

If there is a single subscriber/account that resides or does business in more than one geographic location, treat each separate geographic location as a different subscriber. For example, if a resident owns two homes in two different towns but has one account with his/her provider, treat this account as two different subscribers. Similarly, if a gym franchise owner owns two gyms located in two different areas, treat this account as two different business subscribers.

**Question: How do I know which audit requirements apply to my entity?**

**Answer:** The requirement to submit an audit and the date when the audit is due depends on the legal structure of the entity, its fiscal year end date, and if applicable, the amount of federal award funds the entity expended during the fiscal year.

- If the entity's legal structure is a **Corporation, Commercial Business, Limited Liability Company, Cooperative, or Mutual Organization**, it is subject to the audit requirements under **7 CFR 1773**. For these entities, an audit must be submitted to USDA within 120 days after the

entity's fiscal year end date regardless of the amount of federal award funds that were expended during the fiscal year.

- If the entity's legal structure is **Authority, Municipality, Public Body, Public Power or Utilities District, Indian Tribe, Tribal Government, Higher Education, Non-Profit, Territory or Possession of the United States, or a State or Local Government**, it is subject to the audit requirements under **2 CFR 200**. For these entities, an audit must be submitted within 276 days after the entity's fiscal year end date, if the entity has expended more than \$750,000 in federal award funds. If the entity has submitted its audit to the Federal Audit Clearinghouse, then the upload to R&C is optional.

### *Project-Level Report Inquiries*

#### **Question: What are Project-Level reports and when are they due?**

**Answer:** Project-level reports are required for each award the entity received and based on the specific award requirements. Please note, USDA reserves the right to adjust frequencies and deadlines for the required reports at any time. The following are Project-Level reports specific to ReConnect awardees:

- Construction Progress
  - Reporting Frequency: Annually
  - Creation Date: First day of the calendar year
  - Due Date: January 31
- Annual Performance
  - Reporting Frequency: Annually for a period of three years following the year that construction was completed and certified in R&C
  - Creation Date: First day of the calendar year following the year that construction was completed and certified in R&C
  - Due Date: January 31
- Close Out
  - Reporting Frequency: N/A
  - Creation Date: Created following the event that occurs last:
    - Expiration of the award
    - Termination of the award
    - Project completion
    - Final disbursement of the award funds
  - Due Date: 90 days after creation date

**Question: Is the Construction Progress Map required for an area that is completely built out and ready to receive service, or for areas where build out is still in progress?**

**Answer:** The Construction Progress Map is due annually. The Construction Progress Map must be completed for any area(s) where construction was completed (ready to receive service) within the Approved Project Service Area during the current reporting period.

**Question: Does subscriber data have to be uploaded and geocoded?**

**Answer:** With the exception of the final Construction Progress Report, the entity is required to complete the “New Broadband Subscribers to Report for this Period” section of the Construction Progress Report or the Annual Performance Report. If the entity connected any new broadband subscribers in the Approved Project Service Area during the reporting period, the entity is required to upload subscriber locations to the report. This is a requirement of both the Construction Progress and Annual Performance Reports.

The entity is required to download the Geocoded Subscriber Locations Excel template ([https://www.rd.usda.gov/sites/default/files/Geocoded\\_Subscriber\\_Locations.xlsx](https://www.rd.usda.gov/sites/default/files/Geocoded_Subscriber_Locations.xlsx)), add new subscriber information to the template, and upload it to R&C. The system will automatically populate the locations of new subscribers on a map in the “New Broadband Subscribers to Report for this Period” section of the report. If the data is not already geocoded, the system will use the address provided for the subscriber to geocode, then upload to the system.