

Summary: A 10-day notice was published in the Federal Register on May 28, 2020, vol. 85, No. 103; pp. 32041-42. There was one public commenter with multiple requests and comments. The commenter is requesting that HRSA: 1) revise the requirement for submission of the Coronavirus 2019 (COVID-19) Data Report (CDR) module from monthly to quarterly; 2) extend the due date for the first post-award report by 30 days; and 3) provide additional information on reporting data to RWC.

Request #1: Revise the requirement for submission of the CDR module from monthly to quarterly to better align with the current Ryan White HIV/AIDS Program (RWHAP) grant and subgrant reporting requirements

HRSA HAB Response to Request #1: Thank you for your comment. In order to meet required reports mandated in the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the CDR reports are due monthly.

The Commenter included several supporting statements for this request that require clarification from HRSA HAB. Please note the following:

- **Statement #1:** “Many of our members that received CARES Act RWHAP funds believe that this estimate [average of two (2) hours] is unrealistic and greatly understated.”
 - **HRSA HAB Response:** The average burden estimate of 2 hours is based on pilot data for the RWHAP Ending the HIV Epidemic (EHE) Initiative Triannual Module and the process it takes to develop reports in HRSA HAB’s CAREWare – the reporting software used by the majority RWHAP providers to submit data to HRSA HAB for other RWHAP reports. Similar to the CDR, the EHE Initiative Triannual Module is a short survey that collects aggregate data on the number of clients by RWHAP service categories. The average estimated time for RWHAP participants to complete this survey is 1.8 hours.
- **Statement #2:** The additional monthly CDR would require clinics to collect client-level data on new categories of services and patients.
 - **HRSA HAB Response:** For the CDR, RWHAP providers will report aggregate-level data for existing RWHAP service categories as outlined in *PCN 16-02_Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds.*
- **Statement #3:** “HRSA is requiring recipients to prepare and submit additional COVID-19 Allocation and Expenditure reports.”
 - **HRSA HAB Response:** The allocation and expenditure (A&E) reports are a required by section 15011 of the CARES Act.

Request #2: Extend the due date for the first post-award report by 30 days.

HRSA HAB Response to Request #2: Unfortunately due to the CARES Act reporting deadlines (e.g., the first report is due to the Health and Human Services and Congress no later than 10 days after the end of the CY quarter (June 30, 2020), the due date cannot be extended.

Please note, HRSA HAB has conducted a number of activities over the past two months to help RWHAP participants prepare for the CARES Act data reporting requirements. These activities were intended to provide RWHAP participants with advanced notice of the new data requirements and, thus, allow additional time to make any required adjustments to their data collection systems and processes. Examples of HRSA HAB’s activities include:

- o On April 30, 2020, HRSA HAB shared its data collection and reporting plan for CARES Act funded RWHAP activities with RWHAP participants via e-mail. A draft copy of the CDR instrument was also included to provide RWHAP participants with advanced notice of the data required for reporting. A short question and answer section also was provided to address several anticipated questions from RWHAP participants.
- o Upon reviewing the draft CDR, RWHAP participants were able to submit questions to their Project Officers for further clarification. These questions – and HRSA HAB’s answers – are posted to a Frequently Asked Questions page on HAB’s website (<https://hab.hrsa.gov/coronavirus/frequently-asked-questions>) for anyone who is interested. The first batch of questions and answers were posted to the HAB website in mid-May. HRSA HAB has continued to update this page as questions are submitted.
- o On May 1, 2020, HRSA HAB posted detailed instructions on how to set up and/or modify the CAREWare system to allow users to restrict the funding source to isolate RWHAP services funded by the CARES Act, including information on how to contact the helpdesk.
- o On May 27, 2020, a CDR training was conducted for all RWHAP participants; the recording is available on the TargetHIV website.

Request #3: Provide additional information to RWCs on quantifying and reporting data.

HRSA HAB Response to Request #3:

HRSA HAB has developed a number of resources to provide technical details for the CDR (www.targethiv.org/library/topics/cdr). On May 27, 2020, HRSA HAB conducted a webinar, entitled *Preparing for the 2020 COVID-19 Data Report (CDR) Submission*, to assist with the submission of the monthly CDR. A recording of the webinar is now publically available on the Target HIV website. The CDR Instruction Manual – which includes step-by-step instructions on how to complete the CDR and screen shots of the tool – is also posted to this site. The questions and answers from that webinar will be posted shortly. Some additional data-related FAQs are available at: <https://hab.hrsa.gov/coronavirus/frequently-asked-questions> (filter to the Reporting Requirements category). Finally, technical assistance providers are always available to support CDR respondents.