
Learner Manual – Module 3 Federal Funding Accountability and Transparency Act (FFATA)

TRIBAL, U.S. TERRITORIES AND INSULAR AREAS ADMINISTRATIVE AND FINANCIAL GUIDANCE MANUAL FOR ASSISTANCE AGREEMENTS

*“A Nation is a stable, historically developed community of people
who share territory, economic life, distinctive culture, and language.”*

Office of Environmental Justice, U.S. EPA

U.S. Environmental Protection Agency
Updated August 2013



This manual was originally developed by the U.S. Environmental Protection Agency for Tribal Nations, but content also pertains to U.S. Territories and Insular Areas. Exception: U.S. Territories and Insular Areas are treated as states under Part 31 (and also under Part 35, Subpart A for PPGs, unlike Tribes that are covered under Subpart B).

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Module 3: Federal Funding Accountability and Transparency Act (FFATA)

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Tribal, U.S. Territories and Insular Areas Administrative and Financial Guidance for Assistance Agreements

Grants Management U.S. Environmental Protection Agency

Module 3: Federal Funding Accountability and Transparency Act (FFATA)

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Grants Management U.S. Environmental Protection Agency

What is the Federal Funding Accountability and Transparency Act (FFATA)?

- The Federal Funding Accountability and Transparency Act (FFATA) or Transparency Act was signed on September 26, 2006 and requires 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.
- Reporting requirements were phased in at certain dollar levels beginning in July 2010. All prime awardees of federal funds are now required to be in full compliance with the Federal Funding Accountability and Transparency Act (FFATA).

Overview

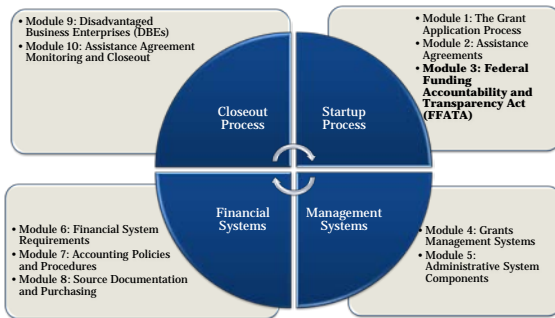
What is the Federal Funding Accountability and Transparency Act (FFATA)?

The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The intent is to empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce wasteful spending in the government. The FFATA legislation requires 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.

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Module 3: Federal Funding Accountability and Transparency Act (FFATA)



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Questions addressed in this module

- What is the Federal Funding Accountability and Transparency Act (FFATA)?
- Why was the regulation passed?
- Who does the regulation pertain to?
- What are the reporting requirements?
- Where can I go to access resources and assistance?

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What is the purpose of FFATA?

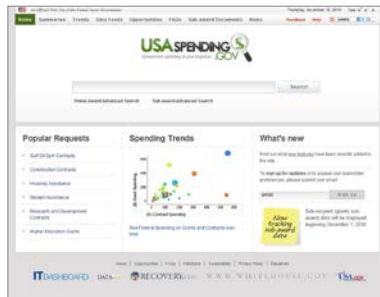
"The intent is to empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce wasteful spending in the government."



Transparency and Accountability

Federal Agency Responsibilities

All federal agencies are required to report accurate information to USASpending.gov no later than 30 days following the award or modification of a grant.



What are the responsibilities of federal agencies under FFATA?

All federal agencies are required to report accurate information to USASpending.gov no later than 30 days following the award or modification of a grant.

On a bi-monthly basis, EPA submits information on its assistance awards, including reference data about prime recipients, to USASpending.gov in a government-wide format known as the Federal Assistance Award Data System (FAADS) Plus.

On a quarterly basis the Agency must provide assurances to OMB about the timeliness and quality of its FAADS Plus submissions.

How is EPA Helping to Reduce Reporting Requirements ?

- On a bi-monthly basis, EPA submits information on its assistance awards, including reference data about prime recipients, to USASpending.gov (USASpending).
- Information about prime recipients will pre-populate FRS records to the maximum extent possible.



Definitions

- Prime Awardee:** an entity that directly receives Federal financial assistance from an agency to implement projects.
- Prime Contractor:** an entity that directly receives a procurement contract from a federal agency or financial assistance recipient.

Definitions, Continued

- Sub Contractor:** An entity that performs work for a prime contractor that is not an employee of the prime.
- Sub-recipient or Sub-grantee:** an entity that is accountable to the Recipient for the use of federal funds.
- Sub Award:** an award of financial assistance in the form of money, or property in lieu of money, made under an award by a recipient to an eligible sub-recipient or by a subrecipient to a lower tier sub-recipient.

Definitions

The Term *subcontractor* is also used to describe an entity that receives a procurement contract from a recipient or subrecipient.

The term *subaward* also includes financial assistance when provided by any legal agreement, even if the agreement is called a contract, but does not include procurement of goods and services nor does it include any form of assistance which is excluded from the definition “award” in §215.2(e).

A *subrecipient or subgrantee* is an entity that is a subrecipient under the standards in OMB Circular A-133 and is accountable to the recipient for the use of federal funds. The term subgrantee does not include vendors who provide commercial goods and services to the recipient under terms that provide for a profit. Subrecipients are subject to the OMB Cost Principles and the federal grant regulations with regard to financial management and procurement.

What is a sub-award?

The Office of Management & Budget issued guidance identifying the requirement to report first-tier sub-awards on April 6, 2010 and that guidance may be found at the OMB Open Government site

at <http://www.whitehouse.gov/omb/open>. That guidance defines a sub-award as generally referring to a monetary award made as a result of a Federal award to a grant recipient or contractor to a sub-recipient or sub-contractor respectively.

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Grants Management Module 6 U.S. Environmental Protection Agency

What new reporting is required?

- Contracts** Prime contract awardees of Federal contracts of \$25K or more must report associated first-tier sub-contracts of \$25K or more.
- Grants** Prime grant awardees of Federal grants of \$25K or more must report associated first-tier sub-grants of \$25K or more.
- Executive Compensation** Prime awardees must report executive compensation information for prime and sub-awardees if they meet reporting requirements.

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What federal grants and contracts are subject to FFATA Executive Compensation Data Reporting?

- New federal grants awarded on or after October 1, 2010 in an amount equal to or greater than \$25,000
- New federal contracts awarded on or after March 1, 2011 in an amount equal to or greater than \$25,000



What federal contracts and grants are subject to FFATA subaward and executive compensation reporting requirements?

The subaward/executive compensation reporting requirements generally apply to “new” discretionary and mandatory EPA assistance agreements, equal to or exceeding \$25,000, awarded on or after October 1, 2010. EPA must notify affected prime recipients of these requirements using a standard award term and condition published by OMB at [2 C.F.R. Part 170 Appendix A](#). Grants Management Offices (GMOs) must include the standard term and condition in all new awards of \$25,000 or more, except for awards to individuals (i.e., where the recipient receives the award as a natural person unrelated to any business or non-profit organization they may own or operate in their name).

NOTE: While a new award of less than \$25,000 is not subject to reporting, EPA may subsequently add funds to meet or exceed the \$25,000 threshold. If that occurs, the reporting requirements apply absent an OMB-specified exception and the Agency would have to amend the award to include the standard OMB award term. If funding is deobligated from the agreement to reduce the award amount to less than \$25,000, the reporting requirements continue to apply.

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What grants are NOT subject to the Transparency Act’s reporting requirements?

- Cooperative Research and Development Agreements (CRDAs), as defined under 15 U.S.C. 3710a;
- Federal awards to individuals who apply for or receive Federal awards as natural persons;
- Federal awards to entities that had a gross income, from all sources, of less than \$300,000 in the entities’ previous tax year; and
- Federal awards, if the required reporting would disclose classified information.

What federal contracts and grants are NOT subject to the Transparency Act’s reporting requirements?

In addition to the award amount threshold, the following are not subject to the Transparency Act’s reporting requirements:

- Grants, whether existing or new as of October 1, 2010, that are funded by the Recovery Act. Rather, such awards will continue to report those awards and related subawards through FederalReporting.gov;
- Transfers of title between Federal agencies of Federally owned property;
- Federal inter-agency transfers of award funds;
- Cooperative Research and Development Agreements (CRDAs), as defined under 15 U.S.C. 3710a;
- Federal awards to individuals who apply for or receive Federal awards as natural persons (i.e., unrelated to any business or non-profit organization he or she may own or operate in his or her name);
- Federal awards to entities that had a gross income, from all sources, of less than

- \$300,000 In the entities' previous tax year; and
- Federal awards, if the required reporting would disclose classified information.

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What does Executive Compensation Data reporting entail?

Names and total compensation of the five most highly compensated officers must be reported. **IF:**

- The entity in the preceding fiscal year received 80 percent or more of its annual gross revenues in Federal awards; AND
- \$25,000,000 or more in annual gross revenues from Federal awards; AND
- The public does not already have access to this information under the Securities and Exchange Act of 1934.

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Prime recipient executive compensation data

- The prime recipient must include data in its SAM registration profile (formerly CCR) by the end of the month following the month it receives an award, and annually thereafter.



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SAM - are you in compliance?



- The System for Award Management (SAM) was deployed as a replacement for CCR on July 30, 2012.
- SAM is combining 8 federal procurement systems & the Catalog of Federal Domestic Assistance (CFDA) to provide one streamlined, more user-friendly system.

--more later in the Module--

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Reminder: What Federal contracts and grants are subject to the FFATA subaward and executive compensation reporting requirements?

- New grants \$25,000 and over. The grants subaward reporting functionality is available via www.fsr.gov.
- Reporting of Sub-contracts of Federal contracts and sub-grants of Federal grants where these sub-contracts and sub-grants are \$25,000 and over.

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Why is subaward information being collected?

- The Federal Funding Accountability and Transparency Act requires OMB to "ensure the existence and operation of a single searchable website" for Federal awards.
- The Transparency Act's **definitions** of "Federal awards" include not only prime awards for grants, cooperative agreements, loans, and contracts, but also sub-grants and sub-contracts.

Why is sub-award information being collected?

The Federal Funding Accountability and Transparency Act (Transparency Act) requires OMB to "ensure the existence and operation of a single searchable website" for Federal awards. The Transparency Act's definitions of "Federal awards" include not only prime awards for grants, cooperative agreements, loans, and contracts, but also sub-grants and sub-contracts.

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What is required to be reported as part of the Transparency Act?

FFATA prescribes specific pieces of information to be reported.

1. The following data for subawards equal to or greater than \$25K is required:
 - a. Name of entity receiving award
 - b. Amount of award
 - c. Funding agency
 - d. NAICS code for contracts / CFDA program number for grants
 - e. Program source (<https://www.federalreporting.gov/federalreporting/programSourceCodes.do>)
 - 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; and
 - j. Total compensation and names of top five executives

Reporting

What is required to be reported as part of the Transparency Act?

FFATA prescribes specific pieces of information to be reported:

1. The following data about sub-awards greater than \$25K

- a. Name of entity receiving award
- b. Amount of award
- c. Funding agency
- d. NAICS code for contracts / 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; and
- j. Total compensation and names of top five executives (same thresholds as for primes)

2. The Total Compensation and Names of the top five executives if:

- a. More than 80% of annual gross revenues are from the Federal government, and those revenues are greater than \$25M annually, and
- b. Compensation information is not already available through reporting to the SEC.

Classified information is exempt from the prime and sub-award reporting requirement as are contracts with individuals.

What does total compensation entail?

2 CFR Part 170 e.5 of the award term in Appendix A: *Total compensation* means the cash and noncash dollar value earned by the executive during the recipient's or subrecipient's preceding fiscal year and includes the following (for more information see 17 CFR 229.402(c)(2)):

- i. *Salary and bonus.*
- ii. *Awards of stock, stock options, and stock appreciation rights.* Use the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with the Statement of Financial Accounting Standards No. 123 (Revised 2004) (FAS 123R), Shared Based Payments.

- iii. *Earnings for services under non-equity incentive plans.* This does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives, and are available generally to all salaried employees.
- iv. *Change in pension value.* This is the change in present value of defined benefit and actuarial pension plans.
- v. *Above-market earnings on deferred compensation which is not tax-qualified.*
- vi. *Other compensation, if the aggregate value of all such other compensation (e.g. severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property) for the executive exceeds \$10,000.*

As of October 1, 2010, definitions for data elements may be found at the data dictionaries maintained on www.USAspending.gov.

What is NAICS?

- **North American Industry Classification System**
 - Was developed by OMB as the standard for use by Federal agencies in classifying business establishments for collection, tabulation, presentation and analysis of statistical data describing the US economy.
 - It provides uniformity and comparability in the presentation of these statistical data.



What is required to be reported as part of the Transparency Act? Continued:

2. Prime **and** Sub-recipients Executive Compensation Data:

Name and total compensation of the five most highly compensated officers if:

- a) Receives more than 80% of annual gross revenues from the federal government, and those revenues are greater than \$25M annually **and**
- b) Compensation information is not already available through reporting to the Securities and Exchange Commission (SEC).

To access company information at the SEC go to: <http://www.sec.gov/answers/excomp.htm>

How Long Do I Have To Report?

Prime awardees must report first-tier subaward information *by the end of the month following the month the award or award's obligation was made*

- For example, if a subaward is made on August 5 the prime awardee would have until September 30 to report the subaward
- subawards made during August all have until September 30 to report

How much time does a prime awardee have to report executive compensation or sub-award information?

The prime recipient will have until the end of the month plus one additional month after an award or sub-award is obligated to fulfill the reporting requirement. For example, if a sub-award was made on March 5, 2012 the prime recipient had until April 30, 2012 to report the sub-award information.

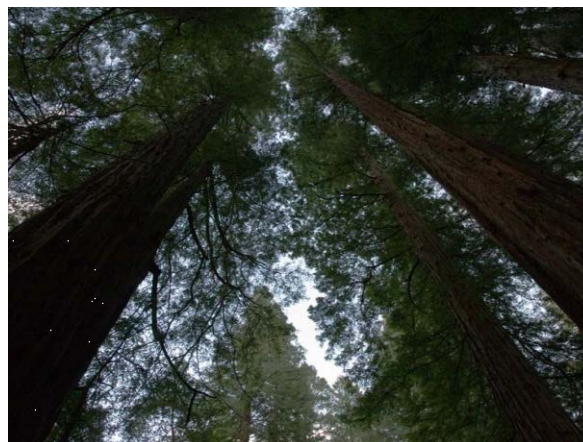
How Does Reporting Occur?

Prime awardees must:

- Register with the System for Award Management (SAM; formerly CCR)
 - Subawardees must register with Dun & Bradstreet to get a DUNS number.
- Respond to the executive compensation questions through SAM
- Report first-tier subaward information through the FFATA Subaward Reporting System (FSRS)

Are subawardees required to report information directly into FSRS in compliance with this Guidance and the Transparency Act?

- A. Yes
- B. No



How are applicants informed of FFATA requirements?

Two clauses in Section VI of announcements:

1. Applicants must ensure that they have the necessary processes and systems in place to comply with the subaward and executive total compensation reporting requirements established under OMB guidance at 2 CFR Part 170 unless they qualify for an exception from the requirements, should they be selected for funding.

Funding Announcements, Continued

2. System for Award Management (SAM) and Data Universal Numbering System (DUNS) Requirements

Unless exempt from these requirements under OMB guidance at 2 CFR Part 25 (e.g., individuals), applicants must:

- I. Be registered in SAM **prior to submitting** an application or proposal under this announcement.
- I. Maintain an active SAM registration with current information at all times during which it has an active Federal award or an application or proposal under consideration by an agency, and
- II. Provide its DUNS number in each application or proposal it submits to the agency.

Please note: SAM and DUNS will be covered in more detail later in the Module

Note: Please note that while the DUNS/SAM clause requires that applicants be registered in SAM and have a DUNS number at time of proposal submission, applicants who fail to do so will not be rejected from the competition. Rather, as provided in the OMB guidance, the effect of noncompliance is measured at the time of award and the Agency may not make an award to an entity if they have not complied with the SAM/DUNS requirements. In such cases, the Agency may determine that the applicant is not qualified to receive an award and may use that determination as a basis to make an award to another applicant.

What exemptions are there from the SAM and DUNS requirements?

Exemptions listed in 2 CFR Part 25.110:

(b) *Exemptions for individuals.* None of the requirements in this part apply to an individual who applies for or receives Federal financial assistance as a natural person (*i.e.*, unrelated to any business or non-profit organization he or she may own or operate in his or her name).

(c) *Exemptions for Federal agencies.* The requirement in this part to maintain a current registration in SAM does not apply to an agency of the Federal Government that receives an award from another agency.

(d) *Other exemptions.* (1) Under a condition identified in paragraph (d)(2) of this section, an agency may exempt an entity from an applicable requirement to obtain a DUNS number, register in SAM, or both.

(i) In that case, the agency must use a generic DUNS number in data it reports to USASpending.gov if reporting for a prime award

to the entity is required by the Federal Funding Accountability and Transparency Act (Pub. L. 109–282, hereafter cited as “Transparency Act”).

(ii) Agency use of a generic DUNS should be used rarely for prime award reporting because it prevents prime awardees from being able to fulfill the subaward or executive compensation reporting required by the Transparency Act.

(2) The conditions under which an agency may exempt an entity are—

(i) For any entity, if the agency determines that it must protect information about the entity from disclosure, to avoid compromising classified information or national security or jeopardizing the personal safety of the entity's clients.

(ii) For a foreign entity applying for or receiving an award or subaward for a project or program performed outside the United States valued at less than \$25,000, if the agency deems it to be impractical for the entity to comply with the requirement(s).



How Are Recipients Notified of FFATA Requirements?

FFATA requirements will be listed in the Terms and Conditions of the grant award. Read carefully!



How are recipients notified of the FFATA requirements?

FFATA requirements will be listed in the Terms and Conditions of the grant award. Read carefully!

Identification Requirements

How are recipients notified of the System for Award Management and Universal Identifier requirements?

System for Award Management and Universal Identifier requirements will be listed in the Terms and Conditions of the grant award.

I. System for Award Management and Universal Identifier Requirements.

- A. Requirement for System for Award Management (SAM). Unless you are exempted from this requirement under 2 CFR 25.110, you as the recipient must maintain the currency of your information in SAM until you submit the final financial report required under this award or receive the final payment, whichever is later. This requires that you review and update the information at least annually

Module 3: Federal Funding Accountability and Transparency Act

after the initial registration, and more frequently if required by changes in your information or another award term.

- B. Requirement for Data Universal Numbering System (DUNS) numbers. If you are authorized to make subawards under this award, you:
1. Must notify potential subrecipients that no entity (see definition in paragraph C of this award term) may receive a subaward from you unless the entity has provided its DUNS number to you.
 2. May not make a subaward to an entity unless the entity has provided its DUNS number to you.
- C. Definitions. For purposes of this award term:
1. System for Award Management (SAM) means the Federal repository into which an entity must provide information required for the conduct of business as a recipient. Additional information about registration procedures may be found at the SAM Internet site (currently at <http://www.sam.gov>).
 2. Data Universal Numbering System (DUNS) number means the nine-digit number established and assigned by Dun and Bradstreet, Inc. (D&B) to uniquely identify business entities. A DUNS number may be obtained from D&B by telephone (currently 866-705-5711) or the Internet (currently at <http://fedgov.dnb.com/webform>).
 3. Entity, as it is used in this award term, means all of the following, as defined at 2 CFR part 25, subpart C:
 - a. A Governmental organization, which is a State, local government, or Indian tribe;
 - b. A foreign public entity;
 - c. A domestic or foreign nonprofit organization;
 - d. A domestic or foreign for-profit organization; and
 - e. A Federal agency, but only as a subrecipient under an award or subaward to a non-Federal entity.
 4. Subaward:
 - a. This term means a legal instrument to provide support for the performance of any portion of the substantive project or program for which you received this award and that you as the recipient award to an eligible subrecipient.
 - b. The term does not include your procurement of property and services needed to carry out the project or program (for further explanation, see Sec. --.210 of the attachment to OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations").
 - c. A subaward may be provided through any legal agreement, including an agreement that you consider a contract.
 5. Subrecipient means an entity that:
 - a. Receives a subaward from you under this award; and
 - b. Is accountable to you for the use of the Federal funds provided by the subaward.



What is a DUNS Number?

The Data Universal Numbering System or DUNS Number is a means of identifying business entities on a location-specific basis. Assigned and maintained solely by Dun and Bradstreet, this unique nine-digit identification number has been assigned to over 100 million businesses worldwide.

Do you know if your organization has a DUNS number?

How do we get the Data Universal Numbering System (DUNS) number?

The Dun and Bradstreet (D&B) Data Universal Numbering System (DUNS) number is an application requirement from the Office of Management and Budget (OMB). Assistance agreement applicants must have a DUNS number. You can get a DUNS number in two ways:

By calling the toll-free DUNS number request line at 1-866-705-5711.

Online at <http://www.dnb.com/>
<http://fedgov.dnb.com/webform/displayHomePage.do>.

A DUNS number will be issued in one business day at no cost.

Why does an organization have to provide a DUNS number?

The federal government's Office of Management & Budget has adopted the use of DUNS numbers as a way to keep track of how federal grant money is awarded and dispersed.



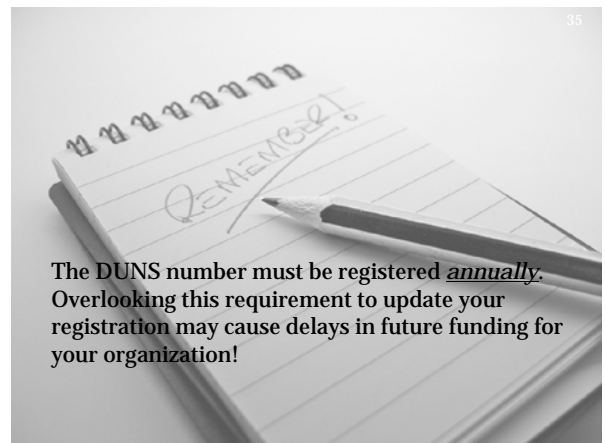
The DUNS Number

Request a Dun and Bradstreet Data Universal Numbering System (DUNS) number
1-866-705-5711—Free
<http://fedgov.dnb.com/webform>

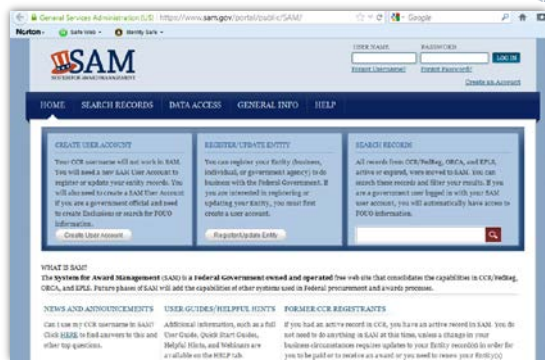
When issuing subawards under prime federal awards received by the Tribal Nation, will the subrecipient be required to obtain a DUNS Number?

Yes. In accordance with FFATA, all subrecipients are required to have a DUNS number before the Tribal Nation can execute a subaward or subcontract.

Make sure you keep track of your DUNS number expiration date!



The DUNS number must be registered *annually*. Overlooking this requirement to update your registration may cause delays in future funding for your organization!



What is the System for Award Management (SAM)?

The System for Award Management (SAM) is the official, on-line registrant database for the U.S. Federal Government. SAM Collects, validates, stores and disseminates data in support of agency acquisition and award missions.

Unless exempt from these requirements under OMB guidance at **2 CFR Part 25** (e.g., individuals), applicants must:

1. Be registered in SAM prior to submitting an application or proposal under this announcement. SAM information can be found at <https://www.sam.gov>.
2. Maintain an active SAM registration with current information at all times during which it has an active Federal award or an application or proposal under consideration by an agency.

What is the System for Award Management (SAM)?

The System for Award Management (SAM) is a Federal Government owned and operated free website that consolidates the capabilities of CCR/FedReg, ORCA, and EPLS.



SAM was deployed July 30, 2012.
Future phases of SAM will add the capabilities of other systems used in Federal procurement and awards processes.

Who is required to register in SAM?

Anyone (sole proprietors, corporations, partnerships and governmental organizations) desiring to do business with the federal government **must** register in SAM.

Exception: SAM registration is not required for individuals seeking grants.

Do you know if your organization is registered in SAM?

The Migration from CCR to SAM

What do I need to do?

- **I am already registered with CCR:** You need to create an account with SAM. You will need to know the email address and username from your CCR account in order to migrate your existing information and permissions into your new SAM account.
- **My CCR registration is incomplete:** Any information entered into CCR will be moved to SAM. You can complete the registration there.
- **I am not yet registered with CCR:** Go to SAM and create your account there; CCR is no longer active.

How does an organization create an account in SAM?

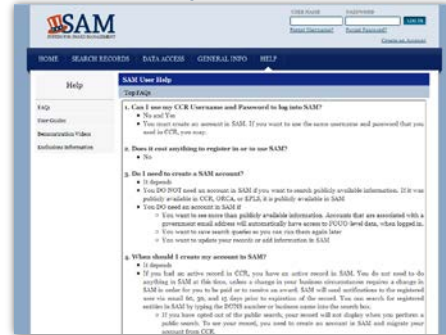
NEW users:

Step 1: Access the SAM online registration at www.sam.gov. Click on "Register New Entity" from the left side navigation pane. **You must have a Data Universal Numbering System (DUNS) number in order to begin the registration process.**

Step 2: Complete and submit the online registration. If you already have the necessary information on hand, the online registration takes approximately 30 minutes to complete, depending upon the size and complexity of your business or organization.

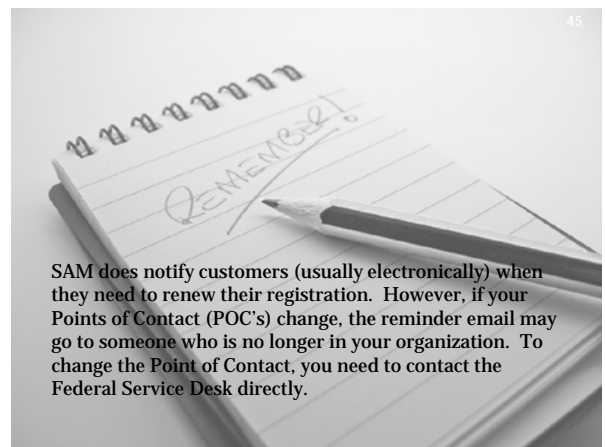
Encourage the organizations you are working with to become registered through SAM!

Online SAM Help



How long does it take to get a SAM application processed?

New registrations can take an average of 3-5 business days to process in SAM.



SAM does notify customers (usually electronically) when they need to renew their registration. However, if your Points of Contact (POC's) change, the reminder email may go to someone who is no longer in your organization. To change the Point of Contact, you need to contact the Federal Service Desk directly.

What does it cost to register in SAM?

Because SAM is a federally mandated and funded program, there is no cost to registrants for registering in SAM.



How long does it take to get a SAM application processed?

- A. Within 24 hours
- B. Two days
- C. One week
- D. Six months
- E. 3-5 days





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IT IS *YOUR* RESPONSIBILITY

Is there someone within your organization delegated with the responsibility to acquire/maintain:

SAM
registration
and updated
information

DUNS
registration
and updated
information

FFATA
compliance



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Now let's review the FFATA reporting process:
www.FSRS.gov

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What is the FSRS?



The Reporting System

What is FSRS?

The FFATA Subaward Reporting System (FSRS) is the reporting tool Federal prime awardees (i.e. prime contractors and prime grant recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet the FFATA reporting requirements. Prime contract awardees will report against sub-contracts awarded and prime grant awardees will report against sub-grants awarded. The sub-award information entered in FSRS will then be displayed on www.USASpending.gov associated with the prime award, thereby furthering Federal spending transparency.

Introduction/Background

The Federal Funding Accountability and Transparency Act (FFATA) necessitates a system to allow prime grant/contract recipients to be able to report on subaward activity and executive compensation.

- FFATA Subaward Reporting System – FSRs.gov
- July 2010, "FSRS.gov" launched as the resource for Prime Awardees to report on FFATA-required **Contract** sub-contract activity and executive compensation
- October 2010 "FSRS.gov" expanded to incorporate FFATA-required **Grant** subaward and executive compensation reporting
- Prime Awardees are those recipients of the grant/contract awards.

Note: Sub-contractors/awardees do not report through the system (**only Prime Awardees**)

<https://www.fsr.gov/>

Reporting Timeline for Grant Recipients, continued

- For those **new Federal grants as of October 1, 2010**, if the initial award is **equal to or greater than \$25,000**, reporting of subaward and executive compensation data is required.
- If the **initial award is below \$25,000** but subsequent grant **modifications** result in a total award **equal to or over \$25,000**, the award will be **subject to the reporting** requirements, as of the date the award exceeds \$25,000.
- If the **initial award equals or exceeds \$25,000** but funding is subsequently **de-obligated** such that the total award amount falls below \$25,000, the award **continues to be subject to the reporting** requirements of the Transparency Act and this Guidance.

Who is required to file a FFATA report in FSRs?

The FFATA Subaward Reporting System (FSRS) will collect data from Federal prime awardees on subawards they make:

- A prime **grant** awardee is required to report on its sub-grants, and
- A prime **contract** awardee is required to report on its sub-contracts.



Reporting Timeline for Prime Contractors

In accordance with Federal Acquisition Regulation clause 52.204-10 (Reporting Executive Compensation and First-Tier Sub-contract Awards), Prime Contractors awarded a federal contract or order are required to file a FFATA subaward report by the end of the month following the month in which the prime contractor awards any sub-contract greater than \$25,000.

The reporting timeline was phased-in. Starting March 1, 2011, reporting on all sub-contracts greater than \$25,000 became mandatory.

Reporting Timeline for Grant Recipients

In accordance with 2 CFR Chapter 1, Part 170 REPORTING subaward AND EXECUTIVE COMPENSATION INFORMATION, Prime Awardees awarded a federal grant are required to **file a FFATA subaward report** by the end of the month following the month in which the prime awardee awards any sub-grant **equal to or greater than \$25,000**. The reporting requirements are as follows:

- This requirement is for both discretionary and non-discretionary grants awarded on or after October 1, 2010.
- All subaward information must be reported by the prime awardee.

If an award recipient receives a grant from a federal agency that is equal to or greater than \$25,000, and meets the other threshold criteria, the prime awardee must report its own executive compensation data by:

- The end of the month following the month the award or obligation was made
- Within six months from the date of the award
- Within twelve months from the date of the award
- By the end of the grant project
- None of the above




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Grants Management U.S. Environmental Protection Agency

If an award recipient issues a subaward or subcontract to another organization, is it required to report executive compensation data of the subrecipient?


- Yes, regardless of the amount awarded
- No
- Yes, if the award amount equals or exceeds \$25,000
- It depends on the Terms and Conditions of the award
- All of the above




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Grants Management U.S. Environmental Protection Agency

FSRS System Overview



The FSRS System Overview

The Federal Funding Accountability and Transparency Act (FFATA) necessitated a system to allow prime grant award and prime contract recipients to report sub-award activity and executive compensation.

- The FFATA Sub-award Reporting System – FSRS.gov – is the system that allows grant award and contract award

recipients to electronically report their sub-award activity.

- July 2010, launched "FSRS.gov" to serve as the resource for prime awardees to report on FFATA-required **contract** sub-award activity and executive compensation.
- October 2010, "FSRS.gov" expanded to incorporate FFATA-required **grant** sub-award and executive compensation reporting.

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Grants Management U.S. Environmental Protection Agency

FSRS Awardee Login Page



How do new users set up an account?

New Users:

Users point their browser to <https://www.FSRS.gov>. Note: users do not need to re-register if they have an existing Electronic Subcontracting Reporting System (eSRS) Contractor user account (www.esrs.gov).

- The awardee clicks on the “Awardees” link within the “Log-In” or “Register Now” box
- To register, the user clicks the “Register” button under the “new awardees: register” section.
- The registrant completes the two step process that opens (forms capture registration data).

Note: Throughout the system a red asterisk (*) designates that the field is required.

- The user enters their organization’s DUNS Identification Number and clicks the “Next” button.
- Some form data may already be populated on the form from SAM.gov. This is based on the DUNS entered in step one.

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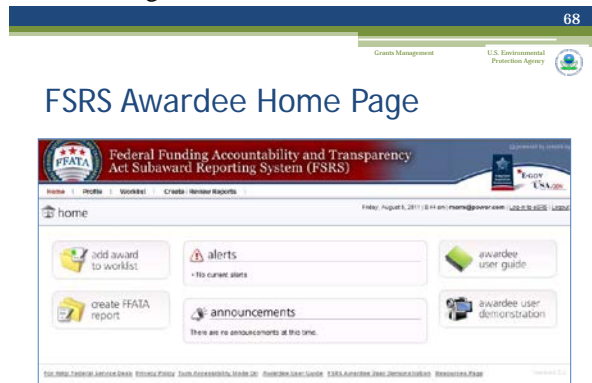
6. Users must complete all required fields (indicated with a red asterisk) and click the “submit” button.
 7. After submitting this form, a confirmation email is sent to the email address provided during the registration. The confirmation email presents instructions on how to finalize the registration process. **An account is only activated after the user follows the instructions presented in the email that is sent to them.**
 8. After a user has confirmed their registration, as outlined in the email that they received, the user can return to the Log-In page (see Existing Users, page 14 of the FSRs Users Guide - https://www.fsr.gov/documents/FSRS_Award_ee_User_Guide.pdf). They can then enter their e-mail address and password (e-mail address will be the user “login ID”), and click the “Login” button, to login to FSRs.
2. The “Alerts” section shows messages that require a user’s attention.
 3. “Announcements” are created by FSRs administrators.
 4. The quicklink buttons on the left hand side of the screen allow users to quickly create a new FFATA Report, or to link an award to their work list. Please see the corresponding sections of the FSRs Users Guide for more information. (See link above)

Creating a Profile

1. If a user clicks on “Profile” in the top navigation menu bar, they can review their core contact information on this screen.
2. To edit profile information, the user should click the “Edit” button. After making desired changes, the user should click the “submit” button to enter the changes.
3. To change a password, users click on the “Password” tab near the top of the page. Users may enter a new password on that page. The user should click “save password” when done. For security purposes, passwords must meet the following criteria:
 - a. Must be between 10 and 14 characters
 - b. Must contain 2 of each of the following: lower case letter, upper case letter, number, special character (i.e., %, ^)

Terms of Use Agreement

1. All users are required to agree to the Terms of Use for FSRs.
2. Use the side scroll bar resource to review the terms and conditions in their entirety.
3. A user can click “OK” to move forward or “Log-Off” to exit.



Home Page Features

1. The Navigation bar at the top of the screen allows users to move through the system. This bar is available on every screen throughout the system. Please read “Section 2.2 Navigation Overview” of the FSRs Users Guide for more information. https://www.fsr.gov/documents/FSRS_Award_ee_User_Guide.pdf



In FSRs, Prime Awardees Can...

Manage FFATA Reports

- Search for an Award
- **Create New FFATA Subaward Report**
- Save Draft FFATA Subaward Report
- Delete Draft FFATA Subaward Report
- Submit New FFATA Subaward Report
- Reopen and Revise Submitted FFATA Subaward Report
- Copy Existing FFATA Subaward Report
- Manage FFATA Subaward Report List
- Submit Multiple FFATA Subaward Reports

Manage Awardee Worklist

- Organize Prime Awards Associated with Registered DUNS
- Search for Prime Award
- Add Prime Award to / Remove Prime Award from Worklist

Overview of the Worklist

1. The Worklist main navigation allows the prime awardee to manage and review the awards for which they have reporting responsibility.
2. The user can search for and add awards (both contracts and grants awarded to their registered DUNS number) to their worklist from contracts reported in the Federal Procurement Data System – Next Generation (FPDS-NG) and grants reported through the Agency's Federal Assistance Award Data System (FAADS+) submissions to USAspending.
3. From the worklist they can create new FFATA sub-award reports against those prime awards.
4. Users can view unassigned prime contracts and/or grants awarded to their registered DUNS number and add them to their worklist.
5. This navigation provides a way to review an award and all associated reports for that award (view existing reports).



Step 2 - Enter Contract / Award # (1 of 3)



Step 2 - Enter Contract / Award # (2 of 3)



Create New FFATA Subaward Report



Step 2 - Enter Contract / Award # (3 of 3)



Step 1 - Instructions



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Step 3 - Grant Award Details

Step 4 - Prime Award Details (3 of 5)

Step 4 - Prime Award Details (1 of 5)

Step 4 - Prime Award Details (4 of 5)

In order to determine whether you are required to report executive compensation data, answer the following question(s):

If "Yes" on 16
Then answer 17

16. In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific CCR record, represented by a DUNS number, belongs) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, grants, subgrants, and/or cooperative agreements, and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, grants, subgrants, and/or cooperative agreements?
 Yes No

17. Does the public have access to information about the compensation of the executives in your business or organization (the legal entity to which this specific CCR record, represented by a DUNS number, belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78(a), 78(d)) or section 304 of the Internal Revenue Code of 1986?
 Yes No

Step 4 - Prime Award Details (2 of 5)

Step 4 - Prime Award Details (5 of 5)

Step 5 - Subawardee Data (1 of 3)



Step 6 - Review



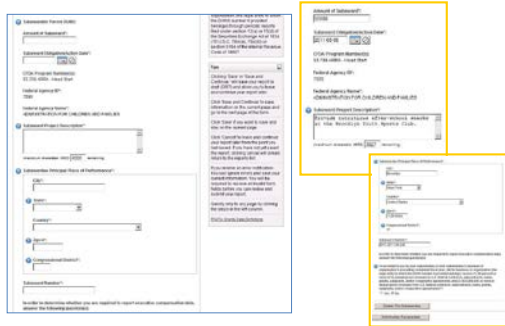
Step 5 - Subawardee Data (2 of 3)



Step 7 - Submit Report



Step 5 - Subawardee Data (3 of 3)



What is the FFATA Subaward Reporting System (FSRS)?

- A. A government contractor
- B. An optional reporting tool
- C. The reporting tool Federal prime awardees use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet reporting requirements
- D. None of the above
- E. All of the above



Module 3: Federal Funding Accountability and Transparency Act



3. There is also a navigational link for the FSD (help desk) contained in the lower navigational bar that is presented when a user is logged into the system.
4. Clicking the FSD link opens a transition page introducing the Federal Service Desk (FSD) where users can secure assistance.
5. The link to access the FSD is presented on this screen (FSD.gov).
6. Users are automatically re-directed to the FSD 30 seconds after navigating to the transition page.



Service Desk (1 of 4)

- ▶ Clicking on the "For Help: Federal Service Desk" link on the home page, or anywhere within the site, takes the user to a splash screen
- ▶ The user can either click the logo to be quickly redirected immediately or wait 30 seconds and be sent to the FSD home page at www.fsd.gov



Where Can I Find Help?

- ▶ FSRS is one of several systems served by the Federal Service Desk (www.fsd.gov) for Tier 1 support
- ▶ The FSRS home page has a For Help: Federal Service Desk link directing users to the multi-channel FSD contact center
- ▶ FSRS also has system FAQs posted on the home page and again within the site on the Resources Page



Service Desk (2 of 4)

▶ There are multiple ways to find information within the FSD site; the easiest is the Answer Center

▶ Users can enter search terms in the box or narrow the search by system

▶ FSRS feeds the Answer Center with new questions and updated information continually

The Help Desk

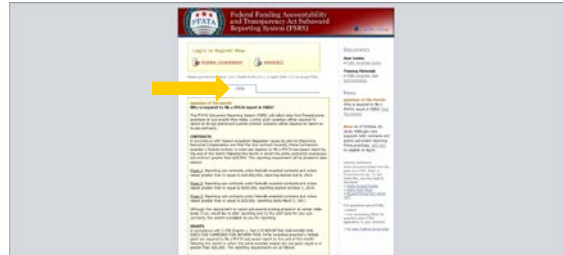
1. Users can access the Federal Service Desk (FSD) directly from within the system. FSD is the help desk organization that provides help desk support for FSRS.gov.
2. A link to the FSD is presented on the home page.

Module 3: Federal Funding Accountability and Transparency Act

Service Desk (3 of 4)

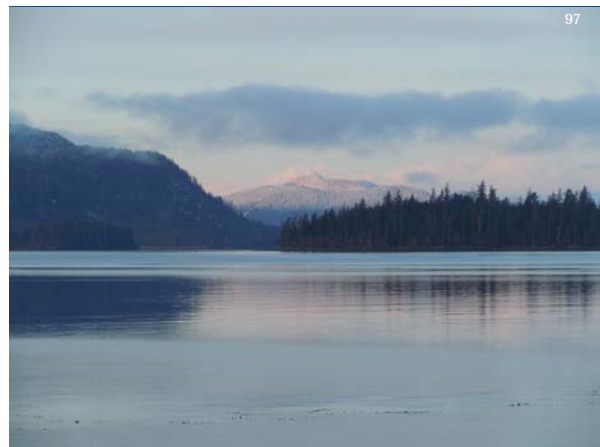
- Click on Search by System to narrow the search
- Click the drop-down arrow to Limit by System
- Enter search terms and the results are provided with links to other like answers
- Search Tips are provided

Frequently Asked Questions (FAQ)

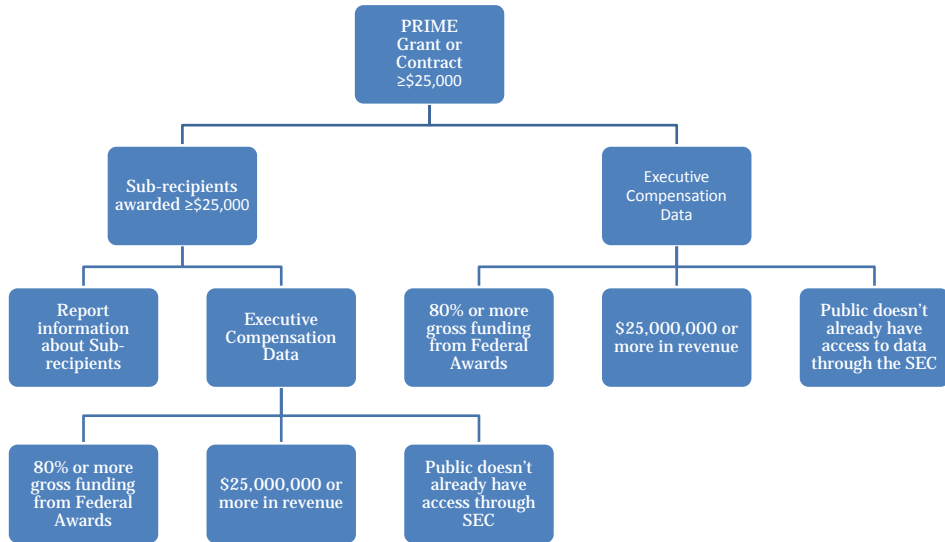


Service Desk (4 of 4)

- Users can also establish an account to use "Ask a Question" web form
- In addition, live FSD Customer Service Representatives are available from 8 a.m. – 8 p.m. Eastern Time, Monday-Friday at:
 - U.S. Calls: 866-606-8220
 - International Calls: 334-206-7828



FFATA in a nutshell





Questions? Contact:

Laurice Jones
U.S. Environmental Protection Agency
Office of Grants and Debarment
1200 Pennsylvania Avenue, N.W.
Mail Code: 3903R
Washington, DC 20460
202-564-0223

Elizabeth January
Program Analyst
U.S. Environmental Protection Agency
11 Technology Drive
Mail Code: EQA
N. Chelmsford, MA 01863
617-918-8655

Jones.laurice@epa.gov

janeary.elizabeth@epamail.epa.gov

OR YOUR GRANT SPECIALIST!

Forms available for download at <http://www.epa.gov/ogd/forms/forms.htm>

Attachment to Module 3

Answers to Quizdom Actionpoint Questions

Slide	Question (bold font indicates correct answer)	Explanation
23	<p>Are subawardees required to report information directly into FSRS in compliance with this Guidance and the Transparency Act?</p> <p>A. Yes</p> <p>B. No</p>	<p>No. The prime awardee must report all information associated with a Federal grant, either regarding executive compensation data for prime awardees or subawardees, or any other information associated with subawards.</p> <p>The subawardee, however, has an obligation to provide to the prime grant awardee all information required for such reporting. This includes subawardee entity information, subawardee DUNS number, subawardee Parent DUNS number, if applicable, and relevant executive compensation data, if applicable. If the subawardee is registered in SAM, this information may be migrated into FSRS to facilitate the prime awardee's reporting, as required under this guidance.</p>
46	<p>How long does it take to get a SAM application processed?</p> <p>A. Within 24 hours</p> <p>B. Two days</p> <p>C. One week</p> <p>D. Six Months</p> <p>E. 3-5 days</p>	<p>New registrations can take an average of 3-5 business days to process in SAM. This timeframe may be longer if the information you provide is flagged for manual validation. If you notice your registration has had a "Submitted" status for longer than 10 business days, and you have not otherwise been contacted to correct or update information, please contact the Federal Service Desk at 866-606-8220 or https://www.fsd.gov.</p>
59	<p>If an award recipient receives a grant from a federal agency that is equal to or greater than \$25,000, and meets the other threshold criteria, the prime awardee must report its own executive compensation data by:</p> <p>A. The end of the month following the month the award or obligation was made</p> <p>B. Within six months from the date of the award</p> <p>C. Within twelve months from the date of the award</p> <p>D. By the end of the grant project</p> <p>E. None of the above</p>	<p>Prime awardees who meet threshold criteria must report executive compensation data by the end of the month following the month the award or obligation was made. For example, if a Federal agency awards a grant to a prime awarded on October 1, the prime awarded must report executive compensation data by November 30.</p>

Module 3: Federal Funding Accountability and Transparency Act (FFATA)

Slide	Question (bold font indicates correct answer)	Explanation
62	<p>If an award recipient issues a subaward or subcontract to another organization, is it required to report executive compensation data of the subrecipient?</p> <p>A. Yes, regardless of the amount awarded B. No C. Yes, if the award amount equals or exceeds \$25,000 D. It depends on the Terms and Conditions of the award E. All of the above</p>	<p>Yes, if the award amount equals or exceeds \$25,000 the reporting of executive compensation of the subrecipient is required.</p> <p>Note: If the initial award is below \$25,000 but subsequent grant modifications result in a total award equal to or over \$25,000, the award will be subject to reporting requirements, as of the date the award exceeds \$25,000</p> <p>If the initial award equals or exceeds \$25,000 but funding is subsequently de-obligated such that the total award amount falls below \$25,000, the award continues to be subject to the reporting requirements of the Transparency Act of this Guidance.</p>
86	<p>What is the FFATA Subaward Reporting System (FSRS)?</p> <p>A. A government contractor B. An optional reporting tool C. The reporting tool Federal prime awardees use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet reporting requirements D. None of the above E. All of the above</p>	<p>The FFATA Subaward Reporting System (FSRS) is the reporting tool Federal prime awardees (i.e. prime contractor and prime grant recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet FFATA reporting requirements. Prime contract awardees will report against subcontracts awarded and prime grant awardees will report against subgrants awarded. The subaward information entered in FSRS will then be displayed on www.USASpending.gov associated with the prime award furthering Federal spending transparency.</p>