

OMB FFATA Guidance

**Summary[[1]](#footnote-1)**

**Guidance and Contacts**

* 8/27/2010 Memorandum from OMB Deputy Director for Management Jeffrey D. Zients (<http://www.whitehouse.gov/sites/default/files/omb/open/Executive_Compensation_Reporting_08272010.pdf>)
	+ Includes data model/data elements as Appendix C
* 4/6/2010 Memorandum from OMB Deputy Director for Management Jeffrey D. Zients (<http://www.whitehouse.gov/sites/default/files/omb/assets/open_gov/OpenGovernmentDirective_04062010.pdf>)
* OMB Open Government Page (includes links to the above): <http://www.whitehouse.gov/omb/open>
* FFATA FAQs (need to add a link to this)
* Contact: Karen Lee, OMB, (klee@omb.eop.gov)
* Forthcoming:
	+ Award Standard Term and Condition
	+ Data Quality Requirements

**Coverage**

* **Grants and Cooperative Agreements:**
	+ *Included:* First-tier subawards under new, non-ARRA grants and cooperative agreements[[2]](#footnote-2) with an award date on or after 10/1/10 and a cumulative awarded amount of $25K or more that hold a new Federal Award Identification Number (FAIN) and include an award standard term implementing this requirement. If an award starts under $25K but subsequently is awarded funds that makes it meet or exceed the $25K threshold, the FFATA obligations start at the time the incremental funding is awarded.
	+ *Excluded:* Continuing or renewal of grants awarded in prior fiscal years with new obligations beginning October 1, 2010.
	+ *Excluded:* Second and subsequent tiers of subawards; any tier procurement actions, including vendor subcontracts (note difference in coverage between prime grants and prime contracts; the latter includes obligations to report on vendor subcontracts)
	+ *Excluded:*ARRA awards (even if new – though there shouldn’t be any after 10/1/10)
	+ *Excluded*: Any award if the required reporting would disclose classified information

**Timeline**

* Effective for new prime grant or cooperative agreement awards (see Coverage) with an award date on or after 10/1/10.
* Reporting must occur by the end of the month following the month the subaward or obligation was made (e.g., a subaward executed on 10/15/10 must be reported by 11/30/10)
	+ (perFDP discussion, there appears to be agreement that this should be interpreted to be the date the second party executed the subaward, rather than the effective date of the subaward (if different) or the date an accompanying PO is issued.)
* The current guidance doesn’t explicitly address how to handle subaward modifications (which data fields have to be changed, verified or re-filed)
* The FSRS system will be made available for grant reporting on 10/29/10 (e.g. approximately one month before any mandatory reporting must be accomplished.) The system will at that time include user guides, FAQs, and an on-line demo.

**Responsibilities**

* Prime recipients are required to work with federal agencies to reconcile any data errors about their prime award that was included in the federal agency’s FAADS+ record into USASpending.Gov
* Prime recipients are required to report all data for their subrecipients (no delegation is permitted)

**System Requirements and Capabilities**

* **FSRS** (http://www.fsrs.gov )
	+ Prime recipients must obtain an account in FSRS (FFATA Subaward Reporting System)
	+ Certain prime award data will be pre-populated by feds (see Timeline)
	+ Data entry may be accomplished either via manual entry or batch uploading via Excel spreadsheet and MAYBE XML . FSRS will provide a downloadable template in a Comma Separate Values (CSV) file for this purpose.
	+ Search capabilities to locate prime awards in FSRS will include award ID, award amount, agency, and program number at minimum. Combination search criteria may be provided (no details or commitment yet.) The system will have WIP capability.
	+ 8-27-10 guidance indicates that USASpending collects 49 elements for assistance and 192 elements for procurement, with 34 data elements being similar (minor differences in terminology).
* **CCR:**
	+ Prime recipients must be registered in CCR;
	+ Subrecipients are not required to be registered in CCR but data can be ported if they are
* **USASpending.Gov**
	+ Location where this data will appear for the public
	+ Data refreshed with FAADS+ data daily but agencies are required to furnish FAADS+ data on a bi-monthly basis. Agencies are required to report awards no later than 30 days following the award or modification of a grant.

**Data Elements**

* Listed in Appendix C of 8-27-10 guidance
* Data field types and lengths not provided in data model
* Pre-populated by federal agencies via FAADS+ files they already submit:
	+ FAIN (Federal Award Identifier Number – federal grant number)
	+ Agency Name
	+ Prime Awardee DUNS
	+ Prime Awardee +4 DUNS extension, if available (not required)
	+ Prime Awardee Name
	+ Prime Awardee DBA Name, if available (not required)
	+ Prime Awardee address (Street 1,2,3, City, State, County, Zip+4)
	+ Prime Awardee Congressional District (populated from FSRS – not clear how this will work?)
	+ Prime Awardee DUNS Parent Number, if available)
	+ Prime Awardee Principal Place of Performance (City or County, State, Country, Zip+4 (pre-populated only if available from fed agency)
	+ Prime Awardee Place of Performance Congressional District (populated from FSRS – not clear how this will work?)
	+ CFDA Number
	+ CFDA Program Title (may be in same field as CFDA number )
	+ Prime Awardee Project Description (pre-populated if available)
	+ Total Federal Funding Amount, including Modifications
	+ Prime Award Obligation/Action Date
	+ Prime Awardee Exec Compensation Eligibility (see definition) Y/N
	+ Prime Awardee Exec Compensation Prior Reporting (see definition) Y/N for those who answered Y to previous question
	+ Prime Awardee Names and Compensation of 5 Most Highly Compensated Officers, if required (see definition)
	+ Date of Prime Award Submission
	+ Subrecipient’s CFDA Number (pre-populated from Prime Award values)
	+ Subrecipient’s CFDA Program Title (pre-populated from Prime Award values – unclear if this is a combined field)
	+ Subrecipient’s Federal Agency Name (pre-populated from Prime )
* To Be Populated for Each Subaward by Prime Awardees (unless otherwise noted)
	+ Subaward Date (Month and Year only)
	+ Subrecipient DUNs +4 Number
	+ Subrecipient Name (pre-populated from CCR if available)
	+ Subrecipient DBA Name (pre-populated from CCR if available)
	+ Subrecipient Address (Street 1,2,3, City, State, County, Zip+4) (pre-populated from CCR if available)
	+ Subrecipient Congressional District (populated from FSRS – not clear how this will work? autopopulate based on Zip+4?))
	+ Subrecipient Parent DUNS Number (pre-populated from CCR if available)
	+ Subaward Amount, including modifications
	+ Subaward Obligation/Action Date
	+ Subrecipient Primary Place of Performance (City or County, State, Country, Zip+4)
	+ Subrecipient Primary Place of Performance Congressional District (pre-populated from FSRS – not clear how this will work – autopopulate based on Zip+4?)
	+ Subaward Number Assigned by Prime Awardee
	+ Subrecipient Exec Compensation Eligibility (see definition) Y/N
	+ Subrecipient Exec Compensation Prior Reporting (see definition) Y/N for those who answered Y to previous question
	+ Subrecipient Names and Compensation of 5 Most Highly Compensated Officers, if required (see definition)
	+ Subaward Project Description (Award title and description of the purpose of each funding action. The description should also capture the overall purpose of the subaward.)

**Worrisome Developments to Keep Abreast Of:**

* 8/27/10 Memo, Page 5, Section D, last paragraph: *“To facilitate transparency of Federal funds awrded through grants, OMB will consider future additional guidance related ot the collection of subaward data. These may include capturing information about procurements under grants, grant awardees’ costs other than subawards and procurements, and subawards under other types of Federal financial assistance awards.”*
1. includes information from FAQs sent by Karen Lee on 9/7/10 as well. This document includes grant and assistance information only; the guidance also includes contract information, which will be provided later. [↑](#footnote-ref-1)
2. The 8-27-10 guidance doesn’t mention cooperative agreements but the 04-06-10 guidance includes a definition of grants that explicitly includes coop agreements. [↑](#footnote-ref-2)