

Subaward/A-133 Committee Notes

Karen Lee, OMB---Transparency Act, Subaward reporting

The goal of Transparency Act reporting is to provide information to nationwide audience so that all input can be considered, from Agencies, institutions, and general public.

"FFATA" and "Transparency Act" were used interchangeably; there does not seem to be an OMB preference for one or the other.

Purpose or reporting is to provide citizens with information about where Federal Funds go

The Transparency Act affects Contracts, grants, loans, insurance--all Federal funds

The Act requires reporting of prime awards and subawards

The reports essentially need to indicate who receives, where, address, city, state, congressional district, the organization recipient, title, how much money, what purpose

Similar to ARRA reporting, except reporting will be for all Federal budget, rather than a specific subset of funds

The 2008 amendment to the Transparency Act requires reporting of executive compensation reporting for:

Reporting organization receives 80% or more of funding from Fed funds

AND—a monetary threshold, and additional criteria—

So -- Reporting covers two parts: Prime and subaward information, and executive compensation

USA Spending.gov – shows spending in all Federal agencies funding to prime agencies; this piece is in place

Subaward reporting now being rolled out on USA Spending.gov

We can expect subaward reference documents within the next 2 days—Before Sept 2

Subaward reporting requirements, contracts and grants

Early July Federal Register requirements for **CONTRACT** reporting requirement

Contracts over \$20 million, **first tier subcontracts** (Not subawards under grants and cooperative agreements) reporting is required, effective in July 1; same criteria for executive compensation

New contracts over \$550,000, first tier **subcontracts** reporting required as of Oct 1

New contracts over \$25,000 must report first tier **subcontracts** as of March, 2011

Contractors are using the FSRS platform to report

Learning from ARRA reporting - - -

Biggest problems were duplication and reconciliation

New FFATA reporting should be based on format pre-populated by Federal Agencies

This is intended to reduce duplication, and to reduce errors

GRANTS - - - different timeline; different programs, different requirements, different recipients---much more variation

OMB is rolling out a series of guidance to delineate how to report subawards

Intent is to mimic the requirements now in use for contracts

First tier sub-grants will be similar in scope to the contracts model

Report first tier subawards of \$25,000 or more

Timing -- Report subawards for all **new** grants awarded Oct 1, 2010 and after; prime recipients may need to confirm with awarding agency whether the "new" award is subject to FFATA reporting

Who reports ---- still developing, but requirements for contracting will serve as model

How --- OMB is trying to parallel the contracts model; the contracts reporting system is being "leveraged" for use on subawards

Training documents will be available through OMB; Kathy Lee is asking for volunteers to demo the training. (Over 50 participants at the committee meeting signed up and their names will be forwarded to Kathy Lee.)

July 29 or 30, Federal Register published 3 paperwork reduction act notices describing subaward

 Data elements (same as those in the Transparency Act)

 Registration process

 Requirement for registration of prime recipients in CCR

Karen will provide the information to Sara Judd, and it will be posted to the Subaward Committee ListServe

Questions from participants

Will subs register in CCR?---*There is no requirement to register, but registration is highly encouraged*

Does subaward include vendors---*yes on contracts, but not grants*

Why can't we have uniformity of definition of what reporting is required? -- *OMB tried to come to consensus on terms, but didn't manage it on all terms.*

What about primary place of performance? ---- *Report the address of the preponderance of performance ,for subawards*

What is the standardized threshold for reporting the subawards? At which \$25,000 level do we report? --- *The total value of the subaward will determine the reporting requirements. Not individual payment, but overall value of the subaward.*

What about batch uploads? ----- *Yes, there will be capability for batch upload.* (This capability was confirmed at another committee meeting at the August FDP meeting.)

Are there help desks? -- *Yes, but each area has its own help desk.*

What about time requirement to report within 30 days of the award? --- *The contracts requirement allow recording 30 days after the end of the month in which the subaward becomes fully executed.*

What is the trigger date for reporting large equipment purchases? -- *Date agreement is completed.*

Do we have a form for reporting grants? ---- *No. Same as used on FSRS.*

What about unexpended balances? --- *What is presented is a forecast, or spend-plan, of what will be used, not necessarily a reporting of actual expenditures.*

We didn't have enough time to do committee reporting. Additional information will be submitted on Subawards list-serve.