

WASHINGTON, D.C. 20460

OFFICE OF ADMINISTRATION AND RESOURCES MANAGEMENT

October 22, 2010

MEMORANDUM

- **SUBJECT:** Initial Guidance on Federal Funding Accountability and Transparency Act Requirements for Subaward and Executive Compensation Data Reporting for non-ARRA Assistance Agreements
- **FROM:** Howard F. Corcoran /s/ Howard F. Corcoran Director, Office of Grants and Debarment
- **TO:** Senior Resource Officials

This memorandum provides initial guidance on subaward and executive compensation reporting and related requirements established by the Federal Funding Accountability and Transparency Act (FFATA), Public Law 109-282 as amended, and associated Office of Management and Budget (OMB) directives. This memorandum applies only to non-ARRA, EPA assistance agreements, including grants and cooperative agreements. It will be updated as necessary to reflect any additional guidance from OMB. Prime recipients of EPA ARRA assistance agreements will continue to comply with ARRA Section 1512 reporting requirements.

1. Applicability and Effective Date

This guidance addresses requirements for prime EPA assistance agreement recipients to report information on: i) first-tier subawards; ii) first-tier subrecipient executive compensation; and iii) prime recipient executive compensation. It also addresses requirements for registration in the Central Contractor Registration (CCR) database and having a current Dun and Bradstreet Data Universal Numbering System (DUNS) number.

a. Subaward/Executive Compensation Reporting - New Awards \geq \$25,000

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 (see Section 6 below for guidance on the term "new award"). EPA must notify affected prime recipients of these requirements using a standard award term published by OMB at <u>2 C.F.R. Part 170</u> 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).

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.

b. CCR/DUNS Numbers

OMB has published a standard award term at 2 C.F.R. Subtitle A, Chapter I, Part 25 that requires:

- Prime recipients to maintain a current registration in the CCR; and
- Prime recipients and first-tier subrecipients to have DUNS numbers.

GMOs must include the standard award term in all new awards, as defined in Section 6, made on or after October 1, 2010, 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). There are other exceptions to the Part 25 CCR/DUNS number requirements, including certain situations involving foreign entities or protected information (for more information on these exceptions, see <u>2 C.F.R § 25.110</u> or contact Frank Roth, Office of Grants and Debarment (OGD) or Jim Drummond, Office of General Counsel (OGC)).

As described in Section 4 below, the Part 25 CCR/DUNS number requirements apply to competitive awards made on or after October 1, 2010, even if the underlying competitive announcements were issued prior to October 1, 2010.

GMOs will verify compliance with CCR/DUNs number requirements as part of the administrative review process.

2. Required Data for Subaward/Executive Compensation Reporting

For first-tier subawards involving an obligation of \$25,000 or more in federal funds, prime EPA recipients must report the following information.

- a. Subaward data
 - Name of the entity receiving the award;
 - Amount and date of the award;
 - Funding agency;
 - Catalog of Federal Domestic Assistance (CFDA) number;
 - Award title descriptive of the purpose of each funding action;
 - Location of the sub-recipient receiving the award and primary location of performance under the award, including city, State, congressional district, and country;
 - DUNS number of the sub-recipient receiving the award and the parent entity of the sub-recipient, should the entity be owned by another entity.
- b. Subrecipient Executive Compensation Data
 - Names and total compensation of the five most highly compensated officers of the subrecipient 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 have access to this information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. See FFATA § 2(b)(1).
 - Total compensation is the cash and noncash dollar value earned by an executive during the recipient's or subrecipient's preceding fiscal year and includes the following: salary and bonus; awards of stock; earnings for services under non-equity incentive plans; change in pension value; and, above-market earnings on deferred compensation which is not tax-qualified.
- c. Exception
 - A prime recipient is not required to report subaward or subrecipient executive compensation data if, in the previous tax year, the prime recipient had gross income, from all sources, under \$300,000.

Prime recipients must also report the names and total compensation of the five most highly compensated officers of their organization subject to the same gross revenue thresholds and information accessibility conditions listed in paragraph b.

3. Subaward/Executive Compensation Reporting Architecture

a. Prime EPA Recipients

Prime recipients will report first-tier subaward/subrecipient executive compensation information in the FFATA Subaward Reporting System (FSRS), located at <u>www.fsrs.gov</u>. To do so, the prime recipient must maintain an active registration in CCR. They must report this information by the end of the month following the month a subaward obligation is made. For example, for a subaward made by a prime recipient on October 21^{st} , the information must be reported to FSRS no later than November 30^{th} .

For prime recipient executive compensation data, the prime recipient must include the data in its CCR registration profile by the end of the month following the month it receives an award, and annually thereafter.

For both subaward reporting and executive compensation reporting, prime recipients must have a DUNS number.

Prime recipients may not delegate FSRS reporting responsibilities to subrecipients.

b. First-Tier Subrecipients

First-tier subrecipients must have a DUNS number before receiving a subaward, but do not have to maintain a CCR registration.

c. EPA

On a bi-monthly basis, EPA submits information on its assistance awards, including reference data about prime recipients, to <u>USASpending.gov</u> (USASpending) in a government-wide format known as the Federal Assistance Award Data System (FAADS) Plus. Grants Specialists, Project Officers and others, who enter data into IGMS fields required for the USASpending.gov upload, should follow the guidance at Attachment A when entering or reviewing data in IGMS. This attachment includes the most problematic data elements. For the complete list of FFATA data elements, see Attachment B.

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

To reduce the reporting burden on prime recipients, FAADS Plus reference data about prime recipients will pre-populate FSRS records to the maximum extent possible. The Agency will therefore need to ensure the accuracy of its FAADS Plus data and work to reconcile any data inconsistencies identified by prime recipients.

4. Competitive Assistance Agreement Announcements

All competitive assistance agreement announcements issued on or after October 1, 2010, as well as competitive assistance agreement announcements issued prior to October 1, 2010 that have application due dates on or after October 1, 2010, must include the following 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.

2. Central Contractor Registration (CCR) and Data Universal Numbering System (DUNS) Requirements

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

1. Be registered in the CCR prior to submitting an application or proposal under this announcement. CCR information can be found at https://www.bpn.gov/ccr/

2. Maintain an active CCR 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

3. Provide its DUNS number in each application or proposal it submits to the agency. Applicants can receive a DUNS number, at no cost, by calling the dedicated toll-free DUNS Number request line at 1-866-705-5711, or visiting the D&B website at: <u>http://www.dnb.com.</u>

If an applicant fails to comply with these requirements, it will, should it be selected for award, affect their ability to receive the award. "

Please note that while the DUNS/CCR clause requires that applicants be registered in the CCR 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 non-compliance 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 CCR/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. Please call Bruce Binder or Val Swan Townsend of the Grants Competition Advocate's Office if these situations arise.

5. Terms and Conditions

The standard OMB CCR/DUNS number and Subaward/Executive Compensation reporting terms and conditions have been posted in IGMS (see Attachment C). These terms and conditions should not be edited or altered.

We have designated both standard OMB terms and conditions as an administrative term and condition, where the GMO is responsible for monitoring as part of administrative baseline and advanced monitoring. Baseline monitoring will focus on asking a recipient if it is complying with the standard OMB terms and conditions. OGD will also address compliance with the terms and conditions in its administrative advanced monitoring reviews.

6. Definition of "New Awards"

For purposes of this guidance, new awards include discretionary or mandatory assistance agreements (other than awards to individuals) that GMOs award ending in "-0." At this time, new awards do not include monetary amendments to existing assistance agreements. OMB is in the process of developing clarifying guidance on the applicability of FFATA reporting requirements to those award actions. OGD will update this memorandum to be consistent with that guidance.

7. Subaward Definition, Intragovernmental/Intergovernmental agreements and Avoiding Duplicative Reporting

As noted in the standard award term, OMB has defined "subaward" very broadly for FFTA reporting purposes. It covers legal instruments, *other than procurement transactions*, that prime recipients use to provide support to an eligible subrecipient to perform any portion of the substantive project or program that EPA funds through an award of a grant or cooperative agreement. This definition extends the term "subaward" to loans and principal forgiveness of \$25,000 or more in federal funds under EPA's grant-funded Revolving Loan Fund Programs. In implementing the standard award term, EPA will follow the guidance in the Agency's <u>Subaward Policy</u> to distinguish between subaward and procurement relationships.

OGC has indicated that intragovernmental agreements involving the internal transfer of funds between State agencies are exempt from reporting. Also exempt are intergovernmental agreements which allow different units of government to take advantage of economies of scale through central purchasing of commercial goods and services. An example would be a local government purchasing supplies under a State contract. On the other hand, if a State provided funding directly to a local government to perform a substantive activity under a State grant, the transaction between the State and the local government would be a subaward subject to FFTA reporting even if the State characterizes the relationship as an intergovernmental agreement. An example of a subaward would be an intergovernmental agreement between a State and local government under which a State transfers Clean Water Act 319 grant funds to a local government for water quality monitoring.

The OMB regulation at <u>2 C.F.R. § 170.200(c)</u> directs agencies that collect subaward obligation data under other authorities to take steps to ensure that prime recipients do not submit the same or similar data multiple times during a given reporting period. EPA Program Offices that currently collect subaward obligation information will need to consult with OGD on how to address the OMB directive.

8. Subaward Reporting: Amendments, Subawardees under Multiple Grants and Subdividing Subawards

A prime recipient is required to report subawards where the obligations are equal to or greater than \$25,000 in federal funds. If a subaward is initially funded at less than \$25,000, the prime recipient does not have to report the subward to the FSRS. However, if the prime recipient subsequently provides additional funding to increase the subaward amount to \$25,000 or more, the subaward must be reported in the FSRS.

Subaward reporting is specific to each assistance agreement. For example, if a prime recipient makes a subaward to an organization under one grant for \$20,000 and another subward for less than \$15,000 to the same organization for different work under a different grant, the prime recipient would not have to report either subaward to the FSRS, even though the cumulative value of the two subawards exceeds \$25,000.

Prime recipients should not subdivide subawards equal to or greater than \$25,000 into smaller subawards in order to circumvent FSRS reporting requirements.

9. Alignment of Public Address Book with USASpending and CCR

Given that the prime recipient information in FSRS will be pre-populated with information from EPA's FAADS Plus submission to USASpending and from CCR, it is imperative that EPA align the IGMS Public Address Book (PAB) with both USASpending and CCR entries. OGD will coordinate this alignment with assistance from GMOs, their Grants Automation Coordinators (GACs) and others who enter data into the PAB. Attachment D provides guidance for the entry of data into the PAB.

10. Principle Place of Performance and Award Number Information

The FSRS will also be pre-populated with information on: the principle place of performance under an assistance award; and the award number. To help ensure place of performance accuracy, OGD will add an item(s) to the Funding Recommendation where POs can verify that an applicant's place of performance information is correct. For award numbers, the Agency will use the eight-digit number contained in USASpending.

11. FSRS Point of Contact

OMB has requested that each agency designate points of contact (POCs) to whom the FSRS Help Desk can send agency-specific programmatic questions. Cleanzo Vollin of OGD will serve as EPA's initial POC. He will coordinate with the FSRS POCs designated by Headquarters and Regional Senior Resource Officials.

12. USASpending Assurance

As described in Sections 9 and 10, heightened scrutiny is necessary for data that is pre-populated in the FSRS from EPA's FAADS Plus submissions. This will affect the USASpending assurance OGD must provide to the Chief Financial Officer. Working with the GMOs, GACs, and Junior Resource Officials (JROs), OGD will provide additional guidance to strengthen the assurance process.

13. Outreach Strategy

- Internal
 - OGD will coordinate federal-wide messages with the GMOs and JROs
 - Regional GMOs will distribute information to their Regional offices
 - JROs will distribute information to their program offices
 - OGD will conduct State Grants Subgroup/Tribal Grants Council outreach
 - OGD will send an e-mail message to current grantees announcing OMB webinars
 - OGD will post FAQ's and links to resources to the Grants Internet web site
 - OGD will prepare a notice that will be incorporated in new award packages
 - OGD will convene a GCRC meeting to provide a Q&A session with OMB
- External
 - OMB hosted a town hall meeting via webinar 9/23/10. The recorded webinar is available at USASpending.gov;
 - GSA hosted a training session for Prime Awardees via webinar 10/7 10:00 a.m. to 11:00 a.m. (Eastern). The webinar will be recorded and available at USASpending.gov;
 - OMB will conduct a variety of outreach to constituencies throughout the country – please see Attachment E
 - GSA hosted an overview webinar for Agencies 9/29/10 from 1:30 2:30 p.m. (Eastern).
 - GSA hosted a training session for Agencies via webinar 10/14/10 10:00 a.m. to 11:00 a.m. (Eastern).

14. Roles and Responsibilities

OGD

- Issue initial guidance and provide additional guidance as necessary
- Coordinate alignment of PAB with CCR and FAADS Plus Submissions
- Modify the Funding Recommendation to allow Project Officers to verify principle place of performance information
- Coordinate Agency outreach program and conduct outreach to State Grant Subgroup and Tribal Grants Council
- Serve as initial point of contact for FSRS Help Desk inquiries
- Coordinate and prepare the quarterly USASpending assurance for assistance agreements

- Include FFATA-related requirements in advanced administrative monitoring reviews
- Serve as the Agency liaison to OMB
- Resolve implementation issues with program offices that have existing systems for subaward obligation reporting

Grants Competition Advocate

- Issue required clauses
- Work with program offices to amend previously issued competitive announcements as necessary

Program Offices

- In the Funding Recommendation, confirm principle place of performance information
- Resolve programmatic issues raised by FSRS Help Desk
- Include required clauses in competitive announcements and amend previously issued competitive announcements as necessary
- If subaward obligation data is currently collected under other authorities, consult with OGD on how to minimize the prime recipient's reporting burden.

Grants Management Offices:

- Incorporate the standard OMB terms and conditions in covered new awards
- Address CCR/DUNS number requirements during the administrative review process
- Conduct baseline monitoring of CCR/DUNS number requirements
- Conduct baseline monitoring of subaward reporting/executive compensation terms and conditions
- Work with OGD to align PAB with CCR entries
- Respond to FSRS Help Desk inquiries if designated as a point of contact

15. Informational Resources

- CCR Registration: <u>http://grants.gov/assets/E-Biz_POC_Checklist.pdf</u>
- DUNS Registration: <u>http://fedgov.dnb.com/webform</u>
- Federal Assistance Award Database System (FAADS) <u>http://www.census.gov/govs/www/faads.html</u>
- FFATA Subaward Reporting System (FSRS): <u>https://www.fsrs.gov/</u>
 - FSRS Reporting: Sub-award reporting user guides, FAQ and on-line demonstrations will be available October 29, 2010
- OMB, "Open Government Directive Federal Spending Transparency", August <u>http://www.whitehouse.gov/sites/default/files/omb/open/Executive_Compensation_Reporting_08272010.pdf</u>
- Federal Funding Accountability and Transparency Act of 2006, PL 109-282: <u>http://frwebgate.access.gpo.gov/cgi-</u> <u>bin/getdoc.cgi?dbname=109_cong_public_laws&docid=f:publ282.109.pdf</u>

- The Supplemental Appropriations Act, 2008, PL 110-252: <u>http://frwebgate.access.gpo.gov/cgi-</u> bin/getdoc.cgi?dbname=110_cong_bills&docid=f:h2642enr.txt.pdf
- USAspending.gov Data Submission and Validation Tool: https://ffatadata.usaspending.gov/
- Subawards Under EPA Assistance Agreements http://intranet.epa.gov/ogd/competition/compet/subaward_policy_part_2.pdf
- OMB Sub-award Presentations
 <u>http://www.usaspending.gov/sub-award-documents</u>

If you have any questions about this initial guidance, please feel free to contact me at (202) 564-1903.

cc: Craig Hooks Nanci Gelb Marian Cooper Linda Gerber **Denise Benjamin-Sirmons** Kathie Herrin Catherine Vass **Stephen Daniels** Francis Roth William Etheredge **Dennis Finney** Cleanzo Vollin **Bruce Binder** Val Swan-Townsend **Elizabeth January** Wendel Askew James Drummond Melissa Heist Janet Kasper Stefan Silzer Jeanne Conklin Steve Erickson **Don Flattery** Barbara Schrodt Troy Hill Patty Bettencourt Rick Coffman, Illinois EPA Tom Lamberson, Nebraska DEQ **Tribal Grants Council Grants Management Officers** Junior Resource Officials Grants Customer Relations Council

Attachment A - Guidance for Select USASpending.gov Data Elements

<u>Recipient Name</u>–Should match the name in the CCR <u>http://www.ccr.gov</u>

<u>Recipient Residence City</u> – Spelling, spaces, hyphens, and capital letters are all important and must conform to Geographic Names Information System standards. http://geonames.usgs.gov/ GNIS <u>http://geonames.usgs.gov/pls/gnispublic/f?p=139:1:848314263894103</u>

<u>Recipient Residence County</u> - Spelling, spaces, hyphens, and capital letters are all important and must conform to Geographic Names Information System standards. Cannot be statewide. http://geonames.usgs.gov/ GNIS http://geonames.usgs.gov/pls/gnispublic/f?p=139:1:848314263894103

<u>Recipient Residence State</u> – Recipient state code

<u>**Recipient Zipcode**</u> Use either 5 digits or 9 digits with no dash. The nine digit zipcode is preferred.

<u>Recipient Residence Congressional District</u> – Cannot be statewide. Congressional District of recipient residence address. District is based on zip code, and zip plus four. http://www.congress.org/congressorg/officials/congress/?azip=02110&state=MA

F<u>ederal Award Identifier Number</u> – This is the EPA grant number. It is an 8 digit number that currently follows the program code at the top of the award document.

Federal Award Identifier Number (Modification) – This is the EPA amendment number. It is the 9th digit following the grant number at the top of the award document.

<u>**Principle Place of Performance Code**</u> – Code is based on city, county, state where the grant work is performed.

<u>**Principle Place of Performance (State)**</u> – Two digit state code. May be more than one state, or statewide.

<u>Principle Place of Performance (County)</u> – May be more than one county, or county wide. Spelling, spaces, hyphens, and capital letters are all important and must conform to Geographic Names Information System standards.

http://geonames.usgs.gov/

GNIS http://geonames.usgs.gov/pls/gnispublic/f?p=139:1:848314263894103

<u>Principle Place of Performance (City)</u> - Spelling, spaces, hyphens, and capital letters are all important and must conform to Geographic Names Information System standards. http://geonames.usgs.gov/

GNIS http://geonames.usgs.gov/pls/gnispublic/f?p=139:1:848314263894103

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Principle Place of Performance (Zip) - Spelling, spaces, hyphens, and capital letters are all important and must conform to Geographic Names Information System standards. http://geonames.usgs.gov/ GNIS http://geonames.usgs.gov/pls/gnispublic/f?p=139:1:848314263894103

<u>Principle Place of Performance (Congressional District)</u> – Districts where work is performed, may be more than one or statewide. District is based on zip code, and zip plus four. http://www.congress.org/congressorg/officials/congress/

Principle Place of Performance (Country code) – Based on the country entered in IGMS

Attachment B - Complete List of FFATA Data Elements

USASpending data elements (see below for web sites)

CFDA Program Number	Only one CFDA		
State Application Identifier (SAI			
Number)	If blank, "SAI Exempt" is entered by data routine		
Recipient Name	Name should match the CCR Name		
Recipient City Code	City code is populated based on the GNIS Feature ID, Official Feature Name, and Official Feature Location are American National Standards Institute standards as specified in ANSI INCITS 446-2008 (Identifying Attributes for Named Physical and Cultural Geographic Features (Except Roads and Highways) of the United States, Its Territories, Outlying Areas, and Freely Associated Areas, and the Waters of the Same to the Limit of the Twelve-Mile Statutory Zone).		
Recipient City Name	City Name must be spelled correctly according to the USGS U.S. Board on Geographic Names		
Recipient County Code	County code is populated based on the GNIS Feature ID, Official Feature Name, and Official Feature Location are American National Standards Institute standards as specified in ANSI INCITS 446-2008 (Identifying Attributes for Named Physical and Cultural Geographic Features (Except Roads and Highways) of the United States, Its Territories, Outlying Areas, and Freely Associated Areas, and the Waters of the Same to the Limit of the Twelve-Mile Statutory Zone).		
Recipient County Name	County name spelling is critical according to the USGS U.S. Board on Geographic Names		
Recipient State Code	Two digit state code		
Recipient Zip Code	Zip plus four is preferred		
Type of Recipient	The IGMS code is converted to FFATA format during data process routine		
Type of Action	The IGMS code is converted to FFATA format during data process routine		
Recipient Congressional District	District will pull from IGMS recipient award data. This field will contain "00" for a congressional district at large, "98" for jurisdictions with a nonvoting delegate, "99" for jurisdictions with no representative. Field will be blank for foreign recipients. Multiple districts should not be entered for recipient residence address. Cannot be statewide.		
Federal Agency/Organizational			
Unit Code	FIPS EPA code is entered		
Federal Award Identifier Number (FAIN)	IGMS Grant number (first 8 digits)		
Federal Award Identifier Number (Modification)	IGMS amendment number		
Federal Funding Sign	Used for negative numbers		
Federal Funding Amount	EPA Amount This Action		
Non-Federal Funding Sign	Used for negative numbers		
Non-Federal Funding Amount	Recipient Contributions		

Total Funding Sign	Used for negative numbers
Total Funding Amount	Total This Action
Obligation/Action Date	Award Date
Starting Date	Project Start Date
Ending Date	Project End Date
Type of Assistance Transaction	The IGMS code is converted to FFATA format during data process routine
Record Type	The IGMS code is converted to FFATA format during data process routine
Correction/Late Indicator	Used for corrections
Fiscal Year and Quarter	
Correction	Used for corrections
Principal Place of Performance Code	Calculated based on Place of Performance State code and Place of Performance City code
Principal Place of Performance (State)	Uses 'Areas Affected by Project' data from IGMS. Spelling is critical
Principal Place of Performance (County or City)	Uses 'Areas Affected by Project' data from IGMS. Spelling is critical
Principal Place of Performance Zip Code Principal Place of Performance Congressional District	Data provided by recipient, however IGMS does not have field for this data. District will pull from IGMS recipient award 'areas affected by project' data. This field will contain "00" for a congressional district at large, "98" for jurisdictions with a nonvoting delegate, "99" for jurisdictions with no
	representative, and "90" for multiple districts. Field will be blank for foreign recipients. If multiple districts are entered in IGMS, the data process routine will code "90".
CFDA Program Title	Data pulled from IGMS
Federal Agency Name	Coded
State Name	Based on Recipient State
Project Description	Data pulled from IGMS 149 characters
DUNS Number	Nine digit numeric string. Should be validated against CCR
DUNS Number PLUS 4	Plus 4 should be validated against CCR
Dun & Bradstreet Confidence Code	Provided by D&B based on recipient name, address, DUNS
Program Source/Treasury Account Symbol: Agency Code	Coded
Program Source/Treasury Account Symbol: Account Code	IGMS data
Program Source/Treasury Account Symbol; Sub-Account	
Code (OPTIONAL)	IGMS data
Recipient Address Line 1	IGMS data
Recipient Address Line 2	IGMS data
Recipient Address Line 3	IGMS data
Face Value of Direct Loan/Loan Guarantee	Blank

Original Subsidy Cost of the Direct Loan/Loan Guarantee	Blank
Business Funds Indicator (BFI)	Coded based on Recovery Act program code
Recipient Country Code	IGMS data
Principal Place of Performance	
Country Code	IGMS data
Unique Record Identifier (URI)	Only used for Fellows, we use the fellow grant number here

The U.S. Board on Geographic Names USBGN Search Domestic Names CCR	http://geonames.usgs.gov/ http://geonames.usgs.gov/pls/gnispublic/f?p=139:1:4034810516388205 http://www.ccr.gov
Look up Congressional Districts by Zip CCR Vendor Code Search in the FDW	http://www.congress.org/congressorg/officials/congress/

Attachment C - Term and Conditions

DUNS/CCR Term and Condition - Administrative

I. Central Contractor Registration and Universal Identifier Requirements.

A. <u>Requirement for Central Contractor Registration (CCR)</u>. Unless you are exempted from this requirement under 2 CFR 25.110, you as the recipient must maintain the currency of your information in the CCR 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 after the initial registration, and more frequently if required by changes in your information or another award term.

B. <u>Requirement for Data Universal Numbering System (DUNS) numbers</u>. 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. <u>Definitions</u>. For purposes of this award term:

1. <u>Central Contractor Registration (CCR)</u> 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 CCR Internet site (currently at http://www.ccr.gov).

2. <u>Data Universal Numbering System (DUNS) number</u> means the ninedigit 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. <u>Entity</u>, 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

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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.<u>Subrecipient</u> 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.

Subaward Term and Condition - Administrative

I. Reporting Subawards and Executive Compensation.

a. Reporting of first-tier subawards.

1.<u>Applicability</u>. Unless you are exempt as provided in paragraph d. of this award term, you must report each action that obligates \$25,000 or more in Federal funds that does not include Recovery funds (as defined in section 1512(a)(2) of the American Recovery and Reinvestment Act of 2009, Pub. L. 111-5) for a subaward to an entity (see definitions in paragraph e of this award term).

2. Where and when to report.

i. You must report each obligating action described in paragraph a.1. of this award term to <u>www.fsrs.gov</u>.

ii. For subaward information, report no later than the end of the month following the month in which the obligation was made. (For example, if the obligation was made on November 7, 2010, the obligation must be reported by no later than December 31, 2010.)

3.<u>What to report</u>. You must report the information about each obligating action that the submission instructions posted at www.fsrs.gov specify.

b. Reporting Total Compensation of Recipient Executives.

1. <u>Applicability and what to report</u>. You must report total compensation for each of your five most highly compensated executives for the preceding completed fiscal year, if --

i. the total Federal funding authorized to date under this award is \$25,000 or more;

ii. in the preceding fiscal year, you received-

(A) 80 percent or more of your annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

(B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

iii. The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission total compensation filings at http://www.sec.gov/answers/execomp.htm.)

2. <u>Where and when to report</u>. You must report executive total compensation described in paragraph b.1. of this award term:

i. As part of your registration profile at www.ccr.gov.

ii. By the end of the month following the month in which this award is made, and annually thereafter.

c. Reporting of Total Compensation of Subrecipient Executives.

1. <u>Applicability and what to report</u>. Unless you are exempt as provided in paragraph d. of this award term, for each first-tier subrecipient under this award, you shall report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year, if --

i. in the subrecipient's preceding fiscal year, the subrecipient received—

(A) 80 percent or more of its annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

(B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts), and Federal financial assistance subject to the Transparency Act (and subawards); and

ii. The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission total compensation filings at http://www.sec.gov/answers/execomp.htm.)

2. <u>Where and when to report</u>. You must report subrecipient executive total compensation described in paragraph c.1. of this award term:

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i. To the recipient.

ii. By the end of the month following the month during which you make the subaward. For example, if a subaward is obligated on any date during the month of October of a given year (i.e., between October 1 and 31), you must report any required compensation information of the subrecipient by November 30 of that year.

d. Exemptions

If, in the previous tax year, you had gross income, from all sources, under \$300,000, you are exempt from the requirements to report:

i. subawards,

and

ii. the total compensation of the five most highly compensated executives of any subrecipient.

e. <u>Definitions</u>. For purposes of this award term:

1. <u>Entity</u> means all of the following, as defined in 2 CFR part 25:

i. A Governmental organization, which is a State, local

government, or Indian tribe;

- ii. A foreign public entity;
- iii. A domestic or foreign nonprofit organization;
- iv. A domestic or foreign for-profit organization;
- v. A Federal agency, but only as a subrecipient under an

award or subaward to a non-Federal entity.

2. <u>Executive</u> means officers, managing partners, or any other employees in management positions.

3. Subaward:

i. 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.

ii. 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").

iii. A subaward may be provided through any legal agreement, including an agreement that you or a subrecipient considers a contract.

4. <u>Subrecipient</u> means an entity that:

i. Receives a subaward from you (the recipient) under this award;

and

ii. Is accountable to you for the use of the Federal funds provided by the subaward.

5. <u>Total compensation</u> 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 taxqualified.

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.

Attachment D - PAB Organization Record

PAB Organization Record			
Name:	The name should match the CCR registered official name		
Abbreviation:	Unique		
DUNS:	Required 9 numbers, no dashes, just nine numbers		
EPA Region:	Region		
Applicant Type: EIN:	Applicant type EIN 9 numbers no dashes		
Organization Code:	Org code (optional)		
Server(s):			
Active Status:	(optional)		
Main phone:	Main phone 10 numbers no dashes		
FAX phone:	FAX phone 10 numbers no dashes		
Vendor Code:	Vendor Code - entered by Las Vegas Finance Center		
Location:	Location (optional)		
ACH:	ACH entered by Las Vegas Finance Center		
Organizational Unit:	Org unit (optional)		
Sub Organizational Unit:	Sub org unit (optional)		
Manager:	Manager (optional)		
Title:	Title (optional)		
Agency Location Code:	Location Code (optional)		
Organization Address			
Street address: Street			
	City must be spelled correctly according to the USGS U.S. Board of		
City:	Geographic Names		
State/province:	State Code, FC if foreign country		
Zip/postal code:	Zip code may be 5 digits or 9 digits no dashes		
Country:	Country of applicant		
	Applicant residence county, cannot be statewide, must be the correct		
County:	county and spelling based on USGS U.S. Board of Geographic Names		
Congressional Dist:	Applicant residence congressional district, cannot be statewide		
NSF Code:	National Science Foundation code per codebook- IT Team enteres		
Minority Institution Flag:	Minority Institution codes- enter if known		
Web Site:	Web site (optional)		
Payment Office Address			
Name:	Name - enter if different from recipient address		
Street address:	Street- enter if different from recipient address		
City:	City - enter if different from recipient address		
State/province:	State - enter if different from recipient address		
Zip/postal code: Pmt Request To:	Zip - enter if different from recipient address enter if different from recipient address		
County:	enter if different from recipient address		

The U.S. Board on Geographic Names	http://geonames.usgs.gov/
USBGN Search Domestic Names	http://geonames.usgs.gov/pls/gnispublic/f?p=139:1:4034810516388205
CCR	http://www.ccr.gov
Look up Congressional Districts by Zip	http://www.congress.org/congressorg/officials/congress/
CCR Vendor Code Search in the FDW	http://iasint.rtpnc.epa.gov/neis/ccr_vend.inquiry
NSF codes	http://www.nsf-surveys.net/FedSupport/help/download_codebook.cfm

Conferences	Timeline (Date)	Stakeholder (s)	Status/ Notes	Who can attend/ pass along material?
National Contract Management Association (NCMA)– Virtual Conference	September 9, 2010	Contract managers	http://www.ncmahq.org/Event s/GC.cfm?PreviewContentIte m=47251&token=38717&user ID=32519&navItemNumber= 7860	puss trong material
Chief Information Officers (CIO)– Full Council Meeting	 September 15, 2010 November 16, 2010 	Federal Chief Information Officers (CIO)	http://www.cio.gov/events.cfm Contact: John Andre John.andre@gsa.gov (ALSO in charge of CFO and CAO meetings)	
National Indian Health Board (NIHB)– 27 th Annual Consumer Conference Information Meeting	September 20-23, 2010	Expecting 600-900 attendees. Includes Health Care providers, Tribal Leaders, Public Health Officials, Health Educators, etc	http://www.nihb.org/communi cations/conferences_events.ph p The theme for this year's conference is: "Tribal-State Relations and American Indian/Alaska Native Health Care."	
Council of the Great City Schools (CGS)– Chief Financial Officers Conference	September 20-23, 2010	Around 100 CFOs representing nation's largest school districts.	http://cgcs.org/conferences/cal endar/home.aspx Contact Conference Manager. Terry Tabor (202) 393-242 Talked to Terry said we could pass along materials to distribute (may be hard to get on agenda).	
Chief Financial Officers (CFO)– Full Council Meeting	 September 21, 2010 October 19, 2010 December 21, 2010 	CFOs and Deputy CFOs of the largest federal agencies and senior officials of OMB and Treasury. (prob over or around 100 people)	http://www.cfoc.gov/index.cf m?function=calendardrill&spe cific=meetings&id=CFO%20F ull%20Council%20Meeting& currentdate=09/01/2010 Contact: John Andre; john.andre@gsa.gov	
National Contract Management Association (NCMA)– Webinar Meetings	 September 21, 2010 October 05, 2010 October 19, 2010 November 02,2010 November 16, 2010 December 21, 2010 	Contract managers	http://www.ncmahq.org/learn/ webinarlist.cfm?navItemNum ber=6234 Contact learningcenter@ncmahq.org for additional information • September 21: Contracting for Services • October 05: Federal Grants • October 19: Government Contract Audits: Dealing with Auditors and Mitigating Risks	

Conferences	Timeline (Date)	Stakeholder (s)	Status/ Notes	Who can attend/ pass along material?
			 November 02: Managing Subcontracts November 16: Government Contract Law December 21: Teaming Agreements and Advanced Subcontracting Issues 	
Contracts and Grants Workshop	September 23, 2010	Federal Grants and Procurement Representatives		
National Association of State Chief Information Officers (NASCIO)– Conference	September 26 – 29, 2010	500-550 attendees to include state/territory CIOs, policy officials, government, universities, non-profits, and corporations.	http://www.nascio.org/events/ 2010Annual/ contact NASCIO Headquarters at (859) 514- 9153. Talked with Shawn. Theme: Innovation and Opportunity: Transforming Government Through IT.	
Chief Acquisition Officers (CAO)– Full Council Meeting	 October 7 , 2010 December 2, 2010 	Federal Chief Acquisition Officers (CAO)	http://www.caoc.gov/index.cf m?function=calendar¤t date=%7Bts%20%272010%2 D10%2D01%2000%3A00%3 A00%27%7D&CFID=339065 8&CFTOKEN=17f54549643f c765-4879309A-5056-8F64- 36D8E86CD3484AF9 Contact: John Andre; john.andre@gsa.gov	
National Grants Partnership (NGP)– Meeting	October 19, 2010	Federal officials, representatives of state, local and tribal governments; executive branch grants offices; and nonprofit organizations. 30-50 to come and the rest there is a webcast on- demand.	http://thengp.org/index.html Participating organizations: AAGP, AFP, AGA, FDP, GWSCPAs, NASACT, NASCIO, NCCS, NCNA, NGMA Tony Cavataio <u>Tony.Cavataio@ed.gov</u> (202) 245-6151 Talked to Tony, if want to come, just send an email to	
			NGP to attend so can come in the door.	

Conferences	Timeline (Date)	Stakeholder (s)	Status/ Notes	Who can attend/ pass along material?
Executive Leadership Conference (ELC) 2010 – American Council for Technology (ACT) – Industry Advisory Council	October 24-26, 2010 CALLED AND LEFT VM EMAILED	Provides a forum for government employees to collaborate on high priority IT issues.	http://www.actgov.org/EVEN TS/EXECUTIVELEADERSH IP/ELC%202010/Pages/defaul t.aspx Theme: Delivering Transformation Government is adopting new tools and methods of doing business to embrace accountability and transparency, enhance collaboration, accelerate innovation, and engage citizens in more effectively and efficiently delivering mission results. Cont: Angela Owens aowens@actgov.org or (703)208-4800 ext: 206	
Contracts and Grants Workshop	October 25 or 26, 2010	Federal Grants and Contracts Representatives	(103)200 4000 CXI. 200	
General Services Administration (GSA)– 2010 Small Business Procurement and Networking Conference	October 28, 2010	GSA program managers, building managers, IT professionals, contracting officers, and Small Business Advocates from DoD and other federal agencies.	http://www.gsa.gov/portal/con tent/118009 www.fbcinc.com/gsa One day - procurement and marketing workshops. Attendees will also be exposed to prime contractors seeking to partner with small businesses to help meet and exceed their company's subcontracting plan goals.	
National Council of University Research Administrators (NCURA) Federal Demonstration Partnership– Annual Meeting	October 31 – Nov 3, 2010	1800-2000 members from universities, colleges, teaching hospitals, and other non-profit organizations.	http://www.ncura.edu/content/ educational programs/sites/52 / The meeting theme, "At the Confluence of Creation and Collaboration" represents the interdependent relationship between the researcher and the research administrator. \$650 before Sept. 27, \$700 after (at the Hilton in DC). Tara Bishop, NCURA Associate Executive Director at (202) 466-3894 or bishop@ncura.edu Talked to	

Conferences	Timeline (Date)	Stakeholder (s)	Status/ Notes	Who can attend/ pass along material?
American Association of Grant Professionals (AAGP)– Annual Conference National Congress of American	November 3 – 6, 2010 November 14-19, 2010	700 grant professionals from across the country and internationally. National Congress of American Indians (NCAI)	Tara. http://grantprofessionals.org/a nnual-conference/about.aspx Annual conference. Nearly 4000 active members representing 49 states, Puerto Rico, Canada, and the United Kingdom. http://www.ncai.org/Registrati on.496.0.html	
Indians (NCAI)– 67 th Annual Convention & Trade Show	2010		Phone: (202) 466-7767 Left VM for Anmaray. Ask about Feb 28 mtg.	
American Association of State Colleges and Universities (AASU – Grant Resource Center Conference	November 21 – 23, 2010	450-500 university presidents and chancellors throughout US, Guam, Puerto Rico, Virgin Islands. (Invite to conference by board request)	http://www.aascu.org/meeting s/annual10/index.htm Theme: Stewardship for America's Future. Will focus on specific institutional strategies that can be used to help advance public progress in such areas as P-20 education, economic competitiveness, and charting the future of our regions and communities. Spoke with Kevin Finkelstein finkelsteink@aascu.org 202- 478-4690 Program: Program: Rosemary Lauth lauthr@aascu.org 202-478- 4689	
National Association of Counties (NACo)– Fall Board of Directors Meeting	December 2, 2010 LEFT VM FOR JOHN	Represents counties across America. NACo's Executive Committee is comprised of four officers elected by the membership, along with a regional representative from each of the four regions in the country.	http://www.naco.org/meetings /dates/Lists/Event%20Calenda r/DispForm_naco.aspx?List=0 f08eeb5%2De5e1%2D441f%2 D8034%2D18f3e879f28f&ID =31&RootFolder=%2Fmeetin gs%2Fdates%2Flists%2Fevent %20Calendar&Source=http% 3A%2F%2Fwww%2Enaco%2 Eorg%2Fmeetings%2Fdates% 2Fpages%2Fdefault%2Easpx -State associations nominate seventy-seven (77) members -Affiliates, WIR, LUCC, RAC nominate twenty-six (26) members -President appoints ten (10) at-large members - Past presidents currently	

Conferences	Timeline (Date)	Stakeholder (s)	Status/ Notes	Who can attend/ pass along material?
National Contract	December 9–10,	Contract managers	serving as elected county officials eight (8) members -Executive Committee five (5) members John Samartzis 202-942-4278 Director of Corporate Programs http://www.ncmahq.org/Event	
Management Association (NCMA)– 2010 Conference	2010		<u>s/ConferenceList.cfm?navItem</u> <u>Number=532</u>	
National Congress of American Indians (NCAI)– Executive Council Winter Session	February 28 – March 2, 2011	National Congress of American Indians (NCAI)	http://www.ncai.org/Conferen ces-Events.7.0.html Talk to Anmaray – ask about Nov. 19 th tradeshow.	
Government Information Technology Executive Council (GITEC) – Summit 2011	March 6-9, 2011	Approximately 800 federal government and senior-level industry IT executives. This includes government representatives with the following titles: SESs, CIOs, CTOs and IT PMs.	https://sites.google.com/site/gi tecorg/ Key focus areas for the conference include: What are the biggest challenges for the largest upcoming projects What new technologies can be helpful What new Program Management Techniques can be useful to move initiatives to implementation Engaging the millennial (Generation Y)	
Associated General Contractors of America (AGC)– Annual Convention	March 21-25, 2011	Represents member firms from every state and construction market.	http://convention.agc.org/ From the latest impact of state and federal regulations on the construction industry, to best practices for BIM and contract negotiations, to practical advice on labor management and green building, AGC's Annual Convention delivers the working knowledge contractors need to improve operations, expand into new markets and build their business.	
General Services Administration – Interagency Resources Management	April 10-13, 2011	OMB, CIOs, CFOs, CAOs, CHCO, senior managers of GSA	http://www.irmco.gov/ For information about speaking, John André, Program Manager, GSA	

Conferences	Timeline (Date)	Stakeholder (s)	Status/ Notes	Who can attend/ pass along material?
Conference (IRMCO) – 50 th Annual Conference			202-501-9069 john.andre@gsa.gov	
American Council for Technology (ACT)/Industry Advisory Council (IAC) 2011 Management of Change Conference – 31 st Annual Conference	June TBD, 2011	Federal, state, and local government IT professionals together with the Industry Advisory Council's (IAC) wide range of IT industry participants.	http://www.actgov.org/events/ managementofchange/Pages/d efault.aspx Information for the 2011 MOC Conference is not available yet. In 2010 had Martha N. Johnson, Administrator, GSA, as keynote speaker and Martha Doris, Deputy Associate Administrator, GSA, as panelist.	