



Federal Funding Accountability and Transparency Act (FFATA) Frequently Asked Questions

Re: Executive Compensation and Subaward Reporting for Certain HRSA Grants and Cooperative Agreements

1. What is the Transparency Act?

- ⊙ The Federal Funding Accountability and Transparency Act (FFATA) of 2006 (Public Law 109-282) requires for each Federal award of \$25,000 or more that OMB create a searchable, no-cost, publicly accessible website (<http://usaspending.gov/>) that includes basic information about the recipient and the project being funded.
- ⊙ FFATA was amended by the Government Funding Transparency Act of 2008 (Public Law 110-252) requiring recipients to report certain information about themselves **and** their first-tier subrecipients for awards obligated as of October 1, 2010.

2. Who's required to report?

- ⊙ **Prime recipients/awardees** of new/"Type 1" non-Recovery Act funded grants and cooperative agreements of \$25,000 or more awarded on or after October 1, 2010.

3. What awards are currently affected by the Transparency Act?

Basically all the Type 1's with new award numbers as of October 1, 2010:

- ⊙ Discretionary Award Types
 - New ("Type 1")
- ⊙ Non-Discretionary Award Types
 - Block Grants ("Type 1")
 - Formula Grants ("Type 1")
 - Entitlement Grants ("Type 1")
 - Earmark Grants ("Type 1")
 - Statutorily-mandated Grants ("Type 1")

4. Where is the "award type" found?

- ⊙ The award type is the first digit of the award number found in box 4a of the Notice of Award.

5. What other awards will be affected in the future?

- ⊙ HRSA will issue guidance when the other award types require reporting.

6. How will the awardee formally be notified if these requirements apply to their award?

- ⊙ Applicants are informed of the new requirements in the Funding Opportunity Announcements. Awardees are legally informed of their obligations in the Notices of Award as a “Grant Specific Term” in the “Terms and Conditions” section.
- ⊙ HRSA sends periodic email reminders to the person(s) associated with the award (i.e., the Program Director/Principal Investigator, etc. as listed in the award letter). If making an inquiry to HRSA’s FFATA Point Person about these requirements, please make sure to include the Grant Number included in the reminder.

7. Where will the prime report the information?

- ⊙ Prime recipients report their own executive compensation as part of their profile at <https://www.sam.gov>, System for Award Management (Note: Central Contractor Registration (CCR) transitioned to SAM on July 30, 2012).
- ⊙ Prime recipients report subaward information at the FFATA Subaward Reporting System (FSRS): <http://www.fsr.gov/>.

8. I’m having problems registering in FSRS. What should I do?

- ⊙ Please contact the Federal Service Desk at one of the numbers listed at https://www.fsr.gov/help_desk.

9. Will any reporting be required in the Electronic Handbooks (EHBs)?

- ⊙ No. All FFATA reporting will be completed online via <https://www.sam.gov> and <http://www.fsr.gov/>.

10. What information should be reported in FSRS?

- ⊙ The following data about subawards equal to or greater than \$25,000:
 - Subawardee DUNS Number
 - Subawardee Name (will prepopulate after DUNS number is entered)
 - Subawardee Address (will prepopulate after DUNS number is entered)
 - Amount of Subaward
 - Subaward Obligation/Action Date
 - CFDA program number for grants
 - Funding Agency ID and Name
 - Subaward Project Description (provide enough information to give the public a good idea of the purpose and intended outcomes of the subaward)
 - Subawardee Principal Place of Performance (including congressional district)
 - Subaward Number (Unique identifier of the entity); and
 - Total compensation and names of top five executives, if applicable (same thresholds as for primes) (will prepopulate, if available, otherwise enter manually)
- ⊙ The Total Compensation and Names of the top five executives if you and/or the subrecipient meet ALL of the following conditions:
 - More than 80% of annual gross revenues from the Federal government, **and** those revenues are greater than \$25M annually, **and**

- Compensation information is not already available through reporting to the SEC.

⊙ Note: Classified information is exempt from the prime and subaward reporting requirement as are awards with individuals. You should also report/update your SAM profile's executive compensation section at the SAM portal.

11. Do I report on subawards per obligation or disbursement...or both?

⊙ Only per obligation. When you obligate/sign an award or contract of \$25,000 or more it's reportable in the FSRS. There is no need to report on individual disbursements or payments to the subawardee. If you make an adjustment to the subaward, you may modify your FFATA report in the FSRS.

12. I have a subaward to report, but I don't have a subaward number. What should I enter?

⊙ If you don't have an identifying number that you use to track the subaward, you may enter "N/A."

13. When is the information to be reported?

⊙ Subaward information must be submitted on a rolling basis by the end of the month following the month in which the obligation was made (e.g., report 11/7/10 obligation by 12/31/10).

⊙ The prime recipient's executive compensation information must be provided in SAM by the end of the month following the month in which the obligation was made by HRSA and annually thereafter during the period of support.

14. Do awards or subawards to individuals need to be reported in FSRS?

⊙ No, none of the FFATA requirements apply to an individual who applies for or receives an award 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).

15. My organization does not make subawards. Do I still need to file any kind of report?

⊙ If you do not make any subawards, then you don't have to file a report via FSRS. However, you would need to address the executive compensation for your organization. Please read the criteria at <http://www.hrsa.gov/grants/ffata.html> and then visit <https://www.sam.gov> to handle this part of your SAM profile. If you answer in the affirmative to ALL the conditions, then you would have to report the compensation. Whether it's "Yes" or "No" to the criteria, you should respond at the SAM portal.

16. What website displays all the FFATA-related information after the prime reports?

⊙ The data entered into FSRS.gov is transmitted daily to <http://usaspending.gov/> for public access.

17. What is the FAIN?

- ⊙ FAIN stands for Federal Award Identifier Number. When FSRS.gov asks for the FAIN, please refer to the HRSA award letter and enter the 10-digit Grant Number found in box 4b.

18. My organization received a grant for Capital Development. Should we consider the fees to the architectural firm or general contractors as subawards?

- ⊙ Yes, in this case, the award to a company who is carrying out the project would meet the following definition of subaward as:
 - “...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.”
 - “...provided through any legal agreement, including an agreement that you or a subrecipient considers a contract.”

19. Are there any other FFATA-related requirements?

- ⊙ Effective October 1, 2010, HHS issued a Policy Directive implementing 2 CFR Part 25 (http://www.whitehouse.gov/sites/default/files/omb/fedreg/2010/09142010_duns.pdf) requiring all entities that plan to apply for and ultimately receive Federal grant/cooperative agreement funds from any HHS Operating Division (OPDIV) or receive subawards directly from recipients of those funds to:
 - Be registered in **SAM** prior to submitting an application or plan (**Note: Central Contractor Registration (CCR) transitioned to SAM on July 30, 2012**).
 - Maintain an active **SAM** registration with current information at all times during which it has an active award or an application or plan under consideration by an OPDIV.
 - Provide its DUNS number in each application or plan it submits to the OPDIV.

20. What are the guidelines for audits where FFATA is concerned?

- ⊙ All recipients of HRSA awards are expected to comply with the audit requirements of Office of Management and Budget (OMB) Circular A-133. OMB published supplemental guidelines for auditing Transparency Act compliance. Please refer to the “Part 3 -- Compliance Requirements” dated March 2011 found at http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2011.

21. Who handles FFATA-related questions at HRSA?

- ⊙ Contact: Doretha Dixon, Grants Policy Analyst, at DGP@hrsa.gov

22. USAspending.gov FAQ: <http://www.usaspending.gov/learn?tab=FAQ>

23. FSRS.gov FAQ: <https://www.fsr.gov/#a-faqs>

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This FAQ is housed on HRSA’s FFATA page at: <http://www.hrsa.gov/grants/ffata.html>