**6.9.14 FFATA Training**

**Q & A**

1. **Q – How does the FFATA reporting system compare to ARRA in terms of obligations and expenditures?**  
   A – A policy decision was made to show only obligations on USASpending.gov. We wanted to show when the money was encumbered, rather than expended, which can take longer. So FFATA only requires the reporting of obligated amounts, not expenditures. Each obligating action made must be reported in FSRS. This includes de-obligating funds if a formal de-obligation (sub-award amendment) is issued.
2. Q – **What takes precedence as the date of the award when there is both a date when the contract was signed, and a date of a Purchase Order?**  
   A – OMB defines the date as the date on which the agreement was signed. For USASpending.gov purposes, we use the date on which the award was signed.
3. Q – **Are consultants and/or physician consultants considered to be “individuals,” and therefore not subject to sub-award reporting?**A – If the money is going directly to one person, e.g. “John Doe,” do not report that as a sub-award. However, if the money flows from state government to consultant that is also a company, e.g. “John Doe Consulting Company,” then it depends on the purpose of your grant. One of the complexities is determining which activities are directly related to the purpose of the award and those that are peripheral. In cases where that answer hinges on the specifics of the award, consult your federal grant officer.
4. Q – **What is the timeframe for reporting a deobligation or other change?**A – Within 30 days.
5. Q – **If you don’t deobligate an award, and your award term expires without being spent, are you required post-award to report that deobligation?**A – Yes.
6. Q – **Is it correct that a sub-recipient that receives less than $300,000 in income does not have to be reported as a sub-award?**  
   A – No. If the sub-award is greater than $25,000, it must be reported. However, if the sub-recipient’s income is less than $300,000, their Executive Compensation does not need to be reported.
7. Q – **Say the state gives out one award to a community for five different activities, but the community is not required to give the funds back if they are underspent on a certain activity. Instead, they can reallocate to other activities. Is it required to report this change?**  
   A – No. The activities are “rolled up.” It is a higher-level reporting. However, if the change cuts across different federal awards, you would have to report revised obligation amounts.
8. Q – **If awards that were originally awarded to one state agency now reside with another, do we need to re-report those sub-awards?**  
   A – No, but moving forward, the new state agency is responsible for reporting the sub-awards. However, if there is a desire from a policy perspective to show that this award was always with your agency, you would need to work with your federal agency to amend old reports. The agency listed on the federal award letters is the agency responsible for reporting.
9. Q – **If you see an award under an old agency, how do you transfer from old agency to new in order to be able to report?**A – Your federal agency would need to do this, and then it would be reflected in FSRS. They would note that it is under a new DUNS number, and presumably your award document would reflect that change as well.
10. Q – **Can you use the batch upload process to upload reports under more than one prime recipient DUNS number?**A – No. Batch uploads can be done for multiple awards, but all awards must be under the same prime recipient DUNS.
11. Q – **Is the FSRS “Worklist” populated from USASpending or is that something that recipients need to populate?**  
    A – Worklist information is populated by federal agencies. They report all new prime awards that they have issued in a given month by DUNS numbers to USASpending. That information is simultaneously routed to FSRS. Prime recipients are than able to pull down their awards by DUNS number into their Worklist. There may be some instances when an award is not on your worklist; in that case you can also search by award number. If it does not come up, your federal agency may not have submitted the award information properly. Contact the federal awarding agency in this case. The latency time between when a federal agency makes an award and when it is available in FSS should be very brief.
12. **Q – What should we do if we attempted to submit sub-award reports but our prime award was not in the system?**A – Document it and keep a record of your attempts to comply, and contact your federal agency.
13. **Q – Generally, we use batch uploading as opposed to the individual entry system. But, my understanding working with the system is that once you do a batch upload, if a change is needed you then have to revert to the manual input. Can you confirm that?**A - My understanding is that you can make an amendment from a batch upload, that you should be able to take that batch upload, open it up, and revise/reopen that report. If that is not your experience, then I can go back and ask GSA for them to confirm.