

FFATA Reporting and Compliance Training for State Agencies

February 8, 2023

Grants Management Office









FFATA Overview and Requirements



Scope of Today's Training

- Today's training is geared to State agencies
- Training deck and recording will be made available and we will notify you by email when they're available
- If you have FFATA questions after the session, please use our Support Desk form
- Today's training is focused on Subaward reporting, but keep in mind that FFATA reports also apply to contracts
 - · Required data fields are similar between subawards and contracts
 - Main source for contract data is the Purchase Order. For subawards, the main source is Subaward agreement
 - Please refer to the guides on FSRS.gov for reporting contracts.
 - NOTE: FSRS contract reporting only applies to Federal prime contracts. Portions of prime awards (grants) that are contracted to vendors for procurement do not need to be reported in FFATA.
 - Where there is an asterisk in the presentation, the instructions apply to both subawards and contracts



What is **FFATA**?

The Federal Funding Accountability and Transparency Act of 2006, as amended (FFATA), requires the full disclosure to the public of all entities or organizations receiving federal funds

FFATA has multiple Federal components, but one key part pertains to State agencies for purposes of this training

State agencies <u>must</u> report certain information about themselves **and** their first-tier subrecipients on ALL subawards* of \$30,000 or greater

This information is made available on USASpending.gov

This training highlights FFATA reporting requirements for State agencies, advises on best practices for FFATA reporting, and showcases some tools currently available to help you report efficiently

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Requirements of State Agencies

- State agencies that are awarded a Federal grant MUST report any first-tier subawards* of \$30,000 or greater through FSRS.gov
 - This applies even if funds for the award or subaward are later de-obligated to below \$30K
- The information that must be reported in FSRS includes:
 - 1. Prime Recipient (State Agency) Information (pulled from SAM.gov)
 - 2. 1st tier subawards* for \$30K or more
 - 3. Executive Compensation under certain conditions
- State Agencies are responsible for obtaining required information from their subrecipients in order to complete FFATA reporting in FSRS
- FFATA report must be created by last day of month FOLLOWING subaward issuance



What is FSRS?

FSRS.gov – FFATA Subaward Reporting System

- The required platform for creating and managing FFATA reports for subawards*
- FSRS enables agencies to report subaward & executive compensation data, feeds data to USASpending.gov for public search
- Can revise existing subaward* reports and upload batch reports (multiple programs/multiple subawards)
- Provides resources, including full guide on how to use the FSRS system and submit reports

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• <u>https://www.fsrs.gov/documents/FSRS_Awardee_User_Guide.pdf</u>

Subaward Information to Report

- State agencies <u>must</u> provide the following subrecipient information in a FFATA report.
- Note: Several of these fields are required to be provided to the subrecipient per 2 CFR 200.332, and should be available on your agency's subaward agreements (Also highlighted in OMB Memo of Guidance dated 8/27/10)
 - UEI/Subrecipient Name
 - Obligation (Subaward) amount
 - Subaward date
 - Project Description
 - Principal Place of Performance
 - Executive Compensation Information when:
 - Federal funds are >80% of entity budget
 - Entity received >\$25M in federal funds in the last fiscal year
 - Executive compensation is not already publicly available (reported through SAM.gov)



Why This Is Important

 In the 2021 State Single Audit, the Auditor General found a sampling of State agencies in Rhode Island that issued subawards not compliant with FFATA reporting requirements (Finding 2021-038). Full finding can be read at <u>http://www.oag.ri.gov/reports/SA_RI_2021.pdf</u> pages

D-47, D-48 and E-21

- Non-compliance puts at risk millions of dollars of federal funding the state receives.
- As a result of the audit finding, the Grants Management Office is providing all agencies with refresher FFATA training and a statewide procedure document to aid in compliance.



Office of the Auditor General D-47

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FFATA Reporting Procedure and Resources



FFATA Reporting Resources

The Grants Management Office provides the below tools to help you get the information you need to comply with FFATA

1. The GMO website has links and information on FFATA reporting requirements

https://controller.admin.ri.gov/grants-management/ffata

https://www.fsd.gov/gsafsd_sp?id=gsa_index

2. The Grants Management System (GMS) allows agencies to quickly aggregate key information fields necessary for FFATA reporting.

- 3. FFATA Subaward Reporting Tool
- 4. FFATA Procedures Guide (forthcoming)



Required Steps for FFATA Compliance

On a high level, compliance with FFATA requires that your agencies perform the following steps.

- 1) Identify all \$30k+ subawards* signed and/or amended in the last month
- 2) Gather FFATA data for each
- 3) Follow agency process for FFATA reporting, either
 - a) Log into FSRS and submit data or
 - b) Send data to person responsible for FFATA reporting

The following slides will focus on the Grants Management Office's recommended procedure for completing these steps



FFATA Reporting Procedure

The Grants Management Office advises the below procedure to ensure timely compliance with FFATA reporting requirements:

- 1. All agency employees assigned to report FFATA information should register with FSRS.gov as described later in this training
- 2. Obtain required information about the first-tier subaward and subrecipient using the tools highlighted in the next slides
 - If subaward is issued through GMS, use Annual Organization Registration (AOR) data, Statewide Subaward Agreement and SR's application
 - If not, or AOR data is not entered, provide the SR with Section 2 of the Subaward Reporting Worksheet. Most data already required in Subaward Agreements per 2 CFR 200.332
- 3. Follow the instructions from FSRS.gov to complete and submit reports



FFATA Procedure Recommendations

Grants Management Office recommends the following for agencies developing their procedures to follow FFATA reporting requirements:

- Establish a consistent method for selecting which employees submit FFATA reports and create a succession plan
- Make sure that your internal processes address how SR data/agreements will be provided to new FFATA submitters
- Create a process for sharing AOR information (discussed on next slide)
- Develop and maintain internal processes or databases that allow for quick retrieval of information for new or modifications to existing reports



Annual Organization Registration

This is a feature of the RI GMS used to pull subrecipient information and executive compensation information together

Subrecipients are required to fill this out in order to accept a subaward

Name/UEI and Executive Compensation can be found in the Profile and FFATA Entity Data sections, respectively

GMS Department Master Account Holders (DMAHs) have access to all submitted AOR applications

DMAHs may request an excel export of AOR data from GMO

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FFATA Fields in GMO Resources

- Between the AOR and subaward data in GMS, all necessary FFATA fields are available without need to obtain further data from the SR
- Subaward Amount, Subaward date and Project Description (Proposal Abstract) can be pulled from the Subaward Agreement, which is already required for new subawards issued in the GMS
- Project Description (Proposal Abstract) and Primary Place of Performance are already required fields for the subaward application, and are built in as part of the Standard process

	General Conditions - Addendum A, General Insurance Requirements	
This A	Agreement shall incorporate by reference:	
1.	. The specific requirements described in the solicitation and related solicitation documents; and	
2.	The application materials submitted in pursuit of this subaward and accepted by the State	
	NOTICE	
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Subaward Reporting Worksheet

Strongly recommended if the subrecipient did not complete an Annual Org Registration or the subaward will not be added to the GMS

This worksheet can be sent to the subrecipient as a fillable PDF, along with Attachment 1-A if multiple Federal awards are funding the subaward

SR will fill out Section 2 and return to agency

IMPORTANT: This is NOT a substitute for the FFATA reporting in FSRS. For collection of subaward/subrecipient data only

Worksheet and Instructional slide deck can be found at https://controller.admin.ri.gov/grants-management/ffata

Note: Agency is NOT required to provide this worksheet to GMO

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Registering and Accessing FSRS.gov



What you need to Register for FSRS.gov

- A Login.gov account <u>https://login.gov/create-an-account/</u>
 - Needed to access SAM.gov and FSRS.gov
- Your agency's UEI number in SAM.gov
 - The UEI is required in order to create an account in FSRS.gov
 - Note: You do NOT have to be an admin for your agency's UEI in SAM.gov in order to submit FFATA reports.
- You are assigned to create/modify FFATA reports for your agency
 - Follow your agency process for permitting authority to create/modify FFATA reports



Registering in FSRS

How to Register

- Create Login.gov account
- Go to FSRS.gov
- Click on Awardees option on FSRS home
- Enter Login.gov credentials
- Step 1 requires UEI
- Step 2 pulls identifying data from SAM.gov



FSRS Registration cont'd

- Fill in the remaining required contact information fields
- Check Yes to certify that you are authorized to create and revise FFATA reports
- You will receive a confirmation email from FSRS. Click the link to confirm and you will be registered.
- Log back in using your Login.gov credentials
- Click OK on the FSRS Terms and Conditions
 screen

Contact Information

This message came from outside your organization. Vednesday, January 04, 2023, 12:59 pm)ear Stephen William Smith:					
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upervisor Name":					
Phone Number*:					
Email Address** stenhen w smith@doa ri gov					
Title					
Suffix:					
Fullname*:					

Company: EXECUTIVE DEPARTMENT OF THE STATE OF RHODE ISLAND Username: stephen.w.smith@doa.ri.gov

If the above information is correct, please click on the following link to confirm your information and continue the registration process. Thank you.



Creating a FFATA Report

- From the FSRS home page, click on the "create FFATA report" button
- In Step 2, enter the FAIN for the Federal award associated with the subaward* you are reporting.
- In Step 3, confirm that the award details are correct and certify that you are the Prime Recipient

NOTE: You can also create a worklist based on FAINs you have/will use



FFATA Report Step 4

Most information about your agency should populate based on your agency UEI and the FAIN.

If award data is incorrect, contact the awarding Federal agency

If your agency data is incorrect, contact the Federal Service Desk

You will need to fill in the Principal Place of Performance information

Some pre-populated fields have red flag markers. If this information is incorrect, select No and provide an explanation



FFATA Report Step 5

- Fill in the subrecipient's UEI. Some data will pull from SAM.gov. Confirm prepopulated information is accurate.
- Fill in the Subaward Amount, subaward date, project description, SR Principal place of performance, Subaward #, and Executive Compensation information
- If you need clarification on a question, hover over the blue question marks



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Submitting the FFATA report

- Once you complete Section 5, you will have a chance to review your responses before submitting. You will also have the option to create a PDF/print version of the report for recordkeeping.
- FSRS.gov has both a print and video demonstration of the report creation and submission process
 - FSRS_Quick_Reference_Guide_Grants_How_to_CREATE_and_SUBMIT_a_FFATA_Sub-award_Report_v2.pdf



Notes and Links



Notes



If you are unable to locate record of the Federal grant, first verify the UEI on the award letter, then contact the awarding agency



For other issues using the FSRS system, contact the Federal Service Desk

Instructions for Batch uploads (multiple/multiple) can be found in the FSRS Awardee User Guide.



Please note that where FSRS guides refer to DUNS, please use UEI number instead



Resource Links

- Federal Service Desk (for SAM.gov technical or data issues)
 - <u>https://www.fsd.gov/gsafsd_sp/?id=gsa_landing</u>
- Quick Guide to create a FFATA Subaward Report
 - https://www.fsrs.gov/documents/FSRS_Quick_Reference_Guide_Grants_How_to_CREATE_and_SUBMIT_a_FFATA_Sub-award_Report_v2.pdf
- GMO FFATA Resource Page
 - <u>https://controller.admin.ri.gov/grants-management/ffata</u>
- GMO Annual Organization Page reference for Subrecipients
 - https://controller.admin.ri.gov/grants-management/grant-management-system-gms/subrecipients/annual-organization-registration
- GMO Support Desk
 - https://controller.admin.ri.gov/grants-management/grant-management-system-gms/user-support/contact-gms-support-0
- Reporting Information for Prime Contract Recipients

https://www.acquisition.gov/far/52.204-10

