PURDUE UNIVERSITY

Federal Funding Accountability and Transparency Act (FFATA) Handbook

Contents

Section 1: What is FFATA

The Federal Funding Accountability and Transparency Act (FFATA or Transparency Act - P.L.109-282, as amended by section 6202(a) of P.L. 110-252) requires the Office of Management and Budget (OMB) to maintain a single, searchable website that contains information on all Federal spending awards. That site is at http://www.USAspending.gov.

Applicable contracts, as of July 8th, 2010, and applicable grants, as of October 1st, 2010, will need to report required information at http://www.fsrs.gov. The purpose of this information is to "empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce waste in the government."

Section 2: FFATA Effective Date

The Office of Management and Budget (OMB) has issued the following guidelines for new contracts or grants on whether or not they will be susceptible to FFATA.

Contracts

For Federal contracts the phase in period is as follows:

- March 1, 2011 forward if the prime contract value is greater than or equal to $25K.

Grants and Cooperative Agreements

As of October 1, 2010, all Federal grants of $25,000 and over are subject to the FFATA subaward reporting requirements. Prime awardees will be able to report in FFATA Sub-Award Reporting System (FSRS) beginning October 29, 2010.
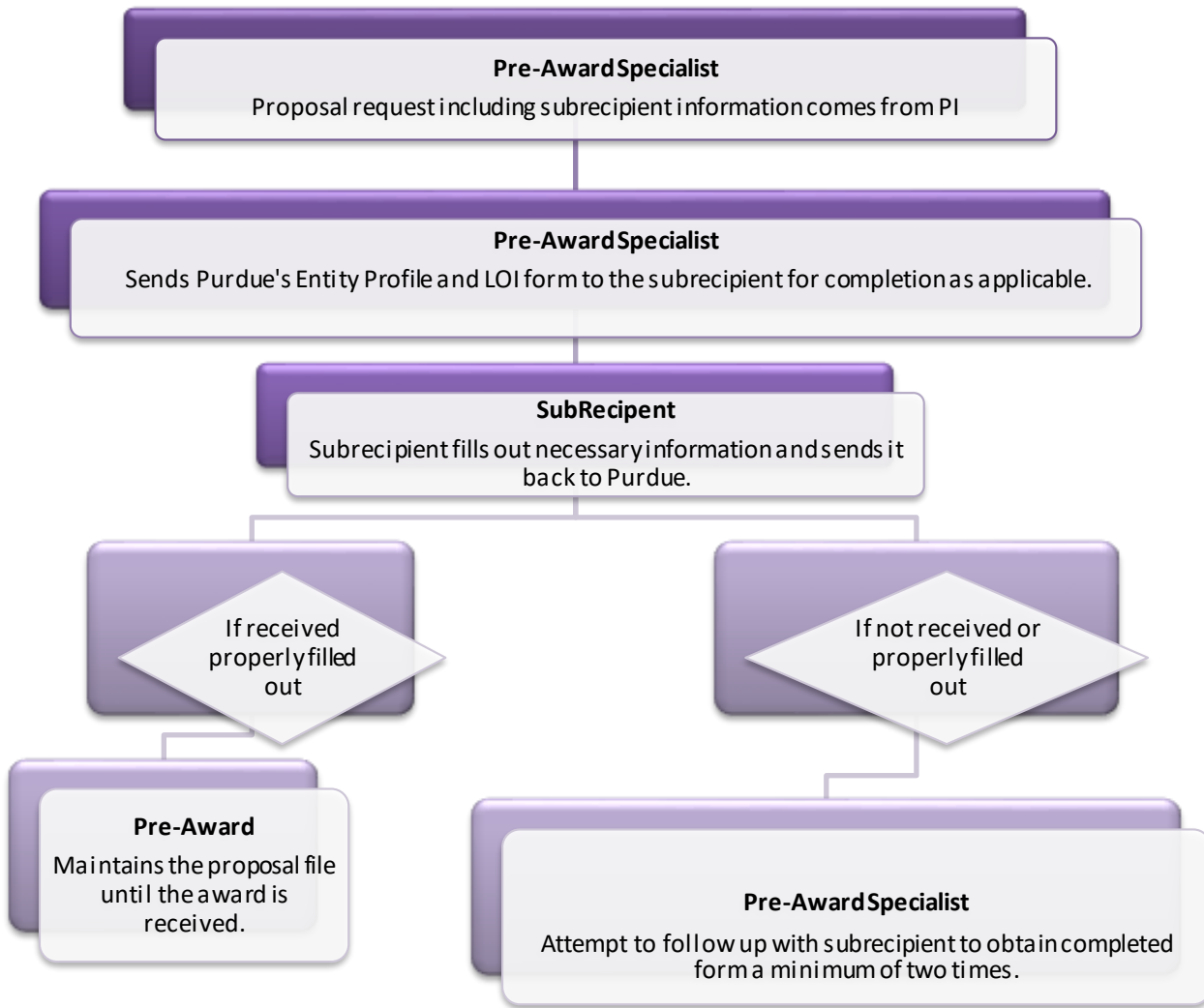
Section 3: Policies and Procedures

Pre-Award Process

During the proposal process, Pre-Award will be responsible for sending the required Entity Profile form to any subrecipients that have not completed one in the previous 12 month period. Additionally, Pre-Award will request a Letter of Intent (LOI) form be submitted to identify project specific information. These forms gather the required FFATA information. The status of receipt of these forms should be noted on the SPS Route Sheet if not received prior to proposal submission.

Specialist Expectations

- Send the Entity Profile form and LOI to each subrecipient as applicable prior to submission.
- When preparing route sheet, mark the appropriate response at the top of the route sheet indicating whether or not subrecipients are included in the proposal. Include notes identifying which, if any, subrecipients have not completed the required forms.
- Ensure all forms are approipriately uploaded in the Coeus record.
- If forms have not been returned by all subrecipients, the specialist should attempt to follow up with the subrecipient a minimum of two times to try to get the information. After the second request the specialist should notify the PI of the missing information and ask that the PI contact the subrecipient to follow up. At this time, Specialist should also notify the PI that any missing subrecipient information will delay the set-up of accounts if the project is funded.

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┌─────────────────────────────────────────────────────────────┐
│                    Pre-Award Specialist                      │
│    Proposal request including subrecipient information        │
│                       comes from PI                          │
└─────────────────────────────────────────────────────────────┘
                              │
┌─────────────────────────────────────────────────────────────┐
│                    Pre-Award Specialist                      │
│   Sends Purdue's Entity Profile and LOI form to the          │
│      subrecipient for completion as applicable.              │
└─────────────────────────────────────────────────────────────┘
                              │
              ┌───────────────────────────────┐
              │          SubRecipent          │
              │  Subrecipient fills out       │
              │  necessary information and     │
              │  sends it back to Purdue.     │
              └───────────────────────────────┘
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If received properly filled out

If not received or properly filled out

Pre-Award
Maintains the proposal file until the award is received.

Pre-Award Specialist
Attempt to follow up with subrecipient to obtain completed form a minimum of two times.

Post-Award Process

New Award

- The administrator will complete the risk analysis document and obtain a copy of the Sam.gov registration for the subrecipient and make sure there is a scope of work, budget, justification and LOI and Entity Profile (when not in the FDP clearinghouse) for all new subagreements. The administrator will put the risk analysis into the IP attachment list for contracting to review and in Perceptive Content (PC) with the sam.gov registration for the manager to review. The manager will review and push to contracting for a new agreement. The administrator will enter into FFATA and print the pdf and put into PC.

Amendment

- The administrator will complete the risk analysis and obtain the sam.gov registration and put in PC and complete the appropriate amendment template (unilateral or bilateral) and email to the manager for review. The manager will sign and return to the administrator who will enter the updated information into FFATA and print the pdf of the successful submission and file in PC.

FFATA Data Requirements

The following data is required from subrecipients for all grants, contracts, and vendor purchases on contracts that meet the FFATA requirements:

1) Name of entity receiving award
   a. Amount of award
   b. Funding agency
   c. NAICS code for contracts / CFDA program number for grants
   d. Program source
   e. Award title descriptive of the purpose of the funding action
   f. Location of the entity (including congressional district)
   g. Place of performance (including congressional district)
   h. CCR Registration
   i. Unique identifier of the entity and its parent (DUNS); and
2) Total compensation and names of top five executives (same threshold for prime)
      If...
         a. More than 80% of annual gross revenues from the Federal government, and those revenues are greater than $25M annually **and**
         b. Compensation information is not already available through reporting to the SEC.

Classified information is **EXEMPT** from the prime and sub-award reporting requirement as are **contracts** with **individuals**.

When does the FFATA Report need to be submitted?

The month following the full execution of a subaward, subaward modification, or vendor payment.

For Grants and Cooperative Agreements: Subawards that have a cumulative total of $25,000 or more must be reported.

For Contracts: Subawards that have a cumulative total of $25,000 or more and/or individual vendor purchases of $25,000 or more must be reported.

Subrecipients are not required to report FFATA if they reported less than $300,000.00 in gross income in the previous tax year. In addition, exemptions to the FFATA reporting requirements may occur and it is up to each area to understand their sponsor's requirements. If an exemption occurs the account manager is to put in zeros in lieu of the DUNS number.

FFATA Website Reporting Responsibility

Grants and Cooperative Agreements

It is the duty of SPS Post Award to properly submit and update the required FFATA information to the FSRS website. When an eligible FFATA award is received, the Funding Administrator's is responsible for entering the information on the FSRS website. At that time, it becomes the Funding Administrator's responsibility to enter the information properly and get information from the subrecipient as needed.

Contracts

When a new subaward is issued it is the duty of SPS Post Award to properly submit and update the required FFATA information to the FSRS website. At that time, it becomes the Funding Administrator's responsibility to enter the information properly and get information from the subrecipient as needed.

Section 4: Helping Obtain DUNS Number

It is the responsibility of all sub-award/vendor recipients to apply for and maintain a DUNS number. Obtaining a DUNS Number is completely free for all entities doing business with the Federal Government. Because of this, it is important to identify the agency/vendor as a federal grant applicant/recipient. Please use the following information to help guide any prospective sub-award recipient.

All U.S. Locations	International Locations
U.S. and U.S Virgin Islands: 866-705-5711 • Federal Contractors – Option 3 • Grantees – Option 4 • Loan Recipients – Option 5 Alaska and Puerto Rico: 800-234-3867 • Option 2 and then Option 1 Or use the online webform http://fedgov.dnb.com/webform	Use online webform http://fedgov.dnb.com/webform

The following information is needed when applying for a DUNS Number

- Legal Company Name
- Headquarters Name/Address
- Tradestyle, Doing Business As, or other name by which your organization is commonly recognized.
- Physical Address, City, State, and Zip Code
- Mailing Address
  - If different from either Headquarters Address or Physical Address
- Telephone Number
- Contract Name and Title
- Number of Employees

Once that information is gathered you may apply for a DUNS number. It takes 1-2 days to receive the DUNS number if the application is done online, if it is done over the phone it can be provided immediately.

Section 5: How to Obtain CCR Registration

Domestic Subrecipients

The following information is required in order to obtain CCR registration for Domestic Subrecipients.

1) DUNS number
2) Tax Identification Number (TIN) and Taxpayer Name used in Federal Tax Matters
      a.   Social Security number is an allowable TIN number
3) Statistical Information about your business
4) Electronic Funds Transfer (EFT) Information for payment of invoices

Once the information is gathered, direct the Vendor/Subrecipient to go to SAM.gov and register. If assistance is needed in registering, please contact the appropriate Post Award account manager for help.

For a step by step guide on how to register for domestic subrecipients/vendors please visit SAM.gov.

International Registrants

The following is required in order to obtain a CCR number for foreign institutions.

1) DUNS Numbers
2) NCAGE code
      a.   http://www.dlis.dla.mil/Forms/Form_AC135.asp
3) TIN and EFT information not required

CCR Verification

It is the policy of Purdue University to verify that all vendors and subrecipients have an active CCR account. The best way to verify registration and status is through the SAM.gov. Please note that vendors may opt out of displaying their registration on the CCR website. In these cases you must follow up with the subrecipient/vendor to confirm they are registered.