

FFATA POLICIES & PROCEDURES

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POLICY BACKGROUND

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. FFATA requires all recipients of federal awards to report purchases of \$25,000 and greater under federal contracts. The act requires the reported data be made available to the public via www.USASpending.gov.

Humboldt State University Sponsored Programs Foundation (HSU SPF) requires compliance with FFATA reporting requirements for all first-tier subawards (subgrants and subcontracts) related to prime Federal awards. All first-tier subawardees that are subject to FFATA reporting must have a Dun and Bradstreet Universal Numbering System (DUNS #) and valid registration with the System for Award Management (SAM) in order to enter into the contract or agreement with HSU SPF on federally funded projects.

PROCEDURES

During the subaward process, preaward will be responsible for sending the required Research Subaward Agreement form to the subrecipients. This form requests the required FFATA information from subrecipients for all grants, contracts, and vendor purchases on contracts that meet the FFATA requirements:

1. Name of entity receiving award
 - Amount of award
 - Funding agency
 - NAICS code for contracts / CFDA program number for grants
 - Program source
 - Award title descriptive of the purpose of the funding action
 - Location of the entity (including congressional district)
 - Place of performance (including congressional district)
 - CCR Registration
 - 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.

The FFATA report will need to be submitted the month following the full execution of a subaward, subaward modification, or vendor payment. 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 compliance officer is to put in zeros in lieu of the DUNS number.



When an eligible FFATA award is received, the compliance officer is responsible for entering the information on the FSRS website. At that time, it becomes the compliance officer's responsibility to enter the information properly and get information from the subrecipient as needed.

RELATED DOCUMENTS

- Dun & Bradstreet Universal Numbering System (DUNS #) is a unique identifier for business entities that receive federal assistance. To apply for a DUNS# go to www.dnb.com.
- Central Contract Registrations (CCR) is a registration system for entities that conduct business with the federal government.
 - To register with CCR go to <https://www.sam.gov/portal/public/SAM/#1>;
 - For certificate of valid CCR registration, select CCR Search and enter supplier's DUNS#. Registration must be valid for at least two months after the anticipated PO encumbrance date. Confirmation consists of printing the registration page.
- Federal Subaward Reporting System (FSRS) <https://www.fsr.gov/> is the system used to report FFATA data on subawards. ORS has registered and will report for the UH.
- www.USAspending.gov is the public website that includes information on all Federal spending awards.