FFATA Workload Survey
Outcomes

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Agenda

- FFATA reporting overview
- Context for the survey project
- Scope of the project
- Data collection overview
- Conclusions & next steps
- Discussion/questions
What is FFATA?

- Federal Funding Accountability and Transparency Act (FFATA) - signed Sept 2006
  - Public Law 109–282
  - 2 CFR Part 170

- “To empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce wasteful spending in the government.”

- Requires information on federal awards be made available to the public via a single, searchable website, which is https://www.usaspending.gov/
FFATA Timeline

- 2006: FFATA signed into law
- 2010: FFATA Reporting
- 2014: DATA Act signed into law
- 2020: OMB Compliance Supplement
- 2014: FDP Working Group Guidance

FFP subawards
What is FSRS?

• The FFATA Subaward Reporting System (FSRS)

• The reporting tool pass-through entities (PTEs) use to capture and report subaward and executive compensation data regarding their first-tier subawards

• The information entered in FSRS is displayed on https://www.usaspending.gov/

• Anyone in the public can access the data, and run reports
Reporting Requirements

• $30,000 USD threshold for reporting
  • Applies to Subawards and Subcontracts
  • Cumulative obligation: includes subawards/subcontracts that are initially below $30,000 but subsequent modifications result in a obligation equal to or greater than $30,000

• Must report no later than the end of the month following the month in which the obligation was made
  • Example: if the obligation was made on November 7, 2023, the obligation must be reported by no later than December 31, 2023

• Obligation could be construed as the date of partial or full execution or date PTE receives the award
Why it Matters

Documents

User Guides
- FSRS Awardee Guide

Training Materials
- FSRS Awardee User Demonstration

News

Question of the Month:
Who is required to file a FFATA report in FSRS? View the answer

New! As of October 29, 2010, FSRS.gov now supports both contracts and grants sub-award reporting. Prime awardees, click here to

Log-In or Register Now:
- FEDERAL GOVERNMENT
- Awardees

When reporting to FSRS, users may experience issues reporting awards made to some sub-awardees. We are currently working to resolve the issue and will have full functionality back shortly.

Starting Monday, April 4, 2022, the new Unique Entity ID from SAM.gov will be the official governmentwide identifier used for federal awards. Without a Unique Entity ID (SAM), primes will not be able to find their sub-awardees in FSRS.gov to report a subaward after April 4, 2022. Go to SAM.gov to get a UEI.

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Goal: “To empower every American with the ability to hold the government accountable for each spending decision.”

“Duplication of subaward records is common. ... Note that [FSRS] does not capture unique record keys at the subaward level, which makes preventing duplicate records within FSRS difficult.”
Filing Reports in FSRS

What do these things do?

[Image: create FFATA report]
[Image: Save PDF | Reopen | Copy Report]
[Image: Save PDF | Reopen | Copy Report]
[Image: Save PDF | Reopen | Copy Report]
[Image: Save PDF | Reopen | Copy Report]
Project Timeline

2020
- OMB Discussion
- Draft Survey

2021
- Survey Launch
- 90 Responses Collected

2023
- Report Issued
- Membership Engagement
- Government Engagement
Scope of the Survey Project

Demographics

Nuts & Bolts

Training & Support

Accessibility
Data Collection Overview

- Survey ran end of 2021
- 90 responses
- Confidential
- All questions voluntary: Not all respondents answered all questions
Demographics
This table was generated based on the following Qualtrics data collected and displays the number of FFATA reports made per year and the reported R&D expenditures per respondent institution.
Who Files FFATA Reports?

What team/office files the FFATA reports at your institution?

- SPA Central Preaward
- SPA Central Postaward/Finance
- SPA Central Pre and Post
- Academic Department/School
- Procurement
- Other (please specify)
Who in the team/office files the FFATA reports at your institution?

- Subaward/Agreement Specialist(s)
- Coordinator/Admin Support
- Dedicated FFATA person
- Post-award / finance team member
- Procurement member
- eRA Team
- Other (please specify)
How do you track when FFATA reports have been filed or need to be filed?

- Spreadsheet
- System flags
- Paper in a pile
- Run reports
- No formal process
- Other (please specify)
Estimate how many hours per month does your institution spend on FFATA reporting? If multiple people file the reports, total all the hours per month.
Accessibility, Training & FSD Support
How do the individuals responsible for reporting log in to the FFATA Subaward Reporting System (FSRS)?

- We created a central ID/log in
- We have multiple accounts (one for each user)
- Other (please specify)
How does your institution train new employees who are responsible for FFATA reporting using FSRS? (select all that apply)

- Shadow employees
- Own written materials
- Refer to FSRS materials
- Don't offer formal training
- Other (please specify)

0 5 10 15 20 25 30 35 40 45 50 55 60
Utilization of FSRS Resources

Does your institution find the FSRS training materials and FAQs (located on the home page of FSRS) helpful to train new employees?

- Yes
- No
- No aware of FSRS/FSD materials
Do the materials, such as FAQs, user guides, etc., located on the FSRS website help you to resolve issues on your own?

Yes

No

Not aware materials existed
Do you routinely review USAspending.gov to view the institution’s filed FFATA reports to ensure data integrity/accuracy?

- Yes - often
- Yes - spot check
- No
- Other
In general, how quickly does the Federal Service Desk (FSD) respond to your queries?

- **Within one workday**
- **2 - 5 workdays**
- **6 - 10 workdays**
- **11 - 19 workdays**
- **20+**
- **At times no response**
- **Have not contacted FSD in 2 yrs**
Quality of FSD Responses

⭐⭐⭐⭐⭐

⭐⭐⭐⭐⭐

⭐⭐⭐⭐⭐
1. Training resources for both federal and institutional stakeholders
2. Award transfer process
3. Institutional visibility into individual access (transparency and continuity of service)
4. Inability to report on individual subawards instead of an award (prevents use of batches)
5. Inability to correct key government-mandated data points, such as Congressional Districts
Feedback on Training Materials

- Fields have specific formatting and no instructions (e.g., zip code without dashes, no commas in dollar amounts)
- Instructions are unclear on when to create a new report or copy reports from the worklist, how to report on de-obligations, and how to proceed if awards cannot be found in the system
- Representatives who are familiar with the FSRS system
  - Example: Called FSD regarding a log-in issue and was told there was nothing they could do. I asked if there was someone else I could call, I was told it "really wasn't anyone's problem". I ended up having to create a new User ID.
- A lot of us make up how we report because there is almost no consistent guidance
- Any answers we do receive from the FSD are completely dependent on the individual; you can get three different answers for the same question
Feedback on Award Transfers

• The biggest challenge [for us] is prime award transfers

• Transfer In awards do not show under our organization and requires FSD intervention 100% of the time

• Unable to complete required reporting for incoming transfer awards

• It would be helpful if FSRS provided a mechanism for us to claim an award (like *This is Mine*). This would help with transfer awards, we claim it, FSRS does whatever they need to do and release it to us.

• When transfer awards are not in FSRS and/or USAspending.gov the granting agency may not understand the issue and/or is not helpful in resolving it

• When the prime recipient of an award in FSRS is incorrect, this prevents the new PTE from fulfilling their obligations
Filing Mechanics
When do you Create a Report?

Under what circumstances does your institution use the Create Report function in FSRS? [select all that apply]

- new sub, reporting threshold reached
- new sub, w/out threshold reached
- de-obliger subaward
- File correction
- Update subaward with supplement or increment
- Update for NCE 0.00 transaction
- sub terminated early
- Other
What amount do you enter in the *Subaward Amount* in FSRS for each modification issued to obligate additional funds to an ongoing subaward?

- **Cumulative total for the subaward**: 30
- **Transaction amount**: 50
- **Something else**: 1

The bar chart represents the distribution of responses, with the y-axis showing options and the x-axis showing the number of responses.
When do you Re-open a Report?

Under what circumstances does your institution use the Re-open Report function in FSRS? (select all that apply)

- de-obligate sub
- file correction
- Update sub with supplement or increment
- Update for NCE 0.00 transaction
- Subaward is terminated
- Does not use Re-open Report
- Other
When do you Copy a Report?

Under what circumstances does your institution use the Copy Report function in FRSRS? (select all that apply)

- De-obligate sub
- File a correction
- Update sub with either supplement or increment
- Update for NCE 0.00 transaction
- Subaward is terminated
- Does not use Copy Report
- Other
Do you use batch uploads, an alternative reporting option available per the FSRS Awardee User Guide?

- Yes
- Don't know how or use batch reporting
- No
Community Feedback on Changing FSRS

- Alignment between the FSRS data fields and structure and those of most academic institutions
  - Use of individual subaward reporting rather than grant reporting might allow more institutions to integrate the requirements of their data warehouse with batch upload requirements

- Improve award transfers
  - Ability to “claim” awards and have the request approved rather than waiting for the agencies to sort out who needs to act

- Enhance relevant documentation for auditors
  - Respondents asked for easier ways to “print” PDFs of filed reports and ensure that important information, such as the filing date was not omitted
Community Feedback on Changing FSRS

- **Enhance oversight ability**
  - Functionality to download an Excel spreadsheet of awards in the FSRS worklist and the most recent reporting actions

- **More flexible reporting options**
  - Ability to file multiple reports for the same FAIN in a month instead of one report in a given month because not all subawards are fully executed on the same day

- **Institutional level accounts**
  - Then all approved users can see all the FFATA reports across the institution
  - Currently, users may only see the awards linked to their individual account, creating continuity risks and preventing institutions from improving oversight
Opportunities
News Flash! GAO-24-106237

- GAO published **GAO-24-106237 Opportunities Exist to Improve COVID-19 & Other Grant Subaward Data on USASpending.gov**

- “Our prior work has identified a lack of reliable award data available on USASpending.gov, including for grant subawards” (pg1)
  - Footnote points to GAO-23-105538 Federal Spending: information on US Funding to Entities Located in China
• “Likely duplicated subaward records were each duplicated five times” (pg 10)

• Impossibly high subaward amounts: “we found one subaward record on usaspending.gov...that exceeded the US [GDP] for the year in which they were made.” (pg 11)

• “Current directions for users do not address many grant subaward data quality challenges on USASpending.gov” (pg 17)
FDP Sees the Why...

Survey addressed many of the why’s behind the issues identified by GAO
Fun Projects!

- Host listening sessions for OMB and the GSA to hear feedback from the FDP community
- FDP working group to review crosswalks between FSRS terminology to required FFATA terms/data points
- Host a webinar that trains on the use of the FSRS portal, including education on the different types of reports
- Work with COGR to promote FSRS changes
  - Access permissions in the FSRS portal (i.e., advocating for a similar model to NSF and NIH, which allow authorized officials to delegate authority to multiple grant officers to complete transactions on behalf of the institution)
  - Ability to “claim” or transfer awards
Support GSA!

The upcoming FSRS revamp is an opportunity to offer support to GSA

- Facilitate focus groups and discussions with the academic community during the development phase
- Host listening sessions for GSA on development of the new portal, specifically related to streamlining the process
- Offer GSA the opportunity for FDP to provide feedback on training materials
- Performing beta testing; and
- Support with outreach during the rollout phase, including facilitating sessions through SRA, NCURA, FDP and other relevant venues to raise awareness, including of any training materials and resources that will accompany the new portal
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Resources & Definitions


• SAM.gov | Contact. (n.d.). Retrieved November 6, 2022


• FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA); Sub-award Reporting System (FSRS); Data Definitions—Grant Reporting. (2022).

• Appendix A to Part 170, Title 2—Award Term. Retrieved November 6, 2022

• Grants Management: Observations on Challenges with Access, Use & Oversight. GAO report 23-106797.
USASpending Definitions

- **Awarding Agency** – The agency that is distributing the federal funding.

- **Funding Agency** – The federal agency funding an award. In some instances, one agency will make an award on behalf of another federal agency.
• **Award ID** – An agency-specific *unique identifier* for each individual award
  
  • FAIN; but it’s also...
  • The Subaward Number issued by PTE to Subrecipient
    • For example, 2(GG009371)
Definitions

- **Award Date** – the date entered as the *Subaward Obligation/Action Date* in the FFATA report.

- **Fiscal Year** – The federal government operates on a fiscal year that begins on October 1 and ends the following September 30.
  - Ex.) Oct. 1\textsuperscript{st} 2020 – Sept. 30\textsuperscript{th} 2021 = FY21

- Award Date determines the FY

- Ex.) If 3/17/2016 was entered as Subaward Obligation/Action Date, it will appear as FY16 data in USASpending.
• **Transaction** – Includes the initial contract, grant, loan, or cooperative agreement award and all amendments or modifications to that award.
USASpending Search

- DUNS of Subrecipient
- Award ID (subaward # issued by PTE to sub)
- Original Agreement Amount
- All modification amounts
- Agreement executed dates