

FFATA Subaward Reporting System (FSRS)

June 13, 2024

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Learning Objectives

At the end of this session, you will be able to:

- Identify and describe the purpose of FFATA and its related reporting requirements
- Identify the process of reporting subawards and modifications using the FSRS system and reviewing submissions using the usaspending.gov portal
- List strategies for ensuring accurate and complete reporting
- Identify and describe common reporting errors and how to avoid them





Agenda/Table of Contents

- Background
- Reporting requirements
- Subaward key data elements that must be reported
- Deadline to report subaward information
- Reporting subaward modifications
- De-obligating the award in FSRS
- FSRS user roles when sharing or transferring awards

- FFATA executive compensation requirements
- How to create a FFATA report in FSRS
- FSRS training video links
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 - Resources





Background

What is FFATA

- The Federal Funding Accountability Act (FFATA or Transparency Act) legislation requires information on federal awards to be made available to the public via a single, searchable website, which is <u>www.usaspending.gov</u>
- FFATA was signed on **September 26, 2006**, with intent to hold the government accountable for each spending decision
- FFATA allows prime awardees to fulfill their grant/contract subaward and executive compensation reporting requirements

What is FSRS

- The FFATA Subaward Reporting System (FSRS) is a reporting tool that federal prime awardees use to capture and report first-tier subawards and executive compensation data
- 2010: <u>www.fsrs.gov</u> was launched as the resource for prime awardees to report on FFATA-required subaward activity and executive compensation
- Subaward information entered in FSRS is displayed on <u>www.usaspending.gov</u> associated with the prime award furthering federal spending transparency





Reporting Requirements

Prime Awardee (AHS)

 Under the FFATA requirement (codified in 2 CRF Part 170), recipients (i.e., direct recipients) are required to report initial first-tier subawards of \$30,000 or more to the FFATA Subaward Reporting System (FSRS) against a prime award already reported by the federal government

Federal Government

- Prime award is reported in <u>www.usaspending.gov</u>
- Award is assigned FAIN (Federal Award Identification Number)
- Award can then be added into a prime awardee's worklist in <u>www.fsrs.gov</u> before their subaward reporting begins

Question: We receive a federal grant but do not use that funding to provide subawards, are we required to report?

Answer: No. If you do not subaward, you do not have to, and should not, report into FSRS. FSRS is used to capture and report subaward and executive compensation data on subawards to meet the FFATA requirements.



Subaward Key Data Elements That Must Be Reported

"What information will we need to have to report our subrecipient/subcontractor award in FSRS?"

FSRS repoi	rting requires the following data elements for any grant award equal to or greater than \$30K
•	Name of entity receiving the subaward
•	Amount of subaward Subaward obligation/action date
•	Funding agency
٠	Listing assistance number for grants (formerly CFDA#)
•	Program source
•	Award title descriptive of the purpose of the funding action
•	Location of the subaward entity (including congressional district)
•	Place of performance (including congressional district)
•	One of the leading identifier of the entity and its parent Total compensation and names of top five executives (same thresholds as for primes)





Obligation Date

Date the subaward agreement was signed/final signature date (e.g., 09/28/22)

It must match the reporting month in Section 14. of FFATA report)

14. Report Month: Sep 2022





Deadline to Report Subaward Information in FSRS

		May	202	4		
SU	MO	TU	WE	TH	FR	SA
28	29	30	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

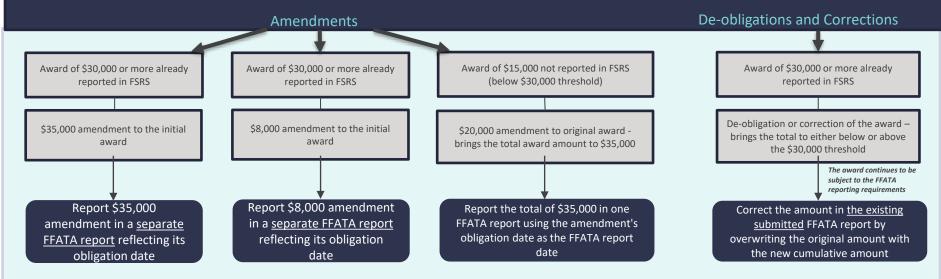
The prime awardee/recipient will have until the end of the month plus one additional month after a subaward is obligated to fulfill the reporting requirement.

For example, if a subaward was made on April 11, 2024, the prime recipient has until May 31, 2024, to report the subaward information.



Reporting Subaward Modifications

The decision tree below outlines reporting requirements pertaining to various scenarios of subaward's modifications



*Note: The VISION Grant Tracking Module <u>MUST</u> match the records in FSRS including the subaward's cumulative amount



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Fun Facts

USAspending portal - reporting results

- USAspending is the official open data source of federal spending information
- Serves as the front end of subaward reporting – "taxpayers view"
- Can provide summarized information regarding submissions





			Search A	ward Data Explore the Data 🗸	Download the Data V Find Reso
Advanced Search				Filter	by: ि Subawards ∨ Share
▼ Filters	2 Active Filters:				Learn how active filte
Learn which data elements are associated with certain search filters	TIME PERIOD RECIPIENT All Fiscal Years RECIPIENT Champlain	Community Services, Inc.			
Submit Search Reset search	TABLE TABLE	ТИЕ 🔮 МАР	CATEGORIES		
> Keyword	Spending by S	ub-Award			
∽ Time Period 🕕 🗧	What's included in this view of	the data?			
Fiscal Year 🗏 Date Range	award's recipient by clicking the		the Sub-Award ID or Prime Aw	ard ID for additional details on the prime a	ward. You can also learn more about the pri
✓ All Fiscal Years	read more				
✓ FY 2024 ✓ FY 2015	Sub-Contracts 0	Sub-Grants 10			
✓ FY 2023 ✓ FY 2014					
✓ FY 2022 ✓ FY 2013	Sub-Award ID 📥	Sub-Awardee Name 💧	Action Date 🚖	Sub-Award Amount 🖕	Awarding Agency 📥
✓ FY 2021 ✓ FY 2012					
✓ FY 2020 ✓ FY 2011	03400-HCBS0000041893	CHAMPLAIN COMMUNITY SERVICES INC	4/1/2022	\$220,000	Department of Health and Human S
✓ FY 2019 ✓ FY 2010	03460-SSA-2023-014	CHAMPLAIN COMMUNITY SERVICES INC	1/24/2023	\$62,195	Department of Health and Human S
✓ FY 2018 ✓ FY 2009	03400-CCS-HCBSWORK-FY24	CHAMPLAIN COMMUNITY SERVICES INC	2/28/2024	\$50.680	Department of Health and Human S
✓ FY 2017					
✓ FY 2016	03460-SSA-2022-014	CHAMPLAIN COMMUNITY SERVICES INC	8/25/2021	\$42,369	Department of Health and Human S
Show New Awards Only 🕕	0206544901	CHAMPLAIN COMMUNITY SERVICES INC	9/15/2017	\$41,571	Department of Health and Human S



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Two Reasons to Be Curious

- You can generate a mini "database" of your departments grant award submissions by searching all current awards during the year
- Instead of retaining FSRS reports, departments may use this data to enhance grants have been reported on time and correctly





Ad	vanced	Search
πu	vanceu	Jearen

> Keyword 🕕
> Time Period 🚯 📃
> Award Type
> Agency
> Treasury Account Symbol (TAS)
> Location 🚯
> Recipient
> Recipient Type
> Award Amount
✓ Award ID
PIID, FAIN, or URI
03460-SSA-2024-014 Award ID

Spending by Sub-Award

What's included in this view of the data?

View a list of sub-award transactions based on your selected filters. Click the Sub-Award ID or Prime Award ID for additional details on the prime award. You can also learn more about the prime award's recipient by clicking the Prime Recipient Name.

read more

Sub-Award ID 🧅 Sub-Awardee Name 🧅 Action Date 🧅 Sub-Award Amount 🧅 Aw	Awarding Agency	
		A
03460-SSA-2024-014 CHAMPLAIN COMMUNITY SERVICES INC 9/26/2023 \$37,251 Dep	epartment of Health and Human S	





Filter by: 🛛 🐻 Subawards 🗸

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Share

↓ Downloa

Download Process

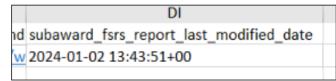
Select "Transactions", then "Everything"

Download Data			
3 Active Filters: Learn how active filters work 🥥			
TIME PERIOD RECIPIENT All Facal Years RECIPIENT Champilain Community Service	AWARD 10 0.0460-55A-2024-014 Award 10		
STEP 1 Choose Level of Data	STEP 2 Choose Columns	STEP 3 Download and Finish	
	Which level of data de	o you need?	
Award		Transaction	
Collects and combines all transactions into	high-level summaries of each award.	Includes all details of each award (known as modifications or amendments).	

Click into the highlighted report once the download is complete

🔋 > Computer Na	e: PF3179LW > Downloads > PrimeTransactionsAndSubawards_2024-04-09_H15M49S56030	883
	^ Name	
CLA	 Assistance_PrimeTransactions_2024-04-09_H15M49S59_1 Assistance_Subawards_2024-04-09_H15M50S05_1 	
nts	 Assistance_subawards_co2+-04-09_H15M30505_1 Contracts_PrimeTransactions_2024-04-09_H15M49S56_1 	
1	Contracts_Subawards_2024-04-09_H15M50S01_1	

This file will contain key information-including the submission date in the final column







USA Spending – Common Issue

Monthly Reporting

FSRS is designed to be used for monthly amended submissions

Ex.

Month 1 - 200k Month 2 - 50k

Month 3 – etc.

FSRS is not designed for "de-obligations", which can cause confusion

Incorrect	Incorrect	<u>Correct</u>
Month 1 – 200k	Month 1 – 175k	Month 1 – 150k
Month 2 – (50k)		Month 3 – 25k
Month 3 – 25k		







Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)

ne | Profile | Worklist | Create / Review Reports

Tuesday, September 5, 2023 | 2:56 pm | ahs.coiagunit@vermont.gov

FFATA reports # 2305VT5ADM

Prime Award Details

Note: Some fields have been pre-populated from data in FAADS+ and SAM; please review the report to identify and complete required fields that have not been pre-populated. For specific data sources by data element, consult the data dictionary found in the Tips section.

FFATA Report For Grants

1. Federal Award Identifier Number (FAIN): 2305/T5ADM

2. Federal Agency ID: 7530 a. Is this information correct?: Yes

3. Federal Agency Name: CENTERS FOR MEDICARE AND MEDICAID SERVICES

4. Prime Awardee Unique Entity ID (SAM): YLQARK22FMQ1

5. EFT Indicator:

6. Prime Awardee Name: HUMAN SERVICES VERMONT AGENCY OF

Report History	-
Nov 10, 2022 5:10 pm Report Revised	
Nov 10, 2022 5:10 pm Report Reopened	
Nov 10, 2022 5:09 pm Report Revised	
Nov 10, 2022 5:08 pm Report Reopened	
Nov 10, 2022 4:55 pm Report Submitted	

Pro	gress _
Y F	FATA Details
4	Federal Award Identifier Number
(FA	IN)
4	Federal Agency ID
4	Federal Agency Name
4	Awardee Unique Entity ID (SAM)
4	EFT Indicator
+	Awardee Name
1	Awardee Doing Business As
Nan	ne
1	Awardaa Addrees



Report submission dates

(original submission with de-

obligations)



USA Spending – Common Issue

Erroneous Submissions

If you make a submission to the FSRS portal and want to delete it, you can not do it alone. The Federal service desk is the only place a submission can be deleted.

• Call 866-606-8220





Reporting Subaward Modifications, Cont.

All **amendments** must be entered into the Grant Tracking Module on a <u>separate</u> <u>line</u> and have a supporting documentation/amendment agreement when requested by an auditor.

For more detailed guidance, please refer to <u>FIN-Grant</u> <u>Tracking Manual (Vermont. gov)</u>, pages 39-41

	GR	ANT TRACK	KING MODUL	.E					
		Grant Aw	vards		Active-Inact	live Active	*	SE	ARCH
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Award Information					F	ind View All	First	3 2 of	26 🕑 La
Business Unit: 03 Grant 03460-DA-2)isabilities Aging Inc		Srant contains (performance me	hasures?	Yes 🖲	No O	Ŧ
Start date: 07	/01/2021 B End Date	06/30/2022	Issued Date: 02	14/2022	Date entered:	06/07/2022			
Court Title Description	tion: DA/SSA Master Grant								-
*Address:	6 Q Attn Accounts Rece	ivable Dept							
	City: Burlington		State: VT	Zip:	05401				
BU Contact Name			State: VT		05401		_		
	McDonald,Grace			Phone:					
		UNDING. OVERALL		Phone:	802/241-0444	mount		000.00	
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Reporting Subaward Modifications, Cont

All **de-obligations** such as FMAP rate true-ups (normally processed annually) and other corrections must be entered into the Grant Tracking Module on a <u>separate line</u> and be supported with an explanation under "General Comments" section.

Closing letter or other documentation must be retained as to evidence true ups/corrections.

		GR	ANT TRA	ACKING N	NODUL	E				-	
			Grant	Awards			Active/Inactiv	Active	~	S	EARCH
rantee Supplier	r ID: 0000000	S50 Supplier na	ame: Howar	rdCenter Inc			Federal Gra Month:	antee Fis	cal Year	End	6
Award Informat	tion						Find	I View Al	l Fir	rst 🕚 20	of 23 🕑
Business Unit	: 03460 Q	BU Name: D)isabilities Agir	ng Ind. Living							l
Grant 03460-	DA-2022-EXAM	IPLE	Active/Ina	active Active	¥ G	rant contains	performance mea	sures?	Yes	No C)
#:									100		5
Start date:	07/01/2021	End Date:	06/30/2022	B Issued	Date: 08/	15/2021	Date entered: 0	6/14/2022			
Grant Title/Des	scription: Mas	ter Grant Agreeme	ent								
*Address:	6 Q A	ttn Accounts Rece	ivable Dept								
*Address:			ivable Dept								
	City: B	urlington	ivable Dept	St	ate: VT		05401				
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De-Obligating or Correcting the Award in FSRS

USAspending.gov tracks the cumulative award amounts; however, we cannot enter the negative amount in a separate report to either de-obligate amounts from subawards or make a correction. Therefore, any corrections of such sort should be made in the already existing submitted report via "Reopen" functionality.

EVIN	: 2205VT5MAP								
_	BACK TO LIST Award Details Existing Reports								
▶ <u>Sea</u>	> Search Filters								
Items 1	Items 1-2 of 2								
	Contract / Award Number -	Agency ID -	Agency Name -	Status	Source 🕶	Report Month 🔻	Options	\frown	
ସ୍କା	2205VT5MAP	7530	CENTERS FOR MEDICARE AND MEDICAID SERVICES	SUB	Grant	Dec, 2021	Save PDF	Reopen	Copy Report

Once report is reopened, process an overwrite of the report with the corrected data under "Subawardee Data" section on the left of the navigation screen.

Note: Do not use the overwrite function with amendments



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FSRS User Roles When Sharing or Transferring Awards

The Federal guidelines stipulate that only one registered FSRS user (i.e., AHS department) can report the subaward information under a federal grant. 1 registered user=1 FAIN. However, the role is transferrable within FSRS system and can be requested via fsd.gov helpdesk if another user has that FAIN on their worklist and has already reported subaward/s against it

Shared Awards

For the awards that are shared between multiple departments, such as Medicaid and SSBG, AHS Internal Audit Group is assigned to report on those awards. All departments must provide an Excel document with the required subaward information to the AHS Internal Audit Group at AHS.COIAGUnit@vermont.gov by the 1st of the month the reporting is due. If award funds are transferred to another department or agency, AHS departments must identify which AHS department or non-AHS department or agency bears the FFATA reporting responsibility. That determination must be explicitly stated on the Memorandum of Understanding/Agreement (MOA/MOU)

Transferring Awards

For the additional guidance pertaining to this topic, please refer to the policy located on AHS Intranet at <u>AHS Policy 2.01 FFATA Dept.</u> <u>Reporting Compliance MOU_MOA (sharepoint.com).</u>

Note: Info in the policy does not yet reflect the new required threshold of \$30,000 for reporting





FFATA Executive Compensation Requirements

In addition to the reporting requirements outlined for subrecipient/contractor, FFATA also includes a requirement for both prime recipients and subrecipient/contractor on reporting executive compensation.

The following criteria and items required for reporting are the same for both prime recipients and subrecipients/contractors, with the only key difference being the system they are reported in:

Key criteria

- 1. 80% or more of prior year annual gross revenues are from Federal awards; *and*
- 2. \$25 million or more in annual gross revenues are from Federal awards; *and*
- The public does not have access to compensation information filed under Securities and Exchange Commission (SEC) and IRS requirements

Items to be reported*

If key criteria one and two are met, the following items must be reported by the prime recipient

- 1. Total Compensation, and
- 2. Names of the top five executives

*Please note that FFATA reporting requirements are not applicable to classified information or if the organization had gross income of under \$300,000 from all sources

Executive Compensation Roles and Responsibilities:



Prime Recipient

Prime recipient report their executive compensation information in the System for Award Management (SAM) D

Subrecipient



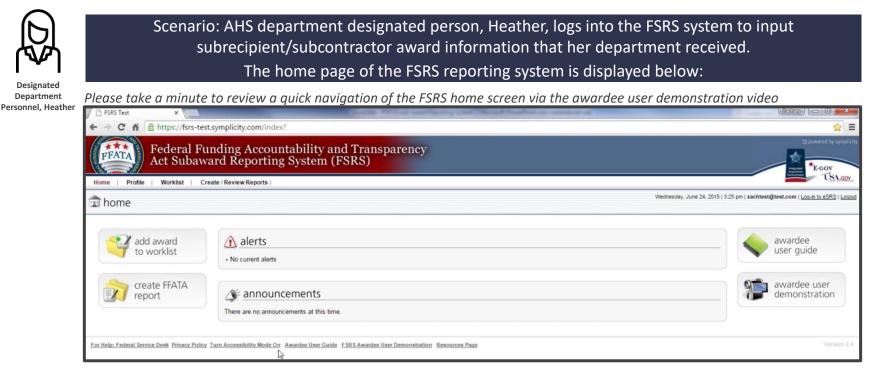
Subrecipient/Contractor

Subrecipient/Contractors provide this information to the prime recipients, who then enter this information into FSRS





How to Create FFATA Reports in FSRS



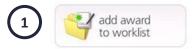
Link to awardee user guide: <u>https://fsrs.gov/documents/FSRS_Awardee_User_Guide.pdf</u> Link to FSRS navigation demonstration: <u>https://www.fsrs.gov/documents/FSRS_Awardee_User_Demonstration.mp4</u>



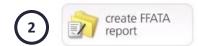


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How to Create FFATA Reports in FSRS, Cont



Worklist – organizational tool that allows the prime awardee/user to organize the awards for which they have reporting responsibility. Users can search for and view unassigned prime grants awarded to their registered unique entity ID (AHS) and add them to their worklist. Users can then create FFATA subawards against those prime awards.



Once a prime award has been added to the user's worklist, a FFATA report can be created. FFATA reports can be copied as the basis for a new report, edited, saved as a draft or deleted if not submitted yet.

For more information, see FSRS Vi	<u>deo</u> :
Worklist navigation	14:20 - 15:49
Create FFATA report navigation	15:50 – 28:31
Batch upload reports navigation	28:32 - 30:44





FSRS Training Video Links

Below are the resources found in the training video on FSRS.gov:

Торіс	Video Timing
Sections and fields found on the FSRS login screen	3:48 - 6:54
FSRS login/registration process	6:55 – 10:49
Navigation of the FSRS homepage	10:50 - 10:57
 Resources section webpage FSRS reporting guides Templates for batch upload of FSRS reporting data 	10:58 – 13:32
Profile section pageChange information on recipient profileChange password	13:40 – 14:19
Methods for submitting FSRS reporting data	14:20 - 30:44

Link to FSRS.gov video training: <u>https://www.fsrs.gov/documents/FSRS_Awardee_User_Demonstration.mp4</u> **Note**: Info in video does not reflect new reporting requirement threshold of \$30,000 per Title 2 of CFR.



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Terminology

Subaward	Monetary award made as a result of a Federal award to a grant recipient or contractor to a subrecipient or subcontractor, respectively
Prime awardee (aka federal grant recipient or contractor)	Non-federal entity that receives funds in the form of a grant or contract directly from the Federal Government. Agency of Human Services (AHS) is considered a "prime awardee" when registering in FSRS
Subrecipient/subcontractor	Non-federal entity that receives a subaward from a pass-through entity (i.e., prime awardee)







Questions



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Reed Cullen Senior-Assurance CLA (CliftonLarsonAllen) reed.cullen@CLAconnect.com | 781-402-6324



Amy Scalabrini Internal Auditor Vermont Agency of Human Services



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Resources

- The FFATA Subaward Reporting System (FSRS) website: <u>www.FSRS.gov</u>
- 2023 compliance supplement: <u>2023 Compliance Supplement</u> (whitehouse.gov)

Additional questions?

AHS departments may contact the AHS internal audit group at <u>AHS.COIAGUnit@vermont.gov</u>

All other departments, please reference the SOV contact list:

FIN-B5 Dept Contact List 03.29.2024.pdf (vermont.gov)

