



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**Office of Sustainable Housing and Communities**  
WASHINGTON, DC 20410-0050

<b>Program Policy Guidance OSHC 2012-08</b>
<b>Date:</b> May 15, 2012
<b>Subject:</b> Reporting Requirements for USA Spending.gov
<b>Status:</b> Current
<b>Applicability:</b> All OSHC Grantees
<b>Related Guidance:</b> None
<b>Comments:</b> Updated July 30, 2012

***Please note: This guidance pertains to required reporting for all recipients of federal funding as a consequence of the Federal Funding Accountability and Transparency Act of 2006. Though it provides relief for the requirement while the technical issues within HUD are addressed, this reporting remains your responsibility once the issue is resolved. Please refer to page 11 of the Terms and Conditions of your award for details.***

Several FY 2010 and FY 2011 grantees have reported problems entering their reporting information into USASpending.gov. The Office of Sustainable Housing and Communities have looked into this issue and has identified the cause as the result of a federal government technical error which we are currently working to address. We are working with the Office of Departmental Grants Management and Oversight to resolve this quickly. You will not be held responsible for this disrupting malfunction. However, there has been concern that audit findings are occurring for our grantees based on this technical error.

Once this has been resolved, you will be notified that the system is functional and you will be able to access your information on the Federal Funding Accountability and Transparency Act Sub Award Reporting System (FSRS). You will then need to report all sub awards made for your award. Once you do so, your records will become current as of the date you enter your data. You will be given a waiver of the reporting delay because it was the result of a federal government malfunction. **Once the grant awards are available for FSRS reporting, the responsibility for compliance returns to you.**

If you are still experiencing this problem after you have been notified that the system is functional, please bring it to our immediate attention. In the meantime, we ask for your continued patience and cooperation while we aim to correct this.

If you have any other concerns regarding this matter, please contact your OSHC Grant Officer.

## **Frequently Asked Questions:**

### **Q: Who is required to file a FFATA report in FSRS?**

The FFATA Sub-award Reporting System (FSRS) collects data from Federal prime awardees on sub-awards they make: a prime grant awardee is required to report on its sub-grants and a prime contract awardee is required to report on its sub-contracts. In accordance with 2 CFR Chapter 1, Part 170 REPORTING SUB-AWARD AND EXECUTIVE COMPENSATION INFORMATION, Prime Awardees awarded a federal grant are required to file a FFATA sub-award report by the end of the month following the month in which the prime awardee awards any sub-grant equal to or greater than \$25,000.

The reporting requirements are as follows:

- This requirement is for both mandatory and discretionary grants awarded on or after October 1, 2010.
- All sub-award information must be reported by the prime awardee.
- For those new Federal grants as of October 1, 2010, if the initial award is equal to or over \$25,000, reporting of sub-award and executive compensation data is required.
- If the initial award is below \$25,000 but subsequent grant modifications result in a total award equal to or over \$25,000, the award will be subject to the reporting requirements, as of the date the award exceeds \$25,000.
- If the initial award equals or exceeds \$25,000 but funding is subsequently de-obligated such that the total award amount falls below \$25,000, the award continues to be subject to the reporting requirements of the Transparency Act and this Guidance.

### **Q: I am a contractor/grantee that needs to file a FFATA, how do I register on FSRS?**

Step 1: Go to [www.FSRS.gov](http://www.FSRS.gov).

Step 2: Click on the "Awardees" link.

Step 3: Click the "Register" button on the right-hand side of the page under new awardees: register.

Step 4: Follow the on-screen directions to register for a new account. You will receive an email message in which you will need to validate to activate your account.

For more information, please visit:

[https://www.fsr.gov/documents/OMB\\_Guidance\\_on\\_FFATA\\_Subaward\\_and\\_Executive\\_Compensation\\_Reporting\\_08272010.pdf](https://www.fsr.gov/documents/OMB_Guidance_on_FFATA_Subaward_and_Executive_Compensation_Reporting_08272010.pdf)

### **Q: Do cooperative agreements have to be entered?**

Yes. OMB's August 27, 2010 guidance outlines the requirements for Federal Agencies and prime contractors and prime grant and cooperative agreement awardees (collectively "prime awardees") for reporting sub-award and executive compensation data pursuant to the Federal Funding Accountability and Transparency Act of 2006 and associated 2008 amendments (the "Transparency Act" or "FFATA"). In FSRS, use of the term "grants" includes both grants and cooperative agreements.

### **Q: Who is considered a Prime Awardee?**

Both Prime Contractors and Grant Recipients are considered "Prime Awardees" when registering.

### **Q: How will these prime awardees report this information?**

Prime awardees will report using the FFATA Sub-award Reporting System (FSRS). The tool will pre-populate, to the maximum extent possible, recipient information from existing Federal agency databases, such as the Central Contractor Registration System (CCR), to reduce the burden associated with this new FFATA reporting. All Federal contractors and prime grant recipients are required to register in CCR. User guides, FAQs, and an on-line demonstration are currently available at the FSRS website ([www.fsr.gov](http://www.fsr.gov))

for the contract sub-award reporting capability. Grant sub-award reporting user guides, FAQs, and an on-line demonstration will be incorporated into FSRS on October 29, 2010.

**Q: What is a sub-award?**

The Office of Management & Budget issued guidance identifying the requirement to report first-tier sub-awards on April 6, 2010; that guidance may be found at <http://www.whitehouse.gov/omb/open>. That guidance defines a sub-award as generally referring to a monetary award made as a result of a Federal award to a grant recipient or contractor to a sub-recipient or sub-contractor.

**Q: What guidance or other documents implement these FFATA reporting requirements?**

The Office of Management & Budget has issued guidance related to Open Government and Transparency to include a memo requiring the reporting of first-tier sub-awards on April 6, 2010 and specific instructions on the sub-award reporting on August 27, 2010. The guidance may be found at the OMB Open Government site at <http://www.whitehouse.gov/omb/open>.

On July 8, 2010, an interim FAR Rule with request for comments was published that contains information on the FFATA reporting requirements for Federal contracts. Comments were due by September 7, 2010.

PRA information collections regarding sub-award and executive compensation reporting requirements for grants and CCR registration for prime grantees was published on July 23, 2010.

**Q: Does the agency have a requirement to ensure FFATA sub-award reports have been submitted by the prime for grants the agency has awarded?**

No. There are no new Federal agency reporting requirements, beyond those already required by the Office of Management and Budget (OMB) Memorandum M-09-19. However, Federal agencies are strongly encouraged to ensure the accuracy and data quality of the award information they report.

*Prepared on May 15, 2012. For more information visit <https://www.fsrs.gov/>*