

Updated: December 16, 2010

FAQ1: If a recipient makes a subaward prior to the federal grant award date, as part of pre-award costs, what is the date of the subaward for reporting purposes?

Answer1: In this situation, the FSRS.GOV date of subaward is the same as the federal award date.

FAQ2: Will I have to report subawards for federal awards made prior to October 1, 2010?

Answer2: At this point in time, subaward reporting applies only to new awards made on, or after, October 1, 2010. The Office of Management and Budget (OMB) is, looking however, at ways to incorporate reporting for continuation awards made prior to October 1, 2010. If there are any changes or updates to the reporting requirements, EPA will notify our affected recipients.

FAQ3: Are foreign recipients required to report?

ANSWER3: Yes. 2 CFR 170.110 requires foreign award recipients to comply with subaward and executive compensation reporting requirements.

FAQ4: Are additional training opportunities and resources available?

ANSWER4: Yes, USAspending.gov includes a list of resources and training opportunities. Fsrs.gov includes a demonstration and user guide on its front page menus. Additionally, EPA is posting our guidance and FAQs on our internet and intranet pages.

FAQ5: If I have a question concerning my ability to report into Fsrs.gov, who should I contact?

ANSWER5: EPA maintains a list of FSRS points of contact here at: ***EPA Contacts***. Contacts are based upon the Regional Office making your award.

FAQ6: What if, when reviewing my award, I notice the listed DUNS number is incorrect?

ANSWER6: If you notice an incorrect DUNS number on your award, or are notified of a DUNS number discrepancy in reporting, contact the Grant Specialist listed on our award document. They can initiate a change process.

FAQ7: Is the current \$25,000 threshold for subaward reporting cumulative or per action?

ANSWER7: The threshold is cumulative for subawards, and their amendments, to the same recipient for the same award. For example, a two year federal award is made to recipient A who makes \$50,000 in subawards to subrecipients X and Y. Subrecipient Y receives a \$25,000 in

year one. Subrecipient X receives \$15,000 in year one and \$10,000 more in year two. Subrecipient Y must report the awards in year one and subrecipient X in year 2; in both cases, once the \$25,000 threshold is reached.

FAQ8: Our Drinking Water SRF program is "Jointly" operated by two state agencies. Some of the set-aside funding is passed on from the State Environmental Agency to the State Health agency. If the State Health agency were to award grants for \$25,000 or more for activities such as for security for Drinking Water sources to a non-State recipient, would either department be required by FFATA to report under FFATA those entities getting grants?

ANSWER8: Yes. Under the definition of "Grantee" in 40 CFR 31.3, the recipient is the entire legal entity even if only one agency is named in the application or performs the grant. Thus, any "intra-state" transfers of grant funds would not be subawards between state agencies. Once the State Health Department makes the \$25 k subaward to a non-state entity the FFATA reporting requirements are triggered.

FAQ9: Are competitive awards exempt from any of these requirements?

ANSWER9: No. The requirement for subaward and executive compensation reporting, and DUNS and CCR registration apply to all awards, whether or not they are competitive.