



FEMA

**Grant Programs Directorate Information Bulletin
No. 350
November 23, 2010**

MEMORANDUM FOR: All State Administrative Agency Heads
All State Administrative Agency Points of Contact
All Urban Areas Security Initiative Points of Contact
All State Homeland Security Directors
All State Emergency Management Agency Directors
All Eligible Regional Transit Agencies
All Private Sector Transportation Security Partners
All Public and Private Sector Port Security Partners
All Tribal Nation Points of Contact

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Grant Programs Directorate

SUBJECT: The Federal Funding Accountability and Transparency Act of 2006 (FFATA) or Transparency Act - P.L.109-282, as amended by section 6202(a) of P.L. 110-252

The purpose of this bulletin is to help clarify requirements under the Federal Funding Accountability and Transparency Act of 2006 (FFATA) (P.L.109-282), as amended by Section 6202(a) of the Government Funding Transparency Act of 2008 (P.L. 110-252).

FFATA, under the 2006 legislation, requires the Office of Management and Budget (OMB) to provide full disclosure to the public of Federal spending through a single searchable database that identifies all entities or organizations receiving Federal funds beginning in fiscal year (FY) 2007. The website was launched in December 2007 and is maintained by the OMB. The public website, which can be found at www.USAspending.gov, is searchable by recipient, State, Congressional District, Federal government agency/department/program, and type of product or service. The website content is supported through the FFATA Sub-award Reporting System (FSRS) found at www.fsrs.gov.

FFATA of 2006 has since been amended by section 6202(a) of Government Funding Transparency Act of 2008 (P.L. 110-252) to require specific financial disclosure under certain Federal awards for highly compensated officials, specifically the name and total compensation of the five most highly compensated individuals. The legislation required OMB to promulgate

regulations consistent with those of the Securities and Exchange Commission in disclosing this same kind of information.

As defined by the OMB, all **new** Federal awards of \$25,000 or more as of October 1, 2010, are subject to FFATA reporting requirements. The Transparency Act definition of “Federal awards” includes not only prime awards for grantees, cooperators, and contractors, but also awards to sub-recipients. Starting October 1, 2010, awards of less than \$25,000 do not have any reporting requirements. Awards in the amount of \$25,000 or more do have FSRs reporting requirements on sub-awards, as well as on highly compensated individuals. There is a new functionality in the OMB system as of October 29, 2010, the grant sub-awards reporting functionality became available for grantees to report sub-awards against new grants for \$25,000 or over and awarded on or after October 1, 2010.

What must be reported?

FFATA prescribes specific reporting elements for:

1. Sub-awards greater than \$25,000:
 - a) Name of entity receiving award;
 - b) Amount of award;
 - c) Funding agency;
 - d) The Catalog of Federal Domestic Assistance program number;
 - e) Award title (descriptive of the purpose of the funding action);
 - f) Location of the entity and primary location of performance including city, state, and Congressional district;
 - g) Dun & Bradstreet (D&B) DUNS Number of the entity, and its parent if applicable; and,
 - h) Total compensation and names of top five executives (same thresholds as for prime recipients).

2. The Total Compensation and Names of the top five executives if:
 - a) 80% or more of annual gross revenues are from Federal awards (contracts, sub-contracts and Federal financial assistance), and \$25,000,000 or more in annual gross revenues from Federal awards; and,
 - b) Compensation information is not already available through reporting to the Securities and Exchange Commission.

Classified information is exempt from the prime and sub-award reporting requirement as are contracts with individuals. Because the information requested is reflective of award data and not descriptive as to programmatic goals and outcomes related to vulnerabilities, Sensitive Security Information (SSI) is not a concern under 49 CFR Section 1520. Award titles and amounts are not SSI.

Grantees are currently required to register with the Central Contractor Registration System (CCR). If they have not already done so, refer to <http://www.ccr.gov> . Grantees are required to register in

the FFATA Sub-award Reporting System (FSRS) in order to report sub-awards and sub-award executive compensation.

Sub recipients have an obligation to provide to the grantees (direct recipients of Federal funding) all information required for the FSRS.

To learn more about sub-award reporting and Federal spending transparency, visit USA Spending.gov where you can sign up to receive updates via e-mail. The General Services Administration's Government-wide Policy Group provides information about training events; posts copies of briefings and webinars; and, helps keep the public informed about any changes to the system and provides access to Frequently Asked Questions. The "What's New" page serves as a central point for new information on FFATA policy, guidance and system information at <http://www.usaspending.gov/learn?tab=What%27s+New>.

Questions may be directed to the Centralized Scheduling and Information Desk at askcsid@dhs.gov or 1-800-368-6498.