



# FFATA Procedures

Related Policy: [FFATA Policy](#)

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## Pre-Award Process

During the proposal process, Pre-Award will be responsible for sending the required FFATA data collection forms to the subrecipients for subawards with an anticipated cumulative value greater than or equal to \$25K across the life of the project. For both grants and contracts, FFATA data elements will be gathered through the issuing of the FDP Research Subaward Agreement - Attachments 3B - Subrecipient Contacts and 3B page 2 - Highest Compensated Officers.

If the initial award is equal to or over \$25,000, reporting of subaward and executive compensation data is required. If the initial award is below \$25,000 but subsequent 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 subaward amount falls below \$25,000, the award continues to be subject to the reporting requirements of the Transparency Act.

Grant and Contract Administrator (GCA) Responsibilities:

- Send the FFATA document to each subrecipient (over \$25,000) as applicable prior to submission.
  - If the initial award is below \$25,000 but subsequent 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. The GCA will ensure that when this threshold is reached that the FFATA documents are sent to the subrecipient.
- Prepare subaward agreements in accordance with our Subrecipient Monitoring policy and procedure. This step is important to ensure FFATA eligible awards are identified.
- The GCA should maintain the proposal file until the fully executed award and required FFATA data documents are received.
- If FFATA is applicable and the form has not been returned by all subrecipients, the GCA must follow up with the subrecipient. Contact a minimum of two times to try to get the information. After the second request the GCA should notify the PI of the missing information and ask that the PI contact the subrecipient to follow up. At this time, GCA should also notify the PI that any missing subrecipient information/FFATA document will delay the set-up of accounts if the project is funded.
- If the GCA cannot get the required information the GCA should notify the Assistant Director of Pre-Award who will make the next step determination.
- Once the fully executed award and required FFATA data documents are received, prepare the *Subrecipient Document Cover Sheet* marking the appropriate response on the cover sheet indicating whether or not the award is FFATA applicable and forward to the PARA within 3 business days of receipt.

## Post-Award Process

Once the subaward has been fully executed and forwarded from Pre-Award along with the *Subrecipient Document Cover Sheet*, the Post Award Research Administrator (PARA) will use these documents to complete the *Subrecipient Action Log (SAL)*, the FFATA link within the PeopleSoft Grants Module, and to populate the *FFATA Subaward Reporting System*

(FSRS). FFATA data will be entered in the FSRS by the end of the month following the month in which the subaward is executed. Click [here](#) for the full FSRS User Guide.

Upon completion of all required data entry and FFATA submission, the complete subaward documentation will be scanned and saved (using the following naming convention *P/G#\_Subaward#\_PI-LastName.pdf*) in the ORSP shared drive **Subagreement Folder** and a hard copy will be filed in the ORSP Award files.

PARA Responsibilities:

- PARA processes subaward agreements and subaward amendments in accordance with our Subrecipient Monitoring policy and procedure.
- If the initial award is below \$25,000 but subsequent 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.
  - The PARA will verify that when this threshold is reached that the FFATA reporting requirements have been identified by the GCA.
- Subawards with FFATA reporting requirements are identified and:
  - The PARA will enter the FFATA data into the FFATA link within the PeopleSoft Grants Module.
    - Under *Resources* Tab (under *Award Profiles*) complete the following:
      - Click on *FFATA Award Project Data*
        - Complete the *Subrecipient Data* section only (it is not necessary to complete the Subrecipient Place of Performance section)
      - If applicable check the box that indicates “*Subrecipient Indication of Reporting Applicability*”
        - It is not necessary to complete the Highly Compensated Officers section
  - The PARA will enter the FFATA data into the FSRS system. FFATA data will be entered in the FSRS by the end of the month following the month in which the subaward is executed.
    - After submitting the FSRS report the PARA will generate a FFATA PDF Report to be uploaded into the “*FFATA Monthly Reports Submitted*” folder in the ORSP shared drive.
  - The PARA will enter the FFATA data onto the *Subrecipient Action Log (SAL)* located in the *Subrecipient Action Log* folder in the ORSP shared drive.
- The PARA will send a monthly update to the Post Award Manager identifying all FSRS reports entered for the month.
  - No less than quarterly, the Post Award Manager will:
    - Run a query of all awards that have been issued a subaward from a Pre-Award PeopleSoft module against the *Subrecipient Action Log (SAL)* to confirm all subawards have been captured in the SAL and that all FFATA data has been entered into the FFATA tabs within the PeopleSoft Grants Module.
    - Compare the GM\_ALL\_FFATA\_RESOURCES query to ensure there is a FFATA PDF report in the “*FFATA Monthly Reports Submitted*” folder in SharePoint for each subaward with FFATA reporting requirements.
  - The Post-Award Manager will work with the PARA with any discrepancies.
- Upon establishment of the PeopleSoft project, the Senior Post Award Administrators verify that FFATA data has been captured in PeopleSoft for Federally funded award that has subawards >= \$25K.

## Related Links

[Research Subaward Agreement - Attachment 3B - Subrecipient Contacts](#)

[Research Subaward Agreement - Attachment 3B Page 2 – Highest Compensated Officers](#)

*Last Updated: October 2015*