

2.304 FFATA Reporting

In order to enhance the transparency of federal spending, the Federal Funding Accountability and Transparency Act (FFATA) outlines reporting requirements (as directed by the Act of 2006 and associated 2008 amendments) that include the maintenance of a single, searchable website (USAspending.gov) that contains information on all federal spending awards.

I. Details of Policy for UH Projects

RCUH will assist the University of Hawai'i with FFATA reporting requirements; refer to the UH Office of Research Services (ORS) website: <http://www.ors.hawaii.edu/index.php/ffata>.

A. Responsibilities

1. ORS has the overall responsibility to ensure compliance with FFATA reporting requirements on first-tier subawards related to prime federal grants and contracts that meet federally defined thresholds. ORS is responsible for submitting required information to the federal government through the FFATA Subaward Reporting System (FSRS.gov), in accordance with established deadlines.
2. The Principal Investigator (PI) and Fiscal Administrator (FA) are responsible for the following:
 - a. Determining the necessity of FFATA reporting for first-tier subawards;
 - b. Obtaining the required FFATA data elements; and
 - c. Confirming that the subrecipient or vendor has obtained a DUNS number and a valid [System for Award Management \(SAM\)](#) registration.
3. The RCUH is responsible for ensuring that the FA has provided the required FFATA data elements and confirmation of a valid SAM registration prior to approving any Purchase Order (PO) that is subject to FFATA reporting.

B. Procedures

1. For all prime federal awards (grants or contracts), ORS will indicate on the award notification whether it is a grant (including a cooperative agreement) or contract.
2. When a subaward is issued, refer to the [FFATA Reporting Guidelines Decision Tree Attachment A](#) to determine whether the subaward is subject to FFATA reporting. If the subaward is subject to FFATA, the FA must do the following:

- a. Obtain the FFATA data elements through the FDP Research Subaward Agreement, Attachment 3B Pages 1 and 2, available at http://sites.nationalacademies.org/PGA/fdp/PGA_063626;
 - b. Obtain validation of SAM registration from the subawardee or directly from the SAM website (SAM registration must be valid for at least two months after the anticipated PO encumbrance date; use the [Letter to Subawardee](#) to request information); and
 - c. Electronically attach the FFATA data elements (located in Attachment 3B of the FDP Research Subaward Agreement or completable online in the PO) **and** SAM validation to the PO when submitting to RCUH for approval.
3. RCUH will verify that the required FFATA data elements (FDP Research Subaward Agreement) and SAM registration have been electronically attached prior to approval of the PO.
 4. ORS will generate a monthly report to identify all subawards and vendor payments that meet the FFATA reporting criteria and obtain FFATA data from these forms.
 5. ORS will prepare the FFATA reports and upload by the deadlines established by the federal government. Refer to the [University of Hawai'i FFATA Reporting Guidelines](#) for deadlines.

Date Revised: 2/02/2017