

7 Federal Funding Accountability and Transparency Act Subaward Reporting System Policy and Procedure

Institutional Policy


Title:	Federal Funding Accountability and Transparency Act Subaward Reporting System Policy and Procedure
Responsible Officer:	Grant Managers; Grant Assistant; Vice President Research Administration
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1 Purpose

The purpose of this document is to define the requirements and procedure for reporting all contracted subawardees for Federally-awarded contracts and orders valued greater than or equal to \$25,000 on and after October 1, 2010 under the Federal Funding Accountability and Transparency Act (FFATA) Subaward Reporting System (FSRS).

2 Scope

The policy applies to all subcontracts awarded by HRC where HRC is the Prime Grant Recipient for Federally-awarded contracts and orders greater than or equal to \$25,000.

3 Definitions

FFATA: Federal Funding Accountability and Transparency Act

Subcontract / Subawardee: an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a program for which the recipient received Federal support

FSRS: Federal Subaward Reporting System

4 Policy Statement

Federal Guidelines Require that Prime Contractors and Grant Recipients awarded a Federal contract, grant or order that is greater than or equal to \$25,000 as of October 1, 2010, are subject to Federal Acquisition Regulation clause 52.204-10 (Reporting Executive Compensation and First-Tier Subcontract Awards) in which the Prime Grant Recipients are subject to FFATA sub-award reporting requirements as outlined in the Office of Management and Budgets guidance. While the guidance states that the prime awardee is required to file a FFATA sub-award report by the end of the month following the month in which the prime recipient awards any sub-grant greater than or equal to \$25,000, Research Administration will continue to report all sub-awards issued of any amount.

5 Procedures

1. A subcontract agreement is generated by the Grant Manager
2. The Subcontract is given to the Grant Assistant for execution, tracking and FSRS reporting
3. The grant administrator enters the subcontract into the FSRS database at <https://www.fsr.gov/index>
4. The subcontract information must be entered no later than the end of the month following the month in which the subcontract was issued to the sub recipient.
5. Grant administrator saves the generated report from FSRS to the shared drive
6. Any updates subsequent to the original submission should be saved along with the original submitted copy.
7. Grant administrator enters the subcontract information into a tracking spreadsheet saved to the shared drive
8. Grant Managers check the FSRS tracking spreadsheet monthly to make sure there are no omissions, and that all reported information is accurate

6 Related Policies (Contact Research Administration for all Documents)

- <https://www.fsr.gov/index>
- FSRS Tracking Document