Compliance with the Federal Funding Accountability and Transparency Act

Policy Type: Administrative
Responsible Office: Office of Sponsored Programs
Initial Policy Approved: 01/07/2013
Current Revision Approved: 01/07/2013

Policy Statement and Purpose

The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The intent is to empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce wasteful spending in the government. The FFATA legislation requires information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website, which is <www.USASpending.gov>.

Effective October 1, 2010, the FFATA Subaward Reporting System (FSRS) became the reporting tool federal prime awardees (i.e. prime contractors and prime grants recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet the FFATA reporting requirements. Prime contract awardees will report against sub-contracts awarded and prime grant awardees will report against sub-grants awarded. The sub-award information entered in FSRS will then be displayed on <www.USASpending.gov> associated with the prime award furthering federal spending transparency.

The Office of Sponsored Programs (OSP) will be responsible for updating the FSRS on a monthly basis to ensure VCU compliance with FFATA.

Noncompliance with this policy may result in disciplinary action up to and including termination. VCU does not tolerate any form of retaliation against an employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation.

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Who Should Know This Policy

All individuals involved in sponsored programs are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

Definitions

Subcontract/Subaward/Subagreement—
The document written under the authority of, and consistent with the terms and conditions of grant, contract or cooperative agreement that transfers a portion of the research or substantive effort of the prime award to another institution or organization.

Subcontractor/Subawardee/Subrecipient—
The third party performing substantive sponsored project services under a subcontract or subaward.

Contacts

The Office of Sponsored Programs (OSP) officially interprets this policy. The Office of Sponsored Programs is responsible for obtaining approval for any revisions as required by the policy Creating and Maintaining Policies and Procedures through the appropriate governance structures. Please direct policy questions to the Office of Sponsored Programs.

Procedures

1. The OSP Database, VCUeRA, will capture the applicability of FFATA. OSP staff will enter the data at the time of award.
2. The Post Award Team, when processing subawards and subcontracts, will ensure that all subawardees and subcontractors are registered in the Federal Central Contractor Registration (CCR) database by searching the CCR for entries. Those not registered will be required to register prior to a subaward being issued.
3. On a monthly basis, the Post Award Team will run a report from VCUeRA to identify new or modified subawards and subcontracts to be reported.

4. On a monthly basis, the Post Award Team will run a report in Banner to identify any vendor information to be reported under applicable contracts. Departments may be contacted to obtain additional information following evaluation of these reports.

5. Following collection of the required information, OSP’s Post Award Team will enter the data in fsrs.gov on a monthly basis.

**Forms**

There are no forms associated with this policy and procedure.

**Related Documents**

Related documents are critical to the development of corresponding policies and procedures. Related documents include federal regulations, state regulations, state policies, and VCU policies, procedures and guidelines.


**Revision History**

This policy supersedes the following archived policies:

Approval/Revision Date  None – New Policy

**FAQs**

1. My subrecipient does not want to register.

   All subrecipients are required to register in the CCR to ensure proper reporting. Should a potential subrecipient choose not to register, they will not be eligible to receive a subaward.
2. Are international subrecipients required to register in the CCR?

All subrecipients are required to register in the CCR.