

2.304 FFATA Reporting

Effective Date: 10/29/24

Prior Dates Amended: 08/13/17; 06/19/23

I. PURPOSE

To ensure compliance with the reporting requirements of the Federal Funding Accountability and Transparency Act (FFATA). FFATA mandates the maintenance of a single, searchable website containing information on all federal spending awards, which enhances transparency in federal spending. The policy outlines specific responsibilities and procedures for University of Hawai'i (UH) projects under the purview of the Research Corporation of the University of Hawai'i (RCUH).

II. DEFINITIONS

- A. **Federal Funding Accountability and Transparency Act (FFATA):** In order to enhance the transparency of federal spending, FFATA outlines reporting requirements (as directed by the Act of 2006 and associated 2008 amendments) that include the maintenance of a single, searchable website ([Government Spending Open Data | USAspending](#)) that contains information on all federal spending awards.
- B. **Subcontract:** Any agreement between the awardee of a prime contract and a subcontractor/vendor for goods or services procured for the performance of the prime contract.
- C. **Vendor:** Any individual or other legal entity who provides the delivery of goods, products, services, and/or equipment under the terms of an RCUH purchase order/contract, and who acts directly or through its agents or employees. "Vendor" also includes the term "contractor," and a vendor may be referred to as a payee.

III. POLICY

A. Details of Policy for UH Projects:

1. RCUH will assist the University of Hawai'i with FFATA reporting requirements; refer to the UH Office of Research Services (ORS) website: [Federal Funding Accountability and Transparency Act \(FFATA\) – Office of Research Services \(hawaii.edu\)](#).

i. Responsibilities

- a. ORS has the overall responsibility to ensure compliance with FFATA reporting requirements on first-tier subawards (issued by ORS) and subcontracts (i.e., vendor agreements under prime federal contracts) 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](https://www.fsr.gov)), in accordance with established deadlines.
- b. The Principal Investigator (PI) and Fiscal Administrator (FA) are responsible for the following:
 1. Determining the necessity of FFATA reporting for first-tier subawards and subcontracts;
 2. Obtaining the required FFATA data elements; and
 3. Confirming that the subrecipient has obtained a valid [SAM.gov | Home](https://sam.gov) registration, and that the Unique Entity ID (UEI) on the SAM registration matches the UEI on the subaward.
- c. 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 (with the exception of subawards executed by ORS).
- d. 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.

ii. Procedures

- a. For subawards subject to FFATA reporting, the required FFATA data elements and SAM validation will already be included in the subaward.
- b. For subcontracts (i.e., vendor agreements under prime federal contracts) subject to FFATA reporting, use the [Letter to Subcontractor](#) to request information, and electronically attach the FFATA data elements (completable online in the PO) and SAM validation to the PO when submitting to RCUH for approval. The validation of SAM registration can be obtained from the vendor or directly from the SAM website; registration must be valid for at least two months after the anticipated PO encumbrance date.

1. RCUH will verify that the required FFATA data elements and SAM validation have been electronically attached prior to approval of the PO.
- c. 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.
- d. 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.

IV. CONTACT INFORMATION

RCUH Procurement
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V. REFERENCES

- A. [Policy 2.206 Administration of UH ORS Subawards](#)