Frequently Asked Questions

FFATA DUNS, CCR, Executive Compensation, and Subaward Reporting for SCBGP Grants

A. General

1. Who must report on subaward and executive compensation information?

2. How should a grantee report on awards that are initially under $25,000 but subsequently receive additional funds that bring the total award over $25,000? What about awards that are initially over $25,000 but are subsequently reduced to less than $25,000?

3. When must grantees report?

4. Where do grantees report?

5. What information are grantees required to report?

6. I'm already filing annual progress reports and periodic financial reports with SCBGP. Does my institution have to file with FSRS too?

7. How can I get more information on the FFATA requirements?

B. CCR and DUNS Requirements

1. Is a Dun & Bradstreet Data Universal Numbering System (DUNS) Number required to receive SCBGP grant funds?

2. Must a subrecipient organization have a DUNS number for a subaward less than $25,000?

3. Must a grantee institution have an active Central Contractor Registry (CCR) registration at the time they apply for an award?

4. What happens if, for example, my institution applies for an award on October 30 and their CCR registration expires on November 2?

C. Subaward and Executive Compensation Data

1. What is a FAIN?

2. I have a subcontract on my award with a vendor. Does my institution need to report this under the subaward reporting requirements?

3. Where do we report executive compensation?

4. Whom do I contact at SCBGP if the agency-provided data in FSRS or USASpending appears incorrect?

A. General

1. **Who must report on subaward and executive compensation information?**
    Recipients of SCBGP grants must report executive compensation and subaward information for all grants awarded on or after October 1, 2010.

2. **How should a grantee report on awards that are initially under $25,000 but subsequently receive additional funds that bring the total award over $25,000? What about awards that are initially over $25,000 but are subsequently reduced to less than $25,000.**
    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 and this Guidance.

3. **When must grantees report?**
    In accordance with 2 CFR Chapter 1, Part 170 REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION, grantees are required to file a FFATA subaward report by the end of the month following the month in which they make any subaward obligation equal to or greater than $25,000.

4. **Where do grantees report?**
    Do not report directly to SCBGP. The FFATA Subaward Reporting System (FSRS) is 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.   That site is https://www.fsrs.gov/. 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.

5. **What information are grantees required to report?**
    Recipient organizations are only required to report subaward and executive compensation information. All other information is pre-populated from existing Federal agency databases to the

maximum extent possible, and may be reviewed by recipients for data quality in the FSRS. Upon completion, FSRS.gov will send the following subaward information for publication on USASpending.gov:

a. The data about subawards greater than or equal to $25,000:
    i. Name of entity receiving award
    ii. Amount of award
    iii. Funding agency
    iv. CFDA program number (for grants)
    v. Program source
    vi. Award title descriptive of the purpose of the funding action
    vii. Location of the entity (including congressional district, as applicable)
    viii. Place of performance (including congressional district, as applicable)
    ix. Unique identifier of the entity and its parent
    x. Total compensation and names of top five executives (same thresholds as for primes)
b. The Total Compensation and Names of the top five executives if:
    i. More than 80% of annual gross revenues from the federal government, and those revenues are greater than $25 million annually and
    ii. Compensation information is not already available through reporting to the SEC

*Definitions for data elements may be found in the data dictionaries maintained at www.USASpending.gov.

6. **I'm already filing annual progress reports and periodic financial reports with SCBGP. Does my institution have to file with FSRS too?**
Yes. The FSRS reporting process is a separate process from reporting on the technical and financial progress of your projects. Therefore, you must file Transparency Act reports with FSRS for any subawards provided under your grant.

SCBGP performance reports and financial reports are unrelated to Transparency Act reporting and you should continue filing these reports with SCBGP in accordance with established reporting requirements.

7. **How can I get more information on the FFATA requirements?**
For more information on the FFATA requirements, may review the Federal Regulations found in 2 CFR 170 Reporting Subaward and Executive Compensation Information.

You may also visit the Frequently Asked Questions section at www.fsrs.gov. Awardee guides and demonstrations are also available on the website for help in entering your data into the system.

Back to Top

B. CCR and DUNS Requirements

1. **Is a Dun & Bradstreet Data Universal Numbering System (DUNS) Number required to receive SCBGP grant funds?**
    Yes, a DUNS number is required to receive SCBGP grant funds.

2. **Must a subrecipient organization have a DUNS number for a subaward less than $25,000?**
    Yes. Grantees must ensure that all first-tier subrecipient entities (defined at 2 CFR Part 25, subpart C) have received a DUNS number at the time the subaward obligation is made, regardless of the dollar level of the subaward.

3. **Must a State department of agriculture grantee have an active Central Contractor Registry (CCR) registration at the time they apply for an award?**
    Yes. Each State department of agriculture that applies for an award must be registered in the CCR prior to submitting an application.

4. **What happens if, for example, my institution applies for an award on October 30 and their CCR registration expires on November 2?**
    The recipient must maintain the currency of information in the CCR until the final financial report required under this award is submitted or the recipient receives the final payment, whichever is later. This requires that recipients review and update the information at least annually after the initial registration, and more frequently if required by changes in the information.

    If a recipient has not complied with the requirement to maintain an active CCR registration with current information, SCBGP may determine that the institution is not qualified to receive an award.

Back to Top

C. Subaward and Executive Compensation Data

1. **What is a FAIN?**
    A FAIN is a Federal Award Identification Number (e.g., 12-25-B-0123) and is the same as the SCBGP grant number assigned to your grant. According to OMB Federal Register Notice published on September 14, 2010, a FAIN is used to identify new Federal grants and cooperative agreements that are subject to executive compensation and subaward reporting, and differentiates these awards from other awards or obligating actions that provide additional funding under continuing awards funded in prior fiscal years.

2. **I have a subcontract on my award with a vendor. Does my institution need to report this under the subaward reporting requirements?**
    The subaward reporting requirements do not apply to vendor relationships when a prime recipient procures property and services needed to carry out the project or program as described in Sec. ___.210 of the attachment to OMB Circular A–133, ''Audits of States, Local Governments, and Non-Profit Organizations.'' The reporting requirements only apply to subawards, which are defined as a legal instrument that provides support for the performance of any portion of the substantive project

or program for which you received the award and that you as the recipient award to an eligible subrecipient. A subaward may be provided through any legal agreement, including an agreement that you or a subrecipient considers a contract.

3. **Where do we report executive compensation?**
Recipients of SCBGP awards subject to the executive compensation reporting requirement should provide this information in their CCR profile as part of the registration and updating process. Subrecipients subject to the executive compensation requirements but who have not already provided it in their CCR profile should provide this information to the prime awardee for reporting through www.FSRS.gov.

4. **Whom do I contact at SCBGP if the agency-provided data in FSRS or USASpending appears incorrect?**
Grantees should contact SCBGP personnel directly with information about any data quality issues regarding their grants. Additionally, in the FSRS system grantees will see a red flag next to certain pre-populated data fields. Users can indicate that the data being auto-populated is incorrect by marking the "is this information correct?" field "no." The grantee is then required to explain their response. While the submitted FFATA report data is not changed, the flag designation for the field, and the explanation of that flag, is viewable by SCBGP and the discrepancy will be reviewed.

5. **My State has multiple grants from SCBGP but many of them are not listed in www.FSRS.gov. Is there a problem with the system?**
SCBGP implementation of the FFATA subaward reporting requirements is limited to grants awarded after October 1, 2010. So even if your state has several awards issued before October 1, 2010, those awards will not appear.

6. **How long after my award is issued will it appear in FSRS.gov for reporting?**
In most cases, awards should be available in FSRS.gov for reporting purposes within a month of the period of performance start date listed on the Grant Agreement. Submission of grant award information from SCBGP requires transmission through multiple government systems before it becomes available in USASpending.gov. Time is then required for USASpending.gov to successfully transmit the data to FSRS.gov; only then is it available for subaward and executive compensation reporting.

7. **What should I do if my award is not available in FSRS.gov for reporting?**

   SCBGP has received reports of grants that require subaward reporting through FSRS.gov not appearing on the site and being unavailable for reporting. In these situations, we recommend grantees take the following actions:

   a. Review the SCBGP Award Terms and Conditions and confirm that the subaward reporting requirements apply to that particular grant.

b. If the award is over a month old, check USASpending.gov to see if the information has already been transmitted by SCBGP. Award information may take at least a month before appearing in USASpending.gov so grantees should wait a bit longer before attempting to report again.
    i. If the award is over a month old and the data is available in USASpending.gov, contact the Federal Service Desk (www.FSD.gov) or 1-866-606-8220 for assistance with making it available in the FSRS.gov system.
    ii. If the award is over a month old and the data is not yet available in USASpending.gov, contact the SCBGP personnel for assistance.

[Back to Top](#)