



Federal Funding Accountability and Transparency Act (FFATA) – *Final Rule*

FAR Clause 52.204–10 *(Aug 2012)*
Effective: August 27, 2012



The Trusted Integrator for Sustainable Solutions

FFATA

- ▶ *Enacted* to empower American *public* with the ability to hold the Government *and its Contractors* accountable for each spending decision.
- ▶ *Objective* to reduce wasteful spending in the Government

FFATA

- ▶ **Part 1:** Report Prime Contractor Executive Compensation: www.sam.gov
 - ▶ **Part 2:** Report First Tier Sub Award Information: www.fsrs.gov
 - ▶ Public Access: www.USASpending.gov
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When does FFATA Reporting apply?

- ▶ When the Prime Contract contains:
 - Interim Rule – FAR clause 52.204-10 (*Jul 2010*)
 - Final Rule – FAR clause 52.204-10 (*Aug 2012*)

APPLICABILITY EXEMPTIONS

- Contractors with less than \$300,000 annual gross income in the preceding tax year
- Prime Contract/Task Order Value is less than \$25,000

FFATA Reporting Requirements

- ▶ **Part 1: Prime Contractor Executive Compensation**
 - Annually Report in Central Contractor Registration (CCR) database which is now apart of the System for Award Management (SAM)

APPLICABILITY EXEMPTIONS

Contractor received in its preceding fiscal year –

- Less than 80% of its annual gross revenue from Federal contracts, subcontracts, loans, grants, subgrants, cooperative agreements and other forms of federal assistance; or
- Less than \$25M of its annual gross revenue from Federal contracts, subcontracts, loans, grants, subgrants, cooperative agreements and other forms of federal assistance; or
- The public has access to information about the compensation of the senior executives through periodic reports filed under SEC

FFATA Reporting Requirements

- ▶ **Part 2:** All First-Tier Subcontract Awards and modifications on subcontracts and orders *expected* to be **\$25,000** or more (unless exemption applies)

www.fsrs.gov

(a module of the Electronic Subcontracting Reporting System
(eSRS))

SUBCONTRACTOR REPORTING EXEMPTIONS

- Subcontractor had gross income from all sources in its preceding tax year that is less than \$300,000
- Subcontractors may also be exempt from reporting Executive Compensation when they received in the preceding tax year
 - Less than 80% of annual gross revenue from Federal contracts, subcontracts, loans, grants, subgrants, cooperative agreements and other forms of federal assistance; or
 - Less than \$25M of annual gross revenue from Federal contracts, subcontracts, loans, grants, subgrants, cooperative agreements and other forms of federal assistance; or
 - The public has access to information about the compensation of the senior executives through periodic reports filed under SEC

FFATA: 1st Tier –Subcontractors

- ▶ MUST have a DUNS number

<http://fedgov.dnb.com/webform>

FFATA Report Information

- ▶ Prime Contract Award Number
 - ▶ Subcontract Award Date
 - ▶ Subcontract Award Amount
 - ▶ Brief Project Description
 - ▶ Primary place of performance for the award (City, State & 9-digit Zip Code)
 - ▶ Subcontractor Name
- 

FFATA Report Information (cont'd)

- ▶ Subcontractor DUNS #
 - ▶ Parent Company name (if applicable)
 - ▶ Parent Company DUNS # (if applicable)
 - ▶ Subcontractor's Address, City, State, 9-digit Zip Code, Congressional District
 - ▶ Top 5 Executive Salaries
 - ▶ Exemptions (if applicable)
- 

1st Tier Subcontract Reporting

- ▶ Subcontractor information must be reported
 - During the month Following Initial Subcontract Award
 - During the month Following each Subcontract Change Order
 - On each anniversary of Prime Contract or Task Order Award Date, if the Subcontract Period of Performance has not ended
- 

Penalties for Non-Compliance

- ▶ Contracting Officers (COs) must exercise “appropriate contractual remedies”
- ▶ FAR Subpart 4.1402(c) requires COs to make [the] contractors’ failure to comply with the reporting requirements a part of contractors’ performance information
- ▶ Improperly certifying compliance with reporting requirements may subject contractors to False Claims Act liability
- ▶ The SAM Section pertaining to Executive Compensation warns that “Knowingly providing false or misleading information may result in criminal or civil penalties as per Title 18 Section 1001 of the US Criminal Code”

FFATA – Auditors

- ▶ Auditors should test for compliance based on whether a recipient demonstrated a "good faith" effort to comply

FFATA Sub-award Reporting System (FSRS) - Windows Internet Explorer

https://www.fsrs.gov/?s=home

General Services Administration [US] sam.gov

File Edit View Favorites Tools Help

pdfforge Yahoo Search PDFCreator eBay Amazon Coupons Radio Facebook Twitter Options

Favorites Suggested Sites Web Slice Gallery AFCEE - 311-HSW-PK - C... AT&T Central Contractor Registr... Christiana Borough CorpTrack Dictionary EngageTrack Home Page FAR Circulars

Weston Intranet Portal - H... FFATA Sub-award Rep...

powered by simplicity

Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)

Home Profile Worklist Create / Review Reports

home Wednesday, January 16, 2013 | 10:44 pm | 044519429@westonsolutions.com | [Log-in to eSRS](#) | [Logout](#)

 add award to worklist

 alerts
No current alerts

 awardee user guide

 create FFATA report

 announcements
There are no announcements at this time.

 awardee user demonstration

For Help: [Federal Service Desk](#) [Privacy Policy](#) [Turn Accessibility Mode On](#) [Awardee User Guide](#) [FSRS Awardee User Demonstration](#) [Resources Page](#)

Version 3.4

Done Internet | Protected Mode: Off 100%

10:44 PM 1/16/2013



awardee worklist

My Worklist **Contracts Not Added** Grant Awards Not Added

Note
 The following contracts were found that match your registered DUNS # and have not been added to your worklist. You may add a specific contract to your worklist or click the "add all contracts to my worklist" button to add them all.

Search Filters

Add All Contracts To My Worklist

Search For Other Contracts Create New Report **Report List** Items 1-20 of 112
 Previous | Jump 1 | Next

Contract Number	Top Level Agency	Agency	Type	DUNS Number	Options
0003 / EPW05042	ENVIRONMENTAL PROTECTION AGENCY	ENVIRONMENTAL PROTECTION AGENCY	Task Order	044519429	Add To Worklist
0004 / W912DR09D0006	DEPT OF DEFENSE	NAD	Task Order	044519429	Add To Worklist
0005 / W912DR09D0006	DEPT OF DEFENSE	NAD	Task Order	044519429	Add To Worklist
0006 / W912DR09D0006	DEPT OF DEFENSE	NAD	Task Order	044519429	Add To Worklist

Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)

Home Profile Worklist Create / Review Reports

FFATA reports Wednesday, January 16, 2013 | 10:57 pm | 044519429@westonsolutions.com | Log-in to eSRS | Logout

All Drafts Submitted Re-opened

Search Filters

Create New Report Items 1-20 of 99

Contract / Award Number	Agency ID	Agency Name	Status	Source	Report Month	Options
0006 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	Mar, 2011	Save PDF Copy Report
0007 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	Jan, 2011	Save PDF Copy Report
0007 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	Feb, 2011	Save PDF Copy Report
0007 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	Mar, 2011	Save PDF Copy Report
0007 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	Apr, 2011	Save PDF Copy Report
0007 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	May, 2011	Save PDF Copy Report
0007 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	Jul, 2011	Save PDF Copy Report
0007 / N6258309D0131	1700	DEPT OF THE NAVY	SUB	Contract	Aug, 2011	Save PDF Copy Report

FSRS Reporting

- ▶ Step 1: Prime Contract Info
 - FPDS-NG
 - Report Month
- ▶ Step 2: Add Subcontractor Info
 - DUNS #
 - Subcontractor Info
- ▶ Step 3: Review
- ▶ Step 4: Submit
 - Save PDF Report
 - Print Report

Need Help with FFATA?

- ▶ Federal Service Desk

<https://www.fsd.gov/app/answers/list>

- ▶ Chat live with a Customer Service Representative
 - ▶ Phone toll free at 1-866-606-8220
 - ▶ Phone internationally at 334-206-7828
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Need Help with FFATA?



The Trusted Integrator for Sustainable Solutions

Contact:

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Weston Solutions, Inc.

Contract Compliance Manager

Office: (610) 701-3707

Questions?