

CAPLAWFAQ

A series of common legal questions and answers for the CAA network



What is FFATA and are CAAs required to comply with its reporting requirements?

March 2015 FFATA stands for the Federal Funding Accountability and Transparency Act, which requires information on federal awards to be made publicly available via a single, searchable website, www.USASpending.gov.

"If a [CAA] receives a grant or cooperative agreement of \$25,000 or more directly from the federal government ... it must comply with FFATA's executive compensation and subaward reporting requirements."

If a Community Action Agency (CAA) receives a grant or cooperative agreement of \$25,000 or more directly from the federal government (i.e., if it is a prime recipient – also known as a prime awardee or prime grantee), it must comply with FFATA's executive compensation and subaward reporting requirements. If a CAA receives a subaward of \$25,000 or more directly from a prime recipient (i.e., if it is a first-tier subrecipient – also known as a first-tier subawardee or subgrantee), it must provide the prime recipient with information necessary for the prime recipient to fulfill its FFATA reporting obligations.

For pass-through grants such as the Community Services Block Grant (CSBG), Low-Income Home Energy Assistance (LHEAP) or the Weatherization Assistance Program (WAP), the prime recipient is the state. For direct awards such as Head Start, the prime recipient is the CAA that receives the funds directly from the federal Office of Head Start within U.S. Department of Health and Human Services (HHS) Administration for Children and Families. Examples of a first-tier subrecipient are a CAA that receives CSBG funding from a state, and a delegate agency or partner that receives Head Start funding from a CAA.

Information about a prime recipient's FFATA reporting obligations will be included in the notice of funding opportunity, the award terms and conditions and/or the grant agreement entered into with the federal awarding agency. See, for example, the HHS Administration for Children and Families [FFATA Award Term](#). Prime recipients should include language in their subaward agreements with first-tier subrecipients requiring the subrecipients to provide them with the information necessary to meet their FFATA reporting requirements. Following is an example of such language:

Subrecipient agrees to provide Prime Recipient with all information requested by Prime Recipient to enable Prime Recipient to comply with the reporting requirements of the Federal Funding Accountability and Transparency Act of 2006 (Pub. Law 109-282, as amended by section 6202 of Pub. Law 110-252) (Transparency Act).

Generally, the information that a prime recipient must report about first-tier subawards of \$25,000 or more includes:

- DUNS number of the first-tier subrecipient;
- Name and address of the subrecipient;
- Amount of the subaward;
- Subaward obligation/action date (i.e., the date the award agreement was signed);
- Catalog of Federal Domestic Assistance (CFDA) program number;

- Subaward project description (i.e., award title and description of the overall purpose of the subaward);
- Principal place of performance of the subaward (including congressional district);
- Subaward number (identifying number, if any, assigned by the prime recipient to facilitate the tracking of its subawards); and
- Names and total compensation of each of the subrecipient's top five executives, if applicable

A prime recipient need only report names and total compensation its top five executives or those of one of its subrecipients if all of the following conditions are met:

- 80% or more of the entity's prior year annual gross revenues was from federal awards;
- \$25 million or more in the entity's annual gross revenues are from federal awards; and
- The public does not have access to compensation information filed by the entity on its Internal Revenue Service Form 990 (if it is a tax-exempt organization) or on reports filed by the entity with the Securities and Exchange Commission.

For more information about these data elements, see [Appendix C](#) from the Office of Management and Budget Open Government Directive – Federal Spending Transparency and Subaward and Compensation Data Reporting (August 27, 2010).

The prime recipient reports its own executive compensation information as part of its registration profile on the federal government's System for Award Management at www.sam.gov. This information must be reported by the end of the month following the month in which the award was made. For example, if a federal agency makes an award to a prime recipient on any date in October 2015, the prime recipient must report executive compensation data, if necessary, by November 30, 2015.

"The prime recipient reports its own executive compensation information as part of its registration profile..."

A prime awardee must report information related to a subaward (including executive compensation data, if necessary) by the end of the month following the month the subaward was made. For example, if a prime recipient makes a subaward on any date in October 2015, it must report subaward data by November 30, 2015. The subaward report must be filed online using the [FFATA Subaward Reporting System](#). Further information from the federal government about FFATA and the FFATA Subaward Reporting System is available [here](#). To facilitate compliance with FFATA by prime recipients, here are two [sample first-tier subrecipient data collection forms](#).

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Appendix C
Grants Reporting Requirements for FFATA Implementation - Data Model

#	GRANTS ELEMENT NAME	GRANTS DEFINITION	Sub-field (if applicable)	Required (Y/N)	Field Type	Data Source: Primary	Data Source: Secondary
	VIEWABLE PRIME AWARD DATA ELEMENTS		An agency awarding official must include the award term that requires recipient reporting of subawards in any new award with an obligation date on or after October 1, 2010; \$25,000 threshold.				
1	Federal Award Identifier Number (FAIN)	The award number or other identifying number assigned by the Federal awarding agency, such as the federal grant number.		Y	Pre-populated	Agency FAADS+ file	
3	Federal Agency Name	The name of the Federal awarding agency.		Y	Pre-populated	Agency FAADS+ file	
4	Awardee - DUNS Number	The prime awardee organization's 9-digit Data Universal Numbering System (DUNS) number associated with the award.		Y	Pre-populated	Agency FAADS+ file	
5	Awardee - DUNS Number +4	The +4 extension to a DUNS number created by registrants in CCR when there is a need for more than one bank/Electronic Funds Transfer (EFT) account for a location.		N	Pre-populated if available	Agency FAADS+ file	
6	Awardee - Name	The name of the awardee organization. This will be the same name and address that appears in awardee's Central Contractor Registration (CCR) profile, as applicable.		Y	Pre-populated	CCR	
7	Awardee - DBA Name	The "doing-business-as" name of the organization. This will be the same name and address that appears in awardee's Central Contractor Registration (CCR) profile, as applicable.		N	Pre-populated if available	CCR	
8	Awardee - Address	Address where the awardee organization is located. This will be the same name and address that appears in awardee's Central Contractor Registration (CCR) profile, as applicable.					
			<i>Street 1</i>	Y	<i>Pre-populated</i>	CCR	
			<i>Street 2</i>	Y	<i>Pre-populated</i>	CCR	
			<i>Street 3</i>	Y	<i>Pre-populated</i>	CCR	
			<i>City</i>	Y	<i>Pre-populated</i>	CCR	
			<i>State</i>	Y	<i>Pre-populated</i>	CCR	
			<i>Country</i>	Y	<i>Pre-populated</i>	CCR	
			<i>Zip +4</i>	Y	<i>Pre-populated</i>	CCR	
			<i>Congressional District</i>	Y	<i>Pre-populated</i>	FSRS	
9	Awardee - Parent DUNS Number	The prime awardee parent organization's 9-digit Data Universal Numbering System (DUNS) number. This will be the same parent DUNS that appears in awardee's Central Contractor Registration (CCR) profile, as applicable.		Y	Pre-populated if available	CCR	
10	Principal Place Of Performance	The primary site where the work will be performed.					
			<i>City (or County)</i>	Y	<i>Pre-populated if available</i>	Agency FAADS+ file	<i>Prime awardee</i>

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			State	Y	Pre-populated if available	Agency FAADS+ file	Prime awardee
			Country	Y	Pre-populated if available	Agency FAADS+ file	Prime awardee
			Zip +4	Y	Pre-populated if available	Agency FAADS+ file	Prime awardee
			Congressional District	Y	Pre-populated	Agency FAADS+ file	FSRS
11	CFDA Program Number (and Program Title)	The number and program title associated with the published description of Federal assistance program in the Catalog of Federal Domestic Assistance (CFDA).		Y	Pre-populated	Agency FAADS+ file	
12	Project Description	Award title and description of the purpose of each funding action, if any. The description should capture the overall purpose of the award and, if there are multiple funding actions, sufficient description to define the need for each funding action. Example of project description: "Investment in public transportation: replace four 10 year old electric commuter train cars. In addition, funds will be used to construct a multi-modal Park and Ride facility featuring: commuter parking, transit hub, bicycle accommodations, and a potential future platform." For a second funding action to this grant, an example of an additional description: "Replace 2 additional electric commuter train cars that are 8+ years old."		Y	Pre-populated if available	Agency FAADS+ file	Prime awardee
13	Total Federal Funding Amount	The net dollar amount of the Federal award including modifications.		Y	Pre-populated	Agency FAADS+ file	
14	Obligation/Action Date	Date the award agreement was signed.		Y	Pre-populated	Agency FAADS+ file	
15	Subaward Date	Represents the time period (by Month and Year) for subawards made against that Federal Award Identifier Number (FAIN).		Y	Predefined values to choose; Month and Year	Prime awardee	
16	Awardee Names and Compensation of Highly Compensated Officers	Names and total compensation of Top 5 highly compensated officials of the awardee organization. This will be the same compensation information that appears in awardee's Central Contractor Registration (CCR) profile, as applicable. If not available from CCR the following questions are used to determine applicability of the element.		Y	Pre-populated if available or manual entry	CCR	Prime awardee

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		Q1. In your business or organization's previous fiscal year, did your business or organization (including parent organization, all branches, and all affiliates worldwide) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?		Y	Radio button: Yes or No If Yes, must answer Q2 If No, user not required to provide data		
		Q2. Does the public have access to information about the compensation of the senior executives in your business or organization (including parent organization, all branches, and all affiliates worldwide) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?		Y	Radio button: Yes or No If Yes, provide link to SEC: http://www.sec.gov / If No, user must enter Top 5 Data		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
17	Date of Report Submission			Y	Auto-complete at time of submission	FSRS	
SUBAWARD DATA ELEMENTS ENTERED BY PRIME							
1	Subawardee - DUNS Number	The subawardee organization's 9-digit Data Universal Numbering System (DUNS) number.		Y	Manual entry	Prime awardee	

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2	Subawardee - DUNS Number +4	The +4 extension to a DUNS number created by registrants in CCR when there is a need for more than one bank/Electronic Funds Transfer (EFT) account for a location.		N	Manual entry	Prime awardee	
3	Subawardee - Name	The name of the subawardee organization. The subawardee organization's 9-digit Data Universal Numbering System (DUNS) number. This will be the same information that appears in subawardee's Central Contractor Registration (CCR) profile, as applicable.		Y	Pre-populated if available	CCR	Prime awardee
4	Subawardee - DBA Name	The "doing-business-as" name of the subawardee organization. This will be the same name and address that appears in subawardee's Central Contractor Registration (CCR) profile, as applicable.		N	Pre-populated if available	CCR	Prime awardee
5	Subawardee - Address	Address where the subawardee organization is located. This will be the same name and address that appears in subawardee's Central Contractor Registration (CCR) profile, as applicable, otherwise manually entered.					
			Street 1	Y	Pre-populated if available; or if manual, free entry	CCR	Prime awardee
			Street 2	Y	Pre-populated if available; or if manual, free entry	CCR	Prime awardee
			Street 3	Y	Pre-populated if available; or if manual, free entry	CCR	Prime awardee
			City	Y	Pre-populated	CCR	Prime awardee
			State	Y	Pre-populated	CCR	Prime awardee
			Country	Y	Pre-populated	CCR	Prime awardee
			Zip +4	Y	Pre-populated if available; or if manual, free entry	CCR	Prime awardee
			Congressional District	Y	Pre-populated	FSRS	
6	Subawardee Parent DUNS Number	The subawardee parent organization's 9-digit Data Universal Numbering System (DUNS) number. This will be the same parent DUNS that appears in subawardee's Central Contractor Registration (CCR) profile, as applicable.		Y	Pre-populated if available	CCR	Prime awardee

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7	Amount of Subaward	The net dollar amount of Federal funds awarded to the subawardee including modifications. The subaward carries forward the purpose of the Federal prime award.		Y	Free text entry	Prime awardee	
8	Subaward Obligation/Action Date	Date the subaward agreement was signed.		Y	calendar widget	Prime awardee	
9	CFDA Program Number (and Program Title)	The number and program title associated with the published description of Federal assistance program in the Catalog of Federal Domestic Assistance (CFDA).		Y	Pre-populated	Default to Prime's value	
10	Federal Agency Name	The name of the Federal awarding agency.		Y	Pre-populated	Default to Prime's value	
11	Subawardee Principal Place of Performance	The primary site where the work will be performed.					
		<i>Enter the city unless a county, as a whole, is the subawardee.</i>	<i>City (or County)</i>	Y	<i>Manual entry</i>	Prime awardee	
			<i>State</i>	Y	<i>Manual entry</i>	Prime awardee	
			<i>Country</i>	Y	<i>Manual entry</i>	Prime awardee	
			<i>Zip +4</i>	Y	<i>Manual entry</i>	Prime awardee	
			<i>Congressional District</i>	Y	<i>Pre-populated</i>	FSRS	
12	Subaward Number	Subaward number or other identifying number assigned by the prime awardee organization to facilitate the tracking of its subawards.		Y	Free text entry	Prime awardee	
13	Subawardee Names and Compensation of Highly Compensated Officers	Names and total compensation of Top 5 highly compensated officials of the subawardee organization. This will be the same compensation information that appears in subawardee's Central Contractor Registration (CCR) profile, as applicable. If not available from CCR the following questions are used to determine applicability of the element.		Y	Pre-populated if available or manual entry	CCR	Prime awardee
		Q1. In your business or organization's previous fiscal year, did your business or organization (including parent organization, all branches, and all affiliates worldwide) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?		Y	Radio button: Yes or No If Yes, must answer Q2 If No, user not required to provide data		

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		Q2. Does the public have access to information about the compensation of the senior executives in your business or organization (including parent organization, all branches, and all affiliates worldwide) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?		Y	Radio button: Yes or No If Yes, provide link to SEC: http://www.sec.gov/		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
			Name		If manual - free text		
			Amount		If manual - free text		
14	Subaward Project Description	Award title and description of the purpose of each funding action, if any. The description should capture the overall purpose of the subaward and, if there are multiple funding actions, sufficient description to define the need for each funding action. Example of project description: "Investment in public transportation: replace four 10 year old electric commuter train cars. In addition, funds will be used to construct a multi-modal Park and Ride facility featuring: commuter parking, transit hub, bicycle accommodations, and a potential future platform." For a second funding action to this grant, an example of an additional description: "Replace 2 additional electric commuter train cars that are 8+ years old."		Y	Free text entry	Prime awardee	