

DATE: June 20, 2011
TO: All WIA Subrecipients
FROM: Susan Simmons, Workforce Operations Manager
Workforce Development Division

SUBJECT: Federal Funding Accountability and Transparency Act Requirements

Beginning with its PY2011 WIA grant funds, the state of Idaho and its WIA sub-recipients must comply with the Federal Funding Accountability and Transparency Act (FFATA), established by Public Laws 109-282 and 110-252. The intent is to empower individuals with the ability to hold the government accountable for each spending decision. FFATA legislation reporting requires the disclosure of information of entities receiving Federal awards (federal financial assistance and expenditures) through a single, searchable, public website that houses award information and can report on sub-awards and executive compensation. Federal awards include grants, subgrants, contracts, awards and other forms of financial assistance.

Prime awardees of federal grants, like IDOL, must now file a FFATA sub-award report through the Sub-award Reporting System (FSRS) by the end of the month following the month in which the prime awardees awards any sub-grant equal to or greater than \$25,000, including executive compensation data, if required. Simply put, if an award is issued to a qualifying entity anytime in July, IDOL must have the required information entered into the FSRS no later than the end of August.

However, the following entities are not subject to the reporting requirements:

- Grants that are funded by the Recovery Act and related sub-awards;
- Federal awards to entities that had a gross income, from all sources, of less than \$300,000 in the entities' previous tax year; and
- Federal awards, if the required reporting would disclose classified information.

This requirement applies to both mandatory and discretionary grants awarded on or after October 1, 2010. PY11 WIA contracts and Provisions and Assurances now include references to this requirement.

Reporting Process

In order to facilitate reporting, subrecipients must first obtain a DUNS number and register with the Central Contractor Registration (CCR) system prior to IDOL entering the subrecipients' information in the FFATA reporting system.

A **DUNS** (Data Universal Numbering System) number is nine-digit number assigned to an entity, having a unique, separate, and distinct operation for the purpose of identifying them as a numeric identifier. A DUNS number is required for all Subrecipients unless specifically excluded as

noted above. A DUNS number may be obtained free of charge via the web at <http://fedgov.dnb.com/webform>.

The CCR (Central Contractor Registration) (CCR.GOV) is the primary vendor database for the U.S. Federal Government. The CCR collects, validates, stores and disseminates data in support of agency acquisition missions. Both current and potential government vendors are required to register in CCR in order to do be awarded contracts by the government. Vendors are required to complete a one-time registration to provide basic information relevant to procurement and financial transactions. This registration must be updated or renewed annually to maintain an active status. Entities can registration with the Central Contractor Registration system at <https://www.bpn.gov/ccr/default.aspx>.

Basic sub-award data required:

- o Name of entity receiving award, including DBA
- o DUNS number (may need the DUNS +4 extension created in CCR). If an affiliate, a Parent Organization DUNS may be required.
- o Amount of award (net federal funds awarded, including modifications)
- o Date the sub-award Agreement signed with IDOL
- o Location of the entity (including congressional district)
- o Place of performance (including congressional district)

Executive compensation data is required only if:

The subrecipient received 80% or more of annual gross revenue in US federal contracts, subcontracts, grants, loans, subgrants, and/or cooperative agreements **and** \$25,000,000 or more in annual gross revenues from the above, then it must report the names and total compensation of the top 5 highest compensated officials in its organization. Currently no WIA subrecipients meet these criteria.

References to this ACT are now included PY11 WIA contracts and Provisions and Assurances. As noted above, subrecipients are required to complete their CCR registration and provide IDOL their DUNS numbers with their signed contracts to comply with this Act. This must be completed and submitted to your grants management officer no later than July 15, 2011.

If you have any questions regarding this requirement, please contact Rico Barrera at (208) 332-3570, extension 3316.