

University of Hawai`i Federal Funding Accountability and Transparency Act (FFATA) Policies and Procedures

Policy

The University of Hawai`i (UH) will comply with FFATA reporting requirements for all first-tier subawards related to prime Federal awards.

All first-tier subawardees that are subject to FFATA reporting must have a Unique Entity Identifier (UEI) and a valid Federal System for Award Management (SAM) registration in order to enter into the grant, contract or agreement with UH on federally funded projects.

Responsibilities

1. The UH Office of Research Services (ORS) has the overall responsibility to ensure compliance with FFATA reporting requirements on first tier subawards and subcontracts related to prime federal grants (includes cooperative agreements) and contracts. ORS is responsible for submitting required information to the Federal government through the FFATA Subaward Reporting System (FSRS.gov) in accordance with established deadlines.
2. The Principal Investigator (PI) and Fiscal Administrator (FA) are responsible for:
 - a. determining the applicability of FFATA reporting requirements for first tier subawards and subcontracts. If award terms include 2 CFR 170.220 or FAR 52.204-10 and first tier subaward or subcontract is \geq \$30,000, FFATA reporting applies.
 - b. obtaining required FFATA Data Elements (refer to FFATA Reporting Guidelines Data Elements Attachment B).
 - c. confirming that the subrecipient / subcontractor has obtained a UEI and a valid SAM registration.
3. The Research Corporation of the University of Hawai`i (RCUH) is responsible for ensuring that the required FFATA data elements are attached for vendor related subcontracts and confirmation of a valid SAM registration prior to approving any Purchase Order (PO) that is subject to FFATA reporting.

Procedures

1. For all prime Federal awards (grants or contracts), ORS will indicate on the award notification whether it is a grant (including cooperative agreement) or contract.
2. When a subaward is issued, FA should refer to the [FFATA Decision Tree](#) to determine whether the subaward is subject to FFATA reporting. If the subaward is subject to FFATA FA will:
 - a. obtain the FFATA data elements for subawards (object codes 7150/7172) through the following forms:
 - For subawards executed on an FDP template use FDP Research Subaward Agreement, Attachment 3B, pages 1 and 2 available at http://sites.nationalacademies.org/PGA/fdp/PGA_063626
 - For all other subawards and vendor type subcontracts use [FFATA Data Collection Form](#). Note: [Letter to Subcontractor](#) may be used to request information.

- b. obtain validation of SAM registration from the subawardee / subcontractor or directly from the SAM website (see SAM instructions below). SAM registration must be valid for at least two months after the anticipated PO encumbrance date.
 - c. electronically attach the FFATA data elements (FDP Research Subaward Agreement or information from FFATA Data Collection Form) and SAM registration to the PO when submitting for approval.
3. For vendor type subcontracts, RCUH will verify the required FFATA data elements (FFATA Data Collection Form) and SAM registration have been electronically attached prior to approval of the PO.
4. ORS will generate a monthly report to identify all subawards / subcontracts that meet the FFATA reporting criteria and obtain the required FFATA data from these forms.
5. ORS will prepare the FFATA reports and upload by the deadlines established by the Federal government. [Refer to [University of Hawai'i FFATA Reporting Guidelines](#) for deadlines.]

Instructions / Links

- **System for Award Management (SAM)** is a registration system for entities that conduct business with the federal government.
 - To register with SAM and obtain a Unique Entity Identifier (UEI) go to <https://sam.gov/content/home> .
 - For certificate of valid SAM registration, select Entity Search and enter subawardee's / vendor's UEI. Registration must be valid for at least two months to allow for the anticipated PO encumbrance date.
- **Federal Subaward Reporting System (FSRS)** is the system used to report FFATA data on subawards. ORS is registered with FSRS and will report on behalf of UH's extramurally funded contracts and grants. <https://www.fsr.gov/>
- **USASpending.gov** is the public website that includes information on all Federal spending awards. www.USAspending.gov

Contacts

Please contact the ORS Compliance Section at orscomp@hawaii.edu if you have questions.