

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION  
OMB Control No: 3090-0291**

**FSRS Registration Requirements for Prime Grant Awardees**

**A. Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Transparency Act requires information disclosure of entities receiving Federal financial assistance through Federal awards such as Federal contracts, sub-contracts, grants, and sub-grants, FFATA § 2(a)(2)(i), (ii).

Specifically, the Transparency Act's section 2(b)(1) requires the Office of Management and Budget ("OMB") to ensure the establishment of a publicly available website that contains the following information about each Federal award:

- name of the entity receiving the award;
- amount of the award;
- information on the award including transaction type, funding agency, the North American Industry Classification System code or Catalog of Federal Domestic Assistance number, program source, award title descriptive of the purpose of each funding action;
- location of the entity receiving the award and primary location of performance under the award, including city, State, congressional district, and country;
- unique identifier of the entity receiving the award and the parent entity of the recipient, should the entity be owned by another entity; and
- names and total compensation of the five most highly compensated officers of the entity if the entity in the preceding fiscal year received 80 percent or more of its annual gross revenues in Federal awards; and \$25,000,000 or more in annual gross revenues from Federal awards; and the public does not have access to this information about the compensation of the senior executives of the entity 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. FFATA § 2(b)(1).

The current, approved information collect directed compliance with the Transparency Act beginning on October 1, 2010 for prime grant awardees to report the first-tier sub-award data. The system that collects the sub-award data is called the FFATA Sub-award Reporting System (FSRS, [www.fsr.gov](http://www.fsr.gov)). Prime grant awardees must register to create a user log-in for FSRS before they can report the Transparency Act-required data on their eligible sub-awards.

This information collection requires only that information necessary for prime awardee

registration in FSRS to create a user log-in and enable sub-award reporting for their entity.

GSA requests OMB's expedited review and approval of the administrative modifications to the currently approved information collection in order to meet the public notification requirements before the current collection expires on March 31, 2014. Review and approval of this Paperwork Reduction Act submission is essential to the sustained implementation of the Federal Funding Accountability and Transparency Act (P.L.109-282, as amended by section 6202(a) of P.L.110-252) hereafter known as FFATA or the Transparency Act. This information collection requirement was captured in the revision to 2 CFR Part 170 Requirements for Federal Funding Accountability and Transparency Act Implementation, as guidance to agencies on the requirement for prime grant recipients reporting under the Transparency Act. Expedited approval will allow prime grant awardees to continue registering in FSRS in accordance with the award term specified 2 CFR Part 170 Appendix A.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information collected will be used to allow prime grant recipients to register in FSRS in order to report eligible sub-award information, pursuant to the Transparency Act.

**a. Who will be required to register in FSRS to report information pursuant to the Transparency Act?**

Prime awardees of Federal grants will be responsible for registering in FSRS in preparation for sub-award reporting under the Transparency Act.

**b. What information is required to register into FSRS?**

This information collection requests approval of the information needed to properly register an entity in FSRS to facilitate the statutorily required reporting of Transparency Act information. To register in FSRS for a user log-in, an entity must provide their Data Universal Numbering System (DUNS) number. FSRS then pulls core data about the entity from their System for Award Management (SAM) registration to include the legal business name, physical address, mailing address and Commercial and Government Entity (CAGE) code. The entity completes the FSRS registration by providing contact information within the entity for approval.

If a prime awardee has already registered in FSRS to report contracts-related Transparency Act sub-award data, a new log-in will not be required. In addition, if a prime awardee had a user account in the Electronic Subcontract Reporting System (eSRS), a new log-in will not be required. FSRS will identify the prime awardee's grants eligible for reporting purposes, based on the registration information provided.

The prime awardee maintains responsibility for verifying the accuracy of pre-populated information about itself (e.g. legal business name, physical/ mailing address, DUNS number, and CAGE Code). Because the Federal Government has a majority of this information already

through the prime awardee's prior registration in SAM, the prime awardee is not be required to provide this information again.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of information technology to reduce burden.**

This collection of information will be electronic. The FFATA Sub-award Reporting System (FSRS) is accessed at <http://www.fsrs.gov>. After creating the user log-in, the prime awardee will be allowed to report information about itself, as needed, and its subawardees, if applicable, by specific grant, or through a batch uploading mechanism. The system will allow a prime awardee to save its reporting for further review or addition, or report immediately. Providing such flexibility, in both the form of reporting (individual and batch uploading capabilities) and in timing will ensure that the burden is minimized to the maximum extent possible.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.**

As discussed above, information already collected from prime awardees during their SAM registration will be pre-populated to minimize duplicative reporting of the prime awardees' entity information (e.g. legal business name, physical/ mailing address, DUNS number, and CAGE Code).

In addition, GSA recognizes that recipients of Federal grants funded by the American Recovery and Reinvestment Act continue to report through [FederalReporting.gov](http://FederalReporting.gov). Therefore, to avoid duplicative reporting, prime awardees in receipt of ARRA-funded grants will not be subject to the reporting requirements in this Paperwork Reduction Act submission. For example, if a prime awardee only received ARRA-funded grants, they would have no need to register in FSRS to report sub-awards made against those grants.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

As discussed above, it is intended that to the maximum extent possible, information already collected prime awardees will be pre-populated during the FSRS registration to minimize duplicative reporting of the prime awardees' entity information (e.g. legal business name, physical/ mailing address, DUNS number, and CAGE Code).

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The collection of this information facilitates continued compliance P.L. 109-282 as amended by section 6202(a) of P.L.110-252 requiring the statutorily required reporting of information on: (1)

executive compensation of applicable grants prime and subawardees and (2) other grants award-related information about grants subawardees accessible to the public, thus making Government more transparent. Registration in FSRS to get a user log-in is the first step to reporting Transparency Act-required information. Delay in approving the continuation of this collection jeopardizes sustained compliance with the Transparency Act.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**

Respondents register electronically at [www.fsrs.gov](http://www.fsrs.gov). Prime awardees must be registered at FSRS in order to meet the sub-award reporting timelines pursuant to the Transparency Act, by the end of the month in which the prime awardee made the sub-award, plus an additional 30 days. The frequency of this reporting is specifically required by the Transparency Act. Respondents will not be required to keep records for more than three years.

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of the study;**

The information collection is not connected with a statistical survey.

- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**

The information collection is not connected with the use of statistical data classification.

- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

The information collection does not request data that is confidential.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize any public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Outreach and solicitation of comments will continue to ensure that the requirements are implemented in the least burdensome manner possible while adhering to the requirements under the Transparency Act. A 30 day notice was published in the *Federal register* at 78 FR 79454, on December 30, 2013. A 60 day notice was published in the *Federal Register* at 79 FR 16333, on March 25, 2014 no comments were received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gifts to respondents will be provided.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The information requested is specifically enumerated under the Transparency Act and is required by the Act to be released to the public.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

Information of a sensitive nature is not requested.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate hour burden estimates for each form and aggregate the hour burdens in Item 13.**
- **Provide estimates of annualized costs to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead the cost should be included in Item 14.**

**Burden Hours**

Estimates are based on the following:

**Summary**

	<b>Registrants</b>	<b>Hours/ Response</b>	<b>Total Hours</b>	<b>Total Cost</b>	<b>Cost Calculation</b>
State governments	50	.5 hrs/response	25	\$897.00	\$17.94/respondent x 50 respondents
All Other	1,794	.5 hrs/response	897	\$32,184.36	\$17.94/respondent x 1,794

					respondents
<b>TOTAL BURDEN</b>	<b>1,844</b>	<b>.5 hrs/response</b>	<b>922</b>	<b>\$33,081.36</b>	

In FY2012, 1,794 unique DUNS numbers reported a grant sub-award in FSRS for display on the USAspending.gov website. Each unique DUNS number represents a prime grant awardee. Each prime grant awardee would be required to register in FSRS just once, making this our population. Additionally, 50 state governments were added to the population, one per state to account for prime grant awardees who may have received Federal grants but had difficulty reporting to USAspending. The burden hours associated with each registration in FSRS.5 hour. This is based on the assumption 2CFR Subtitle A, Chapter I, and Part 25 requires all prime grant awardees to be are registered in SAM, prime grant awardees are only be required to manually input a minimal amount of information to create an FSRS log-in. Assuming one registration per year, where 1,844 information submissions (1,844 Respondents x 1 registration) are received annually, then burden hours are calculated as follows:

**Total Burden:**

$$\underline{1,844} \text{ of Total Respondents} \times .5 \text{ hours} = \underline{922} \text{ burden hours.}$$

**State Governments:**

$$50 \text{ State Governments} \times .5 \text{ hours} = \mathbf{25} \text{ burden hours.}$$

**All Other:**

$$1,794 \text{ Respondents} \times .5 \text{ hours} = \mathbf{897} \text{ burden hours}$$

These estimated numbers of respondents may be an overestimate, given that FSRS will leverage existing registrations if the entity has already registered for the purpose of reporting Federal contracts, pursuant to the FAR Interim Final Rule published on July 8, 2010. They may also be underestimates, given the uncertainty of the total number of prime grants who may have sub-awards but not reported. GSA has provided its best estimates based on available information. GSA will continue to review and revise these burden estimates as more information becomes available.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

**Respondent Costs**

The respondent cost estimates are computed using the hourly rates of a GS 12/1. These hourly rates are comparable to salaries of staff that will perform these functions for the respondent (data entry and review). The time required for data entry and review is estimated at .5 hrs per respondent. Using the Office of Personnel Management’s January 2012 Salary Table, the hourly rate for a GS 12/1 is \$35.88. Therefore, the cost for one respondent is as follows:

$$\text{Data Entry and review (GS 12/1 equiv.) hourly rate of } \$35.88 \times .5 \text{ hrs} = \mathbf{17.94}$$

Total Cost, One Respondent

\$ 17.94

The estimated total annual cost burden to All respondents is \$17.94 x 1,844 Respondents or **\$33,081.36**.

The estimated total annual cost burden to State Governments is \$17.94 x 50 = **\$897.00**

The estimated total annual cost burden to all other respondents is \$17.94 x 1,794 = **\$32,184.36**

This estimated total annual cost burden of respondents may be an overestimate, given that FSRS will leverage existing registrations if the entity has already registered for the purpose of reporting Federal contracts, pursuant to the FAR Interim Final Rule published on July 8, 2010. They may also be underestimates, given the uncertainty of the total number of prime grants who did not report. GSA has provided its best estimates based on available information. GSA will continue to review and revise these burden estimates as more information becomes available.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The cost associated with collecting FSRS Registration information is part of the ongoing operations and maintenance cost of operating the FSRS system which includes training and assisting Federal and non-Federal users. It is not expected that federal agencies will modify their systems to collect this data, as it account registration information specific to FSRS. The annual O&M cost for the grant reporting functionality in FSRS is approximately \$750,000. The account creation process is a subset of the overall O&M.

In addition, time required for Government-wide review is estimated at an average of 1 hour in reviewing and analyzing the information, to the extent that the pre-populated awardee has identified inaccuracies in the pre-populated information, or that Federal agencies will respond to grant awardee requests for information or clarification. It is anticipated that subsequent to initial implementation of the system, the subsequent Paperwork Reduction Act submissions will be able to better estimate burden associated with this review.

Annual Government Burden and Cost

Responses	1,844
Reviewing time/hr	X <u>1</u>
Review time/yr	1,844
Average wages/hr (GS 12/1 hourly rate)	X <u>\$35.88</u>
Average wages/yr	\$66,162.72
Benefits and overhead	<u>100%</u>
Total Government cost	\$66,162.72

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or**

**14.**

The reduction in respondents and thus burden is based on the following: In the existing ICR, the population of respondents was based on the universe of potential respondents based on the grants and assistance community activity. The current update is based on the actual number of respondents in the system, so the reduction is more reflective of real use and burden.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

Registration information about FSRS user accounts is not published in any system. This information collection is purely designed to allow prime grant awardees to register in FSRS, creating the user account they will use to log-in and report required Transparency Act data about their sub-awards.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Such approval is not being requested.

**18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act Submissions”.**

There are no exceptions to the certifications.