

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

FFATA Subaward Reporting System (“FSRS”) Registration

A. Justification

1. Explain the circumstances that make the collection of information necessary.

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).

Beginning October 1, 2010, this Paperwork Reduction Act submission directs compliance with the Transparency Act to report prime and first-tier subaward data. Specifically, Federal agencies and **prime** awardees of contracts and grants will ensure disclosure of executive compensation of both prime and sub awardees and sub award data. This information collection requires reporting of only the information enumerated under the Transparency Act.

This information collection requires information necessary for prime awardee registration into the FFATA Subaward Reporting System (“FSRS”) and review of its entity-related information. This information collection is necessary to allow for prime awardee reporting of subaward and executive compensation data pursuant to the Act.

2. Indicate how, by whom, and for what purpose the information is to be used.

The information collected will be used to allow prime grant recipients to register and report information about executive compensation (if applicable) for Grants prime and subawardees and subaward information, pursuant to the Transparency Act. While some information is currently publicly available on prime awardees, executive compensation of prime awardees and subawardees, as applicable is not. In addition, this information collection will provide public access to information on grant subaward information, pursuant to the Transparency Act.

a. What grants are subject to reporting pursuant to the Transparency Act?

New Federal, non-Recovery Act funded grant awards with an award date on or after October 1, 2010, and resulting first-tier subawards, are subject to the reporting requirements under the Transparency Act. New Federal grants includes grants with a new Federal Award Identification Number (FAIN) as of October 1, 2010 and does not include continuing grants awarded in prior fiscal years with new obligations beginning October 1, 2010.

For those new Federal grants as of October 1, 2010, if the initial award is over \$25,000, reporting of sub award data is required. If the initial award is below \$25,000 but subsequent grant modifications result in a total award over \$25,000, the award is subject to the reporting requirements, as of the date the award exceeds \$25,000. If the initial award exceeds \$25,000 but funding is subsequently de-obligated such that the total award amount falls below \$25,000, the award continues to be subject to the reporting requirements of the Transparency Act and this Paperwork Reduction Act submission.

In addition to the award amount threshold, pursuant to the Transparency Act, Federal grant awards to individual recipients, Federal grant awards made to entities earning less than \$300,000 in Federal benefits in the previous tax year, and classified information are not subject to the reporting requirements in this Paperwork Reduction Act submission, FFATA §§ 2(a)(1)(C), 2(e), 5.

b. Who will be required to register into FSRS to report information pursuant to the Transparency Act?

Prime awardee of Federal grants will be responsible for reporting under the Transparency Act.

c. 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. In order to facilitate proper registration, an entity may be required to provide information to include:

- DUNS number
- Name of Entity
- Address

- Parent DUNS number
- Federal Award Identification Number (FAIN)
- CFDA Number
- Federal Awarding Agency of the Grant

If a prime awardee has already registered in the system to report contracts-related Transparency Act financial data, a new log-in will not be required. The system will identify the prime awardee's grants for reporting purposes based on the registration information provided.

In addition, the prime awardee will be responsible for verifying the accuracy of pre-populated information about itself (e.g. name, address, DUNS number, Parent DUNS). Because the Federal Government has a majority of this information already through the prime awardee's prior registration in the System for Award Management (SAM) the prime awardee will not be required to provide this information again. See attached data elements spreadsheet for a detailed description of data elements and source of pre-population. Where most of this information will be pre-populated, however, the prime awardee will be responsible for reviewing this information for accuracy.

It is intended that, to the maximum extent possible, information already collected from Federal agencies on Federal grants and prime awardees will be pre-populated to minimize duplicative reporting of the prime awardees' entity information (e.g. address, DUNS number) and grant information (e.g. CFDA number, award amount, prime award description).

d. By when will the prime awardee need to register into FSRS and be responsible for reporting under the Transparency Act?

The prime awardee will be responsible for reporting information about itself, as needed, or its subawardee, if any, by the end of the month following the month the award or obligation was made.

For subaward reporting:

If applicable, the prime awardee must report subawardee data by the end of the month following the month the award or obligation was made.

Example 1:

Prime recipient awards subaward on October 1, 2015
Prime recipient must report subaward information by November 30, 2015

Example 2:

Prime recipient awards subaward on October 31, 2015
Prime recipient must report subaward information by November 30, 2015

For executive compensation reporting:

If applicable, the prime awardee must report its own executive compensation data by the end of the month following the month the award or obligation was made.

Example 1:

Federal agency awards grant to prime awardee on October 1, 2015
Prime awardee must report executive compensation data, if necessary, by November 30, 2015

Example 2:

Federal agency awards grant to prime awardee on October 31, 2015
Prime awardee must report executive compensation data, if necessary, by November 30, 2015

Similarly, the prime awardee must report the subawardee's executive compensation data by the end of the month following the month the award or obligation was made.

Example 1:

Prime recipient awards subaward on October 1, 2015
Prime recipient must report subawardee's executive compensation data, if necessary, by November 30, 2015

Example 2:

Prime recipient awards subaward on October 31, 2015
Prime recipient must report subawardee's executive compensation data, if necessary, by November 30, 2015

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.

This collection of information will be electronic. The FFATA Sub award Reporting System (FSRS) is accessed at <http://www.fsrs.gov>. 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.

Further, as discussed above, it is intended that to the maximum extent possible, information already collected from Federal agencies on Federal grants and prime awardees will be pre-populated to minimize duplicative reporting of the prime awardees' entity information (e.g. address, DUNS number) and grant information (e.g. CFDA number, award amount, prime award description).

4. Describe efforts to identify duplication.

As discussed above, it is intended that to the maximum extent possible, information already collected from Federal agencies on Federal grants and prime awardees will be pre-populated to minimize duplicative reporting of the prime awardees' entity information (e.g. address, DUNS number) and grant information (e.g. CFDA number, award amount, prime award description).

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 from Federal agencies on Federal grants and prime awardees will be pre-populated to minimize duplicative reporting of the prime awardees' entity information (e.g. address, DUNS number) and grant information (e.g. CFDA number, award amount, prime award description).

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 complies with P.L. 109-282 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. See attached data elements spreadsheet for full list of data elements.

7. Explain any special circumstances.

Respondents will be submitting information electronically at www.fsrs.gov. Prime recipients will be required to report its own executive compensation data, if needed pursuant to the Transparency Act, by the end of the month of the prime award's obligation from the Federal Government to the prime awardee, plus an additional 30 days. The same timeframe is applied for a prime awardee's reporting of subaward information, if a subaward is obligated. The frequency of this reporting is specifically required by the Transparency Act. FFATA § 2(c)(4) ("The website established under this section shall be updated not later than 30 days after the award of any Federal award requiring a posting.")

Respondents will not be required to keep records for more than three years. The information collection is not connected with a statistical survey, is not connected with the use of statistical data classification, and does not request data that is confidential.

8. Describe efforts to consult with persons outside the agency.

A notice was published in the *Federal Register* at 82 FR 19722 on April 28, 2017. No comments were received. A 30-day notice was published in the *Federal Register* at 82 FR 33129 on July 19, 2017.

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.

Information of a sensitive nature is not requested.

12. Provide estimates of the hour burden of the collection of information.

Burden Hours

On an annual basis, approximately 5,678 new awardee users will register in FSRs. The burden hours associated with each information submission is 0.5 hours. This is based on the assumption all prime grant awardees are registered in SAM. Prime grant awardees will only be required to manually input a minimal amount of information. The burden hours are calculated as follows:

Total Burden:

5,678 New Awardee Users x 0.5 hours = 2,839 burden hours.

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 record keepers resulting from the collection of information.

Registration Costs

The registration cost estimates are computed using the equivalent of hourly rates for a GS 12/1. These hourly rates are comparable to salaries of staff that will perform these functions for the respondent. The time required for data entry and review is estimated at 0.5 hrs per registration. Using the Office of Personnel Management’s January 2017 Salary Table, the hourly rate for a GS 12/1 is \$30.05. Therefore, the cost for one new awardee is as follows:

Data Entry (GS 12/1 equiv.) hourly rate of \$30.05 x .5 hrs =	\$15.03
36.35% overhead	\$5.46
Total Cost, One Registration	\$20.49

Summary (FY16)

	Registrations	Hours/ Response	Total Hours	Total Cost	Cost Calculation
New Awardees	5,678	0.5 hr/response	2,839	\$58,171.11	\$20.49/registration x 2,839 hours

The estimated total annual cost burden is $\$20.49 \times 2,839$ total hours = \$58,171.11. The estimated cost per response is \$10.24.

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.

The cost associated with collecting FSRS registrations is part of operating and maintaining the FSRS system as a whole, as well as any training and assisting of federal and nonfederal users to complete reports. The annualized cost of these efforts is approximately \$1,000,000. This figure was determined through task order obligations related to operation and maintenance of FSRS.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13.

The increase in respondents is due to the number of new users registered in FSRS. As new vendors are awarded grants and contracts, they need to register in FSRS to submit reports, which has caused an increase in burden hours.

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

The information collected will be published on USASpending.gov. Information will be provided is free to the public.

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.