

USING COEUS TO MEET FFATA REQUIREMENTS: CASE STUDIES FROM UMCP, MIT, AND VANDERBILT

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FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA) – WHAT ARE THE REQUIREMENTS?

- P.L.109-282-The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The FFATA legislation requires information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website. Federal awards include grants, subgrants, loans, awards, cooperative agreements and other forms of financial assistance as well as contracts, subcontracts, purchase orders, task orders, and delivery orders.
- In accordance with 2 CFR Chapter 1, Part 170 REPORTING SUB-AWARD AND EXECUTIVE COMPENSATION INFORMATION, Prime Awardees awarded a federal grant are required to file a FFATA sub-award report by the end of the month following the month in which the prime awardees awards any subcontract equal to or greater than \$25,000.

Who needs to report?

- Entities in receipt of new Federal grants/cooperative agreements of \$25,000 or greater on or after 10/1/2010.
- Entities in receipt of Federal contracts: In accordance with Federal Acquisition Regulation clause 52.204-10 (Reporting Executive Compensation and First-Tier Subcontract Awards), Prime Contractors awarded a federal contract or order are required to file a FFATA sub-award report by the end of the month following the month in which the prime contractor awards any subcontract greater than \$25,000. This reporting requirement will be phased-in (see below):
 - **Phase 1**: Reporting subcontracts under federally-awarded contracts and orders valued greater than or equal to \$20,000,000, reporting starts now.
 - **Phase 2**: Reporting subcontracts under federally-awarded contracts and orders valued greater than or equal to \$550,000, reporting starts October 1, 2010.
 - **Phase 3**: Reporting subcontracts under federally-awarded contracts and orders valued greater than or equal to \$25,000, reporting starts March 1, 2011.
- Any existing Federal contracts \geq \$25,000 receiving a modification that incorporates the FFATA reporting requirements (FAR - 52.204-10)

FFATA Reporting Requirements

- Subcontractor DUNS
Subcontract Name
Amount of Subcontract
Date of Subcontract
Product/Service Description
Subcontract Number
Subcontractor Address
Subcontractor Primary Performance Location
Prime Contract Number
Awarding Agency Name and Code
Funding Agency Name and Code
Contracting Office Code
Treasury Accounting Symbol
NAICS Code
- Names and compensation of prime contractor's 5 most highly paid executives if the conditions are met

When do you report and how?

- For new grants/cooperative agreements issued after 10/1/2010, any subawards issued in an amount \geq \$25,000 issued, report by the end of the month following the month in which the issuance occurred
- Modifications to a subaward (subcontract) under an award issued on or after 10/1/2010, that changes previous submitted data (subaward now \geq \$25,000, must be reported (e.g., an additional obligation of funds). Report by the end of the month following the month in which the issuance occurred
- Contracts that meet the FFATA guidelines – (see slide 3). Report by the end of the month following the month in which the issuance occurred
- Report via FSRS.gov – Federal portal

Data Collection from Subawardees

- New FDP Subaward forms that include data elements required for FFATA reporting – Attachment 3B
- Product/Service Description data element – Some institutions are using project title - others are asking for a short description from the subawardee
- Audience – How are you collecting the data you need from subawardees?

Reporting Methods

- ⦿ Data entry online – advantage is that many fields concerning the award are pre-populated.
- ⦿ Excel template
- ⦿ XML upload

UMCP - Strategy for Capturing FFATA Data Elements

⦿ Data Cleansing

- Organization table– Data cleansing to ensure that each Organization (subawardee) has the legal entity name entered in Coeus.
- Rolodex – Data cleaning to make sure that each rolodex entry for the organization, contains the legal entity name.
- ⦿ **Organization table**– For those entities who have a ***parent organization***, ensure that one is created in the rolodex and organization table with the ***parent DUNS*** number and

UMCP - Strategy for Capturing FFATA Data Elements

- **Award Master** – Use of **Execution Date** to determine which new awards are subject to FFATA reporting requirements

Information to update these data elements comes from the FDP Attachment 3b form, or UMCP's subrecipient profile form (new subawardees that are not listed in the Federal Audit Clearinghouse)



- Organization table
 - **Parent organization legal entity name** – followed by a hyphen and the location/name
 - Example: The Regents of the University of California - Berkeley
 - **Questions tab** – **CCR** information and **Parent Organization ID**
 - **DUNS** number and **EIN** number – **Organization 2** tab
- Rolodex
 - **Legal entity name** – selected in the **Contact Info** tab in Subcontracts module
 - **Congressional District** placed in **County** data field
 - **Primary Place of Performance** – created as a second contact type and selected in the Contact Info tab in the Subcontracts module if place of performance differs from the entity's address
 - **Congressional District** placed in **County** data field

UMCP - Strategy for Capturing FFATA Data Elements – Updating Existing Organizations (Subawardees)

- Revise all of our agency FDP Subaward forms and our contract forms to include the new FFATA data elements.
- Confirm **DUNS** number and **EIN** number entered in Org table from subrecipient profile or from Harvester.
- **Congressional District** – Update this field in the Organization table as new subaward agreements are initiated.
- As organization information is updated enter the date in the **Telex number** field on the **Name and Address** tab.

University of Maryland, College Park Strategy


- Subaward Detail tab – Insert ***FFATA*** in the front of the title of the project

Subcontract	Funding Source	Amount Info	Amount Released	Contacts	Closeout	Others
Subcontract Code:	00001175	Seq. No:	2	Status:	Active	
Account No:	529712					
Subcontractor:	University of Baltimore					
Start Date:	01-Oct-2010	End Date:	30-Sep-2011			
Subaward Type:	Contract	Purchase Order Num:	Z971201			
Title:	FFATA: Maryland Small Business Development Center					
Requisitioner:	Evan L. Crierie					

University of Maryland, College Park Strategy – Contacts Tab

Subcontract | Funding Source | Amount Info | Amount Released | **Contacts** | Closeout | Others

Contact List:

Contact Type	Name/Organization
Administrative Contact--2	University of Baltimore
 Place of Performance (POP)	University of Maryland - Baltimore

Contacts tab – Location of entity (top line) and Primary Performance Location (second line)

Contact Details:

Name:	University of Maryland - Baltimore	Rolodex Id:	34262
Sponsor:			
Organization:	University of Maryland - Baltimore		
Address:	Veterans Affairs Medical Center 4-8207		
	10 N. Greene St.		
City:	Baltimore	County:	MD-007
State/Province:	Maryland	Postal Code:	21201-1524


UMCP – Organization Table Screens

Maintain Organization

Name & Address Organization-2 Organization-3 Type Question Audit IDC

Organization Id: 00001188

Organization Name: University of Maryland - Baltimore

Contact Address: University of Maryland - Baltimore 

Address: 620 W. Lexington Street,4th Floor ,Baltimore, M

Cable Address:

Telex Number: 3/17/11

County:

Congressional District: MD-007

As new subawards are initiated, the date the org is updated is inserted here.

UMCP – Organization Table Screens

Maintain Organization

Name & Address Organization-2 Organization-3 Type Question Audit IDC

Incorporated In:

Incorporated Date: **Number Of Employees:**

IRS Tax Exemption: **Federal Employer:**

Mass Tax Exempt Num: **Agency:**

Com Gov Entity Code: **Vendor:**

Mass Employee Claim:

Duns: **Duns+4:**

Dodac: **Cage:**

UMCP – Organization Table Screens

00001191- is the Org ID number for the **University System of Maryland** our Parent organization. Using the Org ID provides a consistent data element that can be used in pulling FFATA data elements from our Data Warehouse.

Maintain Organization

Name & Address Organization-2 Organization-3 Type Question Audit IDC

Co...	Question	Answer
SC04	Does this subcontractor have a parent organization (auditee)? If yes, please enter the parent's Coeus Organization Id (#####) in Explanation below.	<input checked="" type="radio"/> Yes <input type="radio"/> No
SC05	Is this subcontractor registered in CCR ?	<input checked="" type="radio"/> Yes <input type="radio"/> No
SP01	Does this subcontractor have a fiscal year? If yes, please enter FY 'From' & 'To' months in Explanation below. (format: MM-MM)	<input checked="" type="radio"/> Yes <input type="radio"/> No
SP02	Is this subcontractor required to comply with A133? If yes, enter website link or document location in Explanation below then answer the remaining questions as N/A. If no, please	<input checked="" type="radio"/> Yes <input type="radio"/> No

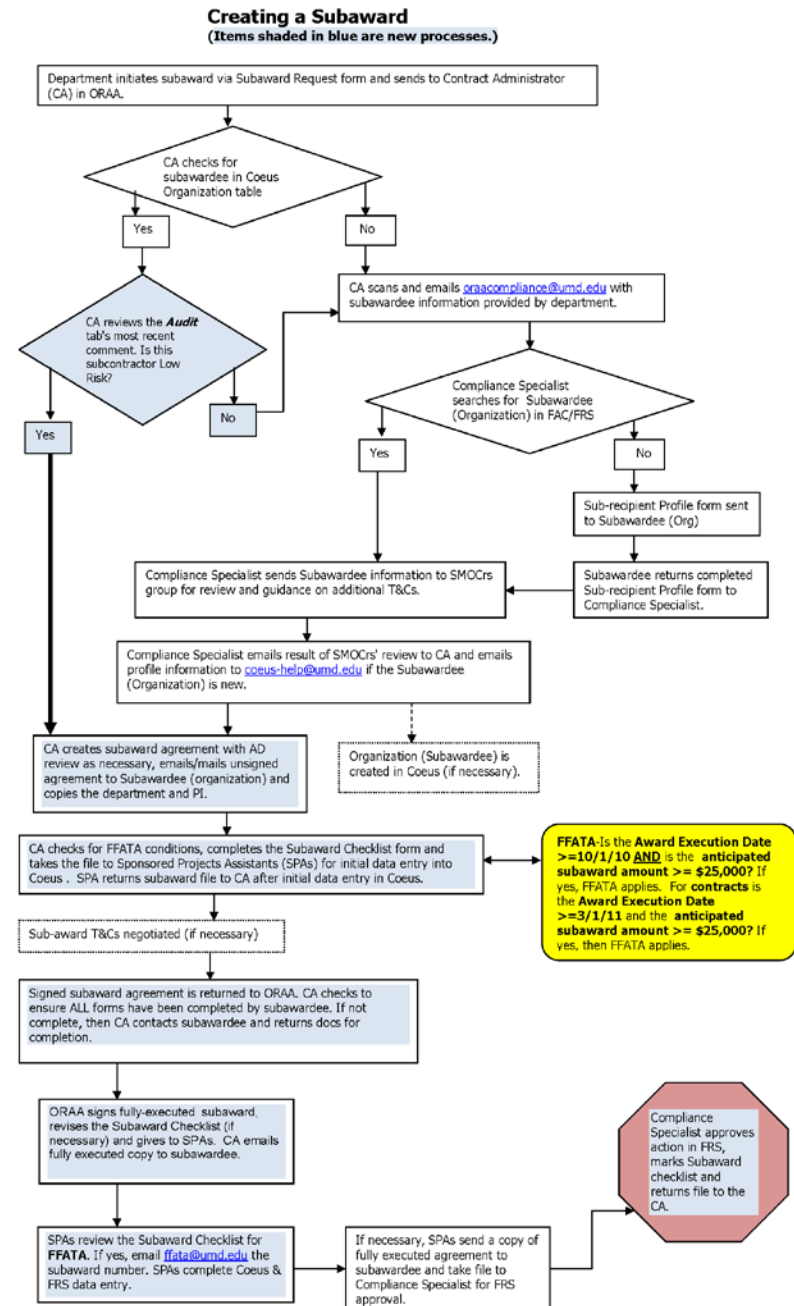
Explanation: 00001191 [More](#)

FFATA Reports from the DataWarehouse

- ⦿ Joining the tables based on a common element
 - Award master table
 - Subcontracts
 - Organization table
 - Rolodex
- ⦿ Not complete yet, as we need the Rolodex table in the Data Warehouse

Who does what at UMCP?

- Electronic Research Administration team- creation of Organizations (subawardees)
- Compliance team – Organization YNQs
- Directions for Contract Administrators and Sponsored Projects Assistants
- Data entry into Subcontracts module – Sponsored Projects Assistants
- FFATA reporting in FRSRS.gov – ARRA/FFATA Specialist
- Progress to-date – submitted 3 initial reports



Reporting in FSRS.gov

- ◎ What we have learned
 - Verify the award execution date in the Research.gov or NIH Reporter or our Award documents
 - Use the award Attachments tab to view the award document
 - Use the subaward attachments feature to view the subaward documents
 - For now create a separate spreadsheet to contain all the data elements for each FFATA subaward until we can get all the data into our DataWarehouse
 - We currently use the Title of the Subaward but we may need to ask our subs for a brief description.

Challenges

- Needed data elements are stored in Coeus, Vendor, Procurement, Financial systems – they are not linked to each other.
- Data elements needed from the above systems are either not in the DataWarehouse or we don't have access to them.
- With Coeus we discovered this year that we needed the Rolodex table in our DataWarehouse so we are working with our campus Office of Information Technology database group to get this table and its data elements into the DW so that we can set up joins among the tables we need to generate some reports to assist our ARRA/FFATA Reporting Specialist.
- Communication among the groups who play a part in this process is a constant challenge.
- Failure of certain sectors in our department to implement the new process.
- Creating a new subaward process was met with great resistance from certain sectors in our department.

MIT'S APPROACH

Process Changes

◎ Subaward office

- Update to subaward forms/FDP templates for collection of all FFATA fields
- In addition to DUNS, we are requesting CCR registration

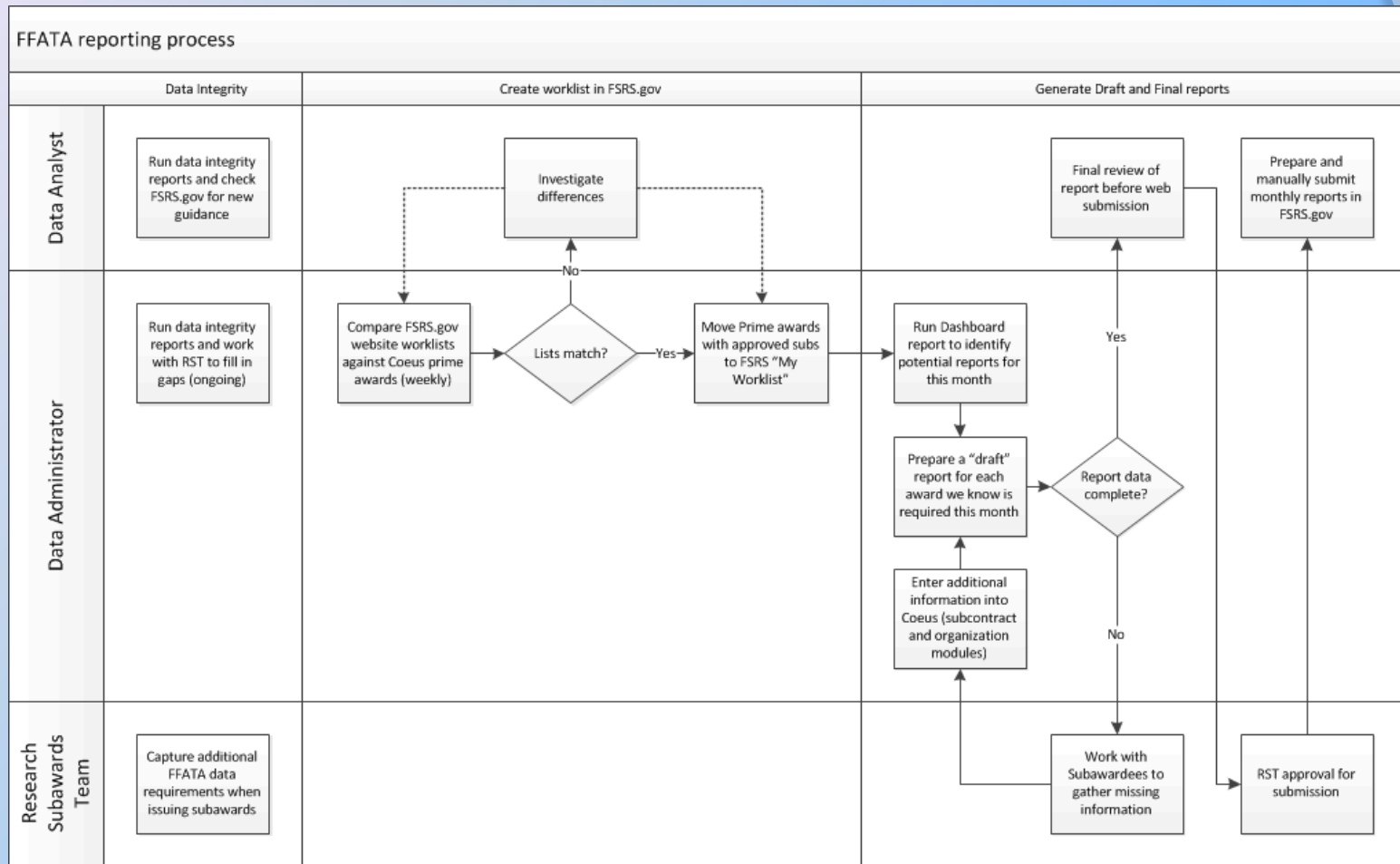
◎ Data administration

- Redefined usage of fields in Coeus
- Updated input forms with FFATA flag
- Additional data integrity checks

MIT's plan for FFATA

- ⦿ Process changes we've implemented
- ⦿ Changes to data definition and capture
- ⦿ Customizations for FFATA
- ⦿ Generating reports
- ⦿ Submissions so far
- ⦿ What we've learned (helpful tips)
- ⦿ Challenges

FFATA Process



Changes to data definition and capture

- ◎ Fields that we now need to enter and/or use differently
 - Award Module
 - Execution Date is now mandatory
 - Approved subcontracts
 - Sub Award Module
 - Amount info screen, Effective date
 - Organization Table
 - DUNS is required input for any subaward action

Customization for FFATA

- ◎ Org YNQ
 - Track compensation questions
 - Recording the date of CCR registration
- ◎ Subaward Module (looking into)
 - Capture the description – purpose of subaward action
- ◎ Award Code Tables
 - FFATA FAR clauses and grant terms added to subcontract approval terms

New YNQ for FFATA

Maintain Organization [X]

Name & Address | Organization-2 | Organization-3 | Type | Question | Audit | IDC

Code	Question	Answer
30	Is this organization being created in order to submit applications as an individual rather than as a company, state, local or tribal government, academia, or other type of organization?	<input type="radio"/> Yes <input checked="" type="radio"/> No
CCR	Organization is registered in CCR? If Yes, provide date CCR last updated.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
G7	Facilities are Properly Accredited or Authorized	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
H0	Organization Certifies Compliance with Federal Lobbying Regulation	<input checked="" type="radio"/> Yes <input type="radio"/> No

Explanation:

Review Date:

New YNQ for FFATA

Maintain Organization [X]

Name & Address | Organization-2 | Organization-3 | Type | Question | Audit | IDC

Code	Question	Answer
J2	Rate Negotiated	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
S1	Subrecipient Profile has been completed? If Yes, provide date of most recent Profile.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
S2	In the preceding completed fiscal year, did the business or organization receive (1) 80 percent or more of its annual gross revenues in U.S. Federal contracts, subcontracts, loans, grants,	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
S3	Does the public have access to information about the compensation of the executives in the Subrecipient's business or organization through periodic reports filed under section 13(a) or	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

Explanation:

Review Date:

Generating Reports for Web entry

- ⦿ Using Brio and our Data Warehouse
- ⦿ Report for purchase orders under contracts (not in Coeus, separate report from our Data Warehouse)

FFATA Dashboard

FFATA Monthly Report

1. Connect to COEUS. Enter your COEUS:
User Name: and Password:

2. Connect to MIT Data Warehouse. Enter your Warehouse:
User Name: and Password:

3. Subcontract Amount Info Effective Date Between:
 and

4. Click on the button below to preview the report:

FFATA reporting data

Prime Award fields	Subaward fields
Award Type	Organization Name
Sponsor Award Number	DUNS
MIT Award Number	PO Number/Subaward Number
Award Execution Date	Subaward Signature Date (Effective Date)
Anticipated Total Amount	Subaward Obligated Amount
Obligated Total Amount	Subaward Obligated Change

FFATA subaward reports submitted

October 2010	0
November 2010	2
December 2010	1
January 2011	1
February 2011	5 (4 new and 1 mod)
March 2011	Anticipate an upsurge

We have not yet had to report on any POs on contracts

What we've learned (helpful tips)

- ⦿ Check FSRS.gov website worklist against list from Coeus FFATA prime awards
- ⦿ For Prime awards we know had approved subs we immediately move into the FSRS “my worklist” tab
- ⦿ Prepare a draft report early for those we know have to be reported to identify non-imported fields from CCR for subawardee

Challenges

- ⦿ Data integrity
- ⦿ Timeliness of subaward data entry
- ⦿ Cross-team communication

What Coeus can't help us with...

- ◎ Procurement (i.e. Purchase orders) issued under FFATA contracts, which according to the FAR must be reported as well
 - Reports check our data warehouse/financial system to pull in purchase orders on our monthly report

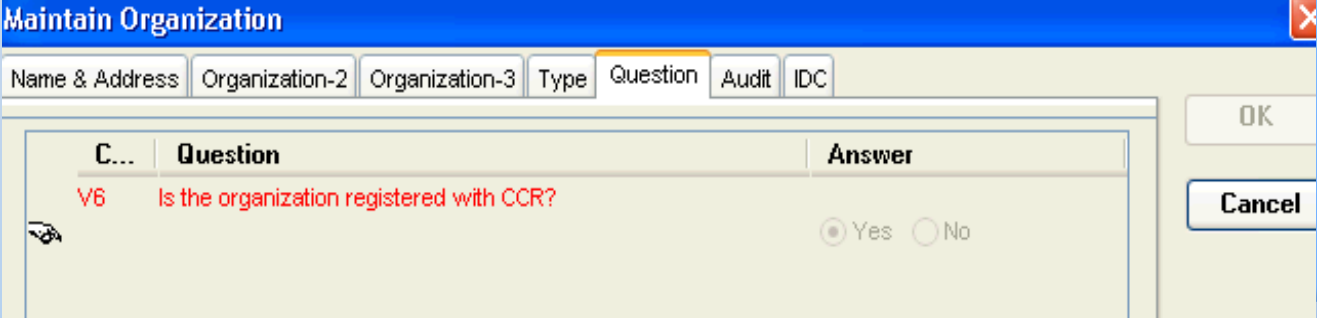
Vanderbilt University Medical Center

Vanderbilt's plan for FFATA

- ◎ New Processes and/or Process Changes
 - Use Organization Table for Subs
 - Begin using Subcontract Module
 - Interface with Contract System
 - Interface with Purchasing
 - Populate ARRA tables
 - New Reports for Review and Submission
- ◎ Challenges

Use Organization Table for Subs

- Populate Organization and Rolodex table(s)
 - Pre-populated entries with DUNS number information from subaward budget information
 - Added new question to Organization Y/N



The screenshot shows a software window titled "Maintain Organization" with a blue header bar. Below the header is a tabbed interface with tabs for "Name & Address", "Organization-2", "Organization-3", "Type", "Question", "Audit", and "IDC". The "Question" tab is selected. The main area contains a table with columns "C...", "Question", and "Answer". A single row is visible with the following content:


C...	Question	Answer
V6	Is the organization registered with CCR?	<input checked="" type="radio"/> Yes <input type="radio"/> No

On the right side of the window, there are "OK" and "Cancel" buttons.

Use Organization Table (continued)

- Rolodex Entries for Organizations have 'Duns #####' in Comment field for easier identification

	<input type="text"/>		<input type="text"/>
City:	<input type="text" value="Redondo Beach"/>	County:	<input type="text"/>
State/ Province Name:	<input type="text" value="California"/>	Postal Code:	<input type="text" value="90278-3714"/>
Country:	<input type="text" value="United States"/>	Phone:	<input type="text"/>
E Mail:	<input type="text"/>	Fax:	<input type="text"/>
Comments:	<input type="text" value="DUNS 138980334"/>		



- Created a process for departments to request new organizations when needed

Use Organization Table (continued)

- Informed/Trained departments on selecting 'Other Site' on the Organization tab in Proposal Development. We customized the search screen to move Duns Number.

The screenshot shows a software interface for managing organizations. On the left, there is a sidebar with a tree view containing three items: 'Proposal Organization', 'Performing Organization', and 'Other Organization'. The 'Other Organization' item is selected. The main area is titled 'Organization/Location' and contains a table with two columns: 'Type' and 'Location'. Below this table are 'Add' and 'Delete' buttons. An 'Organization Search' dialog box is overlaid on the main interface. It has two tabs: 'Organization Search' (active) and 'Organization Search Result'. The 'Organization Search' tab contains a table with the following columns: 'Id', 'Duns Number', 'Name', 'Address', 'Congr District', and 'Fed'. A red arrow points to the 'Duns Number' column header. The first row of the table has the value '*042092122*' in the 'Duns Number' column.

Id	Duns Number	Name	Address	Congr District	Fed
	042092122				

Use Organization Table (continued)

- Business Rule to ensure they have selected 'Other Site' if a subaward is in the budget

Begin using Subcontract Module

- ◎ Vanderbilt has two OSP offices
 - University side (DSR)
 - Will key subcontracts in Coeus
 - Medical Center side (GCM)
 - Uses a different system for contracts
 - Create a process to populate the subcontract tables using data from the contract system

Interface with Contract System

- Coeus data to Contracts
 - Created a view for Contract System to see the Organization entries
 - Created a view for Contract System to see Proposals where a subaward is involved
- ⊙ Contracts to Coeus
 - Created a view for Coeus to see contract information when contract has been finalized
 - Used to populate subcontract tables

Interface with Purchasing

- Purchasing will create a view of vendor information by account number that can be matched to account number in the award
 - Vendor system will begin using DUNS numbers to identify Vendors

Populate ARRA tables

◎ Populate ARRA tables with

- Award data
- Subcontract data
- Vendor Data

▼ Table

OSP\$ARRA_REPORT_VENDORS_CH
OSP\$ARRA_REPORT_VENDORS
OSP\$ARRA_REPORT_SUBCONTRACTS
OSP\$ARRA_REPORT_SUB_CH
OSP\$ARRA_REPORT_STATUS
OSP\$ARRA_REPORT_JOBS_CH
OSP\$ARRA_REPORT_JOBS
OSP\$ARRA_REPORT_AWARDS_CH
OSP\$ARRA_REPORT_AWARDS
OSP\$ARRA_REPORT
OSP\$ARRA_HIGHLY_COMPENSATED
OSP\$ARRA_COLUMN_PROPERTIES

Populate ARRA tables (continued)

- Use Coeus-Lite to review information (will probably rename)

ARRA Award quick card Data Dictionary ARRA Guidelines				
ARRA Award Details >>	Award Number: 1R01CA114471-01A1 Investigator: Mahdevan-Jansen,Anita			
Vendors	Account Number: 4224300801 Award Date: 11/16/2010			
Subcontracts	Agency/Sponsor: 000761 : 0761 : National Cancer Institute Lead Unit: 122430 : Biomedical Engineering			
Print	Title: This is a test			
Past Reports	More Award Details Edit All			
Finalize and Submit	Project Status: <input type="text" value="Less than 50% completed"/>			
	Activity Code: <input type="text" value="2) Professional Development & Trai"/>			
	Award Description: <input type="text" value="This is a Test"/>			
	Quarterly Activities/ Project Description: <input type="text"/>			
	Jobs Created			
	Number of Jobs (at MIT): <input type="text" value="0"/> + Jobs at Subs <input type="text" value="0"/> = <input type="text" value="0"/>			
	Description of Jobs Created: <input type="text"/>			
	<table border="1"><thead><tr><th>Name</th><th>Job Title</th><th>FTE</th></tr></thead></table>	Name	Job Title	FTE
Name	Job Title	FTE		
	Infrastructure			
	Primary Place of Research Activity			

New Reports for Review and Submission

- Run a report on the 5th day of the month showing current information for awards that meet the criteria
- Review/Correct Information in Coeus-Lite
- Run final report on the 25th
- Use final report to submit information to FSRS
- Future plans – Create final report in Excel/XML format to upload information to FSRS

Challenges

- ◎ Data
 - Being able to consistently match Coeus data with Contract data and Purchasing Data
 - Account Information is not complete for current awards and contracts
 - Purchasing system does not currently maintain DUNS numbers for vendors
- ◎ Process Change is always a challenge

Contact Information

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