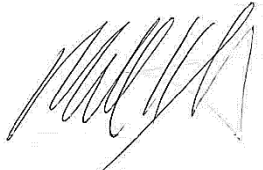


State of Vermont Agency of Human Services (AHS)

Policy Title: Federal Funds Accountability and Transparency Act (FFATA) Departmental Reporting Compliance Pertaining to Memorandums of Understanding (MOU)/Agreement (MOA)	Revision Date: 5.1.20
Attachments/Related Documents:	Revision Number: 2
Name/Title of Authorizing Signature: Michael K. Smith Secretary of AHS	Effective Date: 5.18.16
<input checked="" type="checkbox"/> Trauma Informed Review	

Authorizing Signature: 

POLICY STATEMENT:

All Departments within the Agency of Human Services (AHS) shall adhere to the requirements of the Federal Funding Accountability and Transparency Act (FFATA). The FFATA Subaward Reporting System (FSRS) is used to track FFATA activity. AHS departments must identify which AHS department or non-AHS department or agency ("Agency") bears the reporting responsibility when transferring funds between Agencies.

BACKGROUND:

Funds from a Federal Award are sometimes transferred between Agencies. The funds transferred (TSF) from one Agency to another are then subsequently used by the receiving Agency to enter into a subaward agreement(s). The transfer itself is not subject to reporting as it is not a subrecipient relationship by definition. On occasion, an Agency transfers funds to another Agency via an MOU or an MOA. Agencies sharing an award by transferring funds from said award, must determine which Agency is responsible for FSRS reporting. The responsible Agency is then charged with coordinating and entering subrecipient agreements pertaining to the Federal Award into FSRS.

AGREEMENT:

An MOU or an MOA typically includes the following sections:

- I. Purpose and Overview
- II. Responsibility/Scope of Work
- III. Allowable Activities and Reporting Requirements
- IV. Term of Agreement and Maximum Payment
- V. Payment Terms
- VI. **Federal Funding Accountability and Transparency Act (FFATA) Reporting**
- VII. Contacts
- VIII. Signatures

VI. Federal Funding Accountability and Transparency Act (FFATA) Reporting **must** identify which Agency is responsible for reporting in the FSRS system to ensure compliance with FFATA. For example, the following language should be included when the Agency sending funds (“Agency Y”) is responsible for FFATA reporting and the Agency receiving funds (“Agency X”) *may* subgrant said funds to subrecipients.

“If Agency X awards a subrecipient grant funded through this agreement, It will provide Agency Y with a copy of the award within 15 days of final execution. Agency Y has FFATA reporting responsibility for the federal grant funding this agreement.”

By providing a copy of the subgrant within 15 days of execution it ensures timely reporting of subawards in FSRS by the responsible department.

BACKGROUND REPORTING DEADLINE IN FSRS FOR FFATA:

Awards executed in one month must have all applicable data entered into the FSRS no later than the end of the following month.

Example: Subaward executed on November 10 must be entered into the FSRS no later than December 31.

REPORTING GUIDELINE:

FFATA reporting is required for all subgrants equal to or in excess of \$25,000 awarded on or after 10/1/2010. If a subgrant award initially exceeds \$25,000 but is later amended to below \$25,000, it must continue to be reported under the Transparency Act.

If a subgrant award is initially below \$25,000 but subsequent amendments increase the award amount over \$25,000, it must be included as of the date the award equals or exceeds \$25,000.

DEFINITIONS:

FFATA – Federal Funding Accountability and Transparency Act

FSRS – Federal Subaward Reporting System

TSF - Transfer of funds from one department business unit to another

Subaward – Under 2 CFR 200.92, the Uniform Guidance, Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program.

The Office of Management & Budget (OMB) further defines a sub-award as a monetary award made as a result of a Federal award to a grant recipient or contractor, to a sub-recipient or sub-contractor respectively.

Federal grants to other state agencies/departments are not considered subrecipient per the Uniform Guidance.

Subrecipient – A recipient (VISION Supplier) of a subaward from a pass-through entity (the State) to carry out a portion of the Federal Award. Federal grants to other state agencies/departments are not considered subrecipient per the Uniform Guidance.

VISION Supplier - An individual or company that provides good or services that is assigned an unique number in the State's accounting system.

REFERENCES:

AoA Bulletin No. 5 Policy for Grant Issuance and Monitoring:
https://aoa.vermont.gov/sites/aoa/files/Bulletins/Bulletin_5_eff12-26-14.pdf

Dept of Finance & Management Policy #8 FFATA Compliance:
[FIN-Policy_8_FFATA.pdf](#)

The FFATA Subaward Reporting System (FSRS) website:
[FSRS.gov](#)