

**October 28, 2008 Grants Policy Committee Stakeholder Webcast  
Selected Questions and Answers as of 10/28/2008**

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- **How did the GPC identify and prioritize near and long term products in its implementation plan?**
  - Products were prioritized based on the judgment of policy experts who understand the difficulty of the problem being addressed and the necessary time required to gain cross-agency consensus.
- **How will the new administration impact GPC planning and implementation, moving forward?**
  - Since both presidential candidates are Senators that were attached to Federal Funding Accountability and Transparency Act (FFATA) legislation created in 2006 and both have interest in transparency and accountability, transparency will likely be a part of the next administration no matter who wins.
  - Another challenging question is what pressure might be brought to bear to move more quickly. The existing government-wide policy experts must manage these supplementary activities in addition to their daily agency concerns.
- **What is the status on the effectiveness of the USAspending.gov database to reduce waste and fraud in grants to universities or any other organizations?**
  - We are not aware that there has been any such analysis completed to date to answer this question.
- **What is the possible tie-in of FFATA reconciliation to the single audit (i.e. through the single audit, will auditors be expected to reconcile reported expenditures against what is reported on USAspending.gov (i.e. FFATA data)?**
  - At this point in time, that is not being considered.
  - It has been proposed that the auditors from Inspector Generals' offices perform the FFATA audit.
  - Alternatively, the purpose of A-133 Audit is a check of internal control over the finances of each agency.
- **When will the actual FFATA pilot be finished?**
  - As background, we are currently using a module in the HHS tracking accountability in government grant systems, and it has not been determined if that module would be the final database used for Transparency Act sub-grant reporting or not. Thus, a Request For Information (RFI) was created to see what other systems exist.
  - Information from the RFI is available and OMB will get a report in November. Next steps for OMB are unclear, but they are required to prepare a report for Congress.
- **Is the proposed SF-424 form being used in the sub-award pilot?**
  - The HHS database is populated from the SF-424. Therefore, some primary awardee data is populated in the database. The database is populated with data depending on if the grantee used the SF-424 form, and if they are already in the HHS database.
- **When, where, and how will primary grantees (specifically states) enter their sub-award data on USAspending.gov?**

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- The portal is not currently poised for sub-awardees to post data on [usaspending.gov](http://usaspending.gov).
- Sub-award pilot is limited to the awardee providing the sub-award data
- These issues are being considered now, but there are no definitive answers, stay tuned.
- **When will the 350 plus comments on the proposed sub-award guidance be posted in the federal register?**
  - We will have to wait until after the pilot closes and we've collected the feedback from the pilot participants and until we finish analyzing the proposals that have come in from the RFI and others, then we will finalize the actual policy and submit the final federal register notice with responses to all of the comments.
  - In all likelihood it will be after the inauguration, but it is ultimately up to OMB. It will be an unusual year because of the election and the change of administration.
- **How can errors in USAspending.gov be reported? Is there a single place to cite problems?**
  - Use the feedback tab on the website to submit comments and feedback. There is also a help desk phone number and email address available on the website.
- **As a recipient of federal grants, which we in turn provide to our sub-grantees, who is responsible for reporting data to USAspending.gov? Will it be us, a recipient, or the federal agency?**
  - Currently federal agencies report the primary award recipient data.
  - No decision has been made yet, but in all the models that are being considered, the Federal Government reports the award and the sub-recipients report their obligations.
- **The FFATA law does not grant an extension except to "State, local or tribal governments" FFATA extensions are given by OMB only for certain types of grants**
  - The GPC will make a recommendation to OMB to request an extension.
- **Why don't the GPC and the Work Groups establish a grantee advisory committee to get stakeholder input?**
  - This could be done, but it would have to be hosted by one agency to comply with Federal Advisory Committee Act (FACA) rules.
  - We'll have to follow up on that idea. I know it's a big issue for the stakeholder community and it may require some coordination with OMB.
  - This answer will be put onto the GPC website. If the answer is yes, the follow on question is, when?
  - We will post a more detailed answer to this question on this webpage in the near future.
- **Last time you did a webcast on the PPR being implemented by ACF. When will other agencies implement this form?**
  - The Forms Work Group Chair is not here.
  - We will post an answer to this question on this webpage in the near future.

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- *(Follow Up Answer):* The SF-PPR forms and formats are in a "proof of concept" pilot cleared by OMB and sponsored by the HHS Administration for Children and Families. Under this pilot, 3 specific agencies that have developed instances of the PPR form and formats and are deploying them in electronic and hard copy format in 2009. In addition, another 3 to 6 agencies have formatted their collections and are exploring replacing their existing collections with the PPR formats.
  
- **On page 9 of the Implementation Plan, you have no products planned under your first objective for stewardship which is to continually assess how the committee itself is performing against your plans, why?**
  - The GPC needs feedback on priorities to identify the Plan and timeline that is important to the stakeholder community. Then the GPC will establish performance measurements based on that Plan.
  
- **Will the CCR.gov and the DUNS numbers be required for sub-grantees?**
  - Feedback from the stakeholder community regarding this issue has not yet been resolved. So there is no answer to this question at this time.
  
- **Is the dollar limit for sub-grantee reporting still \$25,000**
  - Yes.
  
- **Regarding the FFATA, who will be required to submit the data, the prime or the sub-awardee? The point is a primary grantee could be responsible for entering data 5 tiers down and work at getting data from those lower tiers that they do not have a legal relationship with, because their legal relationship is between them and their sub-recipient only. That is going to create an incredible amount of administrative burden on the primary recipient to gather and report all of that data down multiple tiers.**
  - The scenario you described would be the case if that top down model is chosen, there are other models being considered. One other model is that each tier is responsible for reporting on the tier underneath it. Again no final decision has been made.
  
- **How many tiers down will the data be required?**
  - Reporting goes all the way down to the bottom level which is \$25,000
  - If you have one tier and it goes down to \$25,000 then that's all, but if you have 50 tiers before you reach \$25,000, then it will go down 50 tiers.
  - The pilot is providing us with opportunity to get an understanding of the full spectrum of states capabilities regarding this type of data collection.
  
- **What agencies have implemented the Federal Financial Report (FFR) thus far?**
  - The National Science Foundation (NSF) is the only agency to date.
  
- **There seems to be very little collaboration between the GPC and the Federal Demonstration Partnership (FDP). Also, little recognition of accomplishments and processes in the National Council of Research Administrators (NCURA) and Society of Research Administrators (SRA). The GPC seems almost to be operating independently of the research administration. How can we get the various groups together with the GPC? Many of the GPC Implementation Plan issues have already being address or have been resolved.**

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- Under Tom Cooley's leadership, the GPC is involved in the FDP, NCURA, and SRA and others, so there must be a misunderstanding. The owner of this question should feel free to personally contact Tom Cooley at [Tcooley@nsf.gov](mailto:Tcooley@nsf.gov) to gain a better understanding of our involvement.
- **If FFATA implementation is delayed, will the October 1, 2008 data still be required?**
  - Yes. Federal agencies have requirements to submit updates every 30 days on primary grants awarded over the previous 30 days. We are still required to report the prime recipient data.
  - The possible deadline extension is regarding how to implement sub-award recipient data and how best to do so.
- **Will there be a grace period for agencies to update their policies once the new reporting model is released?**
  - Yes, possibly an 18 month extension before sub-award reporting is required.
- **When will the data elements that must be reported about each sub-award be established? Is there a list of the data elements currently used in the pilot?**
  - The data elements that are required to be reported are in the statutory language of the FFATA.