Silas: Welcome, and thank you for joining today's conference, FFATA Reporting Webinar and forum. Before we begin, please ensure that you have opened the chat panel by using the associated icon located at the bottom of your screen. If you require technical assistance, please send a chat to the event producer.

You can submit questions throughout the presentation to all panelists from the dropdown menu in the chat panel, enter your question in the message box provided, and send. All audio lines have been muted until the Q and A portion of the call. We will give you instruction on how to ask a question at that time. With that, I'll turn the call over to Morgan Fagioli, program officer. Please go ahead.

Morgan Fagioli: Good afternoon, grantees. Thanks for joining us today. We're going to be speaking about FFATA reporting and lots of tips to try to help with some of your challenges that you've been facing. As Silas said, my name is Morgan Fagioli. I'm a program officer on the state and grantee relations team. I'm joined with David Downey, who is helping us from the Grants Management Policy division in the Office of Finance and Operations.

David Downey: Good afternoon, everybody. Great to be with you.

Morgan Fagioli: All right. All right, so today we're going to review the FFATA reporting requirements. Again, as I mentioned, go through some of the common reporting challenges and also share some tips on how to try to mitigate those challenges as best we can. Then we're also going to take your questions and leave time for some Q and A at the end.

All right. As Silas mentioned, feel free to submit your questions in the chat feature at any point during the presentation. You can also email your questions to FFATA reporting at Ed.gov. If you have multiple questions in your email, if you can just number them, that'll make it a little bit easier for us to read through those questions and make sure we answer all of them. If you can also copy your state mailbox, then your program officer will be aware of your questions.

We're going to try to answer as many questions as we can, but if not, we will get back to you as soon as we can. We might need to phone our friends at GSA for some support. All right. Okay, so first off, does this session apply to me? The answer to that question would be yes. This session applies to all Ed grantees, Federal Prime recipients who have made sub-awards,.

With that, I have listed some of the acronyms and quick links that we will be going over today. As was previously mentioned, this session is going to be recorded, and the recording will be posted on the program specific reporting websites, one for Esser, [Gear Ed Eins 00:03:12], and so we will have the links to those pages at the end of the presentation. From here, the FSRS website, FSRS is the FFATA sub-award reporting system, and of course, FFATA is the Federal Funding and Transparency Act.

We also will be talking about USA spending, education stabilization fund, as well as the transparency portal, and referencing Sam.gov as well as GSA and OMB as well. Okay, so with that, I'm going to pass the reins over to David.

David Downey: Well, thank you, Morgan, and thanks again to all of you. Up to 153 total individuals, maybe 154, it keeps going up today. It's great to have all of you here to learn a little bit more about FFATA. Now, as we start this conversation, and there will be an opportunity to engage and take questions during today's program at the end, but just to kind of get you all in the spirit of being engaged and interactive, I would like you to put a response in the chat box. I want to get just a gauge. Let's just see where we are with this.

In terms of your level of frustration with FFATA, and it might not be any, if you have a high level of frustration, I want you to put the number five, or somewhere going up to five, five being you're the most frustrated with FFATA, or one, where you're not frustrated at all with FFATA, but you thought this would be a great professional learning environment. I want to see this in the chat. I'm seeing, let's see, I got a few here. I see some ones, fours, 500.

Morgan Fagioli: Got a 500.

David Downey: Fours, fives, threes, twos. Oh, they're popping in. Bianca's got four, three, I saw an eight. All right, the person who said 500, their name goes in there for the sympathy card, but if you put an eight, you're up there pretty good. Catherine says one. All right. Thank you all for, I got a few others saying eight. One, thank you for this kind of interaction. What we want to do over the next couple of hours eastern time with you 2:30 to 4:30, is we want to have a real conversation about FFATA in the situation.

To the extent that we can, we want to answer your questions, we'll also compile questions and make sure that our colleagues at GSA, Morgan, I love it when you said phone a friend, because that's what we need to do. There should be a spirit of friendship and partnership in all of this. I've been working on this recent issue with FFATA that's come to my attention over just last couple of years. I was part of the initial team that provided internal training to our Ed staff on FFATA requirements. During that time, it became very readily some of the challenges and issues. We'll talk to you about the overview of what you need to know, and we'll talk to you about those the challenges and some tips as we go forward.

With that said, let's talk a little bit about the FFATA overview. Now, the FFATA requirements requires that information about all of our federal awards, federal financial assistance, sub-awards, be made available to the public in one single one-stop shopping, if you will, place: a searchable website maintained by our friends at the Office of Management and Budget. That site currently is USASpending.gov, and this way it's part of the, FFATA initially was just referred to in shorthand as the Transparency Act.

Former President Obama shortly after signed into law another law that became known as the Transparency Act. We went to just the term FFATA for this. I say that to point out that the intent of this law is to make it very clear to the American people how our tax dollars, your dollars and mine, are being used to promote national interest and support community needs across the country. There's a very strong intent behind how we're reporting. We want to make sure that people know where the monies are and how to leverage those.

When we use the term grant or sub-award or sub-recipient, I want you to, again, don't forget this. Those terms are synonymous with taxpayers and tax dollars, your money and my money, as we are trying to make sure that needs are met across the country. Now, the reporting requirements, I think the law was initially passed in 2006, the recording requirements took effect in 2010. For almost 13 years, give or take a few months, our grantees that make sub-awards and grantees across the country, this has been one of the requirements that have been in effect.

How we define those federal awards includes the Prime awards for Grants, Discretionary and Formula, cooperative agreements, which is kind of a subset of the discretionary grants, more of a closer working relationship with the awarding agency, loans, contracts against sub-grants, and sub-contracts. We might say sub-grant, sub-award, sub-awardee, or sub-recipient, kind of know what we're thinking about there. As of November 20, and we didn't have a lot of changes with this law for almost a full decade. November of 2020, the reporting threshold moved up from $25,000 to $30,000 as a sub-award.

There are a few different places that you can learn more about this requirement, and we invite you to read through that. Now, one of those places is in title two of the Code of Federal Regulations, 2CFR. That's grants and agreements. It's a large kind of section of the code of regs that pertain to our grants programs. Part 170 deals with the FFATA reporting requirements, and that's going to be our focus today. There'll be some references to 2CFR part 200, better known as the Uniform Guidance. We'll be referencing that.

I'd also want to invite you to be aware of within the grant award notification, the GAN, now, this is a document that outlines your institution's, your entity's relationship with the Department of Education. I don't want to call it a contract because it's a grant and there are distinct differences in those pieces, but this document outlines the working relationship between the grantor and the grantee. I invite you to read through the GAN cover to cover.

Now, these documents are anywhere between 30 to 40 pages, and it gives you a sense of the full expectations and responsibilities that grantees have. For today's purposes, the most important of those would be GAN attachment nine, which outlines the FFATA requirements references Part 170. Let me get a chance to know you a little bit more, too. We got up to 166 people here at this moment. In the chat box, could you tell me your role? Are you in the accounting office? Are you a project director? Give me your title, give me your role. Just type that in the chat box here. I want to know who we're talking to.

If you're a project director, we want to know this. Grant manager, financial analyst, federal finance, sub-grant manager. I'm sometimes only get a few of these. Payment processor, ESEA accountant. Okay, good. Federal Funding Coordinator. Okay, count it. Grants manager. Good. Thank you for being so active in this. I think it's important. We wanted to make sure when we decided to hold this event that we were connecting with, yes, we want the project directors, the principal investigators who administer these grants. They're primary point of contact.

We also wanted to make sure that we're talking amongst ourselves, those of you who are charged with submitting the sub-award data into fsrs.gov, so that we're having the conversation with the key people in the key place. I only wish GSA was here to join us so that we could better connect you with the help desk people. It's a system that we don't control, and darn it, I wish we did. There are times, I know I could see Morgan's smiling face, we've all been there with this, so thank you for sharing that. That's good. Again, be familiar with those pieces.

If you have not reviewed GAN attachment nine for your respective awards, contact the program officer, rather, the project director, excuse me, who has access to those so that you can see those pieces, just so you know what's expected of you and how you can work with the folks that are charged with administering the grants as well. Now, some additional key terms that we'd want to highlight for you, the Ed grantee, it's the non-federal entity that received the award from the Department of Ed. Again, grant grantees, grant recipients, prime awardee, prime recipients.

When you've got 26, at least 26 federal grant making agencies, and you're trying to create a law in regs, people use different terms to mean the same things. I bet we'll see a few examples of that in your own work experience too. The pass through entity, that's the non-federal entity that provides a sub-award to the sub-recipients to carry out the work. I saw the comment that came up about level of frustration. We're going to handle questions at the end, but I'm glad to see that.

We're going to read through this chat in depth so that we can have a conversation so that you understand just how committed we are to helping you, and to know that for what it's worth, we share your frustration. We really do. Now, another term that has become rather infamous, nefarious this past year, the Unique Entity Identifier, it's the UEI, it has replaced the DUNS number as the specific number to identify a commercial non-profit or government entity.

Typically, again, this will be associated with our grantees and our sub-awardees. The UEI is used within SAM as a primary key to uniquely identify the entity. It's the equivalent of your organization's social security number. We had a transition that began in April of 2022, and the UEI replacing the DUNS number. It's a work in progress. Hopefully you're not having UEI challenges, but just be aware that the UEI is an important component. I'll say this now. Separate conversation, but it's really important. Please make sure to work with all parties at your organization to update and maintain and keep your UEIs active in Sam.gov.

Now, another number or term that you'll be familiar with or maybe not familiar with, but we want you to be is the FAIN, the Federal Awardee Identification Number. It's synonymous with the department's own PR award number. If the UEI is your organization's social security number, then your FAIN or the PR award number is the social security number, if you will, of that particular grant project. That number needs to be tracked, as for all your reporting and all your general correspondence with us. Internally, again, we call that the PR award number. Just in case you're talking to the help desk at GSA or Grants.gov, FAIN might be something that you'll hear.

Other terms, sub-award, the award provided by a pass-through entity to a sub-recipient to carry out part of a federal award received by the pass-through entity. It does not include payments to contractors. In this sub-award and contract, we're going to talk more in depth about how to differentiate those, or payments to an individual that's a beneficiary of a federal program. A sub-award may be provided through any form of legal means. Again, what we might define based on the regs as a sub-award, you might call a contract, or vice versa.

It is the intent and the nature of how this vehicle of carrying out the work, what it actually does and how it operates, determines that answer. Now, the sub-recipient, again, it's an entity usually, but not limited to the non-federal entities that receives a sub-award from a pass-through. For our purposes today, it is going to be a non-federal entity, but federal agencies do get sub-awards in some cases. That's more history than you'll need. It does not include an individual that isn't a beneficiary. Sub-recipients also may be recipients of other federal awards directly from an entity.

You could have a sub-award, a school district could have a sub-award through its state education agency, but it might have a discretionary grant through Ed or HHS or whomever. There are other terms and conditions and acronyms. If you think at times, maybe the federal government is trying to confuse you in this government ease of terms, well, you might be right, but that's not our goal today. Subpart A of part 200, it gives you a listing of some acronyms and definitions, and so that might help you as you're navigating communicating with us or our colleagues at GSA or other agencies.

Now, let's again, let's focus on this sub-award versus a contract and what this means. Now, first tier sub-awards, regardless of the instrument used, whatever you call it, must be reported when they meet the FFATA criteria for reporting. When the sub-awards perform programmatic work under the prime recipient, the grantee is approved grant. Sub-awards are going to be different from contract. As they maintain the sub awardee, they maintain a day-to-day oversight of the activities, whereas a contract, it's a procurement vehicle to provide goods and services, but they do not have any kind of managerial or oversight duties.

Regardless of what you're calling things, you have to ask yourself, "Does that entity have day-to-day operational control over a component?" If it does, for our purposes under FFATA, it's going to be a sub-award. The procurement awards to provide a service needed by the prime are not going to be reported in accordance with FFATA. That doesn't separate, that doesn't preclude you from maintaining good records, and documenting all the stuff under the procurement activities. For our purposes, we're only looking for those first tier sub-awards to be reported.

Now, 203-31, that's in part 200, the uniform guidance, it kind of g gives us a little bit more detail here. Now, first and foremost, this is going to be consistent with Part 170. We updated, recently, we updated the uniform guidance in 2020. Spoiler alert, we're going to be doing that again this year, federal wide. This regulatory citation in 200 is going to be consistent with Part 170. Here, when you're making that the sub-recipient determination, there's few characteristics, these five characteristics you want to be mindful of.

You determine who is eligible to receive what federal assistance, has its performance measured in relation to whether objectives of the federal program were met, has responsibility for the programmatic decision making? Again, that's such a critical threshold when we differentiate contracts versus sub-awards. It's responsible for adherence to the applicable federal program requirements specified in the federal awards specified in the GAN, and in accordance with its agreement, uses those federal funds to carry out a program for a public purpose authorized in statute, as opposed to just goods and services.

That's what we're looking for in terms of who we are reporting in terms of what is a sub-award? Now, where do you as the prime, as the grantee, where are you reporting? The prime recipients report their first tier sub-awards and first tier sub-award executive compensation, if not already entered in SAM, are self-reported by the sub-recipient through to Securities Exchange Commission, or to the Internal Revenue Service. Now, and that's going to be in the FFATA sub-award reporting system.

Some of this data gets pre-populated, which is great. That's why that UEI is in part so important. Now, when registering in FSRS, the recipient's prime data fields will be, again, pre-populated from what we have in Sam. Now, the prime recipients will report compensation for their five highest paid executives in Sam.gov as well, based on certain criteria. Generally speaking, it's the dollar amount of our sub-awards, which most, not all, but most, that's the focus for today. If the requirements, if you meet those thresholds for the executive compensation, you'd want to report those as well.

Now, that information that gets reported in FSRS.gov transfers to USA Spending, so this way, anyone in the public can see down to the zip code, and we know that's a bit of a challenging issue at times for some of you too, we'll talk about that, just see where those dollars are being distributed across the country. We want to see that to see how we're doing in terms of meeting need, where the public can leverage resources and see what's available in their communities.

It also helps to give us a better sense federal wide, where those pockets of underserved communities, underrepresented institutions, where that lack of equity might exist, and what we can try and do some things to help with those issues. You also want to note here, of course, that the grantee, UEI NG5 are all encompassing grants administration system is what determines the prime recipient in FSRS.gov. Now, some of the implications for increases and decreases, I said in 2020, the threshold after 10 years of no change, thinking ahead maybe of inflation, what have you, it moved from 25 to $30,000.

If an initial first tier sub-award is below 30,000, that's not going to get reported. If subsequent funding results to that sub-award in a total award equal of amount to 30,000, then the FFATAs will be subject to the reporting requirement, as the date that it meets or exceeds the 30,000. The example we have, an entity will receive a $20,000 sub-award in May, go back in time here, 2022, doesn't apply. You don't have to worry about FFATA. However, in August, the entity receives an additional 15,000 on that sub-award, and now the total was up to 35.

Based on the timing of when that sub-award met the threshold, the reporting begins. Again, if that threshold was increased to 35 in August, then in September of 2022, the FFATA reporting would've needed to have been initiated. Now, at the same time, and maybe some of your organizations, for whatever reasons, kind of fell into this, as we're looking at this too, if the initial award meets that $30,000 threshold, of course you're going to report FFATA, but if the funding actually, for whatever reasons, it's de-obligated, it's reduced, such that the total award now falls below that 30,000, the award still continues to be subject to the reporting requirements under FFATA.

You'll see that the prime awardee can then, you'll still continue to report on that. The example shows you maybe you had that 35,000, and drops down to 25,000 for whatever reason, maybe an error, maybe other legitimate reasons. The Prime award, you'll need to edit that information in the January report, because it happened in December, and change the sub-award amount to the 25,000. You'll provide a paper trail within the FSRS system, documenting an explanation for why this change has occurred. Again, the FFATA requirements will still be in effect.

Now, also with the first tier sub-awardee reporting criteria, again, this is with the executive compensation, there's a three threshold test, and the grantees must meet each of these three, where you have to also report on that five highest paid executives and sub-recipients. Only if these three things, if in the preceding fiscal year, the sub-recipient received 80% or more of its annual gross revenue in federal awards, and receive 25 million or more in annual gross revenues from the federal awards, and the public does not have access to the information through periodic filings with Security and Exchange Commission or the IRS.

You've got to meet, so the prime recipients are going to report that executive compensation for their sub-recipients, five highest paid, if they meet those three things. On only all three, if it's two of the three that they meet, but not the third, you don't report it. For many of our grantees, certainly probably the folks that I'm talking with here today, the executive compensation might not be an issue. I'm not saying that all of you are clear of that, but most of you, it's an SEA, it's some kind of governmental, a state entity and providing sub-awards, not always, but in many cases, to school districts, local education agencies, charter schools, where this information will be publicly available.

Just keeping that in mind that you've got to meet all three criteria for this to matter. I see the questions that are coming in. Thank you for putting those in there. That'll allow us to address those and thoughtfully get to them. I'm going to say this right now: there could be a question or two that we'll need to huddle on some questions we're going to need to probably speak with GSA about, but they're not being lost in the ether. You're putting them here in the chat, and we're committed to working with you to get resolution on those.

Now, another important piece to be compliant with the sub-award, the first tier sub-award reporting, is the timeline. Prime recipients report that first tier sub-award, and their first tier sub-award executive compensation, if applicable, by the end of the month following the month the award or obligation was made. If the grantee makes a sub-award on October one, then you're going to report by November 30th, 2022. Even if it's at the end of the month, if you make an award October 31st, if that's your way to trick or treat your Halloween there, you're going to spend that, November 30th, same deal. You're going to report the FFATA, the sub-award, and if applicable, the executive compensation by the end of the month.

The earlier in the month, you've got more time, but it's based on that, the end of the next month. I remember when we had our initial trainings on this, back in the fall of 2010, speaking, OMB came, and we had an event like this. Very, very similar to this with SEAs and the others in the grantee community. We wanted to especially give that level of time for folks just to deal with their own accounting systems and not be rushed. That's why you get this extra time to report. Now, it's really important, based on examples we've seen, the FFATA report should not be cumulative. This can be a real problem. We've identified these issues.

This can confuse the FSRS system and result in data duplications. For instance, as we reviewed information in USA spending, working with the office of the chief data officer, we've seen some state education agencies report 600% obligation of sub-awards, 600%. Now, I wasn't a math major in college, I was a history guy, but I know we can't legitimately obligate 600% of awards. That's a trip, why when we see any kind of sub-awards in excess of the amount. That's something we want to be mindful of. We'd ask that you work with us to ensure that we're not duplicating areas.

Now, there could be other reporting that might be duplicative, but if it's not meeting that 100%, we can't see that readily. We're asking you to be on top of any duplication concerns and work with us, and certainly work with the FSRS help desk to address that. Now, each month's FFATA report should only contain sub-awards made within the prior month. Okay? Keep that schedule in place as you go. That's important. Now, here's part of the fine print of the GAN, the Grand Award Notifications. The impact of being late or failing to report under FFATA, or frankly, in any aspect of not being in compliance, or meeting your performance goals and objectives.

Now, grantees that are not required are required to meet all of that fine print in the GAN, including the FFATA reporting. Failure to submit these reports may result in, one, you're an elevated risk level, and based on that, we look for changes in performance, compliance, and levels of elevated risk, or changes in risk in general. Not submitting the report could elevate that risk, which would mean this program office or others, based on their risk reviews, you could have additional specific conditions imposed to improve the grantee performance and compliance issues.

There could be single audit findings. Attachment three of the GAN outlines your requirements with regards to the non-federal audit, $750,000 expended annually. Subpart F of the uniform guidance goes into detail there. There could be audit findings, and with that, corrective action plans to address why you're not reporting on time or not reporting correctly. Listing of adverse information could be in what was known as FAPIIS, the Federal Award Payment Integrity Information System. That information, I should also say, is in SAM.gov now. It's under a category called Responsibilities and Qualifications. So we have to check FAPIIS before we make our awards, and so that's one of the areas. So there could be adverse information in SAM.gov now that reflects the challenges or problems you've had, and in some cases, early termination of the grant awards. Now ... or requiring returning of funds. That's some pretty heavy, serious stuff.

So what I want to say to all of you right now, take a breath and don't panic. We understand. The whole reason we're doing this, ladies and gentlemen, is because we know. We share your frustrations and we understand the problems you've had. You've got to make a good faith effort here to report accurately and on time, and document those efforts. But the reason we're having a training today is not to zap you with these kind of things, but to say this is what happens, and then let's work together to address this situation going forward.

Now, when the reporting challenges do occur, we are going to ask you to contact ED immediately, your State Mailbox. We've got an example there of how that's done. You want to contact and document that you've contacted the Federal Service Help Desk, the FSRS.gov help desk. Any incident or ticket numbers, you want to share that with your program officer via that State Mailbox. Document that, keep that on file. You probably want to make sure you've got you and somebody else at your organization who has access to that ticket. Document your efforts to comply with this fully, from the date you started this process to whenever it's actually truly resolved. We're going to talk about that word resolved here today. Verify that the information is accurate and current, and then we're going to work to resolve the issues in a monthly ... your monthly reports in a timely way as best we all can.

Now, no one has been working more diligently on this whole effort to address some of these issues and get an ... understanding it, working with her colleagues, working with you, than Morgan. And I'm going to turn things over to Morgan to take us here out for a little bit. Morgan?

Morgan Fagioli: And I've just been reading through some of the questions that have been coming into the chat, and I appreciate everyone submitting those questions. I'm hopeful that in the next few slides we'll try to answer some of those. But then, we can also come back to those at the end of the presentation, also. So I will move on to here. We're going to dive into some of the common reporting challenges that we've heard from you directly.

Okay, so these are the most common pitfalls I would say. One, just working with the Federal Service Desk in general. I'm going to try to run through some suggestions and some things that we've seen some positive feedback from. Also, just grantee familiarity, zip code challenges, batch uploading, and then we're going to jump into some more program specific reminders that we've seen, more so related to GEER and EANs program reporting, and also staff transitions. I know that there's been a lot of transition over the last three years, so a lot of staff have been diligently working to just gain access to the FSRS system, and we want to make sure that is a priority, and make sure that you all have access to the reports that you need to be working on.

Okay, so when to contact the Federal Service Desk. We have tried to divide the roles a little bit to try to focus on what is actually a technical system challenge that the help desk really is needed for to resolve. And then some of the more non-technical issues that maybe we can ... the state and grantee relations or David's team, we can try to help clarify. So the big one that the Help Desk definitely needs to assist with is if you all have a staff transition. When you're logged into FSRS, the person who is submitting the report is the only individual who is able to see an edit button next to that report. So in order to have those reports migrated to a new staff person's account so that the new staff person has those editing rights, that migration has to be completed by the FSRS, the Federal Service Desk.

Another area is if a report has to be deleted. As David was saying, sometimes duplications can occur. If a report is submitted, for instance, if a February report was just ... or a January report was just submitted, and it included sub-awards that were made before December of 2022, then it might need to be deleted so that you can just start fresh and make sure that that January FFATA report only includes sub awards that were made in December of 2022. So the Federal Service Desk is the only team able to delete the actual reports. And the other area are just general system errors. The system is relatively old and it is due for a facelift. We're hopeful that GSA will be working on that very soon once the UEI challenges slow down a bit and the focus can be shifted more towards FSRS. But system errors do happen, and if that is the case, the Federal Service Desk is the right way to go.

Okay, so some general tips for working with the Federal Service Desk. I'm sure that everyone has submitted a ticket. And from your experiences, you might have noticed that sometimes they are closed and they're labeled as resolved. And from the feedback we've received, a lot of times they might be closed and say that they're resolved, but you might not actually have the resolution that you need. That timeframe was at three days. It was within three business days. The Federal Service Desk did expand that to five business days. So we have a little bit more time to respond to the Federal Service Desk before they go and close out the system or close out the ticket. But we need to make sure that we're trying to stay on top of those tickets as best we can. So if you do submit a ticket, make sure that you check your spam folder so that if the Federal Service Desk responds and it goes somewhere else, that you will be able to catch that.

Also, when you're submitting the ticket, make sure that the contact information is fully filled out. Sometimes when, for instance, if a ticket is closed and marked as resolved, and you go in and submit a new ticket for the same issue, which I know many of you have experienced, sometimes the contact information will be left blank on that follow-up ticket. And from the FSRS side, or the Federal Service Desk side, excuse me, there's no connection between those tickets. So they need to make sure that they always see your contact information so they know who to go to, to answer their questions.

Additionally, any new questions are automatically generating a new ticket. They recommend that if you have multiple questions, you actually submit individual tickets just so that they can go through each one individually. So I know that this is very tedious, and we really appreciate your patience going through these processes. And if you have any tips, too, if you've been able to navigate this process and have figured out a way that you get a good response from the Federal Service Desk, please share those recommendations because we are very eager to find all of the tips we can to share with everybody. So I'm going to pass it back to David to continue with some of our challenges.

David Downey: All right. Well, thanks, Morgan. And one of the things I just want to quickly note, these tickets are open for five days, allowing the grantees to respond back to GSA. And at that point, after that fifth day, then they are closed from their perspective as resolved. One of the most maddening, frustrating things about this entire process is you, the grantees, you're having to open up ticket, after ticket, after ticket for whatever reasons. In some cases, I'm sure that maybe that folks were not as responsive as they should have been, from the state back to FSRS. But it's not truly resolved if the problem still exists.

The one positive, I'll say, since we started this to where we are today, is that before, it was three days. It was three days. And we really pushed hard to keep it open for longer. And no doubt because of the UEI crisis, and GSA refers to it as a crisis, so I'm not speaking out of turn by using that language, that bumped it to five days. So that's a benefit that we have here. But anyway, just to point that out, that's, again, one of those levels of frustration we have. We had a great meeting yesterday with GSA, Morgan and others of us were there, and they are changing. It's going to take time, but they are changing their perspective on how they are defining resolution and how they're looking at a caseload perspective that I think is going to be good long term, but it is a ways away.

Now, with grantee familiarity with the FSRS, varying levels of grantee experience we've encountered. There's also turnover among staff. I know that's being an issue that we have to address. And this isn't just our focus here. Morgan's team and folks, we started this with the focus of the grants pertaining to CARES Act grants. This impacts potentially all of our Formula Awards. Our focus and analysis has been on the reporting issues here, but no doubt other programs would be affected. So this is a big issue we've got to work with. So we need you, as best you can, to become as familiar with the website and how to address this. If you haven't already, please review the awardee user demonstration video and the awardee guide, which is available at FSRS.gov. Also review the FAQs, and we made a lot of recommendations in how GSA could enhance these resources for the grantee community to better serve you as we go forward.

Always be aware of the general understanding of the grantee responsibilities, the fine print with the GAN, and work to establish proper internal timelines to in terms of the reporting data and whatnot. Those of you who are more in the accounting or business office side of things, make sure that you've got good lines of communication with the project directors or principal investigators, and vice versa. Make sure that everybody knows who they are and you can connect. If there are any kind of silos or barriers that are keeping you from properly communicating with one another, try to knock those down. And if program staff can help with that, let's have those kind of consultations internally there.

Now, your relationship between the sub-grantees, that's yours, and we rely on you to monitor them and whatnot. But if there's internal issues within your own entity at the grantee, at the prime awardee level, talk to us and see if we can maybe help mediate that, work with you to support those efforts, just so everybody understands the importance of working together. And we've said this, and one of the things that we've learned, though, is it's not just isolated to the CARES Act. I'm sorry to say that became painfully clear.

But if there are other folks, if you're in a governor's office and you're working with the SCA, or if there's other folks that are responsible for reporting under FFATA somewhere else within your organization, connect with those folks. Connect with those folks. If you're a state education agency, work with your Health and Human Services equivalent. Maybe they're having less issues with the FFATA reporting. Build those connections, and maybe those folks are just down the hall from your office, potentially, or maybe they're just down the street in the state capitol. Keep those lines of communication open. Leverage those folks that are closer to you.

Morgan Fagioli: David, somehow you were muted. Sorry.

David Downey: Thank you very much. Sometimes I think the mouse pad's got a little bit of a mind of its own, so I appreciate that. I could filibuster all this whole time and your ears would be so blessed if you didn't have to hear this. But thanks to Morgan, I'm not muted. Now, one of the other issues that we have is the zip code issue. Many of our sub awardees, rural areas, they don't have a +4. In some cases, the folks, it's a mail stop on a rural road. And if folks are more focused on the big city parts of America, and we've got a lot of great folks that are there, they don't understand and appreciate the challenges and concerns for folks across the country in smaller communities.

So, couple things to note here. One, avoid ... use the entire full zip code when you're reporting if you've got the +4. Avoid any use of hyphens with that in the system. It's not as useful. It won't register if you don't. Inform the help desk of any issues and submit the ticket number to the department as soon as possible to help with a timely resolution. There is, at the US Post Office's website, we've provided a link there, you're able to do a lookup for the +4 if you're unaware of it. GSA did implement in 2021, so they know there's a problem. We've been working with them on those things, resolving the congressional zip code issues.

So there could be through the postal services website, you can identify that +4. When there's not, the guidance that GSA has given us, this has been to use the physical address, or you'll be prompted to manually enter a two digit congressional district. And you can get that information. We've got the link. You can get that information from the House of Representatives website if you're the third district of California, or you're the second district of Montana, or what have you. And just using those as examples. There is a Federal Service Desk FAQ that's related that we invite you to read over. And yes, one of the recommendations that we have provided to GSA, in addition to better addressing how they define resolve tickets and extending the timeframe for tickets being open, is to update the FAQs in a more meaningful way. And so I'd encourage you to look at that.

There was something, and I know we'll go to the chat and be talking about this more as we go forward, but I do want to point out we concur with you. We'd love to have had GSA to be a part of this. We'd had to change dates. We'd put out an invitation for them twice. But certainly, the change of dates, I think, made it tough. But this is something that we really would ... we'd welcome their partnership with this and to make time because we're all in this together. The government that is working for the people, regardless of what entity we are, we're all in this to support and to better support you and the important work that's being done across your communities.

Now, another tip that we've had, and we've already seen some issues in the conversations that this could be challenging, but GSA recommends uploading a batch of no more than 100 lines at a time to reduce error and duplications. There's a batch load guide the FSRS.gov website. As grantees, you should verify the sub-awards and sub-award obligations align with the grant award total. That way, again, we're not having a 300, 400, 600% sub-award obligation report in USAspending. The duplicative and the over-reporting is something that we have a better sense of seeing.

But under reporting, that's an equally bad thing. We want to make sure that the public can see how these dollars are being used, these grants slash taxpayer dollars, in as much to real time as we can within that ... The end of that following month, we want proper reports. FSRS does not have validation systems in place, so the system isn't going to be able to flag these duplicates. We've got to work together to identify them. Your work in how you're submitting this data is going be essential in reducing the potential duplication of reports that we see.

Also, another point to note here, and one of the things we learned as we were going, some of our grantees are unitary systems. Puerto Rico and Hawaii, I'm talking about you. I think it's a five-hour time difference to our colleagues and friends in Hawaii. Aloha to you. Save some beach and Mai Tais for us, I guess I'd say. But we appreciate you making the time to be here. We know the time difference makes it even tougher for some of you, including our West Coast folks, as well. But with the unitary systems, Hawaii and Puerto Rico, here, the way that you are set up, the way your structure is set and how you're disseminating those dollars, you are not defined making sub-awards based on this. As a unitary system, the decision is that you would not need to report under FFATA because it's not technically a sub-award.

Now, if you do make a sub-award to a separate entity, and the sub-award is for 30,000 or more, so if it's within the unitary system, it doesn't meet that sub-award definition. But if you do make a sub-award to an entity that does fall into that sub-award category, then it would apply and you would report under FSRS. Now, a sub-award may be provided through any form, just like we've said before, whether you call it a contract, or a sub-award, or what have you, it's the intent of how it works is the biggest piece. Example here is if Puerto Rico or Hawaii entered into a contract costing over 30,000 with a company to provide professional development for teachers, and it's determined to be a sub recipient relationship, this would then be a sub-award. But if it's not considered to be a sub recipient relationship, it wouldn't be. So there's where that has to be worked out. And if you have doubts or questions about it, contact your program person.

So now, also, as an additional reminder, a sub-award does not include the payments to a contractor, the small purchase agreements, vendor agreements, the consultant's agreements, based on that procurement of goods and services. At the end of the day, it is about that managerial, that day-to-day oversight or leadership are the pieces to note here. Some of the examples, again, the cleaning vendors, payroll services, or the information technology vendors. Again, those would not necessarily then meet the definitions of being a true sub-award. Let's see, 25. And now I'm going to turn things back over to Morgan, and let's see where [inaudible 00:53:30]

Morgan Fagioli: Thanks so much. So zooming into some of our program specific questions, too, we're going to start with GEER. So some of the things we've been seeing in our ... from what we can see in USAspending, if you go to your programs, over to your grants page in USAspending and scroll all the way to the bottom, you're able to see all of the sub-awards listed there. And for GEER, we've noticed that there are a lot of sub-awards listed to other state agencies. So I wanted to just share a reminder that if the governor did establish some sort of agreement, whether it's an MOU or an interagency agreement with that state agency, then that would delegate the authority to that state agency to administer the program. So in that case, if there is an MOU in place, the award to that state agency would not be reported as a sub-award, but it would be the sub-awards that state agency is awarding that would be reported into FFATA.

On the flip side, if there is not an agreement, then it would be, the sub-award would be to that state agency. So the ones that we are seeing as sub-awards made to state agencies, I'm hoping that all of those do not have agreements because then they would be reported correctly. But if you do know that there was an MOU in place, then those would need to be edited, and then it would be the sub wards that state agency is making would be reported. And that, it can be found ... It's question one in an FAQ through the annual performance reporting resources through the transparency portal grantee help page, and I'll share that link in the chat.

Okay, so moving on to an EANS FFATA reminder. So we've had a lot of questions about this, but when there are leftover EANs funds that are reverting to the governor for allowable uses under GEER, I think that there's some confusion that reverting means that they actually are changing programs. But in reality, those funds are remaining EANS funds. So once those funds are reverted and everything is approved, you've talked to your program officer, the governor is on board, and all this is happened, then any sub-awards made with those reverted funds that are 30,000 or more should then be reported in FSRS using the EANS FAIN. If you want, in the description section of FSRS, you could note that this sub-award was made with reverted EANS funds. I think that might help to just differentiate. But just a good reminder there.

And also for EANS, we did see that there are some states that have reported sub-awards to non-public schools. And for EANS, sub-awards were not made to non-public schools. It was just reimbursements or services. So you would have to look at the relationship of the contract. I think a lot of the contracts for services that were made, you'd have to look to determine if that contract is a sub recipient relationship, like what David had said previously. But if you are one of the states who accidentally reported, if a reimbursement was made to a non-public school and reported that as a sub-award instead, be sure to go in and edit your reports. The reimbursements would not be a sub-award. And if you need any additional information for EANS specific FFATA reminders, you can look at FAQ G-1 and G-2 of the EANS FFATA FAQs there.

Okay, so I think I mentioned this a little bit before, but for when to contact the Federal Service Desk. But a big common challenge we see are when staff transitions happen, and it really requires a ticket with the Federal Service Desk. I just copied the F FAQ specifically from the FSRS website, and they do note to go to the live chat. I tried to access the live chat yesterday, and was on for quite a while, and wasn't able to connect with someone. So if you do have a similar experience, let us know just so that we can also document it. And also, when you submit a ticket to try to get the previous reports migrated to your new staff person's account, you share that ticket number with your program officer. I've noted here that the only individual who is able to edit a past report is the person who originally submitted that report in FSRS. Alrighty.

Okay. So we've talked a little bit about changing, updating sub-awards amounts, and I know that we've had a lot of questions that are related to this in the chat, so hopefully this is helpful. If a sub-award amount is changed later on for any reason, if a calculation mistake happened or something, negative award amounts cannot be reported? I've seen a couple of these in USAspending, and they do appear as a negative sub-award amount, but the system is not actually calculating that as a negative for the total for the sub-award. So, should a sub-award need to be decreased, you would actually have to go back to the sub-award, the FFATA report for that month when that sub-award was originally reported, and click on the edit button, and edit the sub-award to decrease the total amount.

Again, the person who would be able to edit that report has to be the person who originally submitted it. So that is connected to the staff transitions, also. And I just spotted there was a question about the more multiple staff people permission. That is an area that we are recommending to GSA, and hopefully in future iterations, more staff members could be included. But right now, it's just the one person. There is actually an FAQ that if there is a shared email address and multiple people need to have access to the system, the email that is associated with the UEI could be a shared email so that multiple people within your agency could submit reports. It is noted it is not recommended, but it is an option.

David Downey: And, Morgan, if I could just say real quick of that, because I saw that as one of those questions, it's a really important internal control to minimize who has access to that data. When we met with GSA yesterday, they were talking about that, too. Cybersecurity is certainly one of our primary concerns here at the Department of Education. It's number one on our risk profile of things we want to deter. Those internal controls are things that GSA is looking for, too. So I would say, while some things could be frustrating, there's a real legitimate reason why they're urging that caution there, too. So I just wanted to say that with regards.

Morgan Fagioli: Thank you, David. Alrighty. Okay, so the UEI transition we've talked about a little bit. Just wanted to provide some direct links to some resources that GSA has been actively updating. GSA has published multiple quick start guides with directions, which have helped some grantees, I've heard, so I will provide these links in the PowerPoint.

But in terms of FFATA reporting, if you have an entity who has not yet received their UEI assignment or still in the process of that, for the purposes of reporting, you can omit that entity for that month until they have their UEI. We're recommending that once the UEI is assigned, then you could go back to the previous report and report the subaward that was made to that entity. We know that this is challenging and does require a lot of tracking to make sure that the subaward is tracked appropriately, but for the time being, we really want to get all of the FFATA reports still submitted on a timely basis and not have reports waiting for the one or two straggler UEIs.

Again, if you have sub-recipients who are struggling to receive their UEI assignment, and they do submit federal service desk tickets, please get the ticket numbers for those incidents that your sub-recipients are submitting. If you share those with your program officer, your state and grantee relations office program officer, we can get those escalated to GSA, so that they can work on those UEI issues. That is still very much a priority for GSA as well as ED, so we want to make sure that we are aware of what UEIs are still pending. And your program officer, if you're not sure, is in section nine of [inaudible 01:04:10]. Is that right? No, no. Section three, I think, of [inaudible 01:04:15]. Yep, section three. Sorry. Or you could email your state mailbox, which is just your state spelled out .OESE@ed.gov. And I'll pop that in the chat too.

Okay. And I will pass it back over to David. Thank you.

David Downey: Thanks, Morgan. A few winning reminders here. Let's thinking about things here. Whether you've been there for a while or you're new in your role, familiarize yourself with both USASpending and FSRS.gov. We really encourage you to complete the training, the online training at FSRS.gov. Take advantage of that and the users' guides, those manuals. Look over all those things. Be very comfortable in navigating in that system.

Very important to register and maintain all those required registrations for administering your ED grants and the UEIs too. Again, yesterday we had a great meeting with GSA, and they were very open. I want to emphasize that they were really open and supportive. They get it. And I know we had a little bit of a test thing. Morgan was showing some examples of working with the help desk. And they're committed to working on things. Some of the UEI's issues have kind of triaged and forced a triage and prioritized in making sure that we can resolve those. Stay on top of your UEI situation as you go forward. Really maintain the proper communication internally within your own organization, but also with us here at ED. Keep those lines of communication open. [inaudible 01:06:02] so I want you to do that.

Ensure that your data is accurate, valid and current. Our Office of Inspector General, one of our primary OIG management challenges that all of our grant making units are being held accountable for, and rightly so, is to make sure that our grantees' reporting data and our grantees' sub-recipient reporting data is accurate. So this is one of those areas where there's a major point of emphasis across the department, and so we ask your help in helping ensure that data tells the right story, the accurate story, of how taxpayer dollars are being used, and to what effect those dollars are being used.

Document your efforts. In fact, document, document, document, and when you've done documenting, document some more on your efforts to submit your reports. Document your efforts in communication with us as well as with GSA or any federal entity that you're needing to work with. And keep that information as you're going through auditors. I saw one of the comments says, "Auditors, they'll ding us as these things are going." Auditors have options with findings under $25,000. They don't have to report based on the uniform guidance, but they might. Provide a paper trail and a documentation for how or why things have occurred. And then once we've identified those, the findings are the findings, but then we can still work on our own to address those issues and strengthen up our internal controls, our own internal procedures as best we can as we go forward.

And when in doubt, contact your ED program officer. Feel free to call us. I'd always follow up a telephone call with an email, again, reflecting back on that conversation, just so that everybody who's in that conversation has the same understanding of what happened. Communication problems happen because we don't always hear what was said, and we're not always able to properly communicate our messages. So follow up when we're talking about things. Put that in writing. As appropriate, provide the appropriate citations, whether it's something with FFATA or something more programmatic in terms of grant of project implementation. Base your comments, your decisions, and your rationale in the law, in regulations or department policy as you go forward.

Those are some winning reminders that we share with you this afternoon to help you better administer your ED grants. Morgan, I'm going to turn things back to you.

Morgan Fagioli: All righty, thank you. So finally, we just included a slide with a bunch of resource links. Hopefully the links throughout the presentation are helpful as well. But these are some of the FSRS user guides, user demonstration, the direct link to the FSRS FAQs, which hopefully you've all seen them, but if you go to the FSRS main homepage and you scroll down, there's actually an FAQ tab that you have to click on to be able to see the questions. I have found it to be helpful to just do a simple control-F to try to have the find button box open up so that you can do a simple word search. The FAQs do not include a word search or a way to filter right now, so looking for keywords is helpful to me.

I've also included the Department of Education Job Aid, which is provided in the training that David's office had put together. That was provided in the invitation to this webinar also. And also a few GSA direct links to where UEI-related guidance is constantly being updated. They're actively working to get all of the UEIs assigned. And also the last one is GSA Interact. This is almost like a community discussion place, where you can subscribe to updates. So if GSA puts out some sort of newsletter, or if they're doing a webinar that'll be specific on how to update your registration, I find that website to be really helpful just to stay in the know with things that are happening with GSA.

David Downey: Oh, and Morgan, if I could just really quick-

Morgan Fagioli: Sure.

David Downey: -give a little plug. We'd ask you to review that training on FFATA, but at ed.gov, my office... We're very proud of this. We have a growing curriculum of grants administration tutorials 45 to 60 minutes in length for you and your staff on a host of grant-related topics, internal controls, allowable costs, peer reviewing for our discretionary grants, protection of human subjects, and so much indirect costs and so much more. So take advantage. Your tax dollars at work. Knock on wood. I hope you feel like they're effective. Take these trainings with your staff. Share them with other folks within your organizations. We're growing these. We update them as appropriate. They are 508-compliant. And we're also working to translate those. We're doing a few at a time. We're translating those into Spanish to better serve all of our grantee community. So take advantage of these wonderful trainings beyond the FFATA training, but some other things that'll help you better administer your ED grants down the road. Thanks, Morgan.

Morgan Fagioli: Thanks David. All righty. So we've reached the end of our webinar portion, and now we're going to switch into more of the FFATA forum. So couple options. We have a lot of questions in the chat, so we will try to just go through those and answer as many as we can. And again, we probably will need to phone a friend for more of the technical ones, and we'll check in with GSA and then get back to you with a response. We also... Let's see here. So yeah, and you can also email your questions to the FFATAReporting@ed.gov, and we will get back to you. And if you want to ask your question verbally, feel free to raise your hand, and our event producer will help to unmute you.

Speaker 1: To our attendees, if you would like to ask a question, please press the raise hand icon on Webex located just above your chat panel, or you can enter questions in the chat by sending a question to all panelists.

Morgan Fagioli: David, feel free to jump in. I'm scrolling to the top of the chat.

David Downey: Okay. And a lot of our numbers, big five, we see the levels of frustration we'd ask you to share. [inaudible 01:13:44]. Lot of five-pluses. People are in good humorous spirits with it anyway, I'll say that. That's wonderful.

Morgan Fagioli: I did get a question if they can get a copy of this PowerPoint, and that answer is yes. And I think I saw a question about when the recording will be posted. So following the recording, we're going to be processing the transcript, so we will be posting a copy of the transcript, the recording of this session, as well as the PowerPoint, so you will get all of that, and hopefully in the next couple weeks.

David Downey: Now, one thing... I used that question about your frustration levels as a bit of an icebreaker, but there are a couple of you, and I'm not going to put anybody on the spot here right now... And theoretically if you have a one or a two at your level of frustration with FFATA, that means it's working well for you. Five was it's bad. One or the low end is you're not seeing problems. If you aren't having difficulties with this, if you're not having challenges, maybe you could... You don't have to do it now. Think about it. But maybe reach out to Morgan or your program officer contact, and you say, "I know that people are having problems, and I'm glad to be here, but I'm not having issues with FFATA." Maybe those of you with those lower numbers have some wisdom to share with your colleagues, with us down the road.

I'm a big believer that you learn from one another. We're all teaching and learning from one another. It's like a figure eight. We're all teachers or students at different times. If you're not having those issues, maybe you're able to impart information to us. So think about if you'd be willing to share or to chat with folks. Think about that, and reach out to Morgan or your program officer to see if maybe we could get a sense as to how it's working for you effectively and why it is. Maybe we can replicate that in other states. So be open to that if you don't mind. Think about it. Not going to put anybody on the spot here and now. And now just let's see some more questions or things we can talk about.

Morgan Fagioli: So there's one question about if the subawards... So for the purposes of reporting, do the subawards have to be for the same purpose or just the same overall program? So I think what's being asked there is, the subawards are being reported by entity but also within that program. So for ESSER I specifically, all of the subawards made to whichever entity sub-recipient, you would just edit the subawards to that individual entity. I'm trying to think of another example. I've received one question about if, for ARP ESSER, for example, if the dollars that were allocated by formula to the LEAs needed to be separated from the reports for the SEA Reserve. So if funds from the SEA Reserve of ARP ESSER would also be reported in that same subaward if it were going to the same entity. And it is by entity, not by purpose of the funding, if that makes sense. So you wouldn't separate the SEA Reserve from the general ARP ESSER funds.

We did get a question about a negative subaward. So in general, please don't report negative subawards. If you have a subaward amount that needs to decrease, you would go back to when that subaward was originally made, reopen that FFATA report, and edit the subaward to match whatever the decreased amount is.

David Downey: I think it's an A for effort and creativity, but it doesn't yield the result that you'd like. And we've had several people who've raised that as an option, so you're not the only one to ask.

Looks like there were several folks that had asked the question about having more access, more folks within their entity having access to FSRS.gov. And Morgan, you gave a great example of maybe a workaround issue. That is something that I think came up with GSA yesterday. Obviously there's some security protocols and internal controls, but it is something to keep in mind as we go forward. How was that shared? If you don't mind maybe saying it again, how that shared email or what have you could be [inaudible 01:18:57]

Morgan Fagioli: Sure. I can find the actual FAQ, but it's-

David Downey: And I didn't mean to put you on the spot there. Sorry.

Morgan Fagioli: No, no, you're fine. There's one FAQ on the FSRS website that, if multiple users need to have access to the system, there is an option that you could create a shared email account for the agency, and then multiple people could log in using that shared email account. But they do note in the FAQ, and I'll post it, that it is not recommended, probably because of internal control challenges. But that is another option.

David Downey: I would say if you were going to go this route, again, it shouldn't be blanket, where there'd be a whole lot of people. It should be a couple. Should be like a lead and a backup. But again, with the kind of access to data and the responsibility of reporting on behalf of your entity, you want to make sure that there are... You're selecting that backup person... Just again, very competent, very responsible. Not to say that you've got folks that don't meet that bill, but think about that. Limit that, because that greater access is greater responsibility and greater accountability. So think about that as you go forward.

There was another one in here. "If I have a subgrant of $25,000, can I still report that in FFATA, or will that break the system?" Well, it won't break the system, but you do want to adhere to the reporting requirements. So an initial award of 30,000 or more, you're going to report that. If there's added more to it, you report that. If there is one that starts at 25, you wouldn't need to report that one. But if it was above 25 and then it decreased, let's say if it was 35 and it decreased to 25, you would report that as the example showed. Again, meet your reporting requirements, but don't add additional burden to yourself, would be my suggestion. Don't report what you don't need your report. Only report what is asked of you. It won't break the system, but it might skew some things there unnecessarily as we're reporting data.

Morgan Fagioli: I think that some grantees have shared that it's especially frustrating, because you're doing your finance reports, and it would be great if that same finance report could be uploaded for FFATA. But for the purposes of FFATA, we have to follow their rules to make their system happy, so we need to make sure that it's in the right format there.

David Downey: And another positive thing from that meeting we had with GSA leadership yesterday is they are looking. Again, it takes time, and things are prioritized, but they are looking to update and revamp the system and to make it more user-friendly in some ways. And again, the system's been in effect for since 2010, this reporting requirement. Things are evolving and changing. But I think it's a real positive with... When I heard GSA say yesterday that they were looking at resolve based more on case than just the tickets, and I'm like, "Man, they're getting it. They are getting it. They're seeing it." If you're not working with it, there's a lot that GSA is doing. They're going to have a federal audit clearinghouse in another year. There's a lot on their plate. But when I heard that, I got a sense of optimism. I'm not going to lie. I'm like, "Yes, they're understanding what our people are saying and feeling." And that's a good thing. It might be baby steps, but we're on the road to improving things, and that's good.

Morgan Fagioli: There was one question about... Says, "My agency receives funds through the governor's office via an inter-agency agreement. They are prime. They should report on my agency. But we do not then have to report the further subawards, correct? The instrument by which the funds are received under is irrelevant." So this would depend on the agreement itself. If there is an MOU in place and the agency, the other state agency that is receiving the funds, then that would actually not be reported as a subaward. The governor is delegating the state agency to administer the program, so at that point it would be... The subawarded funds that the state agency is subawarding would be then reported.

David Downey: The nature of the MOU... The devil's in the details, folks. The nature of the MOU and that relationship would determine if that relationship is subaward, a first-tier subaward, or not. And again, you've got examples here where, with this particular program or set of programs under the CARES Act, it was intended to address needs in certain ways. You have this piece of the FFATA reporting requirements. It was set up during another crisis. It was set up with the Recovery Act, and we had the housing market crash, and we were looking just to help avoid another Great Depression, which was a real strong reality at the time, and we wanted to account for dollars. So you've got different pieces kind of hitting and meeting and trying to correspond in ways that neither law, neither program's really set up at the same time or even thinking about one another probably in some respects.

We're just kind of reading through here, folks, to make sure we can... The questions we can get to and those that we very candidly will... I love the way Morgan said, "Phone a friend," so that we can make sure to answer you accurately and timely as best we can.

Morgan Fagioli: So there are a couple questions still about the adjusted subaward amounts, and remembering from what I've seen in USAspending, sometimes a subaward will be listed for $600 or $500, and I think that those are all meant to be adjustments. So instead of reporting just the difference, the change, if there was just a slight increase in the subaward, again, you'd have to go back and edit the previous subaward to be the total amount that that entity received.

David Downey: And it looks like, too, as I'm going through here... I'm looking at questions, but also some of the other responses. A lot of the folks that are here really are in that accounting business office that's responsible for reporting. We've got some of the folks with the program day-to-day oversight, but, knock on wood here, a lot of the people are in the right place, in the right room. We're talking to the right audience, which gives me... That's a real exciting thing, because this information can benefit any and everybody, but talking to those folks who are really hands-on with the FFATA reporting we wanted to get to, we wanted to connect with today.

All right, let's see. I'll just scroll all the way down. Let's see.

Morgan Fagioli: There are a couple comments about just wishing to talk to a person with the help desk, and I do understand that, and we're trying to figure out a way either that we can become a little bit more knowledgeable in the technical side to offer some more support, or we will be able to advocate for more support from the service desk side.

David Downey: And in the meantime, because I think this goes a long way when we think about audit findings and corrective actions, documenting your effort. Now, an auditor's going to look at something, and it's either there or not. It was either on time or it's not. There is some black-and-white aspects. I get that. But if you put a documentation and a paper trail that shows your good-faith effort... And again, in your good-faith effort, you might realize, "Ooh, I didn't realize that," or, "I needed some training myself." Everybody can do better, and so we look at that. But if you're documenting your good-faith effort here, that's going to go a long way, certainly from the Department of Education to auditors, but certainly in the program staff. As we're monitoring our grantees, as we're working with you, you show a paper trail where you're making a good-faith effort to do what we're asking you to do.

And there are challenges. The UEI situation is an example. This was nobody's fault. Wasn't GSA's fault. Wasn't the grantees' fault or the grant applicants' fault. It's not the agency's fault. We're all working together. And so we're in a tough situation. We're going to figure out a way to work it out. So document. Document what you're doing. Keep the lines of communication open. And so that you can say... Because I know with program staff your good-faith effort's going to count for a lot going forward.

"Are the dates of the subaward important?" Only to the extent to know when the reporting and FSRS is required. You might make your subawards almost automatically after you get a grant, and it might take a while for any number of reasons. For instance, 21st Century Community Learning Center, different program here at the department, those subawards are made on a competitive basis. Competitive basis, it's going to take time. It's probably not going to be the same month that ED makes the award for 21st Century that a state would make their competitive subawards in that case. So the key is the timing of when you report on that subaward within. It's by the end of that next month you do that.

[inaudible 01:30:30]

Morgan Fagioli: There are lots of questions about batch uploading, and a lot of really good information too about just the ZIP, that there might not be a category for the two-digit congressional district number, so that is definitely something we can share with GSA. Someone asked if we could do a batch upload training specifically. So I popped the link to the FSRS FAQ on batch uploads, but that is definitely something we will follow up with GSA about.

All of the comments and just that you've shared in the chat is really, really great, and thank you for doing that, because we will be going through the chat with a fine-tooth comb after the meeting too.

David Downey: I saw from the producer that there are some hands up in the queue. And I know there's some conversation back and forth. Now, very candidly, folks, some of these questions, our honest, direct answer is we'll have to get back with you, or we don't know, so know that up front. But I think it would be good if Morgan, if you're all right, I think we'd welcome taking some of these in the queue as well, and we'll see how it goes. You might hear, "We'll need to get back with you," more than you'd like, but let's give it a shot and let's see what we can do.

Silas: All right, moving to the first caller in queue. Caller, your line is unmuted. Please state your name and question.

Kim Palmer: My name is Kim Palmer. I'm with the state education agency. First, I wanted to say I'm new to this position and the transferring of records to the new email work. Obviously, it didn't take long. Everything worked well, so that process was great. Our biggest challenge are UEIs, which we need to upload our reports. My first question is for UEIs, do our grantees or sub-awardees need to have a SAM registration, or can they just have an assigned UEI?

David Downey: This is a good one.

Kim Palmer: I noticed with a lot of my reporting too, our agency was able to, in our files, when the transition occurred from DUNS to UEI, we were able to upload in our system their new UEIs. But now, I'm seeing FSRS is not able to pull over some of those UEIs. I don't know if it's no longer a valid, if the grantee did something in their SAM profile and got a different UEI. I'm not sure what's happening there. I've done, like Morgan said previously, leaving it blank until contacting that grantee and trying to get them to verify and update their information. But, again, that's something we can't control. But it's a continuous problem. Thankfully, it's a smaller percentage. But still, you want to resolve those missing UEIs. That's my biggest challenge at this point. When I have the UEIs, all cylinders are clicking, and I can upload my reports.

Morgan Fagioli: What state are you from?

Kim Palmer: Ohio, Ohio Department of Education. We have hundreds and hundreds of grantees, so it's a lot to keep up with.

Morgan Fagioli: Okay. David, do you want to take it, or do you want me to take it?

David Downey: There are a couple parts to this that I think we can tag team on it. Do you need a UEI to be reported in FFATA, or is it in the best interest of the entity to have a UEI going forward? I'm going to hit that part first. Actually, Morgan, you pop in here and correct me if I'm wrong. My understanding is for the purposes of FFATA reporting, an entity doesn't have to be registered. The sub-awardees don't have to be registered in SAM.gov, is my understanding. Is it in the best interest of every one of those school districts or entities to have a UEI registered in SAM.gov? My perspective, again, outside of just the FFATA reporting, I'd want every one of those school districts, I'd want anyone, if you're looking to do business with the federal government, have a valid UEI registered in SAM that's outside the confines of FFATA. I say that because we have new school districts that pop up all the time. I want them to be in a position to compete for federal dollars to meet the needs of their community. They can do that on a discretionary basis.

The big money, the surefire consistent money is the formula dollars that come down in sub-awards. But I would want my school districts in Southern Ohio or across that great state to be in a position to compete for every dollar that they can to meet needs in their community. That would mean they need to have a UEI registered with SAM. For the purposes of FFATA, they don't need it. But their best interest long term, they do. They should have it. They don't need it for FFATA.

Kim Palmer: Right. We usually advise them of that. I just wanted to know for our purposes for reporting, if they choose just to get an assigned UEI and not register in SAM, can we still complete our reporting? For whatever reason, FRS will still pull that UEI from SAM.

David Downey: They can, as Morgan just said. But I'm glad that you're advising them in that way. The other issue though with the UEI, the full thing is it is still taking time, as we work through some of the validation process. There will be delays, unfortunately, that way. But that's a great question. I'm really glad you asked it. Welcome to this new role. Wish you the very best there for the good people of Ohio.

Kim Palmer: Thank you.

Morgan Fagioli: Also, Kim, when they're submitting for their UEIs, if you have the incident numbers for your sub-recipients, please send them to your Ohio State mailbox, and your program officer can help to get those escalated.

David Downey: Absolutely.

Kim Palmer: They would definitely appreciate that. I will start using that.

David Downey: Who's next?

Kim Palmer: Thank you.

Silas: Moving to the next caller in queue. Caller, your line is unmuted. Please state your name and question.

Speaker 2: Hi, can you hear me?

Morgan Fagioli: Yes.

Speaker 2: Hi. I just had a question because I manage our gear sub-awards, and they're on a reimbursement basis. It sounds like when an award is made, it gets reported into the FFATA the month after the award was made just once, not every single month of the period of performance or after a drawdown is made, right?

Morgan Fagioli: Right. It's by when the sub-award was made. It's not when funds are liquidated, which I think is another area where states might be getting confused.

Speaker 2: Yeah. Then I asked this earlier in an email, but I was a little confused. Our actual [inaudible 01:39:28] creation dates don't necessarily match up with the period of performance. The period of performance might start a couple months earlier than when we actually obligated the award. I just don't want that to show up weird if people are receiving funds months before the actual obligation happened.

David Downey: I think that's a great question because one of the things, very honestly, that somebody, if they're looking at USAspending or whatever, they might say, "This doesn't seem consistent." The law requires that you report that sub-award basically by the end of the month following the time that it's made. For the purposes of FFATA, that's what you do. I would just be consistent in that part. If there is anything that looks like something that is a discrepancy, at least it's going to be a consistent, most likely, in just the way that the things are done. But report that sub-award by the end of the following month. From a FFATA perspective, you're in compliance with the law. That's all you need to be concerned about. Thank you.

Speaker 2: Thank you.

David Downey: The award now, again, if you have an initial award under $30,000, that does not have to be reported. If there is an award that is reduced, it met the reporting threshold, and then for whatever reasons, it was reduced, that still gets reported. You document that in the system. Obviously, if an award started off below the threshold and received additional funds, then that meets the reporting threshold.

Speaker 2: Okay.

Morgan Fagioli: I just want to add that some of... For the state and grantee relations side, when we're monitoring the FFATA reporting and we see, for example, that a state might have 0% reported for ARP ESSER, we do get questions because the public has access to USAspending, goes in, and says, "Why have no sub-awards been made?" If it is something like that or if there's a reason why, for instance, staff transition and you're still trying to get access to report, the best thing is just to let your program officer know so that we can make a note to explain why the sub-awards would be at 0% or why they would be particularly low. We are looking at those, and USAspending is refreshed from FSRS usually on a weekly basis. It might take a little bit longer for sub-awards to be deleted if changes are being made. But that USAspending data is being used in the education stabilization transparency portal too. All of the systems talk to each other, and that's where the public goes to... The public really relies on the data on those sites.

David Downey: Which is why the accuracy of that data is so important. It made me think about something else. If there is a... Duplicative reporting and these high percentages, that's a concern. But if you're a grantee that's making a lot of sub-awards and not reporting this data for whatever reason, we want to make sure that you get into the habit and get back into it. We'll be talking to you as well. The [inaudible 01:43:29] of the obligation for the sub-awards, when you're sitting at 200% or some percentage, that obviously stands out. But if you're not reporting frequently enough, that's another concern because we want accurate data for USAspending. We want the American people to know how those tax dollars are being spent. We want to make sure that if you have questions or unsure of how to report, talk to your state person, your program person, then review the FSRS information, and let's start updating those reports in a timely fashion.

Morgan Fagioli: Thank you.

David Downey: Who's next?

Silas: Moving to the next caller in queue. [inaudible 01:44:15]

Richard Trantha...: Yes, how are you doing?

David Downey: Good. You can speak up please.

Richard Trantha...: I'm Richard Trantham from the Department of Public Instruction in Raleigh, North Carolina.

David Downey: All right.

Richard Trantha...: We've been having an issue that the GSA help desk says that we have two UEIs for our entity, for the Department of Public Construction. I was wondering, was our DUNS number automatically changed to a UEI for the data?

David Downey: Great question, sir. My understanding is that every entity that had an active or inactive DUNS, GSA went through and they automatically gave you a UEI.

Richard Trantha...: Okay.

David Downey: It is possible that your old DUNS got changed over to a UEI, and then maybe somebody went and asked for another UEI at the institution. That's possible that you wound up with two, and maybe you only need one. I don't know.

Richard Trantha...: I have a follow-up question. The help desk said that possibly... Here in North Carolina, we have three people entering the data because it's just so much data. They said that possibly the two other assistants that enter data with me can't enter data now because it's linked to the old UEI. They said if they get new emails, they could possibly enter data in the new UEI. Is that a possibility? I can't seem to get an answer on it.

David Downey: Ladies and gentlemen, this is going to be one of those phone a friend moments, very candidly. It's a help desk issue with their mechanics. We need to reach out. Did you put that question in the chat, sir?

Richard Trantha...: It was rather involved, so I did not.

David Downey: I hate to ask you, I want to make sure that we capture this properly and share that with GSA because even though they weren't able to be here today, they're really committed to helping with this. That was evident yesterday.

Richard Trantha...: I will load all that up into the chat. I have one more question. Morgan, you said the program officer, that name was located in section three of [inaudible 01:46:59].

Morgan Fagioli: Yes, sir.

Richard Trantha...: Okay, thank you.

Morgan Fagioli: Yes. If you email the North Carolina state mailbox, so just NorthCarolina.OESE@ed.gov, your program officer monitors that state mailbox, so they will also get it that way.

Richard Trantha...: Thank you very much.

Morgan Fagioli: You're welcome.

David Downey: In terms of it, it looks like it popped up several times. Folks have asked for an actual mechanics on how to navigate FSRS. Again, this is a system we don't own. As an 8-track guy, the most 8-track guy on the call, I'm not the one to help lead that. But we will share this with GSA, and we'll see what we can do for that because I think that would be a... If we can set up something as a follow-up with them, no promises, but, man, I think that would be a really helpful thing. The demo that's on FSRS, and I'm asking you, let's be real here for a second, have you tried that? Has that been helpful, or is it just not as clear as you would like? Put that in the chat or what have you.

Richard Trantha...: Sorry, I didn't know if I'm muted or not.

Morgan Fagioli: You can go ahead, sir. You're still unmuted.

David Downey: You're still here with us. Go for it, sir.

Richard Trantha...: I had one question, again, with the two UEIs that we have. We've been told that only one UEI will go for reporting. In this case, since one UEI is our old information, will both of those be combined in reporting to US ED?

David Downey: That's going to be something we'll have to figure out with GSA in how that would be done. Previously, the same rules that would apply before, we've had entities with multiple DUNS numbers, so conceivably, if you all had, and that might not have been as clear when we first started this part of the conversation, if North Carolina Department of Ed had three DUNS numbers, you're going to get three UEIs. They weren't going to consolidate it down to one. Just like Syracuse University might have their... School of Journalism had a DUNS, it gets a UEI. Their pre-med program had a DUNS, it gets a UEI, et cetera. There could be more than that. If you only had one DUNS, and now you've got two UEIs, you'd have to talk with them about consolidating that or how that would work, frankly.

Richard Trantha...: I understand. Thank you for your time.

David Downey: Thank you, sir. Appreciate you raising that. Who's next? Oh, Morgan, you wanted to say something. I didn't mean to cut you off.

Morgan Fagioli: There's just a couple questions that are pretty similar in the chat. One is, for example, if an initial award is around $35,000 and is reported, then several months later, another award to the same entity is awarded for $10,000, would that need to be edited in the initial award to boost the award up to the $45,000 total, or because it's $10,000, would it not need to be reported because it's under 30? Whoops, what did I do? There we go. Sorry, I thought I clicked on a link, and it took me somewhere else. You want to answer that one, David?

David Downey: I can. It really depends on how you're defining that. If that's under the same program, that extra $10,000, the award now, if it was 35, now it's $45,000. You'd report that incremental edition. Part of the reporting too is consistency in how you define it with that. There we've got the 50 states and the territories that would be eligible for funding, and they would be required to report. Within a program, if you get an extra 10 grand, I'd say that's just an addition onto that single sub-award. If it was a different program of $10,000, no, then it's a sub-award of less than $10,000. I'll knock on wood, I think consistently following that approach would improve your reporting on that. That's a great question. From what you said, Morgan, we're hearing a lot of that maybe in the chat, so that's good to address. But that would be my guidance for you in that.

Morgan Fagioli: Alrighty. David, while we go to another raised hand question, can you find the link to the trainings you were talking about through your Grants Policy Division and pop that in the chat? That would be great.

David Downey: Yes, I can. I'll do that right now.

Morgan Fagioli: Silas, can we have another participant question?

Silas: Absolutely, moving to the next caller in queue. Your line is unmuted.

Speaker 3: My name is [inaudible 01:52:15]. I'm from Tennessee Department of Education. My question is... I hear that during the session, and in fact, any awards to another state agencies that is supposed to be a non-reportable award, right? We have some grants coming directly to us and supposed to be awarded to Department of Correction and Department of Children's Services. Most of the time or all the time I report this on FFATA, but based on what I hear, I'm not supposed to do that, right?

Morgan Fagioli: It would depend on the agreement you have with those other state agencies. You said you are with the SEA?

Speaker 3: Education. SEA, yeah.

Morgan Fagioli: I think if that's the case, it just would depend on the agreement. The example we were saying was with the governor's office, if the GEAR Award was awarded to the governor's office, but then if the SEA is administering the program, and they have an MOU to notate that, then the SEA would actually help to report the sub-awards that the SEA makes. It just depends on how the agreements are set up in your situation.

Speaker 3: We don't have a specific agreement in that matter anyway, so I'll keep going and reporting that until I figure out what's supposed to be done, right?

Morgan Fagioli: Right. If you don't have an agreement, then it would be reported as a sub-award.

Speaker 3: Thank you.

Morgan Fagioli: You're welcome.

David Downey: 4:27. We've got time for at least one more if I don't filibuster too long. Who's up next?

Silas: Moving to the next caller in queue. Your line is unmuted.

Jennifer Austin: Hi, this is Jennifer. I'm from Colorado State Education Agency. I just have a scenario I want to run by you because it's really affecting the awardee. We have an awardee that we need to, and it's a new awardee, actually, never done business with them before. They went through the competition, won the funds. We have yet to award them because they are having great difficulty getting their UEI number and their SAM.gov registration set up. Apparently, there might be some issues with who it might have been set up prior, underneath that individual's no longer with. There's some email situations or something, is my understanding.

As the State Education Agency, what are we allowed to do? I don't want to withhold funds. They need them. This seems like an administrative function/issue with GSA. But, again, I don't want to be out of compliance. I know that some of our federal contacts project officers are on the line. How should we be handling that, awarding them in hopes that it rectifies itself soon or...

David Downey: Thank you for this question. I know at Ed, I'll tell you what we did here at the department at the end of the fiscal year. We were in a situation where we had entities that were, for all intents and purposes, they should have gotten the grant. In some cases, they were earmarked by Congress to receive funding. But the UEI was on hold. We were in a really tough bind because if we don't make that award, that money lapses and goes back to Congress. In some cases, literally, an entity, Downey Nonprofit, we'll just use me as an example. It was in the law, Downey Nonprofit's supposed to get a grant. But if I don't have a UEI, an agency can't give me the money by law.

We made awards, but we denied grantees the ability to access those funds because of the lapse in funds. That was what we did. We're not doing that this year in part because the odds, it was a lower risk for a bad actor to figure out how to game the system and manipulate it to steal the funds. Now the UEI situation is out there, and people know that people who make a living out of exploiting the system and stealing from others, they know how to rig it now, so we can't do that.

I would want to talk with you... I'm not trying to keep everyone else out of the conversation. But could you reach out to me, David.Downey@ed.gov, and we'll sit down and chat about this more at length just in part because of the time, and see what kind of options there could be. Without having a UEI in place, legally, federal agencies can't make our awards. Now DOD got a special dispensation for its contracts. You think national security issues and that, and they bypassed the UEI late in the end of the fiscal year last year. In some cases, we had some workarounds with OGC, but we prohibited entities from receiving funds. Contact me and let's sit down and talk about what we can do to escalate the ticket issue, but also, just see some of your options. We'll work together. Bring in the right people at your state. Who am I talking to, by the way?

Jennifer Austin: It's Jennifer Austin. I'm with the Colorado Department of Education. In fact, I have a meeting with the entity who should be awarded these funds tomorrow or the day after, so I can get the ticket number and exactly what the situation is before I email you and let you know.

David Downey: Get all of that with me, and then we'll sit down. If I need to bring in some other people here at Ed from our Office of General Counsel to give some guidance, we'll make it happen and see. I'm not trying to keep others away, but it's an the weeds kind of call that what we'll need to do separately here.

Jennifer Austin: I appreciate that. Thank you.

Morgan Fagioli: Then definitely share that ticket number with me so I can escalate it.

David Downey: Right.

Morgan Fagioli: But I'm curious too, just the full registration, the UEI registration, David mentioned this, but it's only for entities who are going to be direct recipients of federal funds. At this current time, if it's critical that they have the full registration, then I would say stay in the queue. Even though GSA has gotten the time to review down incredibly, it's now I think only a five-day turnaround to verify entities, is what they're shooting for.

David Downey: If it's all there, it's five days.

Morgan Fagioli: If it's all there, it's five days. But if it's not critical for them to have the full registration, at this point, I would suggest just doing the UEI assignment so that you can get the awards made.

David Downey: For the purposes of FFATA, that makes sense.

Jennifer Austin: I'll find out tomorrow or the day after at what stage they're in because I honestly don't know the whole story. I just know I'm getting frantic phone calls from a couple of staff saying, "We can't award," blah, blah, blah. Awesome, I'll get the details.

Morgan Fagioli: Thanks for your work on that. Appreciate it.

David Downey: Thank you. Look forward to working with you on it, and we'll get you the right people. We'll do our best.

Jennifer Austin: Thank you.

Morgan Fagioli: We have tons more questions in the chat, so I'm going to get a download of this chat, work through it, and then try to follow up with you all individually to answer your questions. The responses might come from your state mailbox, but I'll be working on those in the coming days. But really appreciate the 132 of you who have stayed on for the full two hours of this. I hope that it was beneficial. We really appreciate your time and your diligence to ensure accurate FFATA reporting.

David Downey: Thank you. Best wishes administering your Ed grants folks. Take care.

Morgan Fagioli: Thank you so much. Bye.

Silas: That concludes today's conference. Thank you for using event services. You may now disconnect.