

Grants & Acquisition Data Elements

An Exercise in Standardization

Presentation at the DATA Act Town Hall

September 2014

Background

- Federal Funding Accountability & Transparency Act (FFATA) of 2006 established specific reporting requirements for federal awards (e.g., contracts, grants, loans) at the prime and sub-tier levels
- OMB issued guidance for reporting the required data based on existing reporting requirements for FAADS (grants) and FPDS (contracts)
- FFATA was amended in 2008 adding additional data elements for executive compensation. The FAR and Title 2 incorporated the requirements
- FFATA was amended in 2014 by the Digital Accountability and Transparency Act (DATA Act). It contained provisions such as: full disclosure of Federal funds; simplifying reporting; and data standardization

HHS and DOD

Volunteer to Examine FFATA Data Elements

- February 2014– HHS and DoD volunteered to examine the FFATA data elements to improve the usefulness of the data available to the public:
 - Goals
 - Improve the data in USASpending for both grants and contracts
 - Increase synergy between the business of grants and contracts
 - Identify areas that require focused work
- HHS/DoD established the following scope and assumptions:
 - Scope:
 - FAR-based contracts, grants (mandatory and discretionary), and cooperative agreements; loans and other financial assistance excluded
 - Examined 72 Data Elements and associated Data Definitions in the context of the presumed intent of FFATA
 - Assumptions:
 - Data elements across acquisitions and grants communities can be standardized, understanding there are some data elements that are truly unique to acquisition and grants
 - Authoritative sources for individual data elements will need to be resourced to support maintenance over time
 - Technical formats/systems will be modified accordingly
 - Agencies will be provided the opportunity to review proposed Data Element Names & Definitions
 - Agencies will be provided adequate time to implement the final resolutions

Analytic Findings for Consideration

Data Area – Identification of the Award

- Includes:
 - Award identifiers, descriptions, CFDA numbers, and NAICS codes
- Challenge:
 - different award identifiers and schemas in the grants and acquisition portfolio
- Recommendations:
 - No policy changes required for unique award IDs
 - No Process changes for award IDS or NAICS
 - Policy clarification for the use of CFDA in regards to whether the requirement for CFDA is to identify programs or funding
 - Authoritative sources (the definitive source for the data based in policy, statute, regulation, and as appropriate, captured electronically by the associated business system) remain as currently identified:
 - CFDA application maintained by GSA
 - NAICS list maintained by Census

Data Area

Awardee / Recipient Information

- Includes:
 - Entity name, entity and parent identifiers, address and compensation
- Challenge:
 - while each entity reported via FFATA has an “entity name, address, etc.,” the name of that entity could be different depending on the authoritative source of the information
- Recommendations:
 - SAM should be considered the authoritative source:
 - SAM must have a business process to ensure data validity and accuracy
 - Governing bodies must ensure agency’s accurate use of SAM data
 - Updated agency business processes as necessary
 - Updated agency systems to include this data in their records
 - Resources provided to governing body and/or managing partner to maintain SAM as the authoritative source so that is also considered as a trusted source throughout the Federal community

Data Area

Place of Performance

- Includes:
 - Predominant place of performance
- Challenge:
 - the place where the activity is performed is captured differently for acquisitions and grants, and there are even differences within the grants community. Additionally – the Congress imposes not geographic “place” indicators, but also quantitative indicators to explain the expanse of the physical territory being serviced
- Recommendations:
 - Confirm the intended goal of “place of performance data”
 - Re-evaluate the data requirements in this area to ensure the data collected meets the intended goal
 - If place codes are maintained an authoritative source and collection mechanism is required
 - Confirm what “place” means – is it a physical building, or can it be a location or landmark
 - Determine how to identify place of performance for Indian tribes

Data Area

Period of Performance

- Includes:
 - Period of Performance start and end dates
- Challenge:
 - the periods of performance of grants and contracts are measured in different ways
- Recommendations:
 - Clear guidance of expected data for period of performance
 - Establish governance process to ensure use of standards and their incorporation into business processes
 - Updated agency business processes as necessary
 - Updated agency systems as necessary to follow guidance

Data Area

Identification of Agencies

- Includes:
 - Funding and awarding agency information
- Challenges:
 - there are different definitions for funding and awarding agency
 - there are differing standards/practices for identifying an agency
- Recommendations:
 - Establishment of a single authoritative source for both Grants and Acquisitions
 - Clear guidance of expected data for awarding and funding agency information
 - Establish governance process to ensure use of standards and their incorporation into business processes
 - Updated collection mechanisms
 - Updated agency business processes as necessary
 - Updated agency systems to include this data in their records
 - Resources provided to maintain the authoritative source as a trusted source for use throughout the Federal community

Next Steps

- OMB, Treasury, Interagency Advisory Committee (IAC) and the Award Committee on E-gov (ACE) agree that iterative progress must be made on the development, review and proposal of common financial data standards, in order to ensure DATA Act deadlines are met, while preserving time for substantive review of more complex data standards issues.
- A Tiered or Phased Approach to Data Standardization Analysis is under consideration based on the principles of: leveraging work already underway, looking for areas of commonality which might evoke “quick” wins, and ensuring adequate time & cross-community collaboration for more complex data standards
- Award Committee on E-Gov to take the lead on examining the FFATA data elements and definitions and for setting the standards – collaboratively between acquisition and grants communities and in consultation with others – for data elements related to award amount, place of performance, period of performance, and “Recipient” organization

Back-Up Material

FFATA Requirements for Federal Awards

- Name of the entity receiving the award
- Amount of the award
- Transaction type
- Funding agency
- North American Industry Classification System (NAICS) code
- Catalog of Federal Domestic Assistance (CFDA) number
- Program source
- Award title descriptive of the purpose of each funding action
- Location of the entity receiving the award (including the city, state, congressional district, and country)
- Primary location of performance under the award (including the city, state, congressional district, and country)
- Unique identifier of the entity receiving the award
- Unique identifier of the parent entity of the recipient, should the entity be owned by another entity
- Names and total compensation of the five most highly compensated officers of the entity if—
 - The entity in the preceding fiscal year received—
 - 80 percent or more of its annual gross revenues in Federal awards; and
 - \$25,000,000 or more in annual gross revenues from Federal awards; and
 - The public does not have access to information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986.
- Any other relevant information specified by the Office of Management and Budget