

 ILLINOIS CRIMINAL JUSTICE INFORMATION AUTHORITY	Subject: Federal Funding Accountability and Transparency Act (FFATA) Data Reporting	
	Department: Federal and State Grants Unit	
	Effective Date: August 26, 2024	
General Counsel Signature: <i>Kristina Dion</i>		Date: August 20, 2024
Executive Director Signature: <i>Delrice J. Adams</i>		Date: August 20, 2024

- I. **POLICY STATEMENT:** The Federal Funding Accountability and Transparency Act of 2006 (FFATA) requires pass-through entities that administer federal Department of Justice (DOJ) grant award funds to report data to the FFATA Subaward Reporting System (FSRS) for grants issued by those pass-through entities that equals or exceeds \$30,000 and that were made from DOJ awards. The Illinois Criminal Justice Information Authority (ICJIA) as the State Administering Agency (SAA) of DOJ funds in Illinois, is required to file a FFATA subaward report in the FSRS by the end of each month following the month in which ICJIA awards (executes) any such sub-grant.

ICJIA does not have to report FFATA information if:

- The grant is awarded to an individual;
- Award recipient(s) had a gross income, from all sources, of \$300,000 or less in the previous tax year; or
- The required reporting would disclose confidential information.

II. DEFINITIONS

“Pass-through entity” means a non-Federal entity that provides a subaward to a subrecipient to carry out part of a federal program. 2 CFR 200.1. For the purpose of this policy, ICJIA is the pass-through entity.

“Subaward” means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. 2 CFR 200.1.

“Implementing Agency” means the first tier subawardee. For the purpose of this policy, the implementing agency is the subawardee that receives funding through a direct contract with ICJIA.

III. PROCEDURE

1. Office of General Counsel (OGC) staff will maintain a Grant Execution Tracking Log to track progress throughout review and through execution of all grant agreements and amendments.
2. The Federal and State Grants Unit (FSGU) Administrative Assistant will request from Innovation and Digital Services staff a copy of the DocuSign records indicating the dates the Executive Director signed the grant agreements or amendments for the applicable reporting period.
3. The FSGU Administrative Assistant will request from Office of Fiscal Management (OFM) staff a copy of the Contract Obligation Document (COD) Log indicating the dates the Executive Director signed the grant agreements or amendments for grants with CODs being processed by OFM.
4. The FSGU Administrative Assistant runs a FFATA query in the enhanced Grant Management Information System (eGMIS) to identify grants executed during the reporting month.
5. The FSGU Administrative Assistant, on a monthly basis, reviews the Grant Execution Tracking Log, the DocuSign records, the COD Log, and the eGMIS FFATA monthly query results for the reporting period to identify grants and amendments executed during the reporting month. After review, the FSGU Administrative Assistant compiles a list of grants to be entered into FSRS for the reporting month.
6. At the end of each month, the FSGU Administrative Assistant enters the subaward FFATA data for subawards identified in the reporting list described above into FSRS.
 - a. A separate report is created for each program and Federal Program Award Number represented by grants or grant amendments identified as executed in the reporting month.
 - i. If a subaward's designation is either increased or decreased during the subaward performance period or during the close-out process, the FFATA report for the affected federal award and month must be reopened and the subaward entry must be updated.
 - ii. FFATA reports do not need to be submitted for federal awards for months during which no new subawards were executed.
 - iii. If the initial subaward is below \$30,000, but subsequent modifications result in a subaward equal to or greater than \$30,000, the award will be subject to the reporting requirements as of the date of the execution of the subaward amendment.
 - iv. If the initial award equals or exceeds \$30,000, but funding is subsequently reduced such that the subaward total falls below \$30,000, the subaward will continue to be subject to the FFATA reporting requirements.
 - v. For subaward grants amended/increased using funds from a different federal

award than that of the original designation (for example, amending a Victims Of Crimes Act (VOCA) FFY18 grant with VOCA FFY19 funds) a separate FFATA report must be entered for each federal award fund source. The FFATA federal award report for the amended/increased amount should be submitted for the month in which the amendment/increase was executed. However, a FFATA report does not need to be submitted for a specific federal award if the additional funds derived from said federal award falls under the \$30,000 reporting threshold. For example, if a \$100,000 VOCA FFY18 subgrantee award is amended using \$25,000 in VOCA FFY19 funds, no FFATA report needs to be submitted to represent the \$25,000 in VOCA FFY19 funds.

- b. For grants executed prior to July 1, 2022, the FSGU Administrative Assistant saves and/or prints a hard copy of the completed FSRS Subaward entry for each subaward entered into FSRS and forwards to the appropriate Grant Specialist. The Grant Specialist places the hard copy of the completed PDF of the FSRS subaward entry in the In-House section of the appropriate Grant (Subaward) Master File.
 - c. For grants executed after June 30, 2022 the FSGU Administrative Assistant saves an electronic copy of completed FSRS Subaward entry for each subaward entered into FSRS to the appropriate electronic Grant (Subaward) Master File located at P:\Masterfiles.
 - d. The FSGU Administrative Assistant saves an electronic copy of each subaward entry entered into FSRS in the P:\FORMS\Initiation\FFATA\Reports folder for archival purposes.
7. As a quality control check, the FSGU Administrative Assistant provides OGC staff with electronic copies of the subaward entries entered into FSRS and OGC staff compares the subaward entries against the entries in their Grant Execution Tracking Log to ensure that all appropriate awards and amendments have been reported.
8. The FSGU Administrative Assistant must document the following information in the FSRS for each grant entry:
 - a. Subawardee Unique Entity Identifier (UEI) - The registered UEI number of the organization receiving the ICJIA grant award (Implementing Agency). Entering the UEI in the FSRS will cause the Subawardee Name, Subawardee Doing Business as Name, Subawardee Address, and responses for Q1 and Q2 to autopopulate.
 - b. Subawardee Name – The registered name of the Implementing Agency organization receiving the ICJIA grant award.
 - c. Subawardee Doing Business as Name – Name provided by subawardee on FFATA form.
 - d. Subawardee address - The registered address of the Implementing Agency. The address must include the city, state, and nine-digit zip code.
 - e. Amount of Subaward – Amount of the grant award indicated on FFATA form.
 - f. Subaward Obligation/Action Date – The date that the Executive Director signed the grant agreement. (Provided by Grant Specialist on the FFATA Form in the Budget Template)

- g. Federal Award Identifier Number – The number assigned to the federal grant award to ICJIA by the federal funding agency. This number will be provided on the Authority Program Funding Chart.
 - h. Subaward Project Description – Brief description of the program being funded. (Provided by Grant Specialist on the FFATA Form in the Budget Template). Subawardee Principal Place of Performance – The principle place of performance must include the city, state, nine-digit zip code and Congressional district (Congressional district is auto-populated per Zip Code entry).
 - i. Subaward Number – ICJIA-assigned grant number.
 - j. Sub Compensation Q1
 - In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific SAM record, represented by a UEI, belongs) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?: – Answer YES or NO.
 - If the answer is YES, Sub Compensation Q2 must be answered.
 - If the answer is NO, Sub Compensation Q2 is not applicable.
 - k. Sub Sub Compensation Q2
 - Does the public have access to information about the compensation of the executive in your business or organization (the legal entity to which this specific SAM record, represented by a UEI, belongs) 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?: – Answer YES or NO.
 - If the answer is NO, enter names and total compensation for the five (5) most highly compensated executives in the sub-awardee's business or organization (the legal entity to which this UEI number is assigned) in the Sub Top Employer Compensation fields.
9. If the FSGU Administrative Assistant is unable or unavailable to submit FFATA Reports, the FSGU Director shall reassign the duty to another staff member.

IV. **RESOURCES**

The FFATA Subaward Reporting System User Guide is located here:

https://www.fsrs.gov/documents/FSRS_Awardee_User_Guide.pdf

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<https://www.fsrs.gov/>

