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UC Comments on GSA's Information Collection 3090-0291, FSRs Registration Requirements for Prime Grant Awardees (89 FR 14842)

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April 26, 2024

Joanne Sosa
Acting Director, Regulatory Secretariat Division
General Services Administration
Submitted via www.regulations.gov

RE: University of California Response to GSA’s Information Collection 3090–0291, FSRS Registration Requirements for Prime Grant Awardees (89 FR 14842)

Dear Ms. Sosa:

On behalf of the University of California system (UC)—comprised of ten campuses, six academic health centers, and three affiliated U.S. Department of Energy national laboratories—I write to respond to GSA’s Information Collection on the Federal Funding Accountability and Transparency Act Sub-Award Reporting System Registration Requirements for Prime Grant Awardees (FFATA reporting requirements) published in the *Federal Register* on February 29, 2024. UC greatly appreciates GSA’s efforts to streamline and improve FFATA reporting for federal award recipients. Our responses to GSA’s specific questions are provided below.

1. Whether this collection of information is necessary and has practical utility:

UC recognizes that the Federal Funding Accountability and Transparency Act (FFATA) requires the Office of Management and Budget (OMB) to “ensure that data regarding subawards are disclosed in the same manner as data regarding other Federal awards” and to ensure that certain specific award information is available on “a single searchable website, accessible by the public.” (Public Law 109-282, Sec.2.) UC therefore will not comment on whether FFATA’s required information disclosures are necessary or practically useful, as Congress has deemed these disclosures mandatory.

2. Whether the GSA’s estimate of the public burden of this collection of information is accurate:

GSA’s estimate of a half hour per year in total burden hours is a gross underestimate based on UC’s experience. GSA’s estimate states that each respondent is submitting one response per year. Per the [FSRS website](#), however, prime contractors subject to Federal Acquisition Regulation clause 52.204-10 “are required to file a FFATA subaward report by the end of the month following the month in which the prime contractor awards any subcontract greater than \$30,000.” Consequently, UC contracts and grants offices submit FFATA reports monthly, for a total of 12 reports per year. Furthermore, each of these 12 reports takes much longer than a half hour to compile and submit. Our campuses estimate at least 18 hours per report and up to 30 hours per report for campuses with high volumes of subawardees. Therefore, the burden estimate should be at least 200 hours per respondent per year and up to 360 hours per year.

3. What are ways to enhance the quality, utility, and clarity of the information to be collected: UC suggests the following actions for the government to aid pass-through entities (PTEs) in submitting reliable, high-quality data in FSRS:

- Improve [the FAQs](#). For answers that describe a complex process in FSRS involving multiple steps—such as the answer to the question “How do I de-obligate an Award Amount in FSRS?”—we suggest clarifying the answer by including screenshots and step-by-step instructions. Alternatively, questions with complex answers could be added to the [FSRS Awardee User Guide](#) which provides more comprehensive information. Additionally, the list of FAQs is difficult to navigate because the questions are not grouped by subject area nor are they searchable. Therefore, we suggest better organization of the FAQs and a search by keyword function.
- Explain how to resolve the following error, which UC has encountered several times: “Another contractor is already designated as the prime contractor for this contract.” We believe this error appears when trying to select a federal award identification number (FAIN) for a prime award that has been transferred to UC from another institution. The FSRS Awardee User guide does not address this error. When we have contacted the help desk, they have advised us to work with the sponsor agency who, in turn, has directed us back to FSRS. We have also asked the original PTE to remove the award from their worklist, but this also has not resolved the problem. Because this error creates a burden for the PTE and inhibits compliance with our reporting requirements, UC requests that FSRS devise a resolution to this error and provide clear instructions.
- Provide dedicated technical support solely for FSRS and train support staff thoroughly on the FSRS system. The help desk currently available supports multiple sites and staff often cannot troubleshoot PTEs’ problems.

4. What are ways in to minimize the burden of the collection of information:

Rather than requiring PTEs to enter data in FSRS each time we obligate funds to a subrecipient, UC suggests that OMB instead allow PTEs to enter only the anticipated total obligation when the PTE first issues the subaward and then the actual obligation, if different, after payment of the final subrecipient invoice. If the government does not take up this suggestion, UC recommends in the alternative that FSRS not require re-entry of certain data each time a PTE awards additional funds on existing subawards. For example, PTEs must enter project descriptions each time funds are awarded on the same scope of work. However, we provide project descriptions with the initial report of the subaward, and the descriptions typically do not change over the project period. UC suggests instead that the FSRS system copy over information that is unlikely to change from year to year and allow entities to change it if necessary.

Additionally, limiting the required data fields in the FSRS system to only those required by FFATA would reduce the amount of time PTEs must spend on data entry. FFATA requires only five pieces of information:

1. name of the award recipient
2. award amount

3. information on the award—specifically transaction type, funding agency, the North American Industry Classification System code or Catalog of Federal Domestic Assistance number (where applicable), program source, and a descriptive award title
4. location of the award recipient and the primary location of performance under the award (specifically the city, state, congressional district, and country)
5. award recipient's unique identifier.

FSRS, however, requires several additional pieces of information, such as a subaward project description, subaward number, Zip+4, and executive compensation information (which is now captured in SAM.gov). The time spent compiling and entering these additional fields adds up to an appreciable extra burden that is not statutorily required.

Thank you for the opportunity to provide our input. If you have any questions concerning these comments, please contact Melissa Waver, Research Policy Manager, at Melissa.Waver@ucop.edu.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deborah Motton', is written over a horizontal line.

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