



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

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M-08-12

MEMORANDUM FOR FEDERAL AGENCIES

FROM: Robert Shea 
Associate Director

SUBJECT: Guidance on Future Data Submissions under the Federal Funding
Accountability and Transparency Act (Transparency Act)

Attached are the new "Operational Guidelines" that federal agencies shall use to report to USAspending.gov in compliance with the Federal Funding Accountability and Transparency Act. Agencies must employ these guidelines to submit data in an accurate format and on a timely basis to assure compliance with the Act. These guidelines supersede all previous guidelines. We anticipate within the next quarter, my office will provide guidance on measures of successful compliance with these guidelines and other data not currently being collected.

For policy questions, please contact Julie Basile at jbasile@omb.eop.gov or by phone at 202-395-4821. For technical questions related to these guidelines, please send an email to usaspendingdata@gsa.gov.

Attachment

FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT OPERATIONAL GUIDELINES

DATA MANAGEMENT:

Agencies shall make every effort to report timely, accurate and complete data as prescribed by the Transparency Act and ensure:

- Data is submitted in the proper format;
- All data for the prior month is provided to USAspending.gov by the 20th of each month or next business day to usaspendingdata@gsa.gov; and
- Each submission includes new data since the last submission and any modifications to previously submitted records.

Contract data is provided by the Federal Procurement Data System (FPDS). Agencies reporting contract data to FPDS must only provide the Program Source data not already collected. Additional information regarding the submission of Program Source data is found later in this guidance. Agencies not using FPDS to provide contract data must provide the data in an alternate file or begin reporting such data to FPDS.

Financial assistance (Grants, loans, and other assistance) data shall be submitted using the format detailed later in this document. It is consistent with the reporting format submitted to the Federal Assistance Award Database System (FAADS), for all financial assistance, with additional data elements required by the Transparency Act.

OMB is conducting a pilot project to identify the proper method for agencies to provide data for Sub-Grant, Subcontract, Other Transactions, inter-governmental transfers, and other types of federal awards.

FILE SUBMISSION PROCEDURES (Available until February 28, 2009)

The following procedure should be used to submit files to the Transparency Act web application via email. Agencies may also transfer data directly to the web application using the File Transfer Protocol (FTP) services outlined below.

File Transfer Protocol (FTP)

To use the FTP services, please provide your primary and alternate points of contact (POCs) to usaspendingdata@gsa.gov (please use a subject line of “Transparency Act FTP Request”). For each point of contact, provide:

- Full name
- Title/organization
- Phone number
- Email address

Upon receipt of this information, a Transparency Act technical team member will contact your POC to provide further details – including a username, password and detailed instructions for connecting to the Transparency Act FTP Server.

Agencies should use the file naming convention outlined below (in the EMAIL Submission section) to name their files.

EMAIL Submission

For email submissions to usaspendingdata@gsa.gov, the subject line will indicate:

1. Agency Name
2. Program Source (OR) Assistance Data (FAADSPLUS)
3. Date of Submission YYYY.MM.DD

Example: DOT_FAADSPLUS_2007.11.20

The body of the email should include the date range for the transactions submitted (e.g., Data included is from 10/1/2007 through 12/15/2007). Note this may differ from the date of submission.

Agencies are requested to use the following file naming convention on all attached email files (all caps):

[Agency Name]_[Data Format: PROGRAM SOURCE / ASSISTANCE]_[Submission Date YYYY.MM.DD].txt

(Example: DOT_ASSISTANCE_2007.12.20.txt)

SECURITY NOTE: Agencies **should not** password-protect the data files, as the data is public information and will ultimately be accessible via the USAspending.gov website.

DATA QUALITY AND ASSURANCE:

Agencies should redouble efforts to improve data quality, as much of the data submitted for posting to the USAspending.gov in the past has been incomplete, untimely, and inaccurate. In compliance with OMB Circular A-123, it is essential for agencies to apply appropriate internal controls to effectively manage the accuracy, integrity, timeliness, and appropriate privacy of all data submitted to USAspending.gov.

Agencies must designate the individuals responsible for working with OMB contract staff to securely and effectively transmit agency data. Agencies must ensure:

- Appropriate measures are put in place to review the content of Transparency Act data submissions,
- Appropriate oversight is provided over the accuracy and timeliness of the process,
- Submissions are validated by an appropriate official,
- Submissions do not contain data that, when posted publicly, would make personally identifiable information inappropriately available, and
- Business processes and authorities for administration and tracking of diverse funding mechanisms to develop their quality and assurance measures are continually maintained.

In particular, agencies should ensure that:

- Submission of “Program Source” data is provided. Of note, FPDS-NG is being modified to allow submission of the Treasury Accounting Symbol (TAS) with contract data (estimated completion in the summer of 2008).
- The “Congressional District” data element is not discretely required. However, a Zip Code PLUS 4 must be provided in the Recipient Zip Code field to support the Transparency Act web application’s determination of Congressional Districts.

The FAADS PLUS format was based on the existing FAADS file format, therefore congressional district processing will continue in the same manner. The congressional district should be populated with the two-position numeric code for congressional district of the recipient. The following codes should only be used when a more precise notation is not available.

- Any transaction covering a district at large, enter "00".
- Any transaction covering a jurisdiction(s) with a nonvoting delegate, enter "98".
- Any transaction covering a jurisdiction(s) with no representative, enter "99".
- Any transaction covering a jurisdiction that includes more than one congressional district, enter "90".

If agencies have trouble populating PLUS 4 data, they should contact Dun and Bradstreet (D&B) for assistance at FFATAHELP@dnb.com

Data Correction

As FAADS PLUS was based on the existing FAADS file format, corrections to assistance data can be performed in a manner similar to that used in the existing FAADS environment.

USAspending.gov uses the Fiscal Year and Quarter Correction field, to flag records as updates to previously submitted data. The correction/late indicator describes the nature of the update. For records marked as a Correction ("C") or as Late ("L"), the funding amount is the amount of the change and the Fiscal Year and Quarter Correction corresponds to the period to which the corrected or late record applies. Note that, in the case of corrections, USAspending does not replace the original record but rather adds the updated record (for example, a transaction of \$25,000 inadvertently submitted as \$250,000 would necessitate a Correction transaction in the amount of -\$225,000).

Data Deletion

Removing data in USAspending is a manually intensive process. As such, it is hoped that agencies will be able to use the Data Corrections process outlined above to correct errors in data. In the event that a record or set of records that was loaded needs to be removed from the system, please contact the USAspending technical team directly through usaspendingdata@gsa.gov.

Metrics on Agency Submission

The USAspending.gov web-site will report the completeness, accuracy, and timeliness of the data submitted. The current metrics (posted at <http://usaspending.gov/data/dataquality.php>) will be updated to include: (1) red, yellow, and green color coding reflecting agency data quality, (2) the date agency data is current through, in addition to the date the last file was submitted, and (3) the completeness of each agency's submission for each major data element.

DUN & BRADSTREET (D&B) DUNS MATCH FILE FORMAT & GUIDANCE:

USAspending.gov uses the DUNS number to fulfill the requirement to assign a unique identifier to entities doing business with the government. All DUNS number data transmitted to the Transparency Act web-site must be sent to D&B for validation prior to receipt by OMB. Agencies should assure that appropriate internal management controls are firmly in place to ensure this validation. The Grants/Assistance/Loans file format contains an optional data field to enter the D&B Confidence Code received for validated DUNS data. Agencies are encouraged to submit this code with their file submissions to affirm the accuracy of data validated through the D&B process. Data submitted to FPDS-NG does not require separate validation.

Please note the match process can still be performed if some of the data elements listed below are missing. Agencies should send D&B as much identifying information as possible on award recipients to increase the confidence level for DUNS Numbers and, through the Integrated Acquisition Environment (IAE) initiative, the appropriate PARENT DUNS match.

Agencies should contact the D&B Transparency Act Support Team at FFATAHELP@dnb.com to initiate the process for mapping and validating DUNS and PARENT DUNS data. Specific guidance on the submission of files will be provided at this time. The file format that will be required for submitting data to D&B is as follows:

To maximize D&B Match results, all fields are required *if* available in agency systems. ***D&B will reject a record if it does not contain both a FFATA Award Entity Name and valid Country Code. D&B will reject the file if the information provided does not conform to the specifications below.***

D&B Format:

Data Element	Length	Starting	Ending	Comments	Example
Department Code	4	1	4		
Agency System ID	20	5	24	Unique record identifier persistent in Agency system.	
FFATA Entity Primary Name	120	25	144	Name of entity receiving the Award. Legal name by which the entity is incorporated and pays taxes. If not incorporated, legal name contained in other official filing.	Johns Hopkins Medical Center
Physical Street Address 1	64	145	208		400 Wolfe Street
Physical Street Address 2	64	209	272	Used for Apt, Suite etc.	Suite 200
Physical City Name	30	273	302		Baltimore
Physical US State CD or Foreign Province	20	303	322		MD Manitoba etc
Physical Postal Code	9	323	331		220333094 P1Z 45N

Data Element	Length	Starting	Ending	Comments	Example
Physical Country Code	3	332	334	REQUIRED. Use the 3 character ISO country code standard.	e.g. USA CAN
Telephone Number	10	335	344	Do not include non-numeric characters	70355555555
FFATA Entity Secondary Name or Tradestyle (Doing Business As)	120	345	464	A secondary name that the Agency may have in its system for the entity receiving the Federal funding Award.	Johns Hopkins Medicine
Secondary or Mailing Street Address 1	64	465	528		
Secondary Mailing Street Address 2	64	529	592	Use for Apt, Suite etc. portion of the address	
Secondary or Mailing City	30	593	622		
Secondary or Mailing US State CD or Foreign Province Name	20	623	642		
Secondary or Mailing Postal Code	9	643	651		
Other internal Agency data	40	652	691	Any Agency specific data may be stored here, and will be returned on the matched record.	
Agency Input DUNS Number	9	692	700	The DUNS number the agency may already have on file for the entity	123456789 (no dashes)

GENERAL DATA COLLECTION INSTRUCTIONS FOR PROGRAM SOURCE IN AGENCY APPLICATIONS:

In November 2007, agencies agreed that the Treasury Account Symbol should be considered the official Program Source.

Guidelines for Submitting Treasury Account Symbols

OMB recommends that agencies work closely with their financial management and accounting systems to identify the Treasury Account Symbols. In general, the format for the Treasury Account Symbol is ‘two-four-three’, to accommodate all possible Treasury Account Symbols: XX-XXXX-XXX. The first two characters are the Agency Code and are mandatory. The four subsequent characters are the Treasury Account Symbol and are mandatory. The last three characters are the Sub-Treasury Account Symbol and must be supplied, if available, or left blank, if they are unavailable. Agencies should omit all X’s, dashes, and decimal points for populating program source data (Treasury Account Symbols).

Special Instructions

In circumstances where an award maps to more than one Treasury Account Symbol, one of the Treasury Account Symbols should be deemed predominate and this predominate symbol should be submitted with the award. The predominate program source is defined as the largest source of funding for the award.

Questions or concerns on Treasury Account Symbols should be directed to the Department of Treasury Financial Management Service (FMS).

Format

The format for providing the program source data to USAspending.gov is as follows:

Data Element	Type	Length
Agency FIPS Code (AgencyID) ¹	Character	4
Procurement Instrument Identifier (PIID) [1]	Character	70
Program Source/Treasury Account Symbol: Agency Code	Character	2
Program Source/Treasury Account Symbol: Account Code	Character	4
Program Source/Treasury Account Symbol: Sub-Account Code	Character	3

¹ Agency FIPS Code (AgencyID) and Procurement Instrument Identifier (PIID) should be identical to that as submitted to FPDS.

Additional Instructions:

In order to improve the availability and accuracy of the program source data, agencies are asked to make the following changes:

Finance System(s) Change:

Ensure the contract number (also known as the procurement instrument identifier) and Federal Award Identification Number (financial assistance) data elements are collected in finance systems.

Contracting System(s) Change:

Collect the Treasury Accounting Symbol (TAS) in automated contract writing systems or provide this data electronically through prescribed interfaces.

Financial Assistance System(s) Change:

Collect the Treasury Accounting Symbol (TAS) in automated financial assistance writing systems or provide this data electronically through prescribed interfaces.

Supporting Policy Changes:

Agencies shall immediately develop policies that establishes the owner of the TAS at the finance office and instruct all contracting/assistance officers to accept purchase requests (PRs)/notices of awards/applications, only if they contain the predominant TAS applicable to the action clearly identified on the face of that document. In addition, agencies that require contract or grant assistance from another agency or organization shall provide their TAS in compliance with the Transparency Act. The originating TAS must be a part of the funding agency's request. The subsequent reporting of the action, shall be based on the funding agency's TAS not that of the contracting or grant-making agency.

FORMAT FOR SUBMITTING FINANCIAL ASSISTANCE DATA

OMB has determined that the following file layout shall be used to report financial assistance data to the USAspending.gov.

Element	Type	Length
CFDA Program Number	Character	7
State Application Identifier (SAI Number)	Character	20
Recipient Name	Character	45
Recipient City Code	Character	5
Recipient City Name	Character	21
Recipient County Code	Character	3
Recipient County Name	Character	21
Recipient State Code	Character	2
Recipient Zip Code[1]	Character	9
Type of Recipient	Character	2
Type of Action	Character	1
Recipient Congressional District[1]	Character	2
Federal Agency/Organizational Unit Code	Character	4
Federal Award Identifier Number	Character	16
Federal Award Identifier Number (Modification)	Character	4
Federal Funding Sign	Character	1
Federal Funding Amount	Numeric	10
Non-Federal Funding Sign	Character	1
Non-Federal Funding Amount	Numeric	10
Total Funding Sign	Character	1
Total Funding Amount	Numeric	11
Obligation/Action Date	Character	8
Starting Date	Character	8
Ending Date	Character	8
Type of Assistance Transaction	Character	2
Record Type	Character	1
Correction/Late Indicator	Character	1
Fiscal Year and Quarter Correction	Character	5
Principal Place of Performance Code	Character	7
Principal Place of Performance (State)	Character	25
Principal Place of Performance (County or City)	Character	25
Principal Place of Performance Zip Code[1]	Character	9
Principal Place of Performance Congressional District[1]	Character	2
CFDA Program Title	Character	74
Federal Agency Name	Character	72
State Name	Character	25
Project Description	Character	149
DUNS Number	Character	9
DUNS Number PLUS 4	Character	4
Dun & Bradstreet Confidence Code [2]	Character	2
Program Source/Treasury Account Symbol: Agency Code	Character	2
Program Source/Treasury Account Symbol: Account Code	Character	4
Program Source/Treasury Account Symbol; Sub-Account Code (OPTIONAL)	Character	3
Recipient Address Line 1	Character	35

Element	Type	Length
Recipient Address Line 2	Character	35
Recipient Address Line 3	Character	35
Face Value of Direct Loan/Loan Guarantee	Numeric	16
Original Subsidy Cost of the Direct Loan/Loan Guarantee	Numeric	16

[1] Congressional District is not required; however, a Zip Code PLUS 4 must be provided in the Recipient Zip Code field to support programmatic determination of Congressional Districts by the Transparency Act web application.

[2] As provided to agencies by D&B when obtaining the DUNS number