MEMORANDUM FOR COMMANDER, UNITED STATES SPECIAL OPERATIONS COMMAND (ATTN: ACQUISITION EXECUTIVE) COMMANDER, UNITED STATES TRANSPORTATION COMMAND (ATTN: ACQUISITION EXECUTIVE) DEPUTY ASSISTANT SECRETARY OF THE ARMY (PROCUREMENT) DEPUTY ASSISTANT SECRETARY OF THE NAVY (ACQUISITION AND LOGISTICS MANAGEMENT) DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (CONTRACTING) DIRECTORS OF THE DEFENSE AGENCIES DIRECTORS OF THE DOD FIELD ACTIVITIES

SUBJECT: Update to Deployment of Subaward Reporting Requirements for the Federal Funding Accountability and Transparency Act

This is an update to my memo of October 28, 2010, regarding the deployment of subaward reporting requirements in accordance with the Federal Funding Accountability and Transparency Act of 2006 (FFATA). Federal prime contractors are required by the Federal Acquisition Regulation (FAR) clause 52.204-10, Reporting Executive Compensation and First-Tier Subcontract Awards, to report certain data about their subcontract awards at the new FFATA Subaward Reporting System (FSRS) (www.fsrs.gov), a module of the Electronic Subcontract Reporting System (eSRS). These reports should be considered as deliverables under the contract or order.

In accordance with the clause phase-in requirements, contracting officers must include the Treasury Account Symbol (TAS) for any new contract, order, or modification valued at $25,000 or more in their contract action report provided to the Federal Procurement Data System (FPDS). Modifications that include funding deobligations of $25,000 or more shall also include the TAS in the contract action report. These new thresholds for TAS reporting to FPDS are effective immediately. To simplify training and compliance, components may choose to include the TAS on all contract action reports with obligations or deobligations regardless of dollar value.

Components are encouraged to update their contract writing systems that interface with FPDS to pre-fill the contract action reports with the TAS where possible. Please see the frequently asked questions, located on the DPAP website at (http://www.acq.osd.mil/dpap/pdi/eb/federal_subaward_reporting_system.html) for more information about the TAS and reporting it to FPDS.
This continues to have a significant reporting impact on our business partner community. I thank you for implementing this requirement immediately to ensure the process is executed as smoothly as possible. Any questions regarding contractor reporting requirements may be directed to Ms. Lisa Romney, lisa.romney@osd.mil, 703-602-8007. Any questions specific to the reporting requirements for grants and other assistance action awardees may be directed to Mr. Mark Herbst, mark.herbst@osd.mil, 703-588-1377, in OASD(R&E).

Shay D. Assad
Director, Defense Procurement and Acquisition Policy