

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

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M-22-02

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

Shalanda D. Yang

FROM: Shalanda D. Young

Acting Director

SUBJECT: New Financial Assistance Transparency Reporting Requirements

The Federal Funding Accountability and Transparency Act (FFATA), as amended by the Digital Accountability and Transparency Act (DATA Act), requires the Federal Government to increase the availability, accuracy, and usefulness of online information regarding Federal spending. Specifically, it requires Federal agencies to link and report disparate and historically siloed budget, financial, and award-related Federal data in an easily searchable, downloadable, uniform, and consistent display to the public. Over the past several years, successful implementation of the DATA Act enabled for the first time a more comprehensive view of Federal spending linked to Federal account and award-level information.

The Administration is committed to increasing transparency of financial assistance data. This memorandum builds on the foundation set by Office of Management and Budget (OMB) Memorandum M-21-20, Promoting Public Trust in the Federal Government through Effective Implementation of the American Rescue Plan Act and Stewardship of the Taxpayer Resources. The purpose of this memorandum is to provide direction to agencies on additional financial assistance data to be reported to and displayed on USAspending.gov.

In 2020, OMB issued Memorandum M-21-03, *Improvements in Federal Spending Transparency for Financial Assistance*. As part of ongoing efforts to improve the transparency of financial assistance spending data reported to and displayed on USAspending.gov, that memorandum directed the development and use of data standards in accordance with the Grant Reporting Efficiency and Agreements Transparency (GREAT) Act, Pub. L. No. 116-103. This memorandum concludes the working group review required by Memorandum M-21-03, and Memorandum M-21-03 is now rescinded.

Grants Management is one of the key functional areas in the <u>Federal Integrated Business</u> <u>Framework</u> (FIBF), a model that enables the Federal Government to better coordinate and document common business needs across agencies. OMB and the Grants Standard Setting Agency (GSSA) convened the Grants Management Standards Working Group to finalize updates to the FIBF Grants Management Business Standards and recommend additional data to be

reported to and displayed on USAspending.gov. Consistent with the <u>Grants Management Business Standards</u>, agencies must report the following information to USAspending.gov, as indicated in the reporting instructions available in the <u>DATA Act Information Model Schema</u> (DAIMS).

- Effective October 1, 2023 (with optional reporting October 1, 2021), for competitive discretionary grants and cooperative agreements, agencies must report the data element Funding Opportunity Number.
- Effective October 1, 2023 (with optional reporting October 1, 2021), for competitive discretionary grants and cooperative agreements, agencies must report the data element Funding Opportunity Goals Text.
- Effective April 4, 2022 (with optional reporting October 1, 2021), for grants and cooperative agreements, agencies must report the data element GRM² Indirect Cost Federal Share Amount.³
- Effective October 1, 2021, for all new financial assistance awards, agencies must report all Assistance Listings and the associated funding for each Federal financial assistance award reported to USAspending.gov.
- Effective October 1, 2021, if the Period of Performance End Date for grants and cooperative agreements is revised for any reason (e.g., due to an extension, termination, lack of available funds, etc.), agencies are required report the updated Period of Performance End Date to USAspending.gov.

The addition of the new reporting requirements builds on previous OMB policy improvements to USAspending.gov reporting policies.⁴ Agencies are also reminded that award descriptions are a primary means of informing the public of the purpose of Federal funding for each financial

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¹ A discretionary award is one for "which the Federal awarding agency, in keeping with specific statutory authority that enables the agency to exercise judgment ("discretion"), selects the recipient and/or the amount of Federal funding awarded through a competitive process or based on merit of proposals." 2 C.F.R. § 200.1. As required by 2 C.F.R. § 200.204, notice of funding opportunities must be provided for discretionary grants and cooperative agreements that are competed.

² Short for "Grants Management."

³ For indirect cost, report the total amount of the award allocated to indirect costs in the approved award budget. If the indirect cost amount is adjusted through the life of the award, the updated amount need not be reported.

⁴ Agencies are reminded of the following OMB Policies that remain in effect for reporting of Federal spending, in addition to the reporting policies for procurement in the Federal Acquisition Regulation and the reporting policies for financial assistance at 2 C.F.R. § 200.212, 2 C.F.R., part 170, and 2 C.F.R., part 25: OMB Memorandum M-21-20, Promoting Public Trust in the Federal Government through Effective Implementation of the American Rescue Plan Act and Stewardship of the Taxpayer Resources; OMB Memorandum M-20-21, Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19); OMB Memorandum M-19-16, Centralized Mission Support Capabilities for the Federal Government; OMB Memorandum M-18-24 Strategies to Reduce Grant Recipient Reporting Burden; OMB Memorandum M-18-16, Appendix A to OMB Circular No. A-123, "Management of Reporting and Data Integrity Risk"; OMB Memorandum M-17-04, Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability; and OMB Management Procedures Memorandum No. 16-03, Additional Guidance for DATA Act Reporting: Implementing a Data Centric Approach for Reporting Federal Spending Information.

assistance award. Memorandum M-21-20 specifies content to be included in all financial assistance award descriptions.⁵

OMB continues to move forward in conjunction with the GSSA and the Grants Quality Service Management Office (QSMO) to support Administration priorities to increase reported Federal financial assistance data while reducing agency and grant recipient burden. These efforts reflect a vision of financial assistance reporting as an integral part of a more comprehensively defined Federal program inventory.

Questions may be sent to SpendingTransparency@OMB.eop.gov.

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⁵ For all Federal financial assistance, agencies are required to establish detailed and accurate award descriptions at the time of award. Award descriptions are critical to ensuring accountability and transparency, as they are a primary means to inform the public of the purpose of the Federal funding that is distinct from the programmatic level information in the Assistance Listings. Agencies shall establish processes to validate that award descriptions provide specificity about the award purpose, activities to be performed, expected deliverables and outcomes, and intended beneficiary(ies), as well as subrecipient activities, if known or specified at the time of award.