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| **USDA** | United States<br>Department of<br>Agriculture | Office of the<br>Chief Financial<br>Officer | Financial<br>Management<br>Services | P.O. Box 60000<br>New Orleans<br>Louisiana 70160 |

Bulletin:   OCFO 17-02

Date:   July 24, 2017

To:   All Agencies

Subject:   Completing DATA Act Award ID on FMMI Direct-Entry Obligations and Expenditures

## PURPOSE

This bulletin establishes policy and provides procedures for Financial Management Modernization Initiative (FMMI) users that will help USDA Agencies properly identify obligations and payments by Federal Award Identifier Number (FAIN) or Procurement Instrument Identifier (PIID) for manually-entered Purchase Orders, Earmarked Funds (i.e., Funds Commitment), or Invoices (FI Documents).

## DEFINITIONS

**Financial Assistance**:  Assistance that non-Federal entities receive or administer in the form of grants, loans, loan guarantees, property, cooperative agreements, interest subsidies, insurance, food commodities, direct appropriations, or other assistance, as defined in Title 31 of the United States Code Section 7501 – Definitions, (5).

**Procurement (Acquisition):**  According to the Federal Acquisition Regulation, Section 2.101(B), "Acquisition" means the acquiring by contract with appropriated funds of supplies or services (including construction) by and for the use of the Federal Government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, demonstrated, and evaluated.

**Award ID:**  For purposes of this bulletin, Award ID refers to either the Procurement Instrument Identification Number (PIID) or Federal Award Identification Number (FAIN) for financial assistance.

## AUTHORITIES

Agency compliance with this policy will result in more efficient operations and greater Digital Accountability and Transparency Act (DATA Act, Public Law 113-101) effectiveness in transparency reporting for Agencies and USDA.

The policy also ensures compliance with Office of Management and Budget (OMB) Memorandum 15-12, Section IV. 1 & 2, as well as OMB Management Procedures Memorandum 2016-03, Section A and Procurement Advisory 105B.

**Procurement Advisory 105B**  states for acquisition actions that exceed the micro-purchase threshold, agencies must use one of the following automated procurement systems:  (1) The Procurement Request Information System (PRISM) module in the Integrated Acquisition System (IAS), (2) The Virtual Incident Procurement (VIPR) System for Forest Service procurements

related to fire emergencies, or (3) The Web Based Supply Chain Management (WEBSCM) System for food commodity procurements processed by the Agricultural Marketing Service or Farm Services Agency. The advisory outlines exclusions for the following:

    a. Aviation contracts,
    b. Stewardship contracts,
    c. Acquisitions from foreign vendors,
    d. Acquisitions from Federal agencies, and
    e. Acquisitions in support of all risk incidents (fire suppression, hurricanes, floods, or other natural disasters) if a suitable system is not available due to urgency or geographic location.

Entry of the award ID on documents noted in this policy ensures compliance with Federal Acquisition Regulations Subpart 4.1602, which concerns the Government-unique identifier for each solicitation, contract, agreement, or order. It also ensures compliance with OMB Memorandum 15-12, Section IV.2 which states that "To implement this requirement (to report the FAIN), agencies will be required to carry the prime award ID in agency financial systems, in order to link between an accounting transaction and an award."

## BACKGROUND

It is USDA's responsibility to ensure Agencies are compliant with the DATA Act and are providing the Award ID (FAIN or PIID) with the information necessary to properly identify obligations and payments for each type of award. OCFO's Financial Management Services (FMS) is establishing this  policy in response to the USDA DATA Act implementation plan and government wide guidance.  This may result in minimal additional work for the Agency when entering obligations or vouchers manually.  However, the negative impacts are negligible contrasted to the enhanced transparency by application of a proper and consistent methodology to capture the FAIN or PIID for manually-entered Purchase Orders, Earmarked Funds, and Vouchers.

## POLICY

Departmental Offices and Agencies shall ensure the FAIN or PIID is entered in the dedicated fields on FMMI documents whenever they expend budget for activities reportable under the DATA Act.   Automated interfaces from subsystems like IAS and ezFedGrants have been updated to record the Award ID in the dedicated fields.  However, whenever manual entry of reportable obligation documents or invoice documents is performed, agency users are responsible for entering the appropriate FAIN or PIID on those documents.

Agencies should continually evaluate how awards are fulfilled and adhere to the USDA Procurement Advisory Number 105B that prescribes approved acquisition methods.  (IAS, VIPR, WEBSCM, etc).

To the extent that business needs result in a departure from these methods and thus requires direct-entry of obligations and/or invoices, every document must nevertheless:

- Include a procurement identifier (PIID), or
- Include a financial assistance identifier (FAIN), or
- Reflect the term "NONDATAACT" in the FAIN Award ID indicating the agency's assertion that the obligation and/or expenditure is not reportable.

OCFO and OPPM will review the appropriateness of variances from the policy. Variances from the above advisory require written justification from the agency and OCFO & OPPM approval.

## RESPONSIBILITIES

FMMI users are responsible for following the instructions provided in the DATA Act, Entering Award ID on Manually-entered FMMI Documents. The section of that document titled "**Procedures"** describes the processes users should follow when utilizing direct-entered POs, Earmarked Funds obligations, or "FI" Invoices.

In brief, the FAIN and PIID fields have been added to the header sections on FI Invoices, Purchase Orders, and Funds Commitment obligations. New transactions have been added to the FMMI roles to support review, modification, and reporting of the Award ID on FMMI documents. Consequently, new functionality has been added to the Invoice Processor/Reporter, Purchase Order Processor/Reporter, and Funds Management Processor/Reporter roles. Agencies do not need to request new roles.

The new transaction codes support reporting on Award ID. With the addition of the FAIN and PIID fields in the document headers, standard FMMI report features can be used to possibly filter on those fields using "Dynamic Selection" and report results of the same via the "Change Layout" option.

## INQUIRIES

Any questions concerning this bulletin should be directed to the Financial Management Services Center (FMSC) at fmsc.help@nfc.usda.gov, or phone numbers (877) 243-3072.

## EFFECTIVE DATE

This bulletin is effective immediately.

/s/
Lynn Moaney
Acting, Chief Financial Officer
USDA, OCFO