



Federal Spending Transparency for Financial Assistance Requirements

A Mandatory Reference for ADS Chapter 303

New Edition Date: 02/02/2021
Responsible Office: M/OAA/P
File Name: 303mbc_020221

1. Background

In November 2020, OMB issued two memos related to federal financial assistance: [M-21-03, Improvements in Federal Spending Transparency for Financial Assistance](#); and Management Procedures Memo 2021-01, Additional Guidance for Federal Spending Transparency for Financial Assistance. These memos build on the Government's existing efforts to improve transparency over financial assistance spending and are intended to align efforts to implement the Transparency Act as amended by the Digital Accountability and Transparency Act (DATA Act), the President's Management Agenda, and the Grant Reporting Efficiency and Agreement Transparency Act (GREAT Act).

2. Overview

In support of Federal financial assistance transparency as outlined in M-21-03, Memo 2021-01 requires agencies to improve the transparency and accountability over grants management.

Agreement Officers (AOs) are reminded of the requirements to generate notices of funding opportunities (NOFOs) in GLAAS and to post NOFOs on the OMB designated website grants.gov, pursuant to [2 CFR 200.204](#) and [ADS 303.3.5](#).

AOs are also reminded of the requirement to announce all Federal awards publicly and publish the required information on a publicly available OMB-designated governmentwide website USASpending.gov. This announcement is currently captured in the Agency's information systems and reported to USASpending.gov on a weekly basis (see [2 CFR 200.212](#)).

3. New OMB Submission Requirements

Effective immediately, AOs must submit all NOFOs and anticipated assistance awards to OMB as outlined below. For purposes of this requirement, NOFOs include Requests for Applications (RFAs), Annual Program Statements (APSs), Broad Agency Announcements (BAAs) that may result in an assistance award, and any addenda to these solicitations.

The requirements outlined below will be in effect through FY2021, or until the Agency's adoption of the Grants Management Standards 2.0 and integrated public display on USASpending.gov.

3.1. Submission of NOFOs

At least five business days before posting a NOFO on Grants.gov, the AO must submit the NOFO to: **NOFO@omb.eop.gov**. The submission must be in the following format:

Submission Format:

- File name and subject line: The file name and subject line must include the agency - specific Opportunity Number, Agency, Bureau/Mission, and estimated Grants.gov date posting (month and day).
- Email body: The text of the email body must include Assistance Listing number(s) and title(s)

For example:

- *(file name and subject line): ABC-123_USAID_GH_09_27*
- *(email body) select from the following:*
 - *Assistance Listing 98.001 USAID Foreign Assistance for Programs Overseas*
 - *Assistance Listing 98.002 Cooperative Development Program (CDP)*
 - *Assistance Listing 98.003 Ocean Freight Reimbursement Program (OFR)*
 - *Assistance Listing 98.004 Non-Governmental Organization Strengthening (NGO)*
 - *Assistance Listing 98.005 Institutional Capacity Building (ICB)*
 - *Assistance Listing 98.006 Foreign Assistance to American Schools and Hospitals Abroad (ASHA)*
 - *Assistance Listing 98.007 Food for Peace Development Assistance Program (DAP)*
 - *Assistance Listing 98.008 Food for Peace Emergency Program (EP)*
 - *Assistance Listing 98.009 John Ogonowski Farmer-to-Farmer Program*
 - *Assistance Listing 98.010 Denton Program*
 - *Assistance Listing 98.011 Global Development Alliance*
 - *Assistance Listing 98.012 USAID Development Partnerships for University Cooperation and Development*

3.2. Submission of Assistance Awards

Except as provided in Section 4, below, at least five business days before a final grant or cooperative agreement is fully executed, the AO must submit the draft award to: **GrantAgreements@omb.eop.gov**.

Prior to submission of the full award to OMB, AOs must redact the following elements from the award:

- The recipient's name and address;
- The recipient's unique entity identifier (DUNS Number);
- The names of any recipient employees;

- The recipient's detailed budget;
- The recipient's full program description (Note: Instead the USAID Program Description from the NOFO can be included in the draft award agreement sent to OMB);
- The recipient's federally negotiated indirect cost rate; and
- Additional information that, based on the country context, raises particular sensitivities.

3.2.1. Submission Format for Individual Awards:

- File name: The file name and subject must include the Agency, Bureau/Mission, Award Number.
- Subject Line: Must include the Agency, Bureau/Mission, Award Number, and the predominant Assistance Listing Title.
- Email body: The text of the email body must include Assistance Listing number(s) and title(s).

For example:

- *(file name): USAID_GH 0123456*
- *(subject line): USAID_GH 0123456 Global Development Alliance*
- *(email body) see full Assistance Listing List above:*
 - *Assistance Listing 98.011 Global Development Alliance*

3.2.2. Submission Format for Multiple Awards (Batch Submission):

AOs may submit in batches for multiple awards made under one predominant Assistance Listing for the same purpose on the same day by the same Agency and Bureau/Mission.

- Subject Line: Must include the Agency, Bureau/Mission, and Assistance Listing title.
- Batch File Name: Must include the Agency, Bureau/Mission, and Assistance Listing number.

- Note; Individual files in the batch submission must include the file information listed above for individual submission.
- Email body: The text of the email body must include Assistance Listing number(s) and title(s).

For example:

- *(file name): USAID_GHANA_98.004*
- *(subject line): USAID GHANA Non-Governmental Organization Strengthening (NGO)*
- *(email body) see full Assistance Listing List above:*
 - *Assistance Listing 98.004 Non-Governmental Organization Strengthening (NGO)*
- *(individual file award name): USAID_GHANA_0123456*

4. Exceptions

The submission of assistance awards to OMB as noted in Section 3.2 applies across all Operating Units and Missions. However, when making awards for food and non-food humanitarian assistance, urgent transition initiatives or stabilization programs, and other time-sensitive activities (including President's Emergency Plan for AIDS Relief (PEPFAR)), the responsible Office Director may provide written approval to the AO to proceed with award in advance of the five business day submission requirement to OMB. In such circumstances, the AO must submit the award to OMB as close as possible to the five business day requirement, but no later than simultaneously with the issuance of the award.

303mbc_020321