

SAM.gov Subaward Reporting: Data Entry vs. Bulk Upload API Guide

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Overview:

Effective March 8, 2025, GSA implemented subaward functionality in SAM.gov, replacing the existing FSRS.gov system. This change affects all users who previously used FSRS.gov to search or report subaward information and executive compensation data in compliance with the Federal Funding Accountability and Transparency Act (FFATA).

Key Changes

- FSRS.gov is now redirected to SAM.gov
- All subaward reporting must now be done through SAM.gov
- Enhanced security and data integrity
- Improved user experience with modern interface
- One-stop shop for entity registrations, contract opportunities, and subaward reporting

Two Reporting Options:

Option 1: Web-Based Data Entry

- When to Use This Option
 - Small to medium reporting volume: Less than 50 reports per month
 - Limited technical resources: No dedicated IT support
 - Prefer manual control: Want to review each entry individually
 - Quick setup: No development time required
- Key Features
 - Simplified process: One record = one subawardee (different from FSRS)
 - Pre-populated data: Leverages existing SAM.gov entity information
 - Real-time validation: Immediate error checking and warnings
 - Easy modifications: Update existing reports instead of creating duplicates
 - Multiple workspaces: Filter and manage reports efficiently
- Benefits
 - No technical setup required
 - Automatic data population from SAM.gov
 - Immediate access with regular user account
 - Built-in validation and error prevention
 - Direct delete capability from user interface

Option 2: Bulk Upload API

- When to Use This Option
 - High reporting volume: Hundreds of reports per month
 - Technical capabilities: Have IT support or development resources
 - System integration: Want to connect internal systems to SAM.gov
 - Automation needs: Reduce manual data entry burden
- Key Features
 - JSON formatting: REST API with structured data format
 - System-to-system connection: Direct integration with internal databases
 - Real-time responses: Immediate error feedback for each record
 - Batch processing: Submit multiple reports in single transaction
 - Enhanced security: System account with API key authentication
- Benefits
 - Immediate feedback: Real-time error messages for specific records
 - Selective processing: Only failed records need resubmission
 - Enhanced security: API key and IP address whitelisting
 - Better error handling: Specific error codes for each validation failure



- Technical Requirements
 - Prerequisites
 1. Internal system or database containing subaward data
 2. REST API capabilities with JSON formatting
 3. Static IP address or range of IP addresses
 4. IT support for development and maintenance
 5. Testing capability at alpha.sam.gov
 - Account Types Required
 1. **User Account**
 - Individual login.gov account
 - SAM.gov profile with entity roles
 - Required role: Entity Reporting Data Entry or Administrator with subaward permissions
 2. **System Account**
 - Required role: Non-Federal System Administrator
 - Must be requested through Federal Service Desk (FSD)
 - Generates system account API key (different from personal API key)

Account Type	API Key Type	Usage	Daily Limit
Personal (no roles)	Personal API	Data consumption only	10 requests
Personal (with entity roles)	Personal API	Data consumption only	1,000 requests
System Account	System API	Data creation/modification	10,000 requests

**Important:* Only system account API keys can be used for bulk upload functionality.

System Account Setup Process:

- **Step 1: Obtain Required Roles**
 - Entity Reporting Data Entry/Administrator role with subaward permissions
 - Non-Federal System Administrator role (must request via FSD ticket)
- **Step 2: Request Non-Federal System Administrator Role**
 - Contact Federal Service Desk (FSD)
 - Specify you need the role for subaward reporting API
 - Mention if you need it for alpha (testing) or production environment
- **Step 3: Create System Account Application**
 - Log into SAM.gov workspace
 - Navigate to Reference Services → System Accounts
 - Click "New Account"
 - Fill required information:
 - System Account Name: Unique identifier
 - Interfacing System Name/Version: Your internal system details
 - Description: Purpose and functionality
 - UEI: Use highest parent-level UEI for hierarchy coverage
 - IP Addresses: Static IPs or ranges for whitelisting
 - Security Official: System ISSO contact information
- **Step 4: Generate API Key**
 - Wait for GSA approval (status changes to "Published")
 - Set system account password (unique, not your login.gov password)
 - Generate API key using the password
 - Copy and securely store the API key
- **Step 5: Send a ticket to contact IOT Data Exchange to establish API automation**
 - IOT Data Exchange will test in Alpha Environment before Prod Environment that may require a CMR (Change Request for Production). These steps include:
 - Required: Must successfully test at alpha.sam.gov before production approval
 - Verify API calls work correctly
 - Test all required functionality
 - Confirm data formatting and responses

API Key & Password Management:

- **Key Rotation Schedule**
 - API keys expire every 90 days
 - Auto-generation: New key created 15 days before expiration
 - Overlap period: Both old and new keys active for 15 days
 - Email notifications: Sent to all Non-Federal System Administrators
- **Password Management**
 - Rotation required: Every 90 days
 - Forgot password: OTP reset available via email
 - Multiple administrators: Recommended for backup access

Reporting Policy and Best Practices:

- **Reporting Timeline**
 - Rule: Report by the end of the following calendar month
 - Example: Subaward issued on March 21st must be reported by April 30th
- **What to Report**
 - New subawards: Create new reports
 - Modified subawards: Update existing reports (preferred over new reports)
 - Obligations, not payments: Report total obligated amount, not payment schedule
- **DO NOTS**
 - Do not create monthly reports for the same subaward
 - Do not report payments instead of obligations
 - Do not create duplicate reports for modifications
- **Best Practices**
 - Update existing reports when terms change
 - Report full obligated amounts for multi-year awards
 - Use single report per subawardee (one record = one subawardee)
 - Test thoroughly in alpha environment before production

Troubleshooting Common Issues:

- **Unauthorized Errors**
 - Check API key: Ensure using system account API key, not personal
 - Verify UEI hierarchy: System account UEI must match or be parent of reporting entity

- Confirm user roles: API call user must have data entry role for the entity
- IP address: Ensure calls originate from whitelisted IP addresses
- **Role Issues**
 - Missing subaward permissions: Must have Non-Federal System Administrator role
 - Can't see system accounts: Need proper role assignment
 - Multiple entities: May need multiple system accounts for different hierarchies
- **Testing Environment**
 - Alpha.sam.gov: Required for all API testing, Data Exchange will handle the API process but can't establish accounts on sam.gov for agencies.
 - Please Remember use Test data: Safe environment for development
 - Production approval for Alpha testing required before production access

Support and Resources:

- **Federal Service Desk (FSD)**
 - Hours: 8 AM - 8 PM Eastern, Monday-Friday
 - Phone: Multiple numbers available
 - Live chat: Available during business hours
 - Ticket system: Create and track incidents
- **Online Resources**
 - [GSA Interact Blog](#): Latest announcements and updates
 - Step-by-step guides in SAM.gov help section
 - SAM.gov/fsrs: Migration information and resources
 - [GSA YouTube Channel](#): Training videos and tutorials
 - [Knowledge Articles](#): Comprehensive help documentation
 - [Open GSA](#): API specifications and examples