

## **Guidance on Processing Grant and Cooperative Agreement Payments to Foreign Recipients in the Financial and Business Management System (FBMS)**

### **1.1 How do foreign grant and cooperative agreement recipients request payment?**

Foreign recipients must request payment using either the standard form SF-270, Request for Advance or Reimbursement (<http://www.whitehouse.gov/sites/default/files/omb/grants/sf270.pdf>) or the SF-271, Outlay Report and Request for Reimbursement for Construction Programs (<http://www.whitehouse.gov/sites/default/files/omb/grants/sf271.pdf>).

### **1.2 What are the payment method options for foreign recipients?**

- A. U.S. Treasury's International Treasury Services (ITS) system: Foreign recipients receiving funds to a bank outside of the United States must be paid electronically through ITS.
- B. Electronic Funds Transfer (EFT): Foreign recipients receiving funds electronically to a bank in the United States must be paid by EFT through the Automated Clearing House (ACH) network.

Both types of payments are processed by the Interior Business Center (IBC).

### **1.3 In addition to the SF-270/271 payment request form, what other documentation is required from the recipient?**

- A. ITS Payments: Recipients must provide their banking information as required on the attached **Foreign ITS Payment Cover Sheet** (available electronically on the Financial Assistance Wiki at <http://fawiki.fws.gov/display/ASAP/Payments+to+ASAP-Waived+Financial+Assistance+Recipients>).
- B. EFT Payments to recipients subject to SAM registration requirements: All foreign recipients, except those waived (see 1.4 C below), must register in SAM. Foreign recipients subject to the SAM requirement and receiving funds electronically to a bank in the United States must enter and maintain valid/current banking information in their SAM profile. The FBMS interface with SAM brings the banking information entered in SAM into the recipient's FBMS vendor record. IBC will use the banking information on the FBMS vendor record to make EFT payments to the recipient.
- C. EFT Payments to recipients waived from the SAM requirement: In accordance with 2 CFR 25, the Service may waive: (1) award recipients whose information may be compromised as a result of disclosure, and/or (2) foreign entities applying for or receiving an award or sub-award for a project performed outside of the United States valued less than \$25,000, from DUNS and/or CCR requirements. Only the Assistant Director, Wildlife and Sport Fish Restoration is authorized to waive financial assistance applicants from the SAM requirement. Contact Maribel Langas

Miller, Branch Chief, Financial Assistance Policy and Oversight, for additional information on SAM exemptions.

Foreign, non-SAM recipients to be paid EFT to a U.S. bank must provide to the Service Program Office their organization and banking information as required on the attached **FBMS Vendor Request Form** (available electronically on Inside.fws at [https://inside.fws.gov/go/post/FBMS-Basics\\_Vendors](https://inside.fws.gov/go/post/FBMS-Basics_Vendors)).

#### 1.4 Where do foreign recipients submit their payment requests?

- A. To the Service Program Office: Programs can instruct their recipients to send their ITS and EFT payment requests to the Service Program Office, or
- B. To IBC: Programs can instruct their recipients to send their ITS payment requests directly to IBC. Recipients must NOT be instructed to send EFT payment requests directly to IBC.

#### 1.5 How will Programs communicate payment instructions to their recipients?

The Program Office must include payment instructions in the notice of award to the recipient. The notice of award must:

- Identify the payment options available to the recipient;
- Identify which of the standard payment request forms (SF-270/271) to use;
- If being paid through ITS, provide a copy of/link to the program-specific **Foreign ITS Payment Cover Sheet**;
- If being paid through EFT, either provide a copy to the recipient of the attached **FBMS Vendor Request Form** (available electronically on the Financial Assistance Wiki at <http://fawiki.fws.gov/display/FBMS/FBMS+Vendor+Request+Form>) or provide a list of all of the required data elements from the form. The following data elements from the **FBMS Vendor Request Form** must be completed/submitted to the Program Office by the foreign recipient: Last Name/Business Name; Address; City; State; Postal Code; Country (click the “Foreign” radio button at the top of the form to enable the Country drop down list in the Vendor Information section of the form); Vendor Point of Contact Name and Phone; Bank Name; ABA #; Account Number; and Account Type (Checking or Savings). This data must be submitted by the recipient to the Program Office either before or with their first payment request and at any time the data previously provided has changed.
- Provide instructions on where and how to submit payment requests. Programs must include the following statement in the notice of award:

*Recipients are responsible for ensuring any sensitive data being sent to the U.S. Fish and Wildlife Service (USFWS) or the Interior Business Center is protected during its transmission/delivery. The USFWS strongly recommends recipients use the most secure transmission/delivery method available. The USFWS recommends the following digital transmission methods: secure digital faxing; encrypted emails; emailing a password protected zipped/compressed file attachment in one email followed by the password in a second email; or emailing a zipped/compressed file attachment. The USFWS strongly encourages recipients sending sensitive data in paper copy to use a courier mail service. Recipients may also contact the USFWS Project Officer and provide any sensitive data over the telephone.*

## **1.6 What is the process when a foreign recipient submits ITS and EFT payment requests to the Program Office?**

- A. The Program Office must revise the instructions on the attached **Foreign ITS Payment Cover Sheet** to insert the Service project officer's contact information in the last sentence, as shown: "Once completed, submit this form along with the SF-270 or SF-271 to: [insert project officer's e-mail, fax, or address, depending on program preference for how requests will be submitted]." Remove all references to IBC fax and email. The Program Office must also insert complete contact information in Section 4 of the Foreign ITS Payment Cover Sheet. Programs should attach/provide a link to this revised document in the notice of award to the recipient.
- B. In addition to their signed SF-270/271 payment request, the recipient will either complete the **Foreign ITS Payment Cover Sheet** or will provide to the Program Office electronically or over the telephone the required data elements from the ITS cover sheet. If the recipient does not provide the required data elements directly on the form, the Program Office will complete the ITS cover sheet for the recipient.
- C. The Program Office reviews each payment request and ITS cover sheet to be sure they are completed accurately and that the recipient has signed the SF-270/271. The Program Office does not need to sign or otherwise provide written approval of the payment request. If the recipient is being paid to a U.S. bank account, Program Office staff must also complete the attached **IBC Payment Package Cover Sheet for Domestic ASAP Waived Financial Assistance Recipient or Foreign Financial Assistance Recipient with U.S. Bank** (available electronically on the Financial Assistance Wiki at <http://fawiki.fws.gov/display/ASAP/Payments+to+ASAP-Waived+Financial+Assistance+Recipients>) for each payment request.
- D. Within 30 business days of receipt, the Program Office will:
  - Send completed and signed payment requests to be paid via ITS together with their **Foreign ITS Payment Cover Sheets** by fax to IBC's secure fax at 303-969-7281 or by encrypted email to IBC at [fbmsfwspayments\\_ibcdenver@ibc.doi.gov](mailto:fbmsfwspayments_ibcdenver@ibc.doi.gov).

- Send completed and signed payment requests to be paid to a U.S. bank account together with the **IBC Payment Package Cover Sheets for Domestic ASAP Waived Financial Assistance Recipient or Foreign Financial Assistance Recipient with U.S. Bank** to the person within the Program Office with the FBMS Document Content Manager role. Document Content Manager work instructions and other information are posted on Inside.fws at [https://inside.fws.gov/go/post/FBMS-BP\\_AP](https://inside.fws.gov/go/post/FBMS-BP_AP). The FBMS User with the FBMS Document Content Manager role must scan the payment cover sheet and payment request into FBMS for processing by Interior Business Center (IBC) staff. IBC staff will verify that the recipient is waived from ASAP before making payment.
- E. Within five business days of receipt of a completed and signed payment request, IBC will process the payment in ITS or via EFT. If payment request information is incomplete, if the request is for an EFT and the vendor record does not include the recipient's banking information, or the payment is rejected in ITS, IBC will contact the Service staff person identified in Section 4 of the ITS Payment Cover Sheet within 3 days of receipt/rejection.
- F. After successful payment transmission is made in ITS, IBC staff will create a corresponding invoice document and post it against the Purchase Order in FBMS. IBC staff will then print the ITS confirmation screen, scan it, and upload it to FBMS as an attachment to the invoice document.

### **1.7 What is the process when a foreign recipient submits ITS payment requests directly to IBC?**

- A. The Program Office will revise the instructions on the attached **Foreign ITS Payment Cover Sheet** to insert IBC's contact information in the last sentence, as shown: "Once completed, submit this form along with the SF-270 to our Interior Business Center by fax to 303-969-7281 or by email to [fbmsfwspayments\\_ibcdenver@ibc.doi.gov](mailto:fbmsfwspayments_ibcdenver@ibc.doi.gov). The USFWS recommends the following digital transmission methods: secure digital faxing; encrypted emails; emailing a password protected zipped/compressed file attachment in one email followed by the password in a second email; or emailing a zipped/compressed file attachment." Remove all references to Service email. The Program Office must also insert complete contact information in Section 4 of the ITS Payment Cover Sheet. Programs should attach/provide a link to this revised document in the notice of award to the recipient.
- B. The recipient will send their payment requests together with their ITS cover sheets by fax to IBC at 303-969-7281 or by email to IBC at [fbmsfwspayments\\_ibcdenver@ibc.doi.gov](mailto:fbmsfwspayments_ibcdenver@ibc.doi.gov).
- C. Within five business days of receipt of a completed and signed ITS payment request, IBC will process the payment in ITS. If payment request information is incomplete or the payment is rejected in ITS, IBC will contact the Service staff person identified in Section 4 of the ITS Payment Cover Sheet within 3 days of receipt/rejection.

- D. After successful payment transmission is made in ITS, IBC staff will create a corresponding invoice document and post it against the Purchase Order in FBMS, and print the ITS confirmation screen, scan it and upload it to FBMS as an attachment to the invoice.