

## SUBAWARD TEMPLATES CONTENT CHANGE REQUESTS GUIDANCE DOCUMENT

**This guidance document is designed to clarify the limited circumstances under which a change to the Federal Demonstration Partnership (FDP) subaward templates (“Templates”) may be warranted, and to describe the process to evaluate the need for and initiate a change request.**

**Background:** The Federal Demonstration Partnership (FDP) is an association of federal agencies, academic research institutions with administrative, faculty and technical representation, and research policy organizations that work to streamline the administration of federally sponsored research. FDP members have affirmed, via their execution of a Memorandum of Understanding (MOU) that they adhere to federally-compliant management and administrative procedures and systems. These shared characteristics allow for the use of the simplified FDP templates (“Templates”). The Templates were designed to expedite review among FDP member institutions, but they may be used by non-FDP member institutions as well.

The Templates reduce administrative burden by reducing the effort needed to create and/or review subaward agreements. Changes to the templates go through a rigorous vetting process by the FDP Subaward Templates working group, on behalf of the membership. Therefore, changes are made infrequently, generally no more than annually (NOTE: While non-FDP members can initiate suggestions, only FDP members will be consulted for input about changes before they are implemented).

**Process for Making Template Changes:** Proposed changes are initially brought to the attention of the Subaward Subcommittee Co-Chairs, and are subsequently brought to the FDP membership during regular FDP meetings, which are held in January, May and September, and through formal email communications to the membership. The *FDP Template Change Request Form* is to be used by FDP members to request specific changes. Members are encouraged to discuss proposed change requests during meetings and electronically during the established comment period. Members requesting changes may be asked to have a representative from their organization present the justification for the change in person at an FDP meeting. If the change is accepted, the edits would be incorporated to the Templates at the time of annual revision. The Subaward Subcommittee Co-Chairs will provide any necessary guidance in the interim until the Templates are formally revised.

**Determining when changes may be warranted:** Changes to the Templates should be broadly *applicable to all FDP members*- in other words, changes should be acceptable to the wide variety of institutions that use the Templates. Please keep in mind the following general reasons that may necessitate a change:

1. A regulatory change that requires language to be altered, added, or deleted from the cover page or an attachment.
2. Simplification or clarification of language for terms/conditions already included.

In addition to the above, members should consider the following before making a formal request to change the Templates:

- How will the change apply to or impact various entity types (i.e., FDP Members vs non-members; IHE’s; non-profits; hospitals; and PUIs/ERIs)?
- What impacts on your or other organizations’ business processes are envisioned as a result of this change? For example:
  - Impacts on invoicing.
  - Impacts on drafting and processing subawards.

- Impacts on subaward risk assessment and monitoring.
- Impacts on campuses or business offices that may need to be involved.
- Impacts on legal review.
- How likely is the change to potentially improve the process or otherwise reduce administrative burden?
- Would the change cause an auditor to request additional information?
- Is the change already addressed through the federal sponsor's policy statements/regulations (as flowed down in the FDP Templates)?

Can the concern be alternatively addressed via a new FAQ rather than a Template change, or does the FAQ document already address the issue? See

[http://thefdp.org/default/assets/File/Documents/subaward\\_FAQ.pdf](http://thefdp.org/default/assets/File/Documents/subaward_FAQ.pdf).

- *Note: If you would you like to request a specific FAQ be added to the Guidance Document, send an email to the Subaward Subcommittee Co-Chairs.*
- How will the change prevent a problem?

If after consideration of the items above, a request for change is warranted, please complete the *FDP Template Change Request Form* and submit it to the [Subaward Subcommittee Co-Chairs](#). Please be sure to address the items above as applicable in explaining the rationale for the change. It is expected that you have discussed the proposed change with the FDP Administrative Representative for your institution prior to submission.