

FDP Major Changes Summary for 2017 Subaward Templates

Purpose: outline the major changes to the FDP Subaward template from the 2016 version to the 2017 version. While only the changes to the cost reimbursement model will be highlighted, most of the changes are applicable to the fixed price template as well with the exception of the Facepage and Attachment 5. Contact the Subaward Subcommittee co-chairs with any questions.

Scope: describing major changes to the template language. *Minor adjustments for consistency in grammar and/or style are not documented in this change sheet.* Some major changes related to data fields will be summarized in this document. For details on the data fields, we have also generated a crosswalk that sets out all the fields in every version of the template, including a brief description of what information should go there.

Note: when making selections in drop down menus, make the appropriate selection. Then click (or tab) outside of the drop-down. This will populate any additional data points that may appear based on the drop-down selection. We also recommend printing your files to PDF prior to sending to your subrecipient to prevent any field changes.

Facepage

2016 Version	2017 Version	Explanation
Federal Awarding Agency was a text box.	In the top section, there is a Federal Awarding Agency drop down.	This new drop down replaces the radio buttons on Attachment 2. This drop down now populates agency requirements throughout Attachment 2.
Cost Sharing, FFATA reporting and R&D check boxes were checkboxes in the top section.	Top section data elements for the PTE to complete have been moved to Attachment 2 (FFATA reporting and R&D check boxes). Cost Sharing is covered in Attachment 5.	Because the confirmation of FFATA and R&D are typically included in the NOA data, we moved this information to the other NOA specific elements in Attachment 2.
Term 1, option to select if the Statement of Work (SOW) was made part of the Subaward through Attachment 5 or the proposal.	Term 1, removed option to select the proposal. The language now references Attachment 5 only for the SOW.	Reasons for the change: 1. Remove data entry. 2. Often, Subrecipients do not have a copy of the final proposal on file. To ensure that they have the right version of the SOW, they would need to get a copy from the PTE. 3. Ensure changes from proposal to award are documented. 4. Often, the SOW is used by the PTE for FFATA reporting. This ensures both parties know what will be reported.

2016 Version	2017 Version	Explanation
<p>Term 2, included: "PTE shall reimburse Subrecipient not more often than monthly for allowable costs. All invoices shall be submitted using Subrecipient's standard invoice, but at a minimum shall include current and cumulative costs (including cost sharing), Subaward number, and certification, as required in 2 CFR 200.415 (a)."</p>	<p>Term 2, revised to: "Subrecipient shall submit invoices not more often than monthly and not less frequently than quarterly for allowable costs incurred. Upon the receipt of proper invoices, the PTE agrees to process payments in accordance with this Subaward and 2 CFR 200.305. All invoices shall be submitted using Subrecipient's standard invoice, but at a minimum shall include current and cumulative costs (including cost sharing), Subaward number, and certification, as required in 2 CFR 200.415(a)."</p>	<p>Discussed in extensive detail with FDP membership over listserv and at January 2017 meeting. Ultimately voted on by members with the purpose of clarifying invoicing frequency. Further information on this language will be available in the Guidance Document.</p>
<p>Term 3, included: "NOT LATER THAN 60 days after Subaward end date."</p>	<p>Term 3, revised to: "NOT LATER THAN 60 days after Subaward [dropdown with choices for: project period / budget period] end date."</p>	<p>Clarification to ensure that subrecipient knows when a final invoice is required (annually or at the end of the competitive segment / project).</p>
<p>Term 4, included: "PTE reserves the right to reject an invoice, in accordance with 2 CFR 200.305."</p>	<p>Moved to Term 2 and edited this sentence, changing it to be "Upon the receipt of proper invoices, the PTE agrees to process payments in accordance with this Subaward and 2 CFR 200.305."</p>	<p>Term 4 is focused on adjustments as the result of audit findings while the sentence related to 2 CFR 200.305 is related to proper invoices and payment requests, which dovetails with the purpose and requirements of Term 2.</p>
<p>Term 7, included: "Unilateral modifications shall be considered valid 14 days after receipt unless otherwise indicated by Subrecipient."</p>	<p>Term 7, revised to: "Unilateral modification shall be considered valid 14 days after receipt unless otherwise indicated by Subrecipient when sent to Subrecipient's [dropdown to select] Contact, as shown in Attachment 3B."</p>	<p>Added a dropdown menu to indicate which email address to use for unilateral modifications .</p>

2016 Version	2017 Version	Explanation
Term 10 covered No Cost Extension (NCE) submission requests.	Moved from Facepage to Attachment 2, General Terms and Conditions (4.a).	Moved this to Attachment 2 because it was already referenced in Attachment 2. Duplicative to state the same thing in two places since it is a change to the language in the RTCs and had to remain with the exceptions to the RTCs.
Term 11, was: "By signing this Research Subaward Agreement Subrecipient certifies that it will perform the work under this agreement in accordance with the terms of this agreement, the applicable terms of the Prime Award, federal, state and local law, rules and regulations, including the research terms and conditions found at: RESERVED and the Subrecipient's policies."	Term 11 has become term 10 and revised to: "By signing this Subaward, including the attachments hereto which are hereby incorporated by reference, Subrecipient certifies that it will perform the Statement of Work in accordance with the terms and conditions of this Subaward and the applicable terms of the Federal Award, including the appropriate Research Terms and Conditions ("RTCs") of the Federal Awarding Agency, as referenced in Attachment 2. The parties further agree that they intend this Subaward to comply with all applicable laws, regulations and requirements."	Amended language to: incorporate all Attachments, moved the RTC link to Attachment 2. Attachment 2 provides the exceptions for the RTCs so it made more sense to leave the link to the RTCs in Attachment 2.
Attachment 1		
General statement at the top indicated that the entire page was a certification. "By signing the Subaward Agreement, the Authorized Official of Subrecipient certifies, to the best of his/her knowledge and belief, that:"	Removed	Language was duplicative with the language in the provisions themselves and erroneously indicated that all the provisions of Attachment 1 were Certifications.

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<p>Certification Regarding Lobbying included: "The Subrecipient shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly."</p>	<p>Moved down two paragraphs to be under the Debarment provision.</p>	<p>The requirement applies to both the preceding certifications (debarment and lobbying) thus it was moved to after the two required certifications and adjusted slightly to make it clear it applied to all certifications on Attachment 1.</p>
	<p>Moved Program for Enhancement of Contractor Employee Protections (41 USC 4712) from Attachment 2 to Attachment 1.</p>	<p>Since this provision is no longer a pilot and the RTC incorporation language was ambiguous as to if the RTC reference was sufficient, we included it here since it applied to all federal awarding agencies.</p>
Attachment 2		
	<p>Required Data Elements: moved R&D and Subject to FFATA checkboxes here from facepage.</p>	<p>Because the confirmation of FFATA and R&D are typically included in the NOA data, we moved this information to the other NOA specific elements in Attachment 2.</p>
	<p>Required Data Elements: Added a field for Key Personnel per NOA.</p>	<p>Added this field to ensure that if there are subrecipient personnel named on the NOA, that the PTE is providing those names to the subrecipient (especially if the PTE does not attach the NOA). If subrecipient personnel are named on the NOA, then the PTE and the subrecipient must work together to see federal awarding agency approval to reduce effort by more than 25%.</p>
	<p>Added dropdown to identify if the NOA is attached as Attachment 6 or if the PTE is entering the data elements required by law.</p>	<p>It is easier to attach the NOA to the end of the document rather than insert it mid-way through the subaward, especially now that this is a single file.</p>

2016 Version	2017 Version	Explanation
<p>General Terms and Conditions 4.a: “. If applicable, the right to initiate an automatic one-time extension of the end date is replaced by the need to obtain prior written approval from the Pass-through Entity;”</p>	<p>General Terms and Conditions 4.a: “No-cost extensions require the written approval of the PTE. Any requests for a no-cost extension shall be directed to the [dropdown] Contact shown in Attachment 3A, not less than 30 days prior to the desired effective date of the requested change.”</p>	<p>Combined with term 10 of the facepage. Duplicative to state the same thing in two places since it is a change to the language in the RTCs and had to remain with the exceptions to the RTCs in Attachment 2.</p>
<p>MPI Leadership language was broad and caused confusion as to when it was applicable to subrecipient (if sub PI was not one of the named MPIs) and how to incorporate the leadership plan.</p>	<p>Changed options to: [This subaward is not subject to an MPI leadership plan. / This subaward is subject to the attached MPI leadership plan.]</p>	<p>Ensured that the PTE provides the final leadership plan to the subrecipient to ensure compliance by both parties. Also changed the wording to make it clear when a subaward is subject to the MPI plan. If the MPI is not at the subrecipient institution, the MPI plan will not apply to the subrecipient.</p>
	<p>Special Terms and Conditions, Copyright, added: “Subrecipient grants to PTE the right to use any written progress reports and deliverables created under this Subaward solely for the purpose of and only to the extent required to meet PTE’s obligations to the Federal Government under its Federal Award.”</p>	<p>Discussed in extensive detail with FDP membership over listserv and at January 2017 meeting. Ultimately voted on by members with the purpose of clarifying PTE use of progress reports and deliverables submitted by the Subrecipient for inclusion in the PTE in its reports to the government. Further information on this language will be available in the Guidance Document.</p>
<p>Carry forward restriction</p>	<p>Moved to Attachment 4</p>	<p>Moved to Attachment 4 because it was more consistent with other revisions to the Attachment for reporting and prior approval. Approved by FDP membership in January 2017.</p>

2016 Version	2017 Version	Explanation
Data Sharing and Public Access was: "Subrecipient agrees to comply with the Federal Award Agency's data sharing and public access policy requirements and the Data Management/Sharing Plan submitted to the Federal Awarding Agency and incorporated herein as Attachment _____."	"Data Sharing and Access (Check if applicable): Subrecipient agrees to comply with the Federal Awarding Agency's data sharing and access requirements as reflected in the NOA (or in the special terms below) and the Data Management/Sharing Plan submitted to the Federal Awarding Agency and [attached / provided upon request]."	Clarified language to ensure that it is clear standard public access and data sharing policies / requirements do not need to be re-iterated and also provided option for the PTE to provide upon request rather than attaching the document.
Work involving Human or Animal Subjects	Revised to: Work involving Human Subjects or Vertebrate Animals	Made the whole provision more consistent with IACUC nomenclature, using vertebrate animals instead of animal subjects.
Human Subjects Data	Added menu choices, including one to not address human subjects data in the subaward	Tried to clarify requirements for human subjects data language / notification of a separate DUA and also provided an option to not address human subjects data in the subaward. Our goal is to ensure that institutions not ready to identify this in their subawards are able to easily work with the template. Further guidance will be in the Guidance Document.
Attachment 3A		
	Added COI contact	Added COI contact because this is often a different contact / office.
Mailing address under each contact name	Moved to bottom of page and changed to be the type of mailing address (i.e. invoice address, PI address or Admin address). Also added a website at the top.	Most business is done electronically, by consolidating in this fashion, we can encourage a "same as above" for those institutions with consolidated locations. Addition of the website allows subs to ensure they have the best contact or other information for the PTE.

2016 Version	2017 Version	Explanation
	Consolidated address fields, removing city, state and zip fields	Consolidated address fields to make for easier programming into electronic systems and also to ensure we can use the same 3A and 3B forms for domestic and foreign subs and PTEs.
Attachment 3B, Page 1		
Mailing address under each contact name	Moved to bottom of page and changed to be the type of mailing address (i.e. invoice address, PI address or Admin address). Also added a website at the top.	Most business is done electronically, by consolidating in this fashion, we can encourage a “same as above” for those institutions with consolidated locations. Addition of the website allows subs to ensure they have the best contact or other information for the PTE.
	Consolidated address fields, removing city, state and zip fields (except for the FFATA information in the first section)	Consolidated address fields to make for easier programming into electronic systems and also to ensure we can use the same 3A and 3B forms for domestic and foreign subs and PTEs.
Attachment 3B, Page 2		
No changes have been made to this page.		
Attachment 4		
	Separated areas into Technical Reports; Financial Reports and Additional Prior Approvals and Other Reports.	Headers make it easier to organize information.
	Revised Technical Reports with dropdowns for the number of days options from 15-90 days for progress report due dates.	Ensure that there is consistent menu for the number of days options from 15-90 days.

2016 Version	2017 Version	Explanation
	Added Financial Reports and Additional Prior Approvals, which includes Carryover provision with the ability to select if carryover is restricted and by which entity (PTE or federal agency)	Intention to make it easier to understand where prior approval for carryover may be coming from. Moved to Attachment 4 because more institutions are using this Attachment to document other financial and reporting obligations.
	Other Reports, invention: added drop down to select when a negative report is required: [upon request / yes / no]	Clearly indicate if the PTE wants a negative report for inventions.
Certification as to the completion of the project (fixed price only)	Removed from cost reimbursement version of the template.	Will be included in the fixed price version of the template.
Attachment 5		
Checkboxes for various rate types.	Changed to drop down for rate types in order to be able to include more options.	Moving to a dropdown allows us to provide more options for the rate type.
	Added "All Amounts in United States Dollars" under Budget Totals section.	Clarification for any foreign Subrecipients that all amounts are in USD. Part of our goal to be consistent, where possible with the foreign template.
Attachment 6		
	New attachment incorporating the NOA as Attachment 6.	It is easier to attach the NOA to the end of the document rather than insert it mid-way through the subaward, especially now that this is a single file.