



FDP
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FDP Meeting Summary

Sept. 2 - 4, 2015

1pm-Faculty breakout sessions -#1 Animal Subjects

Point of Contact	Richard Costanzo
Activities/Progress to Date	Information updates, group discussion of animal subjects related topics, suggestions and ideas presented and discussed.
Agenda/Discussion Points	
Pending Decisions	Distribution of Wildlife FAQ's, Institutions adjusting IACUC amendment/review cycles/dates, IACUC's streamlining local decision making using approved administrative change authority, DEA survey draft will be distributed to DFP members for review and modification before sending to institutions for data collection needed to assess ways to address DEA related burdens at research institutions.
Participation	Faculty,administrators,government representatives.
Key Risks/Issues	
Meeting Summary	



Human subjects workgroup

Point of Contact	Jane McCutcheon
Activities/Progress to Date	3 discussions on the NPRM, at the faculty retreat, a Thursday pm working group session and a Friday morning working group session. The latter two sessions came up with an action plan (see below).
Agenda/Discussion Points	
Pending Decisions	Action Items: <ol style="list-style-type: none">1. Get chart from Lois Brako for cost analysis. (Have requested this by email).2. Have provided David Wright with email addresses for list serve. He has agreed to set up something on the FDP website for consent form collection.3. Will send out list serve email when consent form collection site is set up. Initial strategy: have committee members collect their institutional consent forms. (21 members) expand from there if necessary through individual collections, list serves etc.
Participation	List with David Wright
Key Risks/Issues	Action Items: <ol style="list-style-type: none">1. Get chart from Lois Brako for cost analysis. (Have requested this by email).2. Have provided David Wright with email addresses for list serve. He has agreed to set up something on the FDP website for consent form collection.3. Will send out list serve email when consent form collection site is set up
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Faculty Lunch Forum

Point of Contact	Alice Young & Robert Nobles
Activities/Progress to Date	The Faculty Lunch Forum included presentation & discussion of recommendations from the 2014 NRC "Safe Science" report and the anticipated report of the APLU Task Force on Laboratory Safety.
Agenda/Discussion Points	
Pending Decisions	What role(s) can FDP play to shape "culture of safety" discussion and practices.
Participation	Primarily faculty representatives to FDP
Key Risks/Issues	What role(s) can FDP play to shape "culture of safety" discussion and practices.
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ERA-FISMA Sep 4 9:00 a.m.

Point of Contact

Ron Splittgerber

Activities/Progress to Date

Agenda/Discussion Points

Pending Decisions

Participation

Key Risks/Issues

Action Item: The eRA Committee will put together a webpage for FDP members on FISMA. Sort of a FISMA 101 document. We'll try to get this completed within the next 6 weeks.

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FDP Outreach - Publicizing FDP

Point of Contact

Laura McCabe

Activities/Progress to Date

?Ongoing faculty discussions of FDP
?Made suggestions to develop the website
?Removed an old FDP website
?Used meta-data to get FDP to pop up first in a search
?Added words on website to facilitate fdp appearing in searchers related to faculty burden etc...

Agenda/Discussion Points

Pending Decisions

We have developed a list of tasks that we will begin working on (see moving forward)

Participation

11 people attended including faculty, administrators and federal agents.

Key Risks/Issues

Ideas of what to do moving forward include:
1)Get together key accomplishments of FDP over the years
2)Put together 10 sides or so to use as a basis for presentations to faculty senate
3)Think about preparing annual report with accomplishments at end of 2015...
4)Ask institutes to put that they are a member of FDP on their university website
5)Send email out to get ideas about potential fed institutes to send info/link about FDP
6)Plan what info to send to fed agencies
7)Plan an email for faculty to send to their societies to make them informed about FDP

Meeting Summary



FDP Outreach - Faculty Support

Point of Contact

Laura McCabe

Activities/Progress to Date

GOALS:
Help faculty to distribute FDP information
Building bridges between faculty and administrators
Best Practices

PROGRESS TO DATE:
Faculty discussions
Faculty survey

Agenda/Discussion Points

Pending Decisions

Focus on drafting a best practice options guide for FDP faculty...input from all groups would be helpful since the idea is ultimately to enhance communications among faculty, admin and fed agencies.

Participation

Dont have the participation list, if you want to participate please send your email to mccabel@msu.edu

Key Risks/Issues

Organize a draft of best practice options for a faculty at fdp and send out to committee members

Continue to pursue faculty and administrative bridging ideas

Meeting Summary



Animal Care

Point of Contact	Ara Tahmassian
Activities/Progress to Date	Last year the animal care subcommittee has been primarily focused on finalizing the Wildlife FAQ and soliciting feedback from the members on topics of interest related to regulatory burdens in an effort to develop pilot/demonstration projects.
Agenda/Discussion Points	
Pending Decisions	DEA: distribute the questionnaire to those attending the retreat for input; finalize the questionnaire and distribute to the members. OLAW has indicated that would be able to distribute the questionnaire to those with an assurance on file to broaden the information available on the scope of the problem.
Participation	The list of participants at the faculty session included Sarah Waldemar, Kate Melouk, Ara Tahmassian, Rich Costanzo, JR Haywood, Jacqueline Sagan, Deborah Bordelon, Cheryl Kitt, Mark Mijland, Jeff Underwood, Jonathan Kaye, Jeff Sands(?), and three others. Note: no sign up sheet was kept at the meeting and the list is best recollection!
Key Risks/Issues	<p>IACUC Protocol Burden: Schedule a session at the next meeting to discuss the protocol process at member institutions with the goal of developing a listing of best processes for approving IACUC protocols; number of animals used and justification process; a sample form; and annual review requirements.</p> <p>The discussions could lead to identification of specific areas that may become demonstration projects; or best practices document(s) intended to reduce the faculty burdens.</p> <p>Wildlife FAQ: Robert Silk and Ellen Paul who were major contributors to the wildlife FAQ have just sent a note to the Animal Care subcommittee stating: " After an extensive discussion of the timeline and options regarding the wildlife document, Ellen and I have decided to withdraw the manuscript from further consideration by the FDP. We appreciate the time each of you have put into this project and thank you for your efforts". We will follow-up to identify the reasons.</p>
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Communications Committee

Point of Contact	Melanie Krizmanich or Amanda Lindsay
Activities/Progress to Date	Members of the communications committee served to review and advise on communications pertaining to FDP projects. Most recently these include some for the SRA Catalyst and NCRUA E-xTRA publications.
Agenda/Discussion Points	
Pending Decisions	
Participation	Five committee members plus the two Co-Chairs were in attendance at this meeting, representing several universities and NIFA/USDA.
Key Risks/Issues	Members will work with the Faculty Outreach and eRA's 21st Century Tools working groups to assist with efforts related to outreach and publicizing the FDP.
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Faculty Workload Survey

Point of Contact

Sandra Schneider

Activities/Progress to Date

Agenda/Discussion Points

Pending Decisions

Participation

Key Risks/Issues

Path Forward

The general sense is to do another study but more discussion is needed to address the issues identified. Some take-away thoughts expressed:

- The next FWS needs to continue from the last two, but we can also explore new areas.
- The past surveys were too generic, not leading to actionable data. Use the next FWS to get the high level data to track the trends established by the last two surveys and use drill-down data to identify sub-groups for more specific surveys pertaining to that idea.
- Isolate burdens that are institutionally driven versus those driven by government or funding agency policy - or driven by other factors such as the ERA system used.
- Somehow qualify the usefulness of the burden (i.e., what's the return in terms of risk reduction for the effort expended).
- Examine institutional effects. Are there institutional administrative practices that correlate with burden increase/decrease?

Meeting Summary



ERI: Placements in FDP Activities

Point of Contact	Susan Anderson
Activities/Progress to Date	<p>Chair: Susan Anderson Rivaleau, College of Charleston Co-Chair: David Earwicker, California State University, Sacramento Federal Liaison: Jamie H. French, National Science Foundation</p> <p>The group has focused on clarifying its role and aligning the needs of Emerging Research Institutions (ERI) with the priorities of the Federal Demonstration Partnership. ERIs have unique capacity needs and issues, which makes them particularly able to capitalize on a range of FDP initiatives while also seeking to find efficiencies and best practices that will allow us to address our diverse campus constituencies.</p>
Agenda/Discussion Points	
Pending Decisions	<p>The group is assessing the breadth of involvement in both past and upcoming FDP activities. To that end, a survey was distributed to and completed by attendees which asked for their degrees of participation in Phase V initiatives. That information will be compiled and used to understand ERI priorities and needs, current and aspirational.</p> <p>In addition, the ERI group will survey the full ERI membership during fall 2015 on a discussion ERI specific needs moving forward in order to support expansion of capacity and integrate group-specific needs with FDP priorities.</p>
Participation	<p>There were 18 attendees at the meeting, including 15 ERI members and three NSF representatives (J. French, C. Carney-Nunes, L. Wiley). Attending institutions included:</p> <ul style="list-style-type: none">Bucknell UniversitySalem State UniversityCalifornia State University, SacramentoCollege of CharlestonConcurrent Research, Inc.Governors State UniversityBradley UniversitySouthern Illinois University, EdwardsvilleBall State UniversityNova Southeastern UniversityInstitute for Systems BiologyGeorgia Southern University
Key Risks/Issues	<p>As the identity, focus, and priorities of the ERI group are being solidified, the group expressed particular needs for:</p> <ul style="list-style-type: none">• Templates, models and best practices easily available on an ERI site• Collaboration models and opportunities – how can ERIs learn from the experience and



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sophistication of larger FDP member institutions?

- What areas can we improve efficiencies, and how, with the help of FDP?
- Best resources available to ERI group through FDP staff office
- Better access to FDP listserv info and how to connect more effectively with groups and subgroups
- More information on Phase VI priorities and thematic areas of focus
- An emphasis on what to cover that will be of benefit to the greatest number of members in the group

The next steps for the group include:

- Planning for the January meeting and the possibility of a half-day meeting in advance
- Possible outreach to R15 experts at NIH and/or PUI/REU experts at NSF for advice on best practices pre- and post-award (J. French will assist with federal agency contacts and expert recruitment)
- Distributing the needs survey, compiling and analyzing responses, and distributing initial analysis prior to January meeting to facilitate robust discussion and planning in January at launch of Phase VI.



Subawards Subcommittee

Point of Contact

Jennifer Barron, Johns Hopkins University

Activities/Progress to Date

Template Updates: Assign Unique Field Names to Each Field Across Forms; Consistent Formatting Across Attachment Headings, Legal Citations; Consistent Formatting of Number and Dollar Amount Fields; Consistent Capitalization of Terms; Fix Grammatical Issues and Spelling Errors; Add Citations for Certifications; Fix Document Names when Downloaded; Moving Data Elements from Face Page to Attachment 2

Compliance Attachment: Will have domestic and foreign versions; draft ready by Jan meeting

Attachment 2 Updates: Attachment 2 for NSF and NIH posted to FDP website, to be used for interim period until RTC are updated and released; Will update NSF and NIH Attachment 2 templates upon release of the updated RTC, then work on other Federal Agency Attachment 2s;
 Foreign subaward agreement (NIH template) for cost reimbursable and one for fixed price posted to FDP website; Working on an NSF-specific Foreign subaward agreement template.

Clinical Trial Template: Current focus is subagreement template for NIH sponsored multi-site clinical trials; Good progress made, remaining subagreement template attachments to discuss are attachment 4 and 5; Decision made not to provide significant budget detail on attachment 5 but to prepare budget guidance docs instead; Anticipate final draft for FDP and CTSI review before the end of the calendar year; Hope to “roll out” at the January FDP meeting

eRA 21st Century Tools: Exploring options for better management of FDP working groups through project management software
<https://trello.com/b/fiwI0tKW/fdp-subawards-subcommittee>

Guidance Documents: Promote consistency, while recognizing entities’ unique structures; Dynamic – continuous updates. Uniform Guidance Reference Guide - Updated; Uniform Guidance Reference Guide, Foreign Templates - NEW; FAQs – REVISED and NEW Questions; Invoice Template;
 New Attachments 3A & 3B

Risk Assessment: Updated RAQ tool, guidance documents; data collection through member use for improvement of tool.

Agenda/Discussion Points

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Pending Decisions

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Participation

Key Risks/Issues

Meeting Summary



MEMBERSHIP STANDING COMMITTEE

Point of Contact	Co-Chair Jane Zuber, Texas A&M University
Activities/Progress to Date	<ul style="list-style-type: none"> * Registration desk – provide assistance to FDP staff at each meeting * Institutional mentoring – At the outset of Phase VI, matched new attendee institutions with preexisting member institutions. * Informal mentoring – match new attendees with a member of the Membership Committee * ERI Subcommittee activities – work with ERI members to facilitate their efforts and integrate their members into other committees * Member attendance and feedback – work with FDP staff to monitor attendance and provide feedback * Annual Report – review, summarize and synthesize data
Agenda/Discussion Points	
Pending Decisions	
Participation	Present: Susan Anderson, Glory Brown, Charisse Carney-Nunes, Andrea Deaton, Becky Hayes, Jeanne Hermann, Katherine Kissmann, Debra Murphy, Sandy Schneider, Larry Sutter, Jane Zuber
Key Risks/Issues	<p>Recommendation to Executive Committee to establish business rules for FDP listserv maintenance and identification of which listservs are required vs. optional. Co-chairs will forward request to have a listserv business rule for operational and programmatic committees (to be developed with Executive Committee participation).</p> <p>Need to submit formal request for ERI Subcommittee co-chair’s representation on the Executive Committee. Charisse and Susan will write and forward this to the Executive Committee.</p> <p>Outreach to Minority Serving Institutions. ERI group will take the lead and provide recommendations to Membership Committee at the January meeting.</p> <p>Outreach to additional Federal Agencies to participate in FDP. Co-chairs will continue to monitor this issue.</p>
Meeting Summary	



Joint Application Design (JAD) Working Group

Point of Contact	Debbi Nixon
Activities/Progress to Date	The Joint Application Design (JAD) group is made up of representatives from the FDP who are both Adobe forms and S2S applicants, and staff from the Grants.gov PMO. The group has made progress working together to minimize (or provide sufficient notice) impact related to form changes, certificate changes, and and other changes to grants.gov.
Agenda/Discussion Points	
Pending Decisions	JAD to work with FDP Streamlining Proposal Submission group to: <ul style="list-style-type: none">•Determine who can assist with getting agencies to move away from old forms?•Catalog of “repurposed” fields on forms How can we raise visibility of JAD activities? Would like to add several new Adobe forms experts to the JAD Team JAD feedback on online forms due to Grants.gov in October (for 15.1 release) Grants.gov would like feedback on priorities for existing SCRs JAD would like to have a say in providing requirements for the planned Grants.gov revamp (to take advantage of newer technologies). Would like Grants.gov to move away from forms and toward data capture.
Participation	26 participants from FDP member institutions, Federal agencies, and 6 invited guests
Key Risks/Issues	Agency use of old (but not expired) forms Grants.gov unfunded mandates Upcoming Grants.gov Dec. 31st terminations for endpoints, certificates and email synopsis. No waivers will be granted.
Meeting Summary	



DATA Act Working Group

Point of Contact	Rick Fenger, Mark Sweet, Jason Hitchcock, Bronda H
Activities/Progress to Date	<p>Initial Analysis - Open Gov (Jan 2014 - May 2014)</p> <ul style="list-style-type: none">•Data Act analysis and summary for FDP•Analysis on existing data challenges•Data element analysis across systems <p>DATA ACT passes – (May 2014)</p> <p>Joint DATA ACT Working Group (JDAWG) established (Policy/Admin/Tech) -Open Gov & eRA (Jan 2015)</p> <ul style="list-style-type: none">•Workgroups - Data element feedback and draft FDP response - JDAWG <p>DATA ACT Pilot Kicks off – (May 2015)</p> <ul style="list-style-type: none">•Initial data element feedback period opens and closes – (5/9/2015 - 8/28/15)
Agenda/Discussion Points	
Pending Decisions	
Participation	<p>Presentation/Informational – No participation. A couple of key questions from the audience detailed below</p> <p>Work Group follow-up session – Interested participants from the presentation along with DHS PMO to discuss pain point and a way forward for DP to engage feedback and pilot opportunities</p>
Key Risks/Issues	<p>FDP must remain engaged with OMB, Treasury and the Section 5 Pilot PMO. The PMO knows that FDP is a great asset to assist with any specific pilot phase testing. PMO plans to reach out to FDP when they need our input. However, the FDP groups working on the DATA Act will continue to monitor activities to ensure we do not miss an opportunity</p>
Meeting Summary	



Research Compliance

Point of Contact	Alexandra Albinak Mckeown
Activities/Progress to Date	The FDP Research Compliance Committee held a retreat on September 2, 2015. Current issues were discussed in the following areas: COI; Export Controls; Human Subjects Research; Animal Care and Use; Data Stewardship; and Lab Safety. During the retreat, the participants broke into four groups and brainstormed on how best to address the issues identified earlier. We then regrouped and each group reported out on findings.
Agenda/Discussion Points	
Pending Decisions	Final decisions for co-chairs of updated or new subcommittees. Moving forward on Lab Safety. Logistics and finalization of merging the faculty working groups with RCC subcommittees. Follow up mid-term phone meeting with the group.
Participation	All participants of the retreat were added to the research compliance list serve.
Key Risks/Issues	
Meeting Summary	



ERA STANDING COMM – GRANTS.GOV SHARED WORKSPACE

Point of Contact	Mark Sweet/Jason Hitchcock, eRA Standing Committee
Activities/Progress to Date	<p>The FDP JAD Team and others are currently pilot testing the shared workspace. Round 1 ends on 9/4. A second round will be performed later in the month and will incorporate fixes and enhancements from the first round.</p> <p>The Workspace tool will be released to production in mid-October, starting with the 'Top 50' most used Adobe forms. These are the forms associated with the most used funding opportunities. They are primarily R&R and PHS-specific forms.</p>
Agenda/Discussion Points	
Pending Decisions	<p>The following suggestions were provided by session attendees:</p> <ol style="list-style-type: none">1. Give AORs a way to filter their list of workspaces so they can easily see those that are ready for submission (and alternatively those that have everything in a Passed state but which haven't actually been released by the workspace owner).2. Allow institutions to specify whether AORs for their institution should have access to all workspaces belonging to the institution – or whether each AOR should only be allowed to see workspaces to which they have been given explicit rights.
Participation	Members of the eRA Committee and other attendees of the FDP meeting participated in the session. The audience was pretty evenly split between those who submit to Grants.gov using Adobe Forms and those who submit via S2S.
Key Risks/Issues	<p>The following risks were identified by session attendees:</p> <ol style="list-style-type: none">1. Workspaces will be created and then abandoned if the person initiating the Workspace is unavailable. The attendees suggested that making it mandatory that at least one AOR be assigned to a Workspace prior to work beginning on the workspace. Note: Further discussion needed.<ul style="list-style-type: none">• Concern was raised that this may become an issue if a faculty members downloads 100 FOAs that to which they do not intend to apply.2. Concerns were raised about faculty being able to re-open and modify workspaces that had already been submitted. Ed noted that a workspace is not intended to be a saved record of an individual submission.
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Uniform Guidance Procurement Working Group

Point of Contact

Doug Backman

Activities/Progress to Date

We worked with our Federal partners to extend the grace period for implementing the \$3,000 and greater price or rate quotation requirement under Uniform Guidance regulation §200.320. We are also reviewing options for a pilot demonstration that supports higher price or rate quotation threshold appropriate for our FDP members. We are also reviewing other Uniform Guidance procurement standards language such as conflict of interest (§200.318), the requirement to publically post bids (§200.320), negotiating profit as a separate element of the contract price (§200.323), and other troublesome procurement clauses.

Agenda/Discussion Points

Pending Decisions

Implementation of a Pilot Demonstration.

Participation

Faculty as well as research, compliance and procurement administrators.

Key Risks/Issues

Implementation of a Pilot Demonstration and developing alternate language for the troublesome procurement clauses in the Uniform Guidance.

Meeting Summary



FDP Expanded Clearinghouse/Subrecipient Monitoring

Point of Contact

Lynette Arias

Activities/Progress to Date

The charge of this working group is to: (1) develop one single web based location for all FDP entities (and potentially others) to enter, upload, maintain and update all entity related information about their organization; and (2) utilize this centralized online repository of entity information to enable Pass-Through Entities to obtain and review all necessary sub-recipient entity information and conduct sub-recipient monitoring and risk assessment activities in a timely and streamlined fashion without requiring time and resources to send and collect various forms to collect information.

Current activities are focused on:

- Continuing activities originally started in 2013 to set goals and approach to expanded the FCOI and A133 audit FDP clearinghouses
- Consolidate FDP webpage information on all clearinghouse related activities and provide updated information on working group activities
- Collect, inventory and assess all FDP institutions subrecipient certification/commitment forms, as well as determine which institutions use forms or not. Summary matrix developed.
- Based on above, document recommended "standard data elements/questions" for a "Standard Form", and eventually an online repository/system. Draft developed and being tested Fall 2015 by small pilot group.
- Create summary of all FDP institutions single audit information (as applicable) to provide consolidated/summarized data on # of institutions with findings, low risk auditees, etc. Draft in development.

Agenda/Discussion Points

Pending Decisions

Key decision pending include:

- is it feasible to utilize a standard set of data elements across the country to collect subrecipient information?
- is it feasible to create an online FDP system to house these data elements for FDP (and potentially other) institutions?
- what are the development and maintenance requirements/cost of such a system/repository?
- what data elements are available in federal systems currently (FAC, SAM, etc)?
- is it feasible to obtain a regular download or interface from these systems?

Participation

The active working group consists of 15 members (listed on webpage) and most were in attendance. Approximately 50 members attended the majority of which indicated active involvement in subrecipient monitoring in some form at their institution. Strong support from FDP members continues to be shown for the activities and goals of this working group.



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Key Risks/Issues

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Expanded Clearinghouse

Point of Contact

Lynette Arias, University of Washington

Activities/Progress to Date

Activity to date for this workgroup includes:

- Collected, inventoried and analyzed all FDP institution Subrecipient Forms and contents
- Developed matrix of institutions and who has what type of form, timing of collection, etc.
- Developed matrix of standard form content
- Developed "Entity Profile Form" utilizing standard content/questions
- Updated working group webpage – consolidating A133 and FCOI clearinghouse information into updated page
- Developed estimated timeline
- Coordinated involvement with eRA group

Agenda/Discussion Points

Pending Decisions

Key decisions pending include:

- Feasibility of utilizing a standard set of data elements/questions with all institutions to collect subrecipient information?
- Feasibility of creating online FDP system to house institution information
- Feasibility of FDP developing and maintain such a system / or outsourcing
- Cost of such a system
- Feasibility of integration with or download of information from other systems (SAM, FAC)

Participation

The active working group consists of 15 members (listed on webpage) and most were in attendance. Approximately 50 members attended, the majority of which indicated active involvement in subrecipient monitoring in some form at their institution. Strong support was shown for the activities and goals of this workgroup.

Key Risks/Issues

The cost of development and maintenance of an expanded clearinghouse is an issue that will need to be addressed along with how the system will be managed on an ongoing basis. Adoption by all FDP institutions needs to be addressed to ensure adherence, accuracy and timeliness of data.

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Financial Reporting & NIH Subaccounts

Point of Contact	Jim Luther and Sara Bible
Activities/Progress to Date	<p>For the past two years, the working group has held panels with Federal and University representatives to present and discuss two important topics. Work on these topics has been ongoing between meetings through discussions with Federal representatives.</p> <ul style="list-style-type: none">•Implementation of the Uniform Guidance, including suggestions for simplification, change in the regulations, and development and incorporation of Frequently Asked Questions through technical corrections to the UG.•The NIH's change from pooled accounts to SubAccounts for Letter of Credit (LOC) draws. Partnership between NIH and FDP member institutions has facilitated improved processes.
Agenda/Discussion Points	
Pending Decisions	<p>Keep the same university project number, or establish a new university project number as NIH converts from a pooled LOC draw system, to an individual project or "subaccount" LOC draw system.</p> <p>Notify campus PI's and departmental admin's of the pending change.</p> <p>Issue new sub-awards during the transition or just modify existing subs with new identifying attributes</p> <p>How to modify existing LOC draw systems to accommodate the transition to subaccounts.</p> <p>NIH timely closeout (within 120 days) and the timing conflicts caused by use of the PMS Quarterly Federal Cash Transaction Report (FCTR) and the Final Federal Financial Report (FFR).</p> <p>Should you revise a FCTR to agree with an FFR or wait for the next quarterly FCTR to file the FFR (potentially exceeding the 120 days).</p>
Participation	University representatives, NIH policy representatives, PMS processing experts, session participants.
Key Risks/Issues	<p>Subaccounts: Keeping the same university project number will ease the administrative burden for PIs and departmental administrators, however many university systems cannot accommodate the new LOC draw number without significant reprogramming.</p> <p>Timely NIH close-outs: Universities that adopt the revise the FCTR approach run the risk of auditor questioning, i.e. the report is as of a point in time (quarter end) but the revisions are for expenditures after that time.</p>
Meeting Summary	