Zoom Breakout Room

- Breakout room discussions will NOT be recorded
- Zoom technical support at 1-888-799-9666, option 2
- Audio streamed through your speakers
- Submit questions at any time in the Q&A box at the bottom of your screen OR unmute yourself to share
- Slides and session summaries posted shortly after the event at thefdp.org
Subawards Subcommittee & Expanded Clearinghouse

Alice Reuther, Columbia University
Kevin Ritchie, Harvard Medical School
Kari Tetrault, Institute for Systems Biology
Amanda Hamaker, Purdue University
Denise Moody, Massachusetts Institute of Technology
Robert Prentiss, Yale University
Agenda

- Expanded Clearinghouse
- Sub Templates & Guidance WGs’ plan for 2023
- Sub Monitoring Tools WG update and survey results
- Collaborations with Contracts Subcommittee
  - OTAs; FFRDCs; State Law
- Standing up a Subawards Subcommittee
- NIH DMS Policy and Subawards
https://fdpclearinghouse.org/

- FDP system that publishes on-line organizational profiles for use in lieu of subrecipient commitment forms
- Pass-through entities utilize this publicly-available information when issuing subawards or monitoring subrecipient organizations
- Reduces burden at both proposal and award stages
- Intended to replace unique pass-through entity letter of intent or commitment forms
Expanded Clearinghouse Subcommittee

Co-Chairs
- Amanda Hamaker, Purdue University
- Denise Moody, Massachusetts Institute of Technology
- Robert Prentiss, Yale University

Members
- Lynette Arias, University of Washington, Senior Advisor, Emeritus Co-Chair
- Neal Hunt, Tennessee Technological University
- Emily Lacy, University of Texas Dallas
- Jackie Lucas, City of Hope
- Carrie MacCue, The Research Foundation for the State University of New York
- Chris Renner, Vanderbilt University Medical Center
- Jennifer Rodis, University of Wisconsin, Madison
- Julie Thatcher, Institute for Systems Biology
- Pamela Webb, University of Minnesota, Senior Advisor, Emeritus Co-Chair
316 Expanded Clearinghouse Profiles as of January 1\textsuperscript{st} includes:

- 216 FDP members
- 100 Non-FDP members

Non-FDP Cohort invitations sent quarterly (next to be sent March 1\textsuperscript{st})
FDP Membership vs FDP Clearinghouse Participation

- **ALL FDP Clearinghouse Participants**
  - Relief of institutional letters of intent or subrecipient commitment form requests

- **FDP Members**
  - Unmodified FDP Subaward Agreement terms and conditions for subawards issued under agreements with FDP federal agency partners

- **All FDP and Non-FDP Members**
  - Encouraged to utilize FDP Subaward Agreement templates when issuing subawards
Is entity a member of the FDP? [What does this mean?]

FDP member institutions can be found here. FDP Expanded Clearinghouse includes profiles for all FDP members and 100+ non-FDP members. Regardless of FDP membership status, FDP Expanded Clearinghouse Participants should not be asked by other Participants to complete a letter of intent or subrecipient commitment form that includes information already found in the profile. Participants should be allowed to use their own letter of intent when serving as subrecipients.
Enhancements Released Jan 9th

- Expansion to Canadian Institutions
  - Country / Province address fields

- Removal of the following fields:
  - Primary Auditee Contact Person
  - CPSR Expiration Date
  - Primary HHS/OHRP Human Subjects FWA Expiration Date
  - Primary PHS/OLAW Assurance Approval Expiration Date

- Additional Certifications for Conflict of Interest
1) Entity certifies that it has an active and enforced conflict of interest policy that is consistent with the provisions of the following agencies: [pulldown menu option for “yes” or “not applicable” to each agency listed below]
   - Public Health Service (PHS)
   - National Science Foundation (NSF)
   - NASA
   - Department of Energy
   - Other (Enter Federal Agency) - text box will allow user to enter Agency

2) Entity certifies that it has either incorporated conflict of commitment into its conflict of interest policy or has a stand-alone conflict of commitment policy. [pulldown menu option for “yes” or “no”]

3) Entity certifies that it has an organizational conflict of interest policy that is consistent with the provisions of FAR 9.5. [pulldown menu option for “yes” or “no”]
Certifications Tab > Conflict of Interest and Commitment

For the time being, the new COI fields may remain unanswered while other updates are processed.

<table>
<thead>
<tr>
<th>Entity</th>
<th>Public Health Service (PHS): Yes</th>
<th>National Science Foundation (NSF): Unanswered</th>
<th>National Aeronautics and Space Administration (NASA): Unanswered</th>
<th>Department of Energy (DoE): Unanswered</th>
<th>Unanswered</th>
<th>Unanswered</th>
</tr>
</thead>
<tbody>
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<td></td>
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<td>National Science Foundation (NSF): Unanswered</td>
<td>National Aeronautics and Space Administration (NASA): Unanswered</td>
<td>Department of Energy (DoE): Unanswered</td>
<td>Unanswered</td>
</tr>
<tr>
<td></td>
<td>Entity certifies that it has either incorporated conflict of commitment into its conflict of interest policy or has a stand-alone conflict of commitment policy.</td>
<td>Unanswered</td>
<td>National Science Foundation (NSF): Unanswered</td>
<td>National Aeronautics and Space Administration (NASA): Unanswered</td>
<td>Department of Energy (DoE): Unanswered</td>
<td>Unanswered</td>
</tr>
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<td></td>
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<td>Unanswered</td>
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<td>National Aeronautics and Space Administration (NASA): Unanswered</td>
<td>Department of Energy (DoE): Unanswered</td>
<td>Unanswered</td>
</tr>
</tbody>
</table>
When the Expanded Clearinghouse was in its pilot phase, participating organizations recorded the issuance of subawards to the other piloteers, in order to measure how frequently entity profiles were used in lieu of subrecipient commitment forms.

With 316 participating organizations, this approach is no longer feasible, but we can get a rough estimate of how far the initiative has come by looking at FFATA reports involving participating organizations.
For FY2022 FFATA reports under prime assistance agreements from NIH, NSF, and ONR, subrecipients were participants in the Expanded Clearinghouse 67% of the time.

The most active subrecipients not currently in the Expanded Clearinghouse include:
- Independent medical research organizations
- Primarily undergraduate institutions
- Research universities subject to the single audit in Canada, Australia, South Africa, and the United Kingdom
In October 2023, operation of the Federal Audit Clearinghouse will transition from the Department of Commerce to the General Services Administration.

A new website (fac.gov) will serve as a repository for single audits starting with FY2023 and will house audit data for previous fiscal years.

Notice of the upcoming change has been posted to the Federal Register (2022-27893), with a comment period closing 2/21/23.
The Expanded Clearinghouse currently offers functionality that would be helpful to have in the Federal Audit Clearinghouse for all single audits:

- An API (Application Programming Interface), for system-to-system communication
- A direct link to audit results for individual organizations
- Granular audit results for component organizations of larger audit entities, such as state governments and university systems
- Audit results that indicate when pass-through funding was involved
Risk assessments and single audit reviews are performed by federal agencies when issuing direct funding as well as pass-through entities when issuing subawards.

Audit review is particularly burdensome when:

- An organization is audited as part of a state or system audit, and determination of the individual organization’s results requires review of a several hundred page document.
- A management decision by a pass-through entity may be required under 2 CFR 200.332(d), depending on the source of any pass-through funding associated with the finding, and whether the underlying issue was cross-cutting.

Associating audit findings with UEIs, for both the subrecipient and the pass-through entity, would be ideal.
Data Sources

- Several important and frequently updated fields in the Expanded Clearinghouse have primary sources that reside with federal agencies.
- The Data Act (2014) and the GREAT Act (2019) continue to bring about better access to federal agency data.
- The Expanded Clearinghouse will look for ways to use those sources to improve its data integrity and to automate reporting, with proper controls in place to prevent the spread of erroneous or out-of-date information.
Future Considerations

• Subrecipient risk assessment & monitoring breakout discussion during in-person May meeting
• Accommodation for additional non-US single audit institutions
• SAM.gov integration
• Research security certifications
Participation Agreement

Reminders

- Keep profile information updated
  ✔ Audit report
  ✔ F&A rate agreement & fringe benefit guidance
  ✔ SAM expiration date
- Update contacts and users
- Check your institutional letter of intent when you are a subrecipient to ensure all relevant project-related information is included
- Accept Expanded Clearinghouse participants’ letter of intent
Contact Us

Systems Help: EChelp@thefdp.org
or
General Questions: ExpClearinghouse@thefdp.org
Both emails automatically get forwarded to Subcommittee members.

Wait List Survey:
https://nas.qualtrics.com/jfe/form/SV_e3QgjcfDb8dusUm
Current Working Group Members

- Mora Harris, Johns Hopkins University
- Maria Mendes-Hartstein, Princeton University
- Jennie Wyderko, Virginia Tech
- Beth Kingsley, Yale University, Co-Chair
- Carrie Chesbro, Stanford University, Co-Chair
Now:
• Call for volunteers
• Be thinking about potential template improvements

2023 (Tentative) Work Plan
• Jan-May: Gather feedback
• Jun-Aug: Incorporate updates
• Fall: Upload final versions
Sub Monitoring Tools WG

Subrecipient Monitoring Tools Survey

- Launched on 08/17/2022, closed on 10/03/2022
- A total of 171 responses were received, roughly 20% of the responses were from non FDP member institutions

<table>
<thead>
<tr>
<th>Answer</th>
<th>%</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>FDP member institution</td>
<td>80.12%</td>
<td>137</td>
</tr>
<tr>
<td>Not an FDP member institution</td>
<td>19.88%</td>
<td>34</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>171</td>
</tr>
</tbody>
</table>
Sub Monitoring Tools WG

Tools currently used:

<table>
<thead>
<tr>
<th>Answer</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subrecipient vs Contractor Classification form</td>
<td>38.42%</td>
</tr>
<tr>
<td>Risk Assessment Questionnaire (RAQ)</td>
<td>51.41%</td>
</tr>
<tr>
<td>Sample Invoice template</td>
<td>24.86%</td>
</tr>
<tr>
<td>Continuing Assessment Tool (CAT)</td>
<td>27.68%</td>
</tr>
<tr>
<td>None of the above</td>
<td>28.81%</td>
</tr>
</tbody>
</table>

Have any of the tools been modified to be used? (yes/no)

<table>
<thead>
<tr>
<th>Answer</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subrecipient vs Contractor Classification form</td>
<td>10.26%</td>
</tr>
<tr>
<td>Risk Assessment Questionnaire (RAQ)</td>
<td>5.13%</td>
</tr>
<tr>
<td>Sample Invoice template</td>
<td>7.69%</td>
</tr>
<tr>
<td>Continuing Assessment Tool (CAT)</td>
<td>0.00%</td>
</tr>
<tr>
<td>None of the above</td>
<td>76.92%</td>
</tr>
</tbody>
</table>
Reasons why the responding institution does not use any of the FDP Subrecipients Monitoring tools:

<table>
<thead>
<tr>
<th>Answer</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institutional Policy/required forms</td>
<td>19.88%</td>
</tr>
<tr>
<td>Internal Auditors</td>
<td>1.81%</td>
</tr>
<tr>
<td>External Auditors</td>
<td>0.60%</td>
</tr>
<tr>
<td>Tools are not detailed enough/do not provide the needed/required information</td>
<td>8.43%</td>
</tr>
<tr>
<td>Tool are too complicated to use/not user friendly</td>
<td>7.23%</td>
</tr>
<tr>
<td>Personal preference</td>
<td>16.87%</td>
</tr>
<tr>
<td>Didn’t know the tools are available</td>
<td>19.28%</td>
</tr>
<tr>
<td>Other (Please elaborate)</td>
<td>25.90%</td>
</tr>
</tbody>
</table>
Ranking from 1 to 5 the update of current FDP Subrecipient Monitoring tools, or the development of proposed tools (1 not helpful, 5 extremely helpful):

<table>
<thead>
<tr>
<th>Field</th>
<th>Mean</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subrecipient vs Contractor Classification form</td>
<td>3.34</td>
</tr>
<tr>
<td>Risk Assessment Questionnaire (RAQ)</td>
<td>4.01</td>
</tr>
<tr>
<td>Sample Invoice template</td>
<td>2.92</td>
</tr>
<tr>
<td>Continuing Assessment Tool (CAT)</td>
<td>3.66</td>
</tr>
<tr>
<td>PROPOSED: Subrecipient’s Risk Analysis Guidance</td>
<td>4.25</td>
</tr>
<tr>
<td>PROPOSED: Invoice Monitoring Tool (Checklist)</td>
<td>3.88</td>
</tr>
<tr>
<td>PROPOSED: Financial Questionnaire</td>
<td>4.06</td>
</tr>
<tr>
<td>PROPOSED: Non Single Audit Entity Profile (NSAP)</td>
<td>4.13</td>
</tr>
<tr>
<td>PROPOSED: sIRB Guidance</td>
<td>3.51</td>
</tr>
<tr>
<td>Other</td>
<td>3.65</td>
</tr>
</tbody>
</table>
Would the organization be more likely to use the new/edited(updated) tools if the FDP created companion user guides (for subrecipients: how to fill them out, as applicable; for PTEs: how to interpret the answers, scoring and guidance of next steps)?

<table>
<thead>
<tr>
<th>Answer</th>
<th>%</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>63.85%</td>
<td>83</td>
</tr>
<tr>
<td>Maybe</td>
<td>30.77%</td>
<td>40</td>
</tr>
<tr>
<td>No</td>
<td>5.38%</td>
<td>7</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>130</td>
</tr>
</tbody>
</table>
Sub Monitoring Tools WG

• NSAP Pilot under Executive Committee approval for launch in Spring 2023
• Financial Questionnaire to be launched in Spring 2023
• SMT-WG currently working on the Risk Assessment Tool:
  • One tool for annual risk assessment at the entity level
  • One tool for project risk assessment to be completed as needed based on PTE’s Policies and procedures
  • Reviewing current questions
  • Identifying where additional guidance is needed
OTAs
- Seeking volunteers from Contracts and Subawards communities, including a Subawards co-lead.
- Drafting aims after January meeting.

FFRDCs
- WG exists under Contracts, refining description and goals, developing matrix, mapping out how to work with FFRDCs.
- Subawards will seek volunteers once further along.

State Law
- State Requirements WG recently up and running.
- Subawards to seek specific topics and potential volunteers.
New tool to track volunteer opportunities and allow members to express their interest in volunteering

Login to FDP website with your institutional email address – upper right of thefdp.org

1. Use search people if you don’t know your exact email address – you can reset password at the login
2. Select Complete Committee Interest Form to see openings and to record your interest
3. Edit Personal Profile if needed

Questions/help – membership@thefdp.org
Plan to establish a Subawards Subcommittee

Looking for about 20 (ACTIVE) volunteers

Representing all types of institutions

To serve a two-year term, staggered

Attend four quarterly meetings per year

Provide feedback to WGs, propose new WGs, and help guide the Subawards agenda
• New NIH Data Management and Sharing (DMS) policy effective January 25, 2023
• DMS plans become part of prime awards
• Impact on subaward templates in early 2023
• Avoid complications at subaward stage
• Data Stewardship session Wednesday 11am EST
• What are your subaward-related concerns about NIH DMS Policy?
  • As a PTE?
  • As a Subrecipient?

• What do you think your institution needs in the FDP Subaward templates?
subawards@thefdp.org

Automatically goes to all the co-chairs:

Kevin Ritchie, Harvard Medical School
Kari Tetrault, Institute for Systems Biology
Alice Reuther, Columbia University