



Welcome!

Welcome!

**Today's session will begin shortly.
There will be no audio sound until
the session begins.**



Zoom Webinar Reminders

- 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
- Webinar recording, slides, and session summaries posted shortly after the event at **thefdp.org**



FEDERAL DEMONSTRATION PARTNERSHIP
Redefining the Government & University Research Partnership

Subawards Subcommittee & Expanded Clearinghouse

Amanda Humphrey, Northeastern University

Kevin Ritchie, Harvard Medical School

Kari Tetrault, Institute for Systems Biology

Amanda Hamaker, Purdue University

Denise Moody, Boston VA Research Institute

Robert Prentis, Yale University



Agenda

- Expanded Clearinghouse Business
- Subrecipient Monitoring Tools Working Group
- FCOI instructions for DOE
- DTUA Attachment 7
- Working Group updates
 - FFRDC's
 - Collaboration with Finance, Audit & Costing
- New co-chair announcement



Expanded Clearinghouse Overview

<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 (Welcome NEW members!)

(Thanks to Webb Brightwell - now a Friend of the FDP!!!)

Co-Chairs

- Amanda Hamaker, Purdue University
- Denise Moody, Boston VA Research Institute
- Robert Prentiss, Yale University

Members

- Lynette Arias, University of Washington, Senior Advisor, Emeritus Co-Chair
- Neal Hunt, Vanderbilt University Medical Center
- **[NEW] Emily Lacy, University of Texas Dallas**
- **[NEW] 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

**Systems Help: EChelp@thefdp.org
General Questions: ExpClearinghouse@thefdp.org**



Milestone Achieved!!!

**301 Expanded Clearinghouse
Profiles as of May 5th!!!**

217 FDP members

84 Non-FDP members



Non-FDP Cohorts (invitations sent quarterly)

Implementation Date	# of Profiles	
March 2016	56	Pilot participants – wave 1
Aug 2016	73	Pilot participants – wave 2
July 2017	38	Pilot participants – wave 3
Aug 2018	45	Remaining Phase VII members
Sept 2019	25	Non-FDP member participants – 1 st cohort
Fall 2020 –Jan 2021	37	Phase VII new member profiles
July 1, 2021	14	Non-FDP member participants – 2 nd cohort
Oct 1, 2021	11	Non-FDP member participants – 3 rd cohort
Jan 1, 2022	9	Non-FDP member participants – 4 th cohort
April 1, 2022	6	Non-FDP member participants – 5 th cohort
July 1, 2022	7	Non-FDP member participants – 6 th cohort



Survey Feedback – Audit Questions

Current	Proposed
Did the entity's most recent Single Audit contain any findings?	Did the entity's most recent Single Audit contain any findings in the R&D cluster?
Did the entity's most recent Single Audit contain any Significant Deficiencies?	<i>Remove</i>
Did the entity's most recent Single Audit contain any Material Weaknesses?	<i>Remove</i>
Were any of the findings related specifically to any pass-through federal funding to the entity?	Were any of the findings related to only one pass-through entity?
<i>No requirement but sometimes use "Comment" field for clarification</i>	Please provide the page number of the audit pdf where details about the entity's findings first appear.



Results & Next Steps

- Feedback was generally positive, with some concerns expressed about the need for clear communication and precise answers.
- Long-term, we are looking for opportunities to auto-populate Expanded Clearinghouse data from federal websites using system-to-system data access. Care must be taken to ensure data integrity.
- Operation of the Federal Audit Clearinghouse will transfer from the US Census Bureau to the General Services Administration (GSA) in October 2022.
- Given the potential for better data access via the Federal Audit Clearinghouse, the proposed audit updates will be put on hold and revisited after the transfer to GSA.



Survey Feedback – Letters of Intent/Subrecipient Commitment Forms

When you are the Pass-Through Entity, do you require FDP Expanded Clearinghouse participants to complete your institutional subrecipient commitment form or letter of intent (LOI)?

Yes	42%
Sometimes	13%
No	45%

What are the most common reasons you require this (select all that apply)?

My auditor requires this as part of our subrecipient monitoring process.	41%
My institution's policy requires the use of our form.	37%
The FDP Expanded Clearinghouse does not contain all of the entity information I need.*	22%
The subrecipient's form or LOI does not contain project-specific information as shown in the FDP Sample LOI.	18%

* Primarily public higher-ed FDP members.



Survey Feedback – Letters of Intent/Subrecipient Commitment Forms

Can you estimate how often you get asked by other FDP Expanded Clearinghouse participants to use their institutional subrecipient commitment forms or letters of intent?

	FDP Member	FDP Non-member	Unknown Member Status	Total
Often (>75%)	18%	30%	17%	21%
Sometimes (25-75%)	40%	57%	38%	43%
Rarely (1-24%)	40%	13%	24%	29%
No Answer	2%	0%	21%	7%



Recent Updates & Collaborations

Updates

- Participation Agreement to allow FDP Expanded Clearinghouse Subcommittee to push out profile updates as part of system-wide enhancements
- Letter of Intent/Commitment Form to add more project-specific fields based on survey feedback

Collaborations

- OMB Grants Innovation Exchange May 19th from 12-1pm
- FDP Subawards Subcommittee Subrecipient Monitoring Tools Working Group



Future Enhancement Considerations

- Revised conflict of interest certification statements to recognize NASA, NSF, and Department of Energy requirements (in collaboration with FDP COI Subcommittee)
- Removal of fields:
 - Primary Auditee Contact Person
 - USDA registration expiration date
 - DUNS
- Audit questions (postponed until after Federal Audit Clearinghouse to General Services Administration transition)



Participation Agreement Reminders

- Keep profile information updated
 - ✓ Audit report
 - ✓ Expiring certifications
- Update contacts
- 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://www.surveymonkey.com/r/DV7FF2S>



Subrecipient Monitoring Tools Working Group (SMT-WG)

GOALS - updated

- Creation of Non-Single Audit Entity Profile (NSAP)
- Invitation to non-member institutions to participate in the NSAP Pilot Phase I
- Survey to national Research Administration community regarding awareness, usage, and priorities of Subrecipients Monitoring Tools (FQ, RAQ, CAT, etc.)
- Update/create tools based on survey results
- Pilot solutions (NSAP, Financial Questionnaire and tools)
- Official roll-out (NSAP, Financial Questionnaire and tools)



SMT-WG: Subgroup Projects

Monitoring Tools Subgroup

Survey:

- * Create SMT Survey
- * Launch Survey
- * Analyze results and determine Subgroup's priorities

Tools:

- * Work on existing (or new) tools based on priorities determined by SMT Survey

Profile Subgroup

Profile:

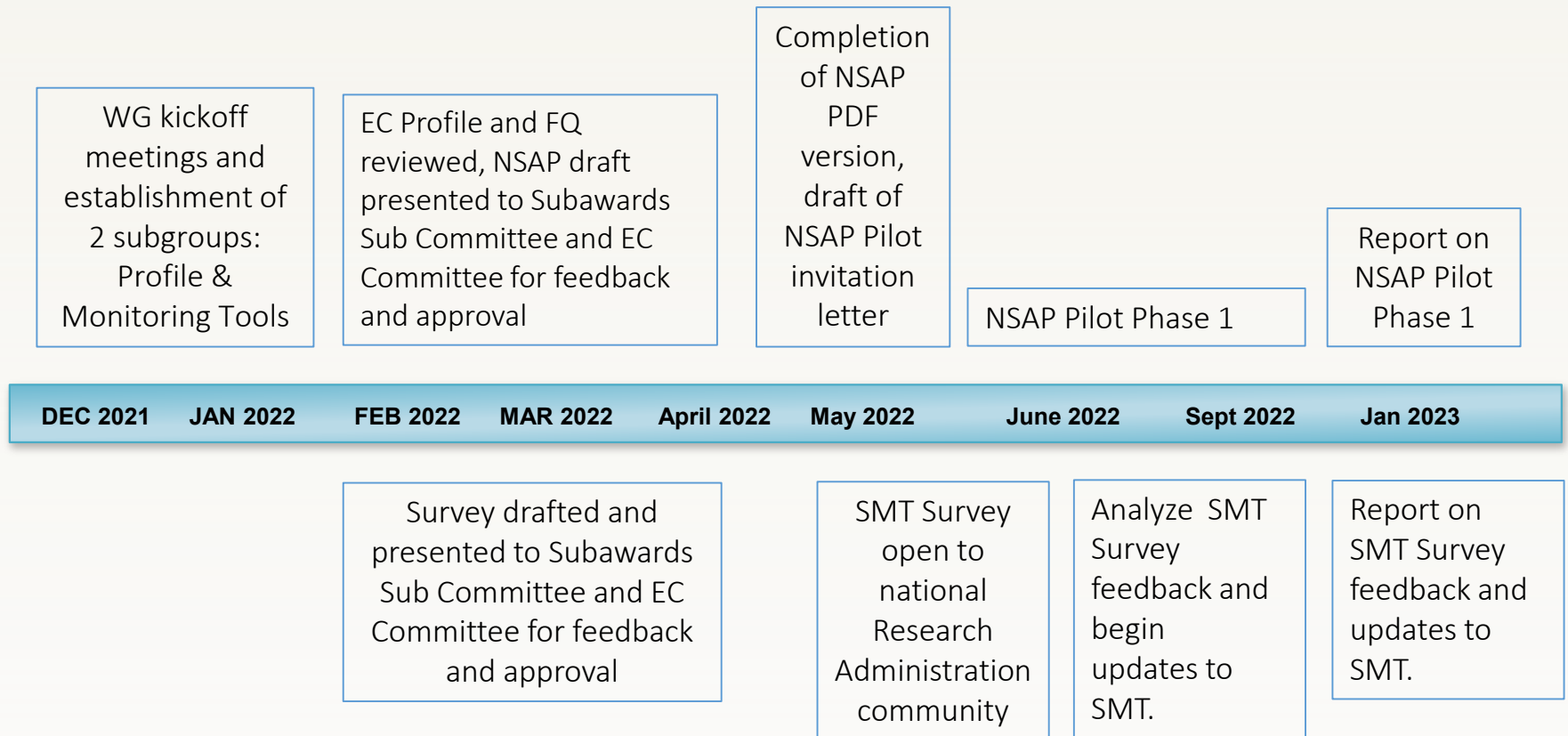
- * Review/update Financial Questionnaire (FQ)
- * Use existing Expanded Clearinghouse Entity Profile and updated FQ to create Non Single Audit Entity Profile (NSAP)
- * Create PDF NSAP

Pilot:

- * Create Pilot invitation letter
- * Finalize invitation list of non single audit entities, send Pilot invitation
- * Launch Pilot



SMT-WG: Update & Timeline





DOE FCOI Policy

- DOE has implemented a new fCOI policy [FAL 2022-02](#)
 - It is similar to, but has some very specific differences from the HHS policy
 - Implementation not final, but anticipated to be soon
- DOE is NOT an FDP participant
- Use of templates:
 - Select other agency
 - Run template
 - Fill in 2B fCOI section with reference to FAR 2022-02
 - May need to check BAA/solicitation as well to see if disclosures needed from Participants or Investigators



Subaward Attachment 7

- Survey in January on proposed amendments to HSD
- 74 responses
 - 30 no impact on ability to accept Att. 7
 - 29 more likely to accept Att. 7
 - 12 blank responses (consider these abstentions)
 - 2 less likely to accept Att. 7
 - 1 of the less likely to accept included a comment indicating positive support, so we believe selection was an error
- Retain or destroy: received requests to have one or the other in the template
 - Instructions on how to execute the term may be included in description of data
 - Will confer with the guidance group on updating guidance



Working Group Updates

- Templates
- Guidance
- Invoice check list working group with Finance, Audit & Costing Committee
- FFATA Survey follow-up
- IACUC MOU
 - Comments done, going through FDP approval



Thought Exchange

- FFRDCs
- Faculty-oriented subawards 101 webinar
- Both have active Thought Exchanges open, please participate!



New Co-Chair

Drum Roll Please!

Please welcome Alice Reuther from Columbia University
as our new co-chair



Friendly Reminder: Changes

- Templates created to make things easier – don't change them!
- Let us know if you get one with changes, we'll contact the institution.



Contact Us

subawards@thefdp.org

Automatically goes to all co-chairs:

Amanda Humphrey, Northeastern University

Kevin Ritchie, Harvard Medical School

Kari Tetrault, Institute for Systems Biology