

Uniform Guidance Working Group

Section: FDP Subaward Templates

January 13, 2015

Agenda

- Working Group Charge
- Working Group Membership
- Process
- UG-related Changes
- Applicability of FDP Subaward Templates

Working Group Charge

- Look at current FDP tools for Subawards
- Incorporate definitions of the Uniform Guidance
- Update related subaward templates

- Other sections under UGWG were assigned to update:
 - Attachment 2
 - Foreign subaward template
- Non-UG related changes will be handled separately from UG-related changes

Working Group Membership

- 25 volunteers representing 23 institutions/organizations

Name	Institution
Lynette Arias	University of Washington
Maren Boyack (Group Lead)	University of Alaska Fairbanks
Amy Brooks	University of Illinois
Matt Cahill	University of Connecticut
Wendy Chan	Harvard Longwood Campus
Trish Corcoran	John Hopkins University Applied Physics Lab
Maryann Deom	University of Georgia
Anne DePietri	Stony Brook University
Jennifer Easley	Mississippi State University
Cindy Fuqua	The Rockefeller University
Brenda Kavanaugh	University of Rochester
Susan Lasley	Duke University
Shannon Lysen	Fred Hutchinson Cancer Research Center
Connie Motoki	Washington University in St. Louis
Suzanne Page	University of Miami
Trent Pitts	University of Tennessee Health Science Center
Charles Resare	Oregon Health & Science University
Jennifer Rodis (Group Lead)	University of Wisconsin-Madison
Amber Saunders	University of Miami
Stephanie Scott	Columbia University
Tami Simmons	Dana Farber Cancer Institute
Dana Simpson	Georgia Tech
Debbie Smith	University of Tennessee Health Science Center
Holly Sommers	Emory University
Patty Yuhás Kieleszewski	Wayne State University

Working Group Process

- Gathered list of suggested changes from membership
- Discussed suggested changes:
 - Whether to incorporate them
 - How to incorporate them
- Revised documents, then sent out draft documents for review
- Worked toward agreement on UG-related revisions to subaward templates
 - *Focused on Uniform Guidance-related revisions*
 - *Also collected list of non-Uniform Guidance-related revisions*
- Finalized draft documents to be reviewed by FDP Subawards subcommittee

Process

- Draft templates sent to FDP subawards listserv in December
- Comments were posted to listserv directly or sent to subawards co-chair
- Co-chair collated comments
- Working group leads & co-chair discussed UG-related comments and how to handle them
- Incorporated several (not all) suggestions from listserv into updated templates
- Set aside non-UG-related comments for discussion at a later date

UG-related Changes: General

- Based changes on 2 CFR 200.331(a)(1) – (a)(6)[requirements for subawards] and incorporated other sections as applicable;
- Updated terminology where appropriate, e.g., “Prime Recipient” became “Pass-Through Entity” or “PTE”;
- Inserted new data elements, e.g., identification of whether the award is R&D;
- Updated references to 2 CFR 200, where appropriate;
- Updated date in footer at bottom of each document; and
- Determined where information should appear, and if it should appear in more than one place.

UG-related Changes: Cost Reimbursement Facepage

- Added “FDP” to title
- Changed “Prime Recipient” to “Pass-through Entity” or “PTE”
- Added “PTE Principal Investigator” and “Subrecipient Principal Investigator”
- Inserted “Federal” in front of “Awarding Agency”
- Added “Federal Award Issue Date” and “Total Amount of Federal Award to PTE, \$____”
- For Period of Performance, changed “From” & “Through” to “Start” & “End”
- Inserted “Is this Award R & D, Yes or No”
- Inserted “Subject to” before “FFATA”
- In T&C #2, inserted “as required in 2 CFR 200.415(a)”
- In T&C #4, added “in accordance with 2 CFR 200.305”
- In T&C #9, inserted reference to 2 CFR 200
- In T&C #12, will add URL for RTCs to facepage as soon as URL is available

UG-related Changes: Fixed Price Facepage

- Added “FDP” to title
- Changed “Prime Recipient” to “Pass-through Entity” or “PTE”
- Added “PTE Principal Investigator” and “Subrecipient Principal Investigator”
- Inserted “Federal” in front of “Awarding Agency”
- Added “Federal Award Issue Date” and “Total Amount of Federal Award to PTE, \$____”
- For Period of Performance, changed “From” & “Through” to “Start” & “End”
- Inserted “Is this Award R & D, Yes or No”
- Inserted “Subject to” before “FFATA”
- Omitted “Cost Sharing Requirement” per 2 CFR 200.201(b)(2)
- In T&C #2, inserted “as required in 2 CFR 200.415(a)”
- In T&C #4, added “in accordance with 2 CFR 200.305”
- In T&C #9, inserted reference to 2 CFR 200
- In T&C #12, will add URL for RTCs to facepage as soon as URL is available

UG-related Changes: Attachment 1

Revised Audit/Records language:

Audit and Access to Records

Subrecipient certifies by signing this Subaward Agreement that it complies with the Uniform Guidance and will provide notice of the completion of required audits, any adverse findings which impact this subaward, and will provide access to records as required by the Uniform Guidance, specifically Section C parts 200.501-200.521, 200.336, 200.237, and 200.201 as applicable.

- Do we need expanded language like current templates?
- Do we need different language for FP and CR?

UG-related Changes: Attachment 3A

- Attachment 3A
 - Changed “Prime Recipient” to “Pass-through Entity”
 - Inserted “Pass-through Entity” in front of each type of contact

UG-related Changes: Attachment 3B

- Attachment 3B, page 1
 - Changed title to “Subrecipient Place of Performance”
 - Removed “Is the Performance Site the same address as above?”
 - Removed “If no, is the Performance Site the same as PI address below?”
 - Removed “If no to both questions, please complete 3B page 2.”
 - Updated “CCR” to “SAM”
 - Inserted “Subrecipient” in front of each type of contact
- Attachment 3B, page 2
 - Removed “Subrecipient Place of Performance” section; kept section on “Highest Compensated Officers”
 - Removed “Is subaward entity exempt from reporting executive compensation?”

UG-related Changes: Attachment 4

- Added checkboxes for the following types of reports, to be checked by pass-through entity as applicable:
 - Technical/progress reports
 - Invention report (option to check “a negative report is, is not required”)
 - Certificate of completion (for Fixed Price subawards only), in accordance with 2 CFR 200.201(b)(3)
 - Property Inventory Report (only to be used when required by PTE’s Federal award)

UG-related Changes:

Attachment 5 – Cost Reimbursement

- Inserted sub-headers “Statement of Work”, “Cost Sharing”, and “Budget”
- Inserted section to add “Statement of Work Below or Attached”
- Added option “If FFATA eligible and SOW exceeds 4,000 characters, include a *Federal Award Project Description* to meet that count” below.
- Added a section to indicate “Cost Sharing Yes or No” and “Amount \$_____”
- Added a section to include “Budget Information Below or Attached” with:
 - Text box for detailed budget
 - Indirect Cost Rate/Type
 - Amounts for Direct/Indirect/Total Costs

UG-related Changes:

Attachment 5 – Fixed Price

- New Attachment 5 for Fixed Price subawards
- Inserted sub-headers “Statement of Work”, “Indirects” and “Payment Schedule”
- Inserted section to add “Statement of Work Below or Attached”
- Added option “If FFATA eligible and SOW exceeds 4,000 characters, include a *Federal Award Project Description* to meet that count” below.
- Added a section to include Indirect Cost Rate/Type
- Added a text box to include Payment Schedule

UG-related Changes: Modification

- Changed “Prime Recipient” to “Pass-through Entity” or “PTE”
- Inserted “City, State, Zip+4 (Country)” after “Address”
- Added “PTE Principal Investigator” and “Subrecipient Principal Investigator”
- Added “PTE Federal” before “Award No.:
- Inserted “FAIN” and “Federal Awarding Agency”
- Inserted “Subaward Period of Performance” with “Start Date” & “End Date”
- Inserted “Amount Funded This Action: \$_____”
- Inserted “Total Amount of Federal Funds Obligated to date: \$_____”
- Inserted “Subject to FFATA, Yes or No”

UG-related Changes: Unilateral Modification

- Changed “Prime Recipient” to “Pass-through Entity” or “PTE”
- Inserted “City, State, Zip+4 (Country)” after “Address”
- Added “PTE Principal Investigator” and “Subrecipient Principal Investigator”
- Added “PTE Federal” before “Award No.:
- Inserted “FAIN” and “Federal Awarding Agency”
- Inserted “Subaward Period of Performance” with “Start Date” & “End Date”
- Inserted “Amount Funded This Action: \$_____”
- Inserted “Total Amount of Federal Funds Obligated to date: \$_____”
- Inserted “Subject to FFATA, Yes or No”

Applicability of FDP Subaward Templates

- Applicability of the UG to PTE's award will determine applicability of the UG to the subaward
 - If UG is applicable to Federal award, then UG is applicable to subaward
 - Requirements for subaward flow from requirements from Federal award
- A group of volunteers will be preparing a guide on how to use the templates
 - If interested, let Jennifer Barron know!

APPENDIX 1: TABLE OF REQUIRED SUBAWARD DATA ELEMENTS & LOCATION IN UPDATED SUBAWARD TEMPLATES

Required Information per 200.331(a)	Cost Reimbursement Facepage	Fixed Price Facepage	Attachment 1	Attachment 2	Attachment 3A	Attachment 3B, page 1	Attachment 3B, page 2	Attachment 4	Attachment 5	Amendment	Unilateral Amendment
200.331(1)(i) Subrecipient Name	x	x				x	x			x	x
200.331(1)(ii) Subrecipient's DUNS number						x					
200.331(1)(iii) Federal Award Identification Number (FAIN)	x	x								x	x
200.331(1)(iv) Federal Award Date	x	x									
200.331(1)(v) Subaward Period of Performance Start and End Date	x	x								x	x
200.331(1)(vi) Amount of Federal Funds Obligated This Action	x	x								x	x
200.331(1)(vii) Total Amount of Federal Funds Obligated to Subrecipient										x	x
200.331(1)(viii) Total Amount of the Federal Award	x	x									
200.331(1)(ix) Federal award project description	x	x							x	x	x
200.331(1)(x) Name of Federal awarding agency	x	x			x					x	x
200.331(1)(x) Name of pass-through entity	x	x								x	x
200.331(1)(x) Contact information for awarding official					x						
200.331(1)(xi) CFDA Number and Name	x	x									
200.331(1)(xii) Identification of whether the award is R&D	x	x									
200.331(1)(xiii) Indirect cost rate for the Federal award									x		

APPENDIX 1: TABLE OF REQUIRED SUBAWARD DATA ELEMENTS & LOCATION IN UPDATED SUBAWARD TEMPLATES (CONTINUED)

Required Information per 200.331(a)	Cost Reimbursement Facepage	Fixed Price Facepage	Attachment 1	Attachment 2	Attachment 3A	Attachment 3B, page 1	Attachment 3B, page 2	Attachment 4	Attachment 5	Amendment	Unilateral Amendment
200.331(2) Requirements imposed by pass-through entity on subrecipient	x	x	x	x							
200.331(3) Any additional requirements imposed by pass-through entity on subrecipient	x	x						x			
200.331(4) Approved federally recognized indirect cost rate, negotiated indirect cost rate, or de minimis indirect cost rate									x		
200.331(5) Requirement that subrecipient permit pass-through entity and auditors access to records and financial statements			x								
200.331(6) Appropriate terms and conditions concerning closeout of the subaward	x	x		x							