Welcome!

Today’s session will begin shortly. There will be no audio sound until the session begins.
• 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
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, Boston VA Research Institute
Robert Prentiss, Yale University
Agenda

• Expanded Clearinghouse Subcommittee
• Subawards Subcommittee Working Group updates
• FFRDC and Faculty Engagement Thought Exchanges
• SAM registration vs UEI requirements
• State Law and Subawards, continued...
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

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
- 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
Milestone Achieved!!!

309 Expanded Clearinghouse Profiles as of September 1st!!!

216 FDP members
93 Non-FDP members
## Non-FDP Cohorts

(Invitations sent quarterly)

<table>
<thead>
<tr>
<th>Implementation Date</th>
<th># of Profiles</th>
<th>Participants Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>March 2016</td>
<td>56</td>
<td>Pilot participants – wave 1</td>
</tr>
<tr>
<td>Aug 2016</td>
<td>73</td>
<td>Pilot participants – wave 2</td>
</tr>
<tr>
<td>July 2017</td>
<td>38</td>
<td>Pilot participants – wave 3</td>
</tr>
<tr>
<td>Aug 2018</td>
<td>45</td>
<td>Remaining Phase VII members</td>
</tr>
<tr>
<td>Sept 2019</td>
<td>25</td>
<td>Non-FDP member participants – 1st cohort</td>
</tr>
<tr>
<td>Fall 2020 – Jan 2021</td>
<td>37</td>
<td>Phase VII new member profiles</td>
</tr>
<tr>
<td>July 1, 2021</td>
<td>14</td>
<td>Non-FDP member participants – 2nd cohort</td>
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<tr>
<td>Oct 1, 2021</td>
<td>11</td>
<td>Non-FDP member participants – 3rd cohort</td>
</tr>
<tr>
<td>Jan 1, 2022</td>
<td>9</td>
<td>Non-FDP member participants – 4th cohort</td>
</tr>
<tr>
<td>April 1, 2022</td>
<td>6</td>
<td>Non-FDP member participants – 5th cohort</td>
</tr>
<tr>
<td>July 1, 2022</td>
<td>7</td>
<td>Non-FDP member participants – 6th cohort</td>
</tr>
<tr>
<td>October 1, 2022</td>
<td>10</td>
<td>Non-FDP member participants – 7th cohort</td>
</tr>
</tbody>
</table>
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
Certifications Tab > Conflict of Interest and Commitment

**Current certification:**
Entity is registered in the FDP FCOI Clearinghouse certifying that it has an active and enforced Conflict of Interest Policy that is consistent with the provision of 42 CFR part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research and 42 CFR part 94.”
Certifications Tab > Conflict of Interest and Commitment

Proposed change:

(1) Entity certifies that it has an active and enforced conflict of interest policy that is consistent with the provisions of the following agencies: [Provide 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(ies)]

(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.
   [Provide 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. [Provide pulldown menu option for “yes” or “no”]
Future Enhancement Considerations

- **Removal of fields:**
  - Primary Auditee Contact Person
  - DUNS

- **Expiration date removal / recognize “active”:**
  - Primary PHS/OLAW Assurance Approval Expiration Date
  - Primary HHS / OHRP Human Subjects FWA Expiration Date
  - Dept of Defense Contractor Purchasing System Review (CPSR) expiration date

- **Expansion of fields to accommodate Non-US Institutions who undergo a single audit**

- **Possible integration with Sam.gov**
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
Subawards Subcommittee Working Group Updates

- Subrecipient Monitoring Tools (active)
  - Invoice Review Standards Working Group (w/ FC&A)
- Templates Working Group (ongoing)
- FAQ/Guidance Working Group (ongoing)
- OTA Working Group (pending, w/ Contracts Subcommittee)
- FFRDC Working Group (pending, w/ Contracts Subcommittee)
- sIRB Working Group (pending, w/ Compliance Committee)
- IACUC MOU (complete, w/ Compliance Committee)
Subrecipient Monitoring Tools Survey

Initial survey sent to the national research administration community. The Working Group will work on the tools that have been prioritized by the community.

- Launched on 8/17/22 and closes on 9/30/22
- Collects awareness, demographical, usage and improvement data on current and proposed tools to monitor outbound subawards under federal funding
- Report on results will be shared during the FDP January 2023 meeting
Non-Single Audit Profile – NSAP - PILOT

Central repository of non-single audit entities profile containing organizational information.

- Combines the information of the Expanded Clearinghouse Profile and the recently updated FDP Financial Questionnaire.
- Collects organizational information and documentation such as financial statements, processes, procedures, policies, etc.
- Includes the following sections: Audit (or the lack thereof), Internal Controls, Funds Management, Cost Sharing, Cost Transfers, Personnel Costs, Procurement, Purchasing, and Property Management/Equipment.
Non-Single Audit Profile – NSAP – PILOT (continuation)

- Includes built-in logic to show/hide questions if the subrecipient is a US or a non-US organization, and throughout the form depending on organization response to questions.

- Overview

- 3 poll questions
Poll Question #1

Would your institution use the NSAP Pilot and refrain from sending any other institutional annual forms/questionnaires to the participating Piloteers?

- Yes
- No
- Maybe/unsure
Poll Question #2

• What is the annual funding threshold that your organization would consider in order to nominate a Piloteer?

• <US $500K
• US $500K – US $1m
• >US $1m
Poll Question #3

• What is the annual total number of executed subawards and amendments that your organization would consider in order to nominate a Piloteer?

  • ≤10 per year
  • 11 – 25 per year
  • >25 per year
FDP Financial Questionnaire – Proposed Tool

• Collects organizational information and documentation
• Includes Audit, Internal Controls, Funds Management, Cost Sharing, Cost Transfers, Personnel Costs, Procurement, Purchasing, and Property Management/Equipment sections
• PTEs can use/send this form to collect information from non-single audit organizations without a profile (NSAP)
• Includes a guide for Subrecipients providing additional information on how to complete the form
• Includes a guide for PTEs to assist in the interpretation of the provided information
FDP Financial Questionnaire – Proposed Tool

- Off-cycle meeting in October will provide a thorough walk-through of this form.
ThoughtExchange Results

FFRDC

- 78 Participants
- 35 Thoughts
- 423 Ratings
- 21 Participants shared thoughts (27%)
- 28 Participants rated thoughts (36%)
- 36 Participants explored thoughts (46%)

Faculty Engagement

- 19 Participants
- 12 Thoughts
- 59 Ratings
- 8 Participants shared thoughts (42%)
- 10 Participants rated thoughts (53%)
- 11 Participants explored thoughts (58%)
Key Thoughts

**FFRDC will not agree to a subrecipient relationship.** Problematic when nature of FFRDC's work is that of subrecipient.

4.3 ★★★★★☆ (17 ★)  
Ranked #1 of 35

**FFRDC's operate under their funding agreement.** Potential conflict between prime terms and their funding agreement.

4.2 ★★★★★☆ (16 ★)  
Ranked #2 of 35

**Insist on using their own agreement; ugly terms; advanced payments** Requires additional review and negotiation; puts IHE at risk with advanced payment requirements

4.2 ★★★★★☆ (16 ★)  
Ranked #3 of 35
Top Themes by total thoughts

- Agreement Terms & Conditions: 20
- Process: 10
- Payment Terms: 8
- Collaboration/Synergy: 2
Faculty Engagement Results

- engagement
- faculty
- issues
- practices
- awards
- training
- subawards
- burden
- research
- subrecipient
- questions
- specific
- institution
- input
- followup
- administrative
- direct
- cost
Faculty Engagement Results

Key Thoughts

Perhaps we should consider providing faculty with tools (best practices, FAQs) regarding sub awards that could be utilized on an as needed basis. Faculty burden is significant.

Craft specific questions for faculty - perhaps sent by email w/ a follow-up from their own Research Services office to initiate engagement.

I am not sure I know what open issues there are about subawards. I understand the purpose of subawards, but don't know much about what issues faculty input would matter for.

3.7 stars (9 votes)  
Ranked #1 of 12

3.7 stars (7 votes)  
Ranked #2 of 12

3.6 stars (7 votes)  
Ranked #3 of 12
Faculty Engagement Results

Top Themes by total thoughts

- Institution Specific Practices: 5 thoughts
- Faculty Relevance: 4 thoughts
- Training Materials: 3 thoughts
- Time Constraints: 1 thought
• 2 CFR 25.300

“(a) A recipient may not make a subaward to a subrecipient unless that subrecipient has obtained and provided to the recipient a unique entity identifier. Subrecipients are not required to complete full SAM registration to obtain a unique entity identifier.”

• SAM.gov

“New entities can get their Unique Entity ID at SAM.gov and, if required, complete an entity registration.”

• Attachment 1 of subaward template

Debarment, Suspension, and Other Responsibility Matters (2 CFR 200.214 and 2 CFR 180)

• Helping subrecipients obtain a UEI or complete a SAM.gov registration
State Law and Subawards

• We discussed State Law and Subawards at the September 2021 FDP meeting
• FAQ #52 Additional Terms allows for state law
• What about E-Verify?
  • Florida state law requirement (§448.095 Employment eligibility) to use E-Verify for all “subcontractor” employees, not just those working on the subaward.
• Send examples and ideas to subawards@thefdp.org
subawards@thefdp.org

Automatically goes to all co-chairs:

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