Expanded Clearinghouse Subcommittee

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Walker Pheil, The Salk Institute for Biological Studies
Agenda

- System updates & user management tips
- Status of Conflict of Interest fields
- Subrecipient Monitoring Tools Working Group
- Federal Audit Clearinghouse & Audits for NIH foreign grant recipients
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
- Robert Prentiss, Yale University
- Jennifer Rodis, University of Wisconsin-Madison

Members
- Lynette Arias, University of Washington, Senior Advisor, Emeritus Co-Chair
- Neal Hunt, Tennessee Technological University
- Emily Lacy, University of Texas Dallas
- Jackie Lucas, Beckman Research Institute, City of Hope
- Carrie MacCue, The Research Foundation for the State University of New York
- Tameria Mace, University of Central Florida
- [NEW] Jokari McMillen, Texas Tech University
- Chris Renner, Vanderbilt University Medical Center
- Julie Thatcher, Institute for Systems Biology
- [NEW] Nancy Thoman, Florida Atlantic University
- Pamela Webb, University of Minnesota, Senior Advisor, Emeritus Co-Chair

Subrecipient Monitoring Tools Working Group
- Tyra Darville-Layne, Northwestern University, Co-Chair
- Walker Pheil, The Salk Institute for Biological Studies, Co-Chair
341 Expanded Clearinghouse profiles as of Jan. 22\textsuperscript{nd}:
- 216 FDP members
- 125 Non-member participants

Invitations for non-FDP members to participate are now sent biannually instead of quarterly
- Next invitations sent in March and September of 2024
Mid-2024 System Updates

- Removal of the DUNS field
- SAM expiration date auto-update
  - Auto-update will only occur when the organization’s SAM registration is active and the SAM expiration date is later than the Clearinghouse SAM date
  - Participants will be able to turn off auto-updating and update manually
- Expansion to allow participants in Australia & the UK that are subject to the Single Audit, or a Program-Specific Audit under the Uniform Guidance
- Expansion to allow participants not subject to the Single Audit (NSAP Pilot)
- Invoicing contact for non-FDP participants
  - Located on the Contacts tab
  - For use internally, but not visible on the public profile
## Users

Note: Modifying the organization users and their respective permissions take effect immediately.

<table>
<thead>
<tr>
<th>Name</th>
<th>Email</th>
<th>Roles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jennifer Rodis</td>
<td><a href="mailto:rodis@rsp.wisc.edu">rodis@rsp.wisc.edu</a></td>
<td>User Manager, Profile Editor</td>
</tr>
<tr>
<td>Compliance Manager</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mark Sweet</td>
<td><a href="mailto:masweet@rsp.wisc.edu">masweet@rsp.wisc.edu</a></td>
<td>User Manager, Authorized Profile Certifier</td>
</tr>
<tr>
<td>Director of Grants and Contracts</td>
<td></td>
<td></td>
</tr>
</tbody>
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User Management Tips

- Participating organizations can authorize users with the following roles:
  - *Profile Editor*, to submit updates
  - *Authorized Profile Certifier*, to certify updates
  - *User Manager*, to add, remove, or modify access for other users.
- There can be multiple Profile Editors and User Managers, but only one Authorized Profile Certifier.
- We strongly encourage the authorization of multiple Profile Editors and User Managers.
- The Authorized Profile Certifier should be in a position to perform a timely and substantive review of profile updates.
Conflict of Interest Questions

Conflict of Interest

Entity certifies that it has an active and enforced conflict of interest policy that is consistent with the provisions of the following agencies:

- Public Health Service (PHS):
  - Yes

- National Science Foundation (NSF):
  - Yes

- National Aeronautics and Space Administration (NASA):
  - Yes

- Department of Energy (DoE):
  - Yes

- Other agencies:
  - Not Applicable

Entity certifies that it has either 1) incorporated conflict of commitment into its conflict of interest policy, or 2) has a stand-alone conflict of commitment policy.

- Yes

Entity certifies that it has an organizational conflict of interest policy that is consistent with the provisions of FAR 9.5.

- Yes
Conflict of Interest Questions

- Half of Clearinghouse participants have provided full or partial answers to the COI questions implemented in January 2023.

- We plan on requiring answers for the new questions on 6/1/24. Updates submitted after that date will not move forward without answers to all of the COI questions.

- The field for Other Agencies can be used to reflect compliance with COI policies of federal & state agencies other than PHS, NSF, NASA, and DoE.

- Note COGR’s helpful Quick Reference Table of Current & Upcoming Federal Research Security Requirements, which includes Financial Conflict of Interest requirements.
Subrecipient Monitoring Tools Working Group (SMT-WG)

- Non-Single Audit entity Profile (NSAP)
  - PILOT coming soon!

- Risk Assessment Questionnaire (RAQ)
Non-Single Audit Profile (NSAP) Pilot

- NSAP Pilot launch coming soon
- Pilot will test how much workloads are reduced by collecting information in one repository
- Opportunity to test and perfect the contents of the NSAP before building additional functionality in the Expanded Clearinghouse
The NSAP follows the structure of the current FDP Expanded Clearinghouse profile.

Consists of questions that would typically be asked of a Non-Single Audit entities during a risk assessment.

Addresses topics such as financial statements, accounting and procurement practices, and compliance policies.
The FDP Members’ Administrative Representative received an invitation to participate in the NSAP Pilot as a Pilot institution/Pass-Through Entity (PTE) in Nov, deadline for response was Dec 8th.

18 FDP Member/Pilot institutions submitted a survey to Opt-in to the Pilot.

40 Non-Single Audit entity participants were nominated by Pilot institutions.

FDP EC Co-Chairs and SMT-WG Co-Chairs are in process of making final selection of Non-Single Audit entity participants to whom invitations to join the Pilot will be sent.
By Opting-in, the FDP Member Pilot Institution agreed to:

- Provide approval of an FDP Administrative Representative (or delegate).
- Nominate up to five institution’s subrecipient entities not subject to Single Audit.
- Contact the selected nominee subrecipient to introduce the NSAP Pilot.
- Refrain from sending institution’s own annual questionnaires to Non-Single Audit subrecipient entities participating in the NSAP Pilot (okay to send ‘project specific’ requests to participants).
- Provide feedback to the SMT-WG, including some metrics such as number of times the PTE has accessed the NSAP Pilot to collect data.
Based on review of multiple questionnaires shared by FDP members

Available at [bit.ly/fq2023](bit.ly/fq2023)

NSAP entities to upload to Audit tab of the Profile

Includes contextual help feature (requires questionnaire to be opened in Acrobat)
Financial Questionnaire: bit.ly/fq2023

- Audit/audited financials
- Department of Defense/Office of Naval Research System Review
- Defense Contract Audit Agency (DCAA)
- Accounting System/Internal Controls
- Accounting System/Funds Management
- Funds Management/Cost Sharing
- Funds Management/Cost Transfers
- Documentation of Personnel Costs
- Procurement/Purchasing
- Property Management/Equipment
Through survey of FDP Member community, Risk Assessment Questionnaire (RAQ) was identified as priority for tools update and improvement.

SMT-WG is near completion of its review and analysis, including updated RAQ form.

Form will be streamlined but will largely retain previous format and content.

Updates also include revised or added guidance to PTE and reference to associated UG, other federal regulation, and/or other resources.
The Federal Audit Clearinghouse is now operated by the General Services Administration and is located at fac.gov.

It has an Application Programming Interface (API), which allows for system-to-system communication.

A complete data download is planned but not yet available. In the meantime, you can search by multiple UEIs or EINs and generate a summary report from the results.

Individual audits have a summary page, which indicates the presence or absence of findings. Audit reports and their summary pages both have dedicated links.

We encourage participating organizations to use the dedicated links from the Federal Audit Clearinghouse in their Expanded Clearinghouse profiles.
The Dept. of Health and Human Services Office of the Inspector General published an audit report on 12/14/23: *The National Institutes of Health Did Not Receive 81 of 109 Required Audit Reports for Foreign Grant Recipients*

**Appendix B** lists the foreign organizations subject to audit in 2019 and 2020.

54 foreign organizations were required to undergo an annual audit in 2019, and 55 in 2020.

The audit notes that NIH did not receive a majority of these. Did recipient organizations request and receive them from their subrecipients?

Everyone would benefit from having an up-to-date list, as well as a public repository containing these audits.
Future Considerations

• Accommodation for additional non-US single audit institutions
• Potential auto-population of fields from the updated Federal Audit Clearinghouse (fac.gov)
• Research security certifications
Reminders & Contacts

• Participants are required to keep their profile information up-to-date:
  • Audit report
  • F&A rate agreement & fringe benefit guidance
  • SAM expiration date
  • Contacts and users
• Please push back on requests for entity information in the Expanded Clearinghouse. Use our suggested language, and copy the Primary Contact of the requesting organization.
• Systems help: EChelp@thefdp.org
• General questions: ExpClearinghouse@thefdp.org