



FEDERAL DEMONSTRATION PARTNERSHIP
Redefining the Government & University Research Partnership

Expanded Clearinghouse Subcommittee

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Agenda

- Subrecipient Monitoring Tools Working Group
- Status of Conflict of Interest fields
- Potential future field additions & removals
- The role of the Single Audit in reducing administrative burden
- Discussion



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
- **[NEW]** Heidi Copeland, Northeastern University
- 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
- Jokari McMillen, Texas Tech University
- Chris Renner, Vanderbilt University Medical Center
- Julie Thatcher, Institute for Systems Biology
- 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



Expanded Clearinghouse Participation

- **349 Expanded Clearinghouse profiles as of May 17th:**
 - 216 FDP members
 - 133 Non-member participants
- **Invitations for non-FDP members to participate are sent biannually**
 - Next invitations sent in September 2024 and March 2025



2024 System Updates

- Completed
 - Expansion to allow participants not subject to the Single Audit (NSAP Pilot)
- Pending
 - 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
 - Invoicing contact for non-FDP participants
 - Located on the Contacts tab
 - For use internally, but not visible on the public profile



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

- 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



Financial Questionnaire

- Based on review of multiple questionnaires shared by FDP members
- Available at bit.ly/fq2023
- NSAP entities to upload to Audit tab of the Profile
- Includes contextual help feature (requires questionnaire to be opened in Acrobat)



Opt-in to the NSAP Pilot

By Opting-in, the FDP Member Pilot Institution agrees 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.



Opt-in to the NSAP Pilot

By Opting-in, the NSAP Subrecipient Participant/Nominee agrees to:

- Provide approval of an Authorized Business Official (or delegate)
- Abide by the NSAP Pilot Participation Agreement
- Create a Profile on the FDP Expanded Clearinghouse website
- Update their entity Profile within 30 days of renewed certifications (update Profile at least once annually)
- Communicate within their organization the processes necessary to abide by the expectations listed above.
- Responsibilities are limited and are not anticipated to be burdensome



NSAP Pilot Preparation Updates

Updates:

- The FDP Members' Administrative Representative received an invitation to participate in the NSAP Pilot as a Pilot institution/Pass-Through Entity (PTE) in November
- 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 selected 18 Non-Single Audit entity participants to whom invitations were sent (based on pre-established criteria)
 - 1st contact: notice of nomination sent March 19
 - 2nd contact: formal invitation sent April 3
(deadline for response was April 19, and extended to May 1)



NSAP Pilot Preparation Updates

Steps Leading to Launch

- Prep for next round of PTE nominations of NSAP entity nominees
- Send next round of invitations to nominees
- Finalize profile instructions for nominees and send to nominees with deadline to submit Profile
- Review/vet/publish nominee Profiles
- Launch NSAP Pilot



NSAP Pilot Preparation Updates

Other Updates:

- Revision of nominee engagement plan and strategy
- Re-engage SMT-WG and Pilot PTE group for inputs
- Expand nominee base, including criteria for nominees to invite
- Some preliminary suggestions: include entities using non-standard audits; reach out to single audit entities not using the Clearinghouse
- Ideas for nominee targets: send email to ExpClearinghouse@thefdp.org (include NSAP in the email subject field)
- Pilot launch anticipated later 2024 (Summer/Fall)



Risk Assessment Questionnaire (RAQ)

- Through survey of FDP Member community, Risk Assessment Questionnaire (RAQ) was identified as priority for tools update and improvement
- SMT-WG has completed 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
- Proposed RAQ update to be submitted to FDP EC Subcommittee for review/comment



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



Yes



Yes



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.

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



Conflict of Interest Questions

- As of early May, 55% 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, except for the question regarding FAR 9.5. Updates submitted after that date will require answers to the COI questions regarding NSF, NASA, DoE, and Conflict of Commitment.
- Note COGR's helpful [Quick Reference Table of Current & Upcoming Federal Research Security Requirements](#), which includes Financial Conflict of Interest requirements.



COI & FAR 9.5

Current Question

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

[Yes/No]

Proposed Revision

Entity certifies that it has prescribed responsibilities, general rules, and procedures for identifying, evaluating, and resolving organizational conflicts of interest as defined in FAR 9.5. [Yes/No]



Field Additions & Removals

- The original fields in the Expanded Clearinghouse were based on the questions used by 133 FDP members on their subrecipient commitment forms in 2015.
- Since go-live in 2017, the Expanded Clearinghouse website has added seven fields: five related to COI, the participant's country, and the Unique Entity Identifier.
- Seven fields have been removed: four expiration dates associated with assurances (FWA, PHS/OLAW, CPSR, USDA), two fields associated with the primary audit entity, and the Contractor Establishment Code.



Field Additions & Removals

- Some recent requests for changes have been:
 - A field to indicate compliance with Responsible Conduct for Research regulations from NSF, NIH, and USDA-NIFA. Some participants check for compliance on their commitment forms & letters of intent, but many do not.
 - Modification of the sample LOI to indicate compliance with the NIH foreign subrecipient data access requirements. This is a fairly common practice, but not a requirement.
 - Modification of fields on the Contacts tab, which currently includes SAM, F&A, Audit, and FFATA contacts.
- Which fields have been useful? Which have not?



The role of the Single Audit in reducing administrative burden

1979 The Government Accounting Office (GAO) issues the report *Grant Auditing: A Maze Of Inconsistency, Gaps, And Duplication That Needs Overhauling*.

It proposes the creation of an annual Single Audit, which would be “acceptable to all the funding organizations. . . and assure that the recipient’s financial records and controls are adequate and check for compliance with important terms of the grants received.”

1984 Congress passes the Single Audit Act, which is applicable to state and local governments.



The role of the Single Audit in reducing administrative burden

1990 The Office of Management & Budget (OMB) issues [Circular A-133](#), which extends the applicability of the Single Audit to non-profit organizations.

1996 Congress passes the [Single Audit Act Amendments](#), which introduce basic requirements for pass-through entities to monitor subrecipients and to review their Single Audits.

2020 The OMB issues revisions of the Uniform Guidance that include a clarification in [2 CFR 200.332\(d\)\(4\)](#) regarding responsibility for the resolution of audit findings:

The pass-through entity is responsible for resolving audit findings specifically related to the subaward and not responsible for resolving crosscutting findings.



The role of the Single Audit in reducing administrative burden

2024 The Government Accountability Office (GAO) issues the report *Single Audits: Improving Federal Audit Clearinghouse Information and Usability Could Strengthen Federal Award Oversight*.

It makes recommendations concerning improvements in the quality of Single Audits, improvements in the quality of the data in the Federal Audit Clearinghouse, and the identification of organizations that should have a Single Audit in the Federal Audit Clearinghouse, but do not.



Open Discussion





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