



**FEDERAL DEMONSTRATION PARTNERSHIP**  
Redefining the Government & University Research Partnership

# Expanded Clearinghouse Subcommittee

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Robert Prentiss, Yale University

Jennifer Rodis, University of Wisconsin-Madison

Tyra Darville-Layne, Northwestern University

Walker Pheil, The Salk Institute for Biological Studies



# Agenda

- Proposed January 2024 system updates
- Status of new Conflict of Interest fields
- Non-single audit profile (NSAP) pilot update
- Continued discussion regarding auditors, institutional policies, and federal policy



# Upcoming Polls

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# 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
- **[NEW]** Tamera Mace, University of Central Florida
- Chris Renner, Vanderbilt University Medical Center
- Julie Thatcher, Institute for Systems Biology
- Pamela Webb, University of Minnesota, Senior Advisor, Emeritus Co-Chair

## Subrecipient Monitoring Tools Working Group

- **[NEW]** Tyra Darville-Layne, Northwestern University, Co-Chair
- **[NEW]** Walker Pheil, The Salk Institute for Biological Studies, Co-Chair



# Expanded Clearinghouse Participation

- **332 Expanded Clearinghouse profiles as of Sept. 20<sup>th</sup>:**
  - 216 FDP members
  - 116 Non-member participants
  
- **Starting in 2024, invitations for non-FDP members to participate will be sent biannually instead of quarterly**
  - 10 new participating organizations starting Oct 1<sup>st</sup>
  - Additional new participating organizations starting Jan 1<sup>st</sup>
  - Next invitations sent in March and September of 2024



# January 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



# 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

- Currently ~10% of Clearinghouse participants have provided full answers to the new questions, and another ~20% have provided partial answers
- How soon should organizations be required to respond to these questions?
  - By December 1, 2023
  - In early 2024 would be acceptable
  - Whenever they want



# Poll

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# Expanding Clearinghouses

2012	FDP Financial Conflict of Interest Clearinghouse is created.
2016	FDP Expanded Clearinghouse begins as a pilot project using Excel forms and a cohort of ~40 organizations.
2017	Pilot continues as a dedicated website and database with a cohort of ~40 organizations.
2018	Pilot concludes with all FDP Phase VI members listed in the Expanded Clearinghouse.
2019	FDP Expanded Clearinghouse begins adding non-FDP organizations for an annual fee. Participation is limited to domestic organizations subject to the Single Audit.
2023	Updates are made to allow the participation of Canadian organizations subject to the Single Audit.
2024	Non-Single Audit Profile (NSAP) Pilot begins, to allow the participation of organizations not subject to the Single Audit.



# Non-Single Audit Profile (NSAP) Pilot

- The Subrecipient Monitoring Tools working group (SMT-WG) is now part of the Expanded Clearinghouse Subcommittee
- NEW! Non-Single Audit entity Profile (NSAP), currently planning Pilot launch



# Introducing the NSAP

## *What is the NSAP?*

- Non-Single Audit entity Profile
- Will ease collaborations with these entities
- Based on the Expanded Clearinghouse structure



# Using the NSAP

- Information in the NSAP can be used for risk assessments of Non-Single Audit entities
- Information addresses the four risk factors listed in [2 CFR 200.332 \(6\)\(b\)](#)



# NSAP Format

- 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



# 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





# NSAP Pilot Next Steps

- The FDP Members' Administrative Representative will receive an invitation to participate in the NSAP Pilot as a Pilot institution/Pass-Through Entity (PTE) in the Fall 2023.
- A survey to Opt-in to the Pilot will be available for interested FDP Member institutions.
- The survey will also be used for Pilot institutions to nominate up to five (5) Non-Single Audit entity participants.



# 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.



# Financial Questionnaire

- Based on review of multiple questionnaires shared by FDP members
- Available at [bit.ly/fq2023](https://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

**Financial Questionnaire: [bit.ly/fq2023](https://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



# Poll Question

Would you recommend your institution opt-in the NSAP Pilot?

- Yes
- Seriously considering
- Maybe, need more information
- My institution does not subcontract with enough non-Single Audit entities to participate
- We don't have the bandwidth to participate



# Poll

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# Institutional Policies

- All Expanded Clearinghouse participants have agreed to forgo the use of forms to exchange entity information with other participants. If you are asked to provide entity information on a form, please push back using our [suggested language](#), and copy the organization's primary contact.
- Auditors or risk-averse institutional stakeholders may question the flexibilities associated with subrecipient monitoring requirements, but they are clearly stated in federal policy.
- Consider this hypothetical scenario that recently appeared on the FDP Subawards listserv:

An internal auditor believes that compliance with 2 CFR 200 Subpart E (Cost Principles) requires that all subrecipient invoices contain supporting documentation for all costs included.



# Federal Policies

- [2 CFR 200.303](#) requires an Internal Control framework that provides a reasonable assurance regarding compliance.
- The GAO's [Green Book](#) sets the standards for an effective internal control system for federal agencies. OMB suggests using it as a source for best practices among non-Federal entities.
- From the [2 CFR Frequently Asked Questions \(Q-67\)](#):

*Non-Federal entities and their auditors will need to exercise judgment in determining the most appropriate and cost-effective internal controls in a given environment or circumstance to provide reasonable assurance for compliance with Federal program requirements.*





# Future Considerations

- Accommodation for additional non-US single audit institutions
- Potential auto-population of fields from the updated Federal Audit Clearinghouse ([fac.gov](https://www.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
- Systems help: [EChelp@thefdp.org](mailto:EChelp@thefdp.org)
- General questions: [ExpClearinghouse@thefdp.org](mailto:ExpClearinghouse@thefdp.org)