Subawards Subcommittee & Expanded Clearinghouse

Alice Reuther, Columbia University
Kevin Ritchie, Harvard Medical School
Kari Tetrault, Institute for Systems Biology
Amanda Hamaker, Purdue University
Jaclyn Lucas, Beckman Research Institute, City of Hope
Robert Prentiss, Yale University
Jennifer Rodis, University of Wisconsin-Madison
Agenda

• Expanded Clearinghouse
• Subawards
  • Discussion groups
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
• Chris Renner, Vanderbilt University Medical Center
• Julie Thatcher, Institute for Systems Biology
• Pamela Webb, University of Minnesota, Senior Advisor, Emeritus Co-Chair
FDP Membership vs FDP Clearinghouse Participation

- **Co-chair transition (April 10, 2023)**
  - Thank you to Denise Moody, now an FDP Friend
  - Welcome to Jennifer Rodis

- **323 Expanded Clearinghouse profiles as of May 22nd:**
  - 216 FDP members
  - 107 Non-member participants

- **Non-FDP invitations sent quarterly**
  - 12 new participating organizations starting July 1st
  - Next invitations sent June 5th
## New COI fields

### Certifications

#### Conflict of Interest

<table>
<thead>
<tr>
<th>Entity Certifications</th>
<th>Agency Certifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Entity certifies that it has an active and enforced conflict of interest policy that is consistent with the provisions of the following agencies</td>
<td>Public Health Service (PHS): Yes</td>
</tr>
<tr>
<td></td>
<td>National Science Foundation (NSF): Yes</td>
</tr>
<tr>
<td></td>
<td>National Aeronautics and Space Administration (NASA): Yes</td>
</tr>
<tr>
<td></td>
<td>Department of Energy (DoE): Yes</td>
</tr>
<tr>
<td>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.</td>
<td>Yes</td>
</tr>
<tr>
<td>Entity certifies that it has an organizational conflict of interest policy that is consistent with the provisions of FAR 9.5.</td>
<td>Yes</td>
</tr>
</tbody>
</table>
COI Timeline

- The new COI fields were added in January. Roughly 1 in 5 participating organizations have supplied full or partial answers.
- If you haven’t yet had a conversation within your organization about your answers, please do so, with the aim of populating the fields later this year.
- By next year, we plan on requiring answers to all COI questions.
A few audit reminders...

- If an institution is part of a comprehensive (e.g., system or state) audit, they should answer the audit questions as they pertain to the individual campus/entity.

- If an institution’s Single Audit has audit findings/material weaknesses/significant deficiencies in ANY category, they should answer YES to the applicable questions. This includes findings/MWs/SDs in Financial Statements and Federal Awards, and includes findings pertaining to Student Financial Aid.

The questions in the Audit section of the profile link directly to the Summary of Auditor’s Results.
Single Audit

For the Year Ended September 30, 2020

Section I—Summary of Auditor’s Results

## Financial Statements

Type of report the auditor issued on whether the financial statements audited were prepared in accordance with GAAP:

<table>
<thead>
<tr>
<th>Item</th>
<th>Unmodified</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material weakness(es) identified?</td>
<td>Yes</td>
</tr>
<tr>
<td>Significant deficiency(ies) identified?</td>
<td>X</td>
</tr>
<tr>
<td>Noncompliance material to financial statements noted?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

## Federal Awards

Internal control over major federal programs:

<table>
<thead>
<tr>
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<tr>
<td>Significant deficiency(ies) identified?</td>
<td>X</td>
</tr>
<tr>
<td>Type of auditor’s report issued on compliance for major federal programs:</td>
<td></td>
</tr>
<tr>
<td>Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?</td>
<td>Yes</td>
</tr>
<tr>
<td>Auditee qualified as low-risk auditee?</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Future Considerations

• Accommodation for additional non-US single audit institutions
  • Suggestions?
• SAM.gov API integration
• Federal Audit Clearinghouse API integration
• Research security certifications
Participation Agreement Reminders

• Keep profile information updated
  ✔ Audit report
  ✔ F&A rate agreement & fringe benefit guidance
  ✔ SAM expiration date

• Update contacts and users

• 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://nas.qualtrics.com/jfe/form/SV_e3QgjcfDb8dusUm
Subawards Subcommittee

- **General subaward template use and Fall 2023 updates.** Get to know the Templates WG members and discuss questions and concerns along with expectations for adherence to FDP templates.

- **State Law and subawards.** Discuss the requirements and perspectives of public Pass-through entities, the challenges of subrecipients and compliance with terms, and possible solutions. This conversation will ultimately move to the State Law Working Group under the Contracts Subcommittee. Thought Exchange! Volunteers welcome!

- **“FDP Subawards 101”** for newer attendees, or if you attended the “Information Session for new FDP Members” on Wednesday afternoon. Overview of subcommittee, working groups, subs website and resources, listserv, subs inbox, expectations around FDP members and subs, etc.
Volunteers

• **19** volunteers for the Subawards Subcommittee
  • **12** via interest form on FDP website
  • **7** current co-chairs + WG leads
  • Need some more representation...
  • First meeting in **June**

• **Current (active) working groups**
  • Templates WG is full
  • FAQ/Guidance
  • Sub Monitoring Tools/NSAP
Call for new co-chair

• Alice Reuther from Columbia University is leaving her co-chair position at the end of May.
• Kari Tetrault and Kevin Ritchie will put out a call for applicants asap so we can have a new co-chair in place and caught up by September.
• Need NSAP Pilot volunteers to continue project.
OTAs

- OTAs on Subawards agenda, but little traction.
- Contracts Subcommittee leading WG on OTAs.
  - Subawards not the primary focus of WG.
  - Encourage volunteers if interested in topic.
- Subawards co-chairs to provide feedback/input.
- Keep sending us OTA & subaward questions!
Pass-through entities and foreign subrecipients on NIH-funded grants

• NIH NOT-OD-23-133 - Updated Policy Guidance for Subaward/Consortium Written Agreements.
• Effective October 1, 2023.
• To meet 2 CFR 200.332(a)(5) - “NIH finds it necessary to impose a requirement that foreign subrecipients turn over all records to the primary recipient at an agreed upon frequency (e.g., once a quarter, once a month).”
• Does not apply to vendors.
• First, what can/should the FDP and the FDP Subawards Subcommittee (and co-chairs) do?
• Clarify, mediate, remind, support, consider, etc.
• Refer to guidance, make suggestions, monitor trends.
• MOU contains conditions of membership, agreement to abide by FDP Operating Guidelines, remain in good standing with FDP, etc.
• MOU and Operating Guidelines reference appropriate use of FDP subaward templates (unedited).
• Subawards Subcommittee cannot *enforce*. 
General subaward template reminders

• Using the optional, award-specific items in the template or adding appropriate additional terms \((allowed)\) vs making template edits or changes to standard template language \((not\ allowed)\).

• Using your own version with FDP member, even after removing FDP moniker, is still discouraged.

• We can go into more detail in discussion group.
• Monitoring impact of NIH DMS Policy on subawards.
• Use current versions* (including Attachment 3B).
• 60 days for final invoices, should not be changed except under “rare and extenuating circumstances.”
• Backup for sub invoices is discouraged unless due to risk assessment or mandated by prime award.
• Additional sub closeout forms should be discouraged just as additional sub commitment forms have been.
• Unilateral amendments are ok, ultimately a negotiated outcome between PTE and Subrecipient.
General subaward template reminders

- Please use FDP Template Change Request Form (and Guidance) to request substantive changes.
- **Send by Jun 30th for consideration in Fall 2023!**
- Summary of changes and info sessions Jan 2024.
- Continue to send typos and formatting issues to subawards@thefdp.org.
Discussion groups

• **General subaward template use and Fall 2023 updates.** Get to know the Templates WG members and discuss questions and concerns along with expectations for adherence to FDP templates.

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