Welcome!

Today’s session will begin shortly. There will be no audio sound until the session begins.
Zoom Webinar Reminders

• 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

Amanda Humphrey, Northeastern University
Kevin Ritchie, Harvard Medical School
Kari Tetrault, Institute for Systems Biology
Amanda Hamaker, Purdue University
Denise Moody, Boston VA Research Institute
Robert Prentis, Yale University
Agenda

• Expanded Clearinghouse Business
• Subrecipient Monitoring Tools Working Group
• FCOI instructions for DOE
• DTUA Attachment 7
• Working Group updates
  • FFRDC’s
  • Collaboration with Finance, Audit & Costing
• New co-chair announcement
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
(Welcome NEW members!)

(Thanks to Webb Brightwell - now a Friend of the FDP!!!)

**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
- **[NEW] Emily Lacy, University of Texas Dallas**
- **[NEW] 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

**Systems Help:** EChelp@thefdp.org
**General Questions:** ExpClearinghouse@thefdp.org
Milestone Achieved!!!

301 Expanded Clearinghouse Profiles as of May 5th!!!

217 FDP members
84 Non-FDP members
## Non-FDP Cohorts
(invitations sent quarterly)

<table>
<thead>
<tr>
<th>Implementation Date</th>
<th># of Profiles</th>
<th>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 – 1(^{st}) 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 – 2(^{nd}) cohort</td>
</tr>
<tr>
<td>Oct 1, 2021</td>
<td>11</td>
<td>Non-FDP member participants – 3(^{rd}) cohort</td>
</tr>
<tr>
<td>Jan 1, 2022</td>
<td>9</td>
<td>Non-FDP member participants – 4(^{th}) cohort</td>
</tr>
<tr>
<td>April 1, 2022</td>
<td>6</td>
<td>Non-FDP member participants – 5(^{th}) cohort</td>
</tr>
<tr>
<td>July 1, 2022</td>
<td>7</td>
<td>Non-FDP member participants – 6th cohort</td>
</tr>
</tbody>
</table>
## Survey Feedback – Audit Questions

<table>
<thead>
<tr>
<th>Current</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Did the entity's most recent Single Audit contain any findings?</td>
<td>Did the entity's most recent Single Audit contain any findings in the R&amp;D cluster?</td>
</tr>
<tr>
<td>Did the entity's most recent Single Audit contain any Significant Deficiencies?</td>
<td>Remove</td>
</tr>
<tr>
<td>Did the entity's most recent Single Audit contain any Material Weaknesses?</td>
<td>Remove</td>
</tr>
<tr>
<td>Were any of the findings related specifically to any pass-through federal funding to the entity?</td>
<td>Were any of the findings related to only one pass-through entity?</td>
</tr>
<tr>
<td>No requirement but sometimes use “Comment” field for clarification</td>
<td>Please provide the page number of the audit pdf where details about the entity’s findings first appear.</td>
</tr>
</tbody>
</table>
Results & Next Steps

• Feedback was generally positive, with some concerns expressed about the need for clear communication and precise answers.

• Long-term, we are looking for opportunities to auto-populate Expanded Clearinghouse data from federal websites using system-to-system data access. Care must be taken to ensure data integrity.

• Operation of the Federal Audit Clearinghouse will transfer from the US Census Bureau to the General Services Administration (GSA) in October 2022.

• Given the potential for better data access via the Federal Audit Clearinghouse, the proposed audit updates will be put on hold and revisited after the transfer to GSA.
When you are the Pass-Through Entity, do you require FDP Expanded Clearinghouse participants to complete your institutional subrecipient commitment form or letter of intent (LOI)?

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>42%</td>
</tr>
<tr>
<td>Sometimes</td>
<td>13%</td>
</tr>
<tr>
<td>No</td>
<td>45%</td>
</tr>
</tbody>
</table>

What are the most common reasons you require this (select all that apply)?

<table>
<thead>
<tr>
<th>Reason</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>My auditor requires this as part of our subrecipient monitoring process.</td>
<td>41%</td>
</tr>
<tr>
<td>My institution’s policy requires the use of our form.</td>
<td>37%</td>
</tr>
<tr>
<td>The FDP Expanded Clearinghouse does not contain all of the entity information I need.*</td>
<td>22%</td>
</tr>
<tr>
<td>The subrecipient’s form or LOI does not contain project-specific information as shown in the FDP Sample LOI.</td>
<td>18%</td>
</tr>
</tbody>
</table>

* Primarily public higher-ed FDP members.
Can you estimate how often you get asked by other FDP Expanded Clearinghouse participants to use their institutional subrecipient commitment forms or letters of intent?

<table>
<thead>
<tr>
<th>Frequency</th>
<th>FDP Member</th>
<th>FDP Non-member</th>
<th>Unknown Member Status</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Often (&gt;75%)</td>
<td>18%</td>
<td>30%</td>
<td>17%</td>
<td>21%</td>
</tr>
<tr>
<td>Sometimes (25-75%)</td>
<td>40%</td>
<td>57%</td>
<td>38%</td>
<td>43%</td>
</tr>
<tr>
<td>Rarely (1-24%)</td>
<td>40%</td>
<td>13%</td>
<td>24%</td>
<td>29%</td>
</tr>
<tr>
<td>No Answer</td>
<td>2%</td>
<td>0%</td>
<td>21%</td>
<td>7%</td>
</tr>
</tbody>
</table>
Recent Updates & Collaborations

Updates

• Participation Agreement to allow FDP Expanded Clearinghouse Subcommittee to push out profile updates as part of system-wide enhancements
• Letter of Intent/Commitment Form to add more project-specific fields based on survey feedback

Collaborations

• OMB Grants Innovation Exchange May 19th from 12-1pm
• FDP Subawards Subcommittee Subrecipient Monitoring Tools Working Group
• Revised conflict of interest certification statements to recognize NASA, NSF, and Department of Energy requirements (in collaboration with FDP COI Subcommittee)
• Removal of fields:
  • Primary Auditee Contact Person
  • USDA registration expiration date
  • DUNS
• Audit questions (postponed until after Federal Audit Clearinghouse to General Services Administration transition)
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
GOALS - updated

• Creation of Non-Single Audit Entity Profile (NSAP)
• Invitation to non-member institutions to participate in the NSAP Pilot Phase I
• Survey to national Research Administration community regarding awareness, usage, and priorities of Subrecipients Monitoring Tools (FQ, RAQ, CAT, etc.)
• Update/create tools based on survey results
• Pilot solutions (NSAP, Financial Questionnaire and tools)
• Official roll-out (NSAP, Financial Questionnaire and tools)
SMT-WG: Subgroup Projects

Monitoring Tools Subgroup:
- Survey:
  * Create SMT Survey
  * Launch Survey
  * Analyze results and determine Subgroup’s priorities

Profile Subgroup:
- Profile:
  * Review/update Financial Questionnaire (FQ)
  * Use existing Expanded Clearinghouse Entity Profile and updated FQ to create Non Single Audit Entity Profile (NSAP)
  * Create PDF NSAP

Pilot:
* Create Pilot invitation letter
* Finalize invitation list of non single audit entities, send Pilot invitation
* Launch Pilot

Tools:
* Work on existing (or new) tools based on priorities determined by SMT Survey
WG kickoff meetings and establishment of 2 subgroups: Profile & Monitoring Tools

EC Profile and FQ reviewed, NSAP draft presented to Subawards Sub Committee and EC Committee for feedback and approval

Completion of NSAP PDF version, draft of NSAP Pilot invitation letter

Survey drafted and presented to Subawards Sub Committee and EC Committee for feedback and approval

SMT Survey open to national Research Administration community

Analyze SMT Survey feedback and begin updates to SMT.

Report on SMT Survey feedback and updates to SMT.

Report on NSAP Pilot Phase 1
• DOE has implemented a new fCOI policy **FAL 2022-02**
  • It is similar to, but has some very specific differences from the HHS policy
  • Implementation not final, but anticipated to be soon

• DOE is NOT an FDP participant

• Use of templates:
  • Select other agency
  • Run template
  • Fill in 2B fCOI section with reference to FAR 2022-02
  • May need to check BAA/solicitation as well to see if disclosures needed from Participants or Investigators
Survey in January on proposed amendments to HSD

- 74 responses
  - 30 no impact on ability to accept Att. 7
  - 29 more likely to accept Att. 7
  - 12 blank responses (consider these abstentions)
  - 2 less likely to accept Att. 7
    - 1 of the less likely to accept included a comment indicating positive support, so we believe selection was an error

Retain or destroy: received requests to have one or the other in the template

- Instructions on how to execute the term may be included in description of data
- Will confer with the guidance group on updating guidance
Working Group Updates

- Templates
- Guidance
- Invoice check list working group with Finance, Audit & Costing Committee
- FFATA Survey follow-up
- IACUC MOU
  - Comments done, going through FDP approval
Thought Exchange

• FFRDCs

• Faculty-oriented subawards 101 webinar

• Both have active Thought Exchanges open, please participate!
Drum Roll Please!

Please welcome Alice Reuther from Columbia University as our new co-chair
Friendly Reminder: Changes

• Templates created to make things easier – don't change them!

• Let us know if you get one with changes, we'll contact the institution.
Contact Us

subawards@thefdp.org

Automatically goes to all co-chairs:

Amanda Humphrey, Northeastern University
Kevin Ritchie, Harvard Medical School
Kari Tetrault, Institute for Systems Biology