



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

# Subawards Subcommittee

Amanda Humphrey, Northeastern University

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# Agenda

- Editing FDP Subaward Templates
- State law & auditors discussion
- FFATA reporting
- 2 CFR 200.216 follow up
- Financial & invoicing discussion
- Working Group updates
- UEI and other updates



# Friendly Reminder: Changes

- Templates created to make things easier – don't change them!
  - Changing terms and removing FDP moniker vs adding terms
  - FDP subrecipients vs Non-FDP subrecipients
  - FAQ #52 Additional Terms, “reasonable,” specific not generic
  - UG § 200.208 Specific Conditions
- Let us know if you get one with changes, we'll contact the institution.
  - Subawards Subcommittee is here to help
  - Monitor trends, correct mistakes, and reinforce consensus



# State Law & Auditors

- FAQ #52 Additional Terms allows for state law
- Exemptions for subawards under fed research grants?
- Coordination at a state-wide level?
- Can state institutions provide policy justification or reference to law along with the draft subaward?
- Can we get ahead of state data privacy laws?
- Adding terms “required by [state] auditors”?
- Send examples (or ideas) to [subawards@thefdp.org](mailto:subawards@thefdp.org)



# FFATA Reporting

- Renewed government interest in FFATA reporting as evidenced by [2020 Compliance Supplement](#) which mentions it specifically as an area for auditors to test
  - Data quality
- GAO is slated to start looking at modernizing FSRS after they complete the SAM.gov updates



# FFATA Reporting

## How can FDP help?

- Surface some of the issues with burden and how it impacts data quality & integrity
- Generating survey to start to assess:
  - Workload, including time and resources used
  - Pain points / areas for improvement
- Working with OMB to connect with GAO and gather user experience information



# 2 CFR 200.216

- Prohibition against using federal funds to purchase telecommunications and video surveillance equipment and services from certain entities as specified in Section 889(b).
- The prohibition language was included in the FDP's December 2020 Subaward template revision in Attachment 1
- Discussion:
  - How are organizations screening foreign subawardees with 2 CFR 200.216 compliance questions?
  - Have any FDP organizations developed procedures to address this issues with their subawardees?



# Invoicing Discussions

- Discussions with Finance, Audit, and Costing.
- Listening sessions proposed for Oct and Nov.





# Working Group Updates

- IACUC MOU
  - Reviewing Comments
- Human Subjects Data Attachment 7: PILOT
  - Please complete survey a few times
- Templates and Guidance
  - Accepting comments & feedback; next round 2022
- Subrecipient Monitoring Tools Working Group
  - Co-chairs: Alice Reuther & Tyra Darville-Layne



# Call for Volunteers

## Subrecipient Monitoring Tools Working Group

### Mission:

- Liaison between the Expanded Clearinghouse and Subawards Subcommittees
- Reduce administrative burden among Member and Non-Member Institutions through the creation of a new Non-Member Institution Profile in the Expanded Clearinghouse to host non-member institutions' compliance information.
- Create/review/update tools (FQ, RAQ, CAT) to streamline compliance aspects of Subrecipients Monitoring, and maintain/update related documentation



# Goals

- Creation of Non-Member Profile template in the Expanded Clearinghouse
- Invitation to non-member institutions to create their profiles in the Expanded Clearinghouse
- Survey to Membership regarding Subrecipients Monitoring Tools (FQ, RAQ, CAT) priorities
- Update/create tools based on survey results
- Pilot solutions
- Official roll-out



# Meeting Frequency & Timeline

## Phase 1:

- Meeting frequency twice a month, adjusted as needed
- Reporting expectation is monthly (internally) with updates to the Membership during FDP Meetings

## Estimated timeline:

- The estimated start date is early October 2021
- The timeline to have the pilot ready is between 12 - 15 months

## Phase 2:

- Operates on an ongoing basis to adjust tools to changes to Federal regulations


**If interested in joining the Subrecipient Monitoring Tools Working Group, please provide your name, title, institution, email address and phone number by sending an email to :**

**FDPSUBAWARD-L@LSW.NAS.EDU**



# Adobe Sign: Error Message Issue

## New Subaward:

InstitutionType 

Drop down options cannot be blank or contain only spaces.


Export values cannot be blank or contain only spaces.

cipa

(TCCUs)  
US Territory or Possession  
Other


Enter each drop down option on a separate line.

## Modification:

Carryover is Automatic 

Carryover Authorized

Detailed Budget/Scope of Work

CODD 

Drop down options cannot be blank or contain only spaces.

Export values cannot be blank or contain only spaces.



# Adobe Sign Issue: Solutions

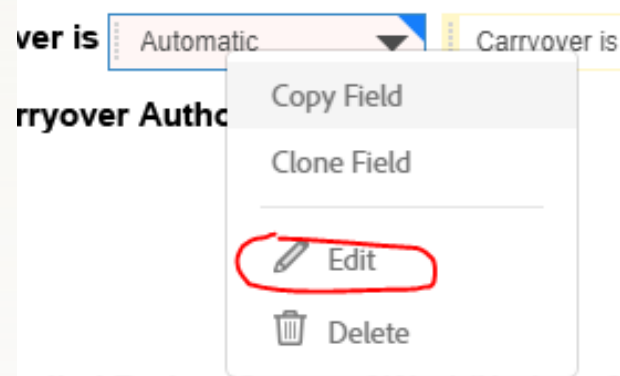
## New Subaward:

- Fill in the template
- “Print to pdf” to flatten the document
- Send the flat document via Adobe Sign for signature

\*Note to send the Subrecipient a separate fillable 3\*

## Modification:

- Same as New Subaward; or
- Right click on “Carryover is” field, then click Edit
- Select a Default Value, then OK



Default Value	Automatic
Tooltip	



# UEI

- Unique Entity Identifier (UEI) will replace the DUNS number as the federal government's identifier for entities in April 2022.
- Added UEI field to Bilateral Mod templates.
- Revised Attachment 3B to read “UEI / DUNS.”
- Expanded Clearinghouse Subcommittee will be adding a UEI field in mid-Oct.
- Agency Implementation of UEI session
  - Wed Sep 22, 11am-12:30pm EST



# Contact Us

[subawards@thefdp.org](mailto:subawards@thefdp.org)

Automatically goes to all co-chairs:

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Kari Tetrault, Institute for Systems Biology