Online Web Form Section Name	Session Info
Session Name	FDP Expanded Clearinghouse
Date	September 6, 2018
Point of Contact	Lynette Arias and Pamela Webb
Working Group Activities/Outcomes/ Progress to Date	 Post-pilot summary status The newly established steering committee was formulated and has been working together since the last meeting. Since the pilot was completed, we re-invited the remaining 43 FDP members to upload their profiles. As of this morning, ALL FDP member profiles (207 total) are completed in the Clearinghouse. Ongoing enhancements are in progress, API developed, financial questionnaire drafted, and long-range planning recommendations submitted to Executive Committee.
	 Application Programming Interface (API) tokens issued to 8 institutions (VUMC, UVA, Columbia, NCSU, FAMU, Duke, UCF, Iowa) since the end-of-May launch; 2 institutions actively consuming (VUMC & UVA). There have been issues with roles (Org Owners, Profile Contacts & Users) with an encouragement in a recent email to the listsery to remind everyone to ensure their institutional contacts for all roles are updated as people leave the institution. System versus user roles are being re-evaluated. The steering committee is reviewing the list of enhancement requests to focus on, including notifications once something has expired, increased data integrity, and administrative burden reduction areas.
	 Website updates have been made to the Archived Pilot and the Subcommittee pages. The revised Subcommittee website includes a streamlined mission, description, and resources (including a revised fillable pdf version of the Letter of Intent). Effort to possibly revise profile content by 1) removing underutilized, "N/A" and blank fields, 2) potentially adding institutional information common in the federal JIT award process, and 3) potentially adding non-subaward institutional information that would benefit other FDP working groups and EC members. EC members were asked to forward specific suggestions by email to jthatche@systemsbiology.org.
	 Long-Range Planning Specific recommendations were submitted to Executive Committee to include topics around long-term ownership, participation of FDP and non-



FDP members in the Clearinghouse, maintenance and development, and use of Clearinghouse data. Recommendations include the following:

- o FDP should continue to own and manage the Clearinghouse.
- o FDP should allow a limited number (50-100) non-FDP single audit organizations to join the Clearinghouse for a nominal fee.
- FDP should mandate participation in the Clearinghouse in FDP Phase VII.
- FDP should continue Clearinghouse development and enhancement as resources permit.
- FDP should pursue federal data interfaces (SAM, Federal Audit Clearinghouse, etc.).
- FDP should support the Clearinghouse using the technical team at Vanderbilt University Medical Center.
- Changes regarding additions or deletions of certain data elements should be analyzed.
- FDP should utilize Clearinghouse data to support overall FDP activities

Financial Questionnaire

- Guidance for PTEs completing and subrecipients reviewing the financial questionnaire completed in August.
- Financial questionnaire and guidance has been reformatted into easier to digest format for review and distribution.
- Survey under development to determine interest in using the financial questionnaire and willingness to participate in pilot.
- Drafting email to distribute the financial questionnaire and along with survey 1-2 weeks after the Sept FDP meeting.

Requests for subrecipient commitment forms

- Everyone is encouraged to use the Clearinghouse, but organizations are still
 asking for their forms to be completed. If you receive this request, use the
 sample pushback language or provide a copy of the Business Agreement. If
 this doesn't work, please contact fdpechelp@gmail.com.
- This includes when you have provided a Pass-Through Entity your
 organizational information via the sample LOI, they should not be asking for
 this information again at time of subaward issuance. If you have provided
 LOI info and have a Clearinghouse Profile, please continue to direct PTE's to
 your LOI and Clearinghouse Profile rather than completing their forms.

Agenda/Discussion Points for this Meeting

System enhancement discussion

- Notifications arrive too far in advance and are forgotten once the expiration date arrives. A suggestion was made to provide a notification closer to the expiration date.
- There are concerns with known expired entries such as "2016" being allowed.



- Have there been considerations about feeding data from the federal audit clearinghouse? (see data analysis and profile review section)
- The following enhancement suggestions were requested:
 - o If your audit report includes a very broad compilation, it would be useful to have additional guidance on how to narrow down the audit report to just the organization.
 - o A checkbox that states the finding is part of a R&D cluster.

<u>Planning to survey membership to consider potentially revising data fields that are requested in profile:</u>

- · Remove blank, "not applicable" and underutilized items
- Add data elements common in federal JIT process (e.g., description of accounting system, standardized assurances,...). Data elements will ultimately be subject to FDP Executive Committee approval before adding.
- Seek suggestions from FDP working groups for additional elements (e.g., SmartIRB participants could report here and not duplicate efforts in 2 places)
- Feedback from the audience was that removing unused fields would be favorable.
- A request was made for FDP members to provide a list of typical items that are requested from sponsors frequently that are institution-wide and not transaction-specific. For example, assurance that you are an EOE.
- Additionally, institution-to-institution requests can be submitted in order to consider adding to the Clearinghouse (e.g., IT security clearance structures in place).

Data Analysis & Profile Review

- The FDP Expanded Clearinghouse system sends email reminders before certifications expire. However, links that have broken or expired are more difficult to detect (e.g., F&A rate, audit). A reminder that these fields, especially single audit report dates, need to be updated (e.g., "2016" appears, which is out-of-date).
- Single audit and profile update questions can be sent to fdpechelp@gmail.com
- Federal clearinghouse data and Expanded Clearinghouse data is not consistent.
- FDP F&A rate data and breakdown by institution type was provided. There
 was a discussion about using the Clearinghouse data for analysis such as
 F&A rate comparisons. The following comments were made:
 - o What rate would be used if the agreement has multiple rates?
 - o What would the data be used for?
 - It was found that 89% of the institutions should be considered low risk, but they aren't deemed low risk in the audit report. The Clearinghouse could support the argument that we can still monitor an institution as low-risk.
 - O Data analysis is not the mission of the Expanded Clearinghouse, but it can be very useful to the FDP as a whole. It was clarified that the



data is already publicly available. This "use of data" component is part of the recommendations to the Executive Committee in the Clearinghouse Future recommendations. This would constitute an expansion of the original scope of the Clearinghouse and will require additional conversation with the Executive Committee.

- If we extracted data from the Clearinghouse, it would be vetted through the Executive Committee.
- o COGR could leverage FDP to obtain data.
- Any analysis should run through the FDP membership, and raw data should be provided to the membership. Any data used from the Clearinghouse will always be subject to approval from the participating organizations as well as the Executive Committee. No individual data is intended to be identifiable.
- Federal USASpending.gov and Federal Audit Clearinghouse data is linked by the DUNS # and is not consistent. There could be a potential to link the Expanded Clearinghouse with data extracted from these federal sites. The following comments were made:
 - State institutions would have difficulty pulling information from the federal sites.
 - DUNS # legal names may differ between federal sites and Expanded Clearinghouse. Legal names in the Expanded Clearinghouse were compared from SAM.gov. Please send discrepancies found in the Expanded Clearinghouse and federal sites to fdpechelp@gmail.com
 - o SAM.gov legal name should be the official one, so all participants should be sure their SAM.gov profile is correct.

Long-Range Planning

- The Executive Committee reviewed the long-range planning recommendations and approved the following:
 - o FDP will continue to own and maintain. Focused education and communication with federal agencies will be developed.
 - Non-FDP membership participation consideration will continue to be discussed, with a decision being held at this time.
 - Data element analysis will continue, with results presented back to the membership and Executive Committee.
 - o VUMC will continue to maintain and develop the Clearinghouse.
 - Use of data obtained from the Clearinghouse will continue to be discussed with the membership and Executive Committee.
- Subrecipient monitoring is still the primary mission of the Expanded Clearinghouse. However, we should still explore possible expanded use with everyone's buy-in before anything moves forward.
- The Executive Committee will continue to explore the long-range planning report more thoroughly.
- Non-FDP members have requested to participate and are being compiled for future consideration. Though they can't participate at this time, they can still obtain access to all published FDP member profiles.



	<u>Financial Questionnaire</u>
	 Reminder to participate in email and survey to be distributed 1-2 weeks after the Sept FDP meeting and provide feedback on the draft financial questionnaire. The survey results will help draft a pilot proposal. New email address for working group – fq@thefdp.org
Key Decisions Pending	 Executive Committee to further discuss long-range planning recommendations.
	 All recommendations proposed in the long-range planning recommendations list
Moving Forward Key	Data fields to retain or delete
Risks/Issues Identified	 Data fields to add for use with federal JIT and/or FDP working groups
	Enhancement requests to implement
	The session covered the following:
	 Provided status of all FDP members who have become Participating Organizations
	Recent updates to website information
Meeting Summary	 Reviewed parameters for updating profiles and typical issues seen during profile review process
	 Future long-range planning including: status of adding additional members,
	ongoing maintenance, data element additions/deletions, etc
	Financial questionnaire pilot status
Volunteer	Participate in Financial Questionnaire survey. Email to be sent soon.
Opportunities	Forward items for consideration that are common in federal JIT process