

#### FEDERAL DEMONSTRATION PARTNERSHIP

Redefining the Government & University Research Partnership

# FDP Expanded Clearinghouse

Lynette Arias, University of Washington
Pamela Webb, University of Minnesota
Courtney Swaney, University of Texas Austin
Chris Renner, Vanderbilt University Medical Center
Sara Clough, University of Texas Austin
Lesley Schmidt Sindberg, University of Minnesota

FDP Meeting – May 2018



- Introductions & Exciting News!
- Pilot Recommendations Updates
- General updates & reminders
- Data Integrity & Use
- System Update
- Financial Questionnaire
- Open discussion



Transitioning out of Pilot mode!



- Executive Committee approved Clearinghouse transition from Working Group to Subcommittee!
  - From a limited duration & focused Pilot
  - To an ongoing official Subcommittee
- Steering Committee formed for ongoing support





# Meet your new Steering Committee!

Area/Role/Functions	Lead Area Partner	Area Partner
Overall direction & oversight	Lynette Arias & Pamela Webb (co-chairs)	NA
Federal Agency Liaison(s)	TBD Federal partner(s)	
Project Management	Courtney Swaney	Denise Moody
Help Desk	Courtney Swaney	TBD
Web Based System	Chris Renner	Michael Johnson
Education, Outreach & Evaluation	Julie Thatcher	Neal Hunt
Profile Review & Approval (new)	Lynette & Pamela	NA
Profile Review & Approval (updates) & Data Analysis	Robert Prentiss	Webb Brightwell
Financial Questionnaire	Sara Clough	Lesley Schmidt Sindberg
Long Term Planning	Jennifer Rodis	Amanda Hamaker



### Communication & Marketing

- Final Pilot Report now on webpage!
  - http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga 185899.pdf
- Press Release
  - http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga 186207.pdf
- NCURA article to be published Mid May
- Spring conference presentations NCURA regional mtgs



### Pilot Recommendations – Reminder and status updates

- Re-invite FDP members not already Participating Organizations (43)
- Have participation in Expanded Clearinghouse be mandatory for FDP members
- Continue development & enhancement work
  - Ongoing small to medium enhancements
  - Develop Application Programming Interface (API)
  - Continue development & pilot use of Financial Questionnaire for non-Single Audit organizations
- Continue long term planning for Expanded Clearinghouse & future directions



# Adding Other FDP Members

- Have been very successful with others joining
- 200 Participating Organizations / Profiles currently!
- Still considering:
  - Children's Hospital of Philadelphia
  - Morgan State University
  - Ohio State University
  - Columbia University



- Profiles most recently published or updated:
  - Go to Participating Organizations page
  - Sort on "Last Published On" column



### Mandatory Use of Clearinghouse?

- Still being discussed by Executive Committee
- Likely would not happen until next Phase in 2020
  - If at all
- We have almost all members in current phase!
  - So might be a moot point
- There are side benefits to having all of this information on Members.... More to come on this!



# Continued development & enhancement work

- Ongoing small to medium enhancements & bug fixes
- API has been developed, tested and ready to launch
- Use for non-Single audit organizations?
  - Work continues on Financial Questionnaire
  - Pilot in development, similar to Clearinghouse Pilot approach
  - Sara and Lesley will share more about this shortly!



## Getting to Future Planning

First step was to close out and report on the Pilot



 Then get established as Subcommittee with Steering Committee to support operations



Stabilize and standardize the Clearinghouse processes





## Future planning - examples

- Mandatory use by FDP Member Organizations
- Inviting/allowing non-FDP Member Orgs to join
  - To charge or not to charge
  - Phases or cohorts to be invited in
  - Single Audit orgs first
- Federal involvement? How?
  - SAM.gov mapping project. SAM webservices
  - Federal Audit Clearinghouse
- Financial Questionnaire added to Clearinghouse system
- Merging other components of FDP page in FCOI Clearinghouse, A133 Database, FDP member institutional profile, others?
- FDP responsibility and ownership of data in Clearinghouse / use of data for FDP



### Updating your Profiles - Reminders

- SAM Registration
  - Update SAM and then immediately also update your Profile
- Audit Section:
  - Audit answers are KEY profile preparers and certifiers must verify accuracy before approving.
  - Add new audit (2017) and then move 2016 audit down to "Single Audit Report from previous fiscal year"
  - Audit link must be direct or no more than 1 more obvious click
  - Make sure you are capturing your Single Audit (not Financial Statements)
- Contacts section:
  - Need to make sure you keep the contacts current at all times
- Current data at all times in Profiles:
  - New escalation process for Profiles not kept current
  - Reminder about <u>Business Use Agreement</u>
- Vital to the integrity of the system!!





## Profile Updating activity

Profile Updates

- Tank \*Xyou!
- 550 profile updates in the last year
- 149 profile rejections in past year (for corrections)
- We are looking at this more closely to see if this can be modified to more fully automate the validation process
  - Check for bad hyperlinks, bad dates, etc.

Sample push back language updated

http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga\_171500.docx

- Webpage updates
  - In the process of archiving pilot information
  - Updated pages will contain key information needed for ongoing activity and resources
- Instructions & Videos

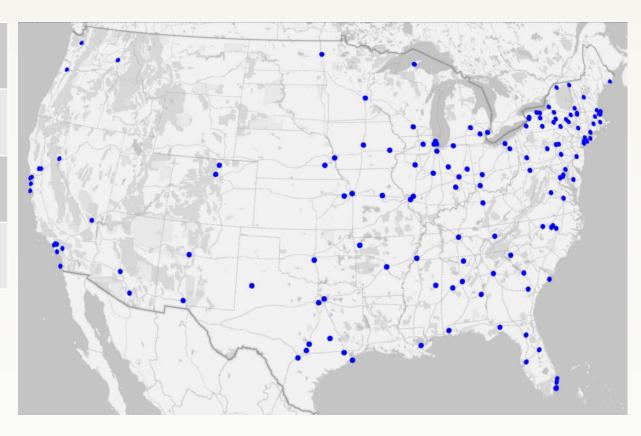


## Data review & updating

- Also to support the integrity of the system....
- Robert, Pamela and Lynette are undergoing some data scrubs and review of the data in the system
- You might be contacted to update your Profile for consistency sake with things like:
  - Legal entity name needs to match SAM.gov
  - Primary Audit Entity needs to match Entity actually being audited – state, larger system or organization
  - Links no longer working
  - Update to Fringe Benefit attachment

# April 2018 Activity

Organizations	195
Users	2,583
Sessions	5,667
Page Views	27,688



# Data Analysis

#### To help us evolve the Clearinghouse

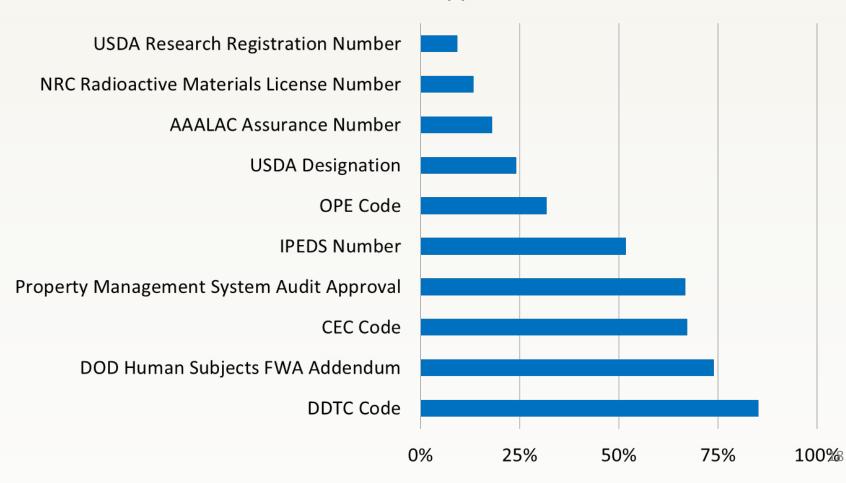
- Are there fields not being populated as much as others?
- Are there common comments that we might want to think about creating a dedicated field for?

#### Also potential side benefits for FDP as a whole

- Having all FDP member data allows us to gather interesting data and analyze to potentially support FDP
- All participating organizations agreed to Terms & Conditions which included open transparency, with respect to the data being used for subrecipient entity monitoring
- Might we all benefit from other uses as well?

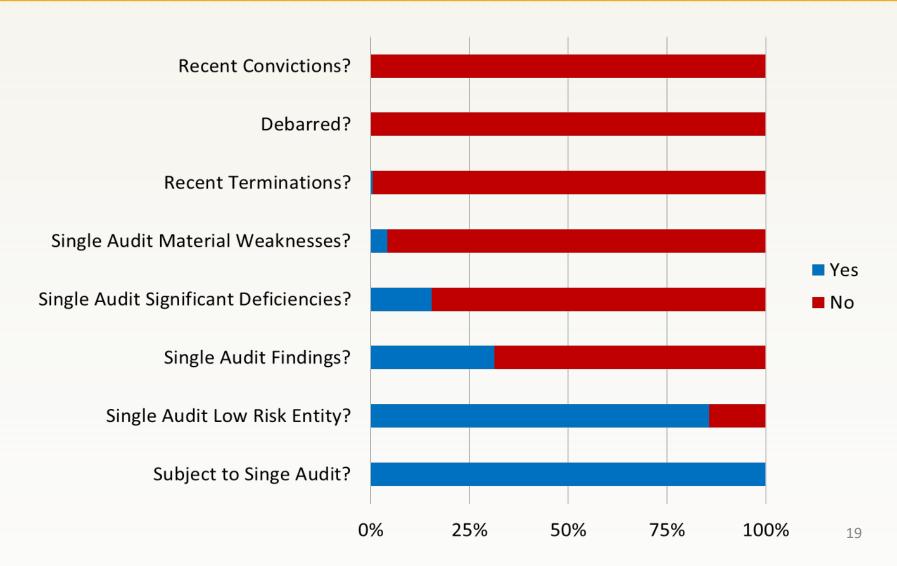
### Example: Data Element Usage

#### How often is *Not Applicable* used?





### Example: Audit & Risk Data





### Brief open discussion

- What do organizations think about the data being used to support FDP in this fashion?
- Other suggestions for ways to analyze data that might be helpful?
- This is not meant to replace organizations subrecipient monitoring procedures!





# System Updates

- Significant code update
  - Keep codebase current
  - Improve maintainability & scalability
  - No visible changes to the user
- No Excel/CSV data export feature
  - Duplicates API functionality
  - Reduces references to website, increases risk of old/bad data
  - Enhanced search tools coming to the web site
- API

# Application Programming Interface (API)

#### Status

- Finalize and open to all Participating Organizations in May
- 3 tokens issued to member institutions during testing phase

#### Documentation

- Available on SwaggerHub at <a href="https://goo.gl/qtbJgN">https://goo.gl/qtbJgN</a>
- Requirements for Access
  - Must already have a valid EC profile
  - Submit Token Access request from Data Access page
  - Token will be provided by FDP API helpdesk
  - Calls to API will be logged by token and IP address
  - Non-FDP member "Public" access under consideration\*
- \* requesting access token would still be required



#### API Version 1 has 4 Methods:

- Get all profiles for all members
- Get a single profile by DUNS# (returns multiple results in scenario of 1-DUNS to many members—rare)
- Get a single profile by their clearinghouse unique ID
- Get date an org profile was last updated by their clearinghouse unique ID



### Request API Access Token



Organizations Add Organization Admin My Dashboard Data Access Help FDP Website

#### **Data Access**

#### GO TO THIS PAGE FIRST

#### System-to-System API [BETA]

Beta Version 1 of the API is now available to FDP Members with a published Clearinghouse profile. See below for documentation and to request your institution's access token.

#### API Terms & Conditions

API users are expected to review and adhere to the API terms and conditions of use, which can be viewed here.

#### Documentation

Technical documentation for API Version 1 is publicly available on SwaggerHub.

#### What to Expect

The API returns data in JSON format, a common cross-platform data format. Although the data is human readable, the purpose is for system-to-system communication. A profile returned by the API will contain the majority of data elements visible on screen for the same profile, with a few exceptions: 1) the comments fields at the bottom of each tab are not included in the API output, and 2) the Authorized Profile Certifier name and date of certification/submission to FDP.

#### Request API Token

#### CLICK HERE TO REQUEST API TOKEN

Access tokens are currently available only to FDP members with an active profile in the Expanded Clearinghouse.

Click here to request an API access token (login required).

# FDP Financial Questionnaire Pilot

Sara Clough, University of Texas at Austin Lesley Schmidt Sindberg, University of Minnesota

- Subaward Basics
- Uniform Guidance Risk Assessment Requirement
- Development of Financial Assessment Questionnaire
- Potential Pilot
- Draft Financial Questionnaire Overview



#### Why Assess Risk of Subrecipients?

- Ensure stewardship of Federal funds
- Prevent audit findings
- Stop disallowed costs from being charged
- Avert fines/penalties
- Comply with Uniform Guidance



# 2 CFR 200.331 Requirements for Pass-through Entities

- Requires PTE to conduct a risk assessment to evaluate the likelihood that a subrecipient will fail to comply with the requirements of the subaward.
- Criteria used in evaluating risk often includes:
  - Subrecipient's audit experience
  - Subrecipient type or location (university, hospital, nonprofit organization, government organization, for-profit organization or foreign organization)
  - Size, nature, and complexity of the proposed research project
  - Fiscal maturity of the subrecipient



#### Single Audit vs. Financial Questionnaire

- If subrecipient has expended \$750,000 or more of Federal grants/awards in a fiscal year, they are subject to Single Audit.
- If subrecipient is not subject to Single Audit, alternative financial questionnaire and financial materials should be gathered and reviewed.

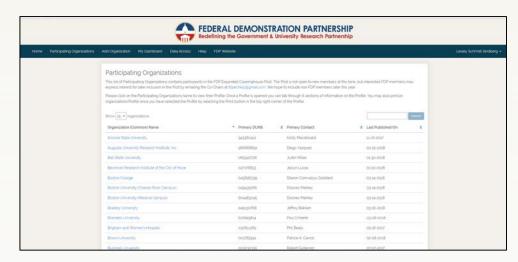


## Ways of Obtaining Single Audit

#### Federal Audit Clearinghouse



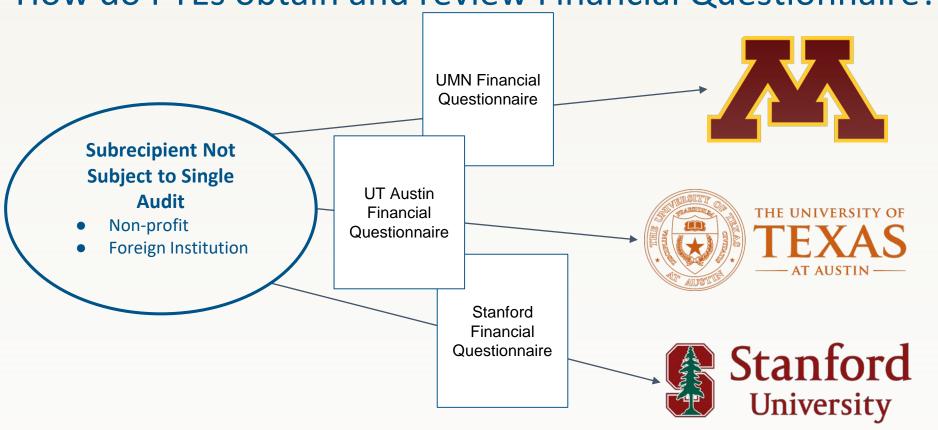
# FDP Expanded Clearinghouse





## Financial Questionnaire (FQ)

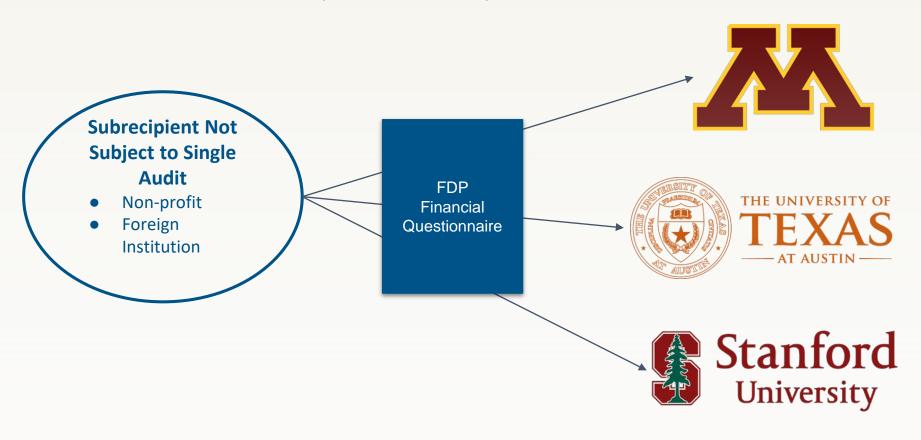
How do PTEs obtain and review Financial Questionnaire?





## Financial Questionnaire (FQ)

National consistency, efficiency, and consensus needed



#### Pitfalls of current process:

- No standardized, consistently used form
  - An example financial questionnaire is provided on FDP website but is an exhaustive list of all potential questions
- No online repository
  - Subrecipients must complete PTE-specific form for each institution with which they work
  - Housed locally at each PTE
- Little documented consensus guidance on how to review financial questionnaire



### Progress to Date

April 2017

Supporting
Documents
Working Group
Kick Off Call

#### Spring 2017

Developed draft FQ

- Removed redundant questions
- Made applicable to different subrecipient types
- Limited use of jargon

#### Summer 2017

Feedback from small sample of subrecipients and FDP institutions

#### Fall 2017

Revised FQ

#### Winter 2017 - Current

Developing detailed guidance

- For subrecipients filling out FQ
- For PTEs reviewing the completed FQ
- Potential risk
   mitigation strategies to implement

Next Steps: Potential Pilot



### Working Group Members

# Thank you to all who participated and dedicated their time!

Alice Reuther Laura Register

Anne DePietri Amanda Hamaker

Steve Parker Jennifer Barron

Sara Clough Marcy Friedle

Stephanie Scott Lesley Schmidt Sindberg

Tyra Darville-Layne Judy Krzyzek



#### Financial Questionnaire: Potential Pilot

Demonstrate need and want for the questionnaire

Test questions,
guidance, & risk
mitigation strategies
to ensure
consistency

+

Collect feedback on the above from both PTE's and Subrecipients

Measure burden relieved

#### After the pilot...

- Determine whether FQ could be incorporated into Expanded Clearinghouse for entities not subject to single audit.
- If not, FQ remains useful, standard tool with guidance and best practices for subrecipients to more readily recognize -- likely reducing some administrative burden.



### Initial Survey for PTEs

- Estimated # of financial questionnaires (FQ) sent
  - segmented by subrecipient entity type
- Average time to complete a FQ
- Average time to send and review a FQ
- Which office issues and reviews FQ?
- Would your institution be willing to use the FDP FQ?
   Why or why not?
- Would your institution use this for new entities or on an annual basis? What is your current process?



### Tell us your thoughts....

Would you be interested in participating in a pilot?



### Outline of DRAFT FQ

- 1. Characteristics of Your Subrecipient
  - Size (# of employees); Foreign/Domestic (country where entity located); Forprofit/Nonprofit; Public/Private
- 2. General Financial, Audit and Internal Controls Information
- 3. Accounting System/Funds Management
- 4. Facilities & Administrative Costs (F&A)/Indirect (IDC)
- 5. Documentation of Personnel Costs
- 6. Procurement/Purchasing
- 7. Property Management
- 8. Cost Transfers
- 9. Entity Authorized Official Approval/Certification



### **Example Questions from Section**

#### General Financial, Audit and Internal Controls Information

- 1. Does your organization have its financial statements reviewed by an independent auditor/accounting firm (third party, external, public)? (Yes/No)
  - If yes, please provide a copy of or link to the most recent audited financials including auditors' letter.
  - If no, please provide a copy of or link to the most recent un-audited financials (for example: ledger, tax statements, etc.).
- 2. Are duties separated so that no one individual has complete authority over an entire financial transaction? (Yes/No)
- 3. Does your organization have and periodically evaluate its internal controls policies or procedures to assure it is managing U.S. Federal and non-federal awards in compliance with applicable law, federal regulations, and terms of the award? (Yes/No)
  - If yes, please provide a copy of or link to your organization's internal controls policies or procedures.
  - If no, please provide a brief description of your organization's internal controls.



### Sample of the FQ Guidance

#### General Financial, Audit and Internal Controls Information

1. Does your organization have its financial statements reviewed by an independent auditor/accounting firm (third party, external, public)?

#### **Subrecipient Guidance**

These financial documents are used by the organization passing through funding to comply with federal regulations to assess the risk of awarding funds to your organization and to verify that your organization has policies and procedures in place to adequately manage the funds.

#### **PTE Guidance**

Audited and unaudited financials are both used in the risk assessment process to identify and assess the ability of the Subrecipient organization to handle the funds awarded. Unaudited financials are considered less reliable than audited financials because they are not reviewed and attested to by an independent, external entity; they are self-reported.

• If yes, please provide a copy of or link to the most recent audited financials including auditors' letter.

#### **Subrecipient Guidance**

Audited financials include any financial statements that have been reviewed by a qualified third-party, such as an external audit or accounting firm and include an opinion on the quality and accuracy of the financial statements, a statement that it has been prepared in accordance with generally accepted accounting principles and that has been audited by an independent certified public accountant in accordance with generally accepted auditing standards. This may also include a 10-K or annual report from a large company that may not necessarily include an audit letter or statements.

#### **PTE Guidance**

Some things from the financial statement that can be considered:

- Current ratio (Current Assets/Current Liabilities) determines liquidity (assets should exceed liabilities)
- Total Revenue to determine how much funding they're able to handle
- Revenue less Expenses to ensure they are not running a deficit
- Changes in cash on hand, revenue, profit, etc. from prior years to identify potential issues
- Changes in expenditures from prior years
- Trends and diversions from them are important to note, inquire about, and understand what might have caused them



Sara Clough, University of Texas at Austin sarac@austin.utexas.edu

Lesley Schmidt Sindberg, University of Minnesota schm1421@umn.edu

Please contact us with any questions or if you are interested in joining!



# Questions & Discussion

 All feedback, comments, questions and praise please use

### fdpechelp@gmail.com





## Key links & Helpdesk Email

- Expanded Clearinghouse Webpage
  - http://sites.nationalacademies.org/PGA/fdp/PGA 055835
- FDP Clearinghouse web-based system
  - http://fdpclearinghouse.org/
- Helpdesk
  - fdpechelp@gmail.com



### Co-Chair Contact Info

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