



Welcome!

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**



FEDERAL DEMONSTRATION PARTNERSHIP

Redefining the Government & University Research Partnership

Subawards Subcommittee

Amanda Hamaker, Purdue University

Amanda Humphrey, Northeastern University

Kevin Ritchie, Harvard University

Stephanie Scott, Columbia University



Agenda

- Session format
- Committee update
- Project updates
- Discussions:
 - COVID-19 and subawards
 - Modification POP terminology discussion
 - DTUA, checking in on Attachment 7
 - DTUA, what information would be useful to determine if human subjects data is being transferred



Session Format

- Polling questions
- Please feel free to ask questions
 - Use the chat box
- If there are unanswered questions, we will follow up by email
 - Will post to the list serv
 - All questions will be de-identified



Committee Update

Welcome Kevin Ritchie!

We are very excited to welcome Kevin Ritchie to the subaward subcommittee as a new co-chair.

Kevin is an Associate Director of Grants & Contracts at Harvard Medical School. He oversees subaward issuance for HMS. We look forward to his contributions.



Project Updates

- Guidance Document
 - More on that later, but will be released soon
- Subcontract Guidance Document
 - Being worked on should have something to share before September meeting
- IACUC MOU Collaboration
 - Next meeting being scheduled for June
- Subaward delay survey analysis
 - Working group will reconvene soon to complete analysis and draft recommendations



Just a Heads Up

- IACUC MOU Collaboration

- NIH's OLAW recently reached agreement with NASA to oversee animal research activities on NASA funded research
- NSF already has a similar agreement with OLAW
- <https://nexus.od.nih.gov/all/2020/04/30/animal-oversight-changes-for-institutions-receiving-national-aeronautics-and-space-administration-nasa-funding/>
- Likely will not impact the work we are doing on the IACUC MOU, just a heads up another agency is utilizing OLAW



COVID-19 & Subawards

- Posted sample force majeure language to [FDP Subaward Forms](#) page
- Not required to include force majeure because of additional Terms on Attachment 2
 - Don't need to rush out and modify all subawards
- Options to use:
 - FDP foreign subaward language;
 - General force majeure language from FDP sample language; or
 - COVID-19 specific language from FDP sample language



COVID-19 & Subawards

- Announcement posted to list serv on April 22nd
- Key reminders:
 - We are awaiting guidance from federal funding agencies / OMB to assess, what, if any, additional reporting requirements
 - Currently, there is no regulatory requirement to support requests for additional subrecipient reporting
 - Subrecipients should manage expenses in accordance with their own policies and procedures
 - If possible, please refrain from asking subrecipients for additional information



COVID-19 & Subawards, Cont'd.

- Update:

- NIH released [FAQ](#)
- Requires PTEs to include specific project impacts in their next RPPR
- PTEs are not to submit standard, form letters that their institution was impacted
- This is consistent with the guidance on the listserv from 4/22: Report COVID-19 impact in progress reports to the PTEs
- PTEs should take information in subrecipient progress report and include in their RPPR
- NIH is also granting flexibilities to PTEs in terms of late RPPR submissions, see [NOT-OD-20-086](#)



COVID-19 & Subawards

Two discussion points:

- Should we add force majeure to FDP subaward templates?
- COVID-19 letters to subrecipients with requests for information
 - Has your institution received any such letters?
 - Are you responding?



POLL QUESTION

Should we add force majeure to FDP subaward templates?

- YES
- NO



POLL QUESTION

Has your institution received any such letters from PTEs?

- YES
- NO



POLL QUESTION

Are you responding?

- YES
- NO
- NOT SURE YET



Potential FAQ

What happens if there is a force majeure event (i.e. a natural disaster, act of God, act of terrorism or other event that may impact either or both the Subrecipient and PTE's fulfillment of their obligations), does the Subaward need to be amended? What should the PTE do?

In many respects, these rare and unexpected events exemplify the FDP's function in working with its members in promoting mutual collaboration to reduce administrative burden. In this spirit, there are several factors and options to consider.

If a federal guidance is issued subsequent to a natural disaster (for example, with OMB Memo M-20-17 (related to the COVID-19 pandemic) and subsequent implementation guidance by federal agencies), the PTE would not need to amend the subaward, since federal regulations are automatically passed down to the subrecipient via the subaward, via Term and Condition 1 of Attachment 2 of the FDP subaward template. However, for high-risk subrecipients, PTEs may determine some additional documentation is needed to provide assurance of the subrecipient's ability to comply with new federal guidance or requirements.

As collaborative advocates, PTE's should explore all realistic options with their subrecipient to allow project work and payments to flexibly continue, in accordance with institutional policies, keeping the federal awarding agency appropriately informed and obtaining approvals if needed.

If it is determined by the PTE and subrecipient that work cannot feasibly continue, the subaward template already includes a termination for convenience clause which allows either party to terminate for any reason with 30 days notice.

PTEs may also consider including language in the subaward to address such circumstances. The FDP recently published guidance ([link](#)) specifically addressing COVID-19/other natural disasters that may impact PTE and/or subrecipient performance, which includes optional language for general delays/force majeure. However, this is not a requirement or an expectation of FDP members.



POLL QUESTION

Do you have any concerns or questions with this potential guidance question?

- YES
- NO
- NOT SURE – NEED MORE TIME
- OTHER (talk to us more in the Q&A feature)



Subaward Modification POP

Number <input type="text"/>			
Pass-Through Entity (PTE)		Subrecipient	
<input type="text"/>	Entity Name	<input type="text"/>	
<input type="text"/>	Email Address	<input type="text"/>	
<input type="text"/>	Principal Investigator	<input type="text"/>	
Project Title: <input type="text"/>			
PTE Federal Award No: <input type="text"/>		Federal Awarding Agency: <input type="text" value="Select from drop down options or type in"/>	
Revised Subaward Period of Performance: <input type="text" value="?"/> Start Date: <input type="text"/> End Date: <input type="text"/>		Amount Funded This Action: <input type="text"/>	Subaward No: <input type="text"/>
Total Amount of Federal Funds Obligated to Date: <input type="text"/>	Cost Share: <input type="radio"/> Yes <input checked="" type="radio"/> No	Subject to FFATA: <input type="radio"/> Yes <input type="radio"/> No	Automatic Carryover: <input type="radio"/> Yes <input type="radio"/> No
Amendment(s) to Original Terms and Conditions This Amendment revises the above-referenced Subaward Agreement as follows:			



Subaward Modification POP

Discussion

- Thoughts on how to modify the POP field to indicate that it only needs to be completed when the POP has been modified
 - I.e. if POP not changing, it can be blank
- Do you use this field another way?
- Do you always want to see this field completed?



POLL QUESTION

Please indicate which changes you would like to see:

- Change title of the field
- Find way to indicate that it should only be completed when POP modified



POLL QUESTION

Do you use this field another way?

- YES (tell us more in Q&A)
- NO



POLL QUESTION

Do you always want to see this field completed?

- YES (tell us more in Q&A)
- NO



DTUA Attachment 7

- It's live on the [website](#), look for Attachment 7
 - Minor update posted at beginning of May correcting two citations
- Draft guidance was posted on April 30th
 - Please provide feedback by May 31st
- Next steps: webinar training on use and pilot tracking information



DTUA Attachment 7

- One question that has come up with this Attachment is knowing when to use it
- Human Subjects Data may be used without there being an IRB approval
- What kind of guidance or information would be useful to help institutions assess the use of human subjects data?
- Any guidance or experiences you would like to share with us? (please email subawards@thefdp.org)



DTUA Attachment 7

Discussion Feedback on Attachment 7

- How easy is this attachment to use?
- Is your institution using Attachment 7?
- Is your institution accepting Attachment 7?
- Any asks for the webinar / trainings? What should we cover?



POLL QUESTION

As a PTE, is your institution including Attachment 7 when issuing subawards?

- YES
- NO
- NOT YET BUT WE WANT TO



POLL QUESTION

As a subrecipient, is your institution accepting Attachment 7 when reviewing subawards?

- YES
- NO
- HAVEN'T SEEN IT YET IN THE SUBAWARDS I'VE REVIEWED



POLL QUESTION

How easy is this attachment to use?

- EASY
- HARD
- TAKES A WHILE TO GET THE HANG OF IT THEN GREAT
- NOT USING IT



POLL QUESTION

Any asks for the webinar / trainings? What should we cover?

- BEGINNER LEVEL (tell us everything)
- MID-LEVEL (assume we know subawards OR DUAs but not both)
- MAKE IT FOR PROS! (assume we know about BOTH subs and DUAs)
- OTHER (TELL US MORE IN THE Q&A BOX)



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 Hamaker, Purdue University

Amanda Humphrey, Northeastern University

Kevin Ritchie, Harvard University

Stephanie Scott, Columbia University



Upcoming Sessions

- **Plenary - COVID Federal Panel** (Wednesday, May 27, 2020 from 1-3pm EDT)
- **Supporting COVID-19 related Data Transfer and Use Agreement needs** (Wednesday, May 27, 2020 from 4-5pm EDT)
- **The Impacts of COVID-19 on Research Activities: The University Perspective** (Thursday, May 28, 2020 from 1-2:30pm EDT)

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