



FEDERAL DEMONSTRATION PARTNERSHIP
Redefining the Government & University Research Partnership

Subawards Subcommittee

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Agenda

- Session format
- Committee update
- Subaward delays
- Research Security (Foreign Influence)
- Compliance Supplement
- UG updates
- Project updates
 - Contract FAQs
 - Subaward Templates



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

Let us all take a moment to grab a snack to stress eat while I tell you...

It's Stephanie Scott's last official meeting as a co-chair of the FDP Subaward Subcommittee!

Steph will continue to share her talents via the Communications Committee.



Subaward Delays - Poll

- As a subrecipient, I reasonably expect to receive a draft subaward within XX days *of the prime award start date*:
 - A) 30 days
 - B) 45 days
 - C) 60 days
 - D) Any time under 90 days is fine



Subaward Delays - Poll

- From a PTE perspective, what takes more time?
 - A) From when we receive the prime award to when we issue the draft subaward.
 - B) From when we issue the draft subaward to when we fully execute the subaward.



Subaward Delays - Recap

- Fall 2019 Survey open
- Jan 2020 Preliminary results at FDP
- **Sep 2020 Detailed results at FDP**
- Fall 2020 Reconvene the working group
- Jan 2021 Present final recommendations at FDP



Subaward Delays - Recap

- We asked institutions about:
 - Subaward volume
 - Timelines and tracking
 - Workflow
 - Document collection
 - Other specific items (amendments, auto-CF, PO, DTUA, etc.)
 - Open-ended suggestions
- Subrecipient *and* PTE perspectives
- 133 Responses



Subaward Delays - Results

- As the PTE, how many days, on average, does it take to send a new subaward agreement to the subrecipient?
 - 0-30 days (40%)
 - 31-60 days (34%)
 - 61-90 days (17%)
 - +91 days (9%)
- *Amendments take roughly the same amount of time



Subaward Delays - Results

- As the PTE, what do you believe are the most common reasons that delay issuance of a subaward by your institution?
 - Waiting for PI/Dept to provide documents
 - Staffing/Workload/Other priorities
 - Other
 - IRB approval
 - ...
 - Conducting risk assessment (least cited reason)



Subaward Delays - Results

- As the PTE, what do you believe are the most common reasons that delay execution of a subaward by your institution?
 - Waiting for board/executive approval
 - We don't hold/delay execution of a subaward
 - Waiting for subrecipient to respond
 - IRB approval
 - ...
 - Waiting for official signature (least cited reason)



Subaward Delays - Other

- 98% issue amendments instead of new agreements for continuation years.
- 93% pass auto-carryforward down to subrecipients.
- Only 36% issue unilateral amendments for non-substantive changes.
- PTEs *seem* to be limiting document collection to “whatever is required” by prime sponsor at all stages.
- Subrecipient questionnaires are not too popular, especially if the Subrecipient is in FDP Expanded Clearinghouse.



Subaward Delays – Next Steps

- Analyze qualitative survey responses and comments
 - Business process documents
 - Suggestions for improvement
- What has changed since the survey was open?
 - Attachment 7, new compliance requirements, etc.
- Develop recommendations for:
 - FDP
 - Subawards Subcommittee
 - Institutions
 - Individuals



Research Security

What we have:

- Lot of synchronous activity

- ✓ Lawmakers discussing foreign influence
- ✓ Federal partners engaging us in conversation
- ✓ Federal partners engaging in conversation (J-CORE)
- ✓ Federal partners releasing additional guidance, FAQs and updating forms to better collect relevant information
- ✓ Enforcement actions
- ✓ Media coverage



Research Security

What we DON'T have:

- Final Changes

- X New enacted legislation
- X New administrative rules and/or requirements
- X Definition of talent program (coming soon, thanks J-CORE)
- X A requirement for PTEs to monitor the employees of a subrecipient



Research Security

- NIH and NSF changes have been clarifications to existing policies, forms and procedures
- NIH and NSF continue to encourage and celebrate global research activity
- The activities are related to ensuring disclosures are clear, consistent, transparent, timely and updated routinely
- Other agencies are still reviewing their processes
- There is no prohibition on participation in talent programs



Research Security

- Recently, we learned that some institutions have begun asking about foreign influence or research security in various ways.
- Specifically:
 - "All of the named personnel on this subaward have disclosed in the relevant proposal documents (biosketch, Current & Pending, etc.) any international appointments or affiliations (paid or unpaid) or financial or in-kind support received from a foreign entity in the past 12 months."

If you were asked to sign off on this statement in a LOI form, would you?



Research Security

- Discussion:

- Currently, LOIs typically require the AOR to sign off on a current and pending that is, to the best of their knowledge and belief, correct and comports with both agency and institutional policy.
- What are your major concerns around foreign influence in a subaward setting?
- What are you hoping to avoid?
- How has research security at your institution shifted how collaborations are executed?
- Are the most effective controls on the front end or on the back end?



Foreign Influence

- Alternative suggestions for this interim period
 - Check the fCOI or expanded clearinghouse to confirm the subrecipient has an appropriate policy
 - Post-proposal review of submissions



Compliance Supplement

- Big question: COVID-19 related expenses should be included in SEFA
 - Does that mean it should be reported to the PTE
 - Supplement specific to COVID coming September 2020



UG Updates

- Revisions and Sep 9th Innovation Exchange Session [here](#).
- Updated references throughout.
- Unique Entity Identifier, SAM registration not required.
- PTE responsible for resolving audit findings specifically related to the subaward, not cross-cutting findings.
- Program goals and agency priorities, and termination.
- Longer reporting, stricter closeout.
- Period of Performance and Budget Period clarification.
- Agency updates by Nov 12th...



DTUA Collaboration Update

- Guidance document forthcoming, in final stages of preparation
- Also created a matrix that compares the DTUA to the Attachment 7 and explain differences between the two documents
 - Provides context for your OGC and other offices with questions about how the subaward could meet the obligations set forth in a standard DTUA



Subaward Template Update

- New subaward templates:
 - Federal regulation citation updates to reflect Uniform Guidance changes will be released in November 2020
 - The next major release for the templates will be in Fall 2021



Subaward Template Update

- Amendment templates:
 - Bilateral and unilateral modifications have been updated for October 2020
 - Automated options
 - Aligned all templates in format and language
 - Addressed Period of Performance concerns
 - Addition of UEI to bilateral amendments
- Coming with October modification template release
 - Amendment Template Crosswalk
 - Amendment Template User Guides
 - Updates to FAQ's



Subaward Template Update

FDP Subaward Amendment		
Amendment No. <input type="text"/>	Subaward No. <input type="text"/>	
Pass-Through Entity (PTE)	Subrecipient	
<input type="text"/>	Entity Name	<input type="text"/>
<input type="text"/>	Contact Email	<input type="text"/>
<input type="text"/>	Principal Investigator	<input type="text"/>
Project Title <input type="text"/>		
PTE/Prime Award No. <input type="text"/>	Awarding Agency <input type="text"/>	
Subaward Period of Performance	Amount Funded This Action	Total Amount of Funds Obligated to Date
Start Date: <input type="text"/>	End Date: <input type="text"/>	<input type="text"/>
Subrecipient Cost Share <input type="checkbox"/>	Subject to FFATA <input type="checkbox"/>	Subrecipient UEI <input type="text"/>
<p align="center">Amendment(s) to Original Terms and Conditions</p> <p align="center">This Amendment revises the above-referenced Subaward Agreement as follows:</p>		
<input type="checkbox"/> Additional Period of Performance <input type="checkbox"/> No Cost Extension <input type="checkbox"/> Additional Funding <input type="checkbox"/> Deobligation Carryover is <input type="text"/> <input type="checkbox"/> Carryover Authorized <input type="checkbox"/> Detailed Budget/Scope of Work/Notice of Award Attached (Specify if the Budget and Scope of Work are "New", "Revised", or "Supplemental" in dropdown or "Other") <input type="checkbox"/> Other (See Below)		
<p align="center"><i>For clarity: all amounts stated in this amendment are in United States Dollars.</i></p> <p align="center">All other terms and conditions of this Subaward Agreement remain in full force and effect.</p>		
By an Authorized Official of PTE:	By an Authorized Official of Subrecipient:	
<input type="text"/>	Date	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
Name <input type="text"/>	Name <input type="text"/>	
Title <input type="text"/>	Title <input type="text"/>	

FDP Subaward Amendment		
Amendment No. <input type="text"/>	Subaward No. <input type="text"/>	
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Project Title <input type="text"/>		
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Start Date: <input type="text"/>	End Date: <input type="text"/>	<input type="text"/>
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<input checked="" type="checkbox"/> Additional Period of Performance <input type="text"/> - <input type="text"/> is hereby added to the Subaward Period of Performance. <input checked="" type="checkbox"/> No Cost Extension This is a No Cost Extension. The Period of Performance is hereby extended through <input type="text"/> <input checked="" type="checkbox"/> Additional Funding Additional funding in the amount of <input type="text"/> is hereby obligated. <input checked="" type="checkbox"/> Deobligation Funding is decreased in the amount of <input type="text"/> from period <input type="text"/> - <input type="text"/> Carryover is <input checked="" type="checkbox"/> Not Automatic - Carryover across budget periods requires prior approval. <input checked="" type="checkbox"/> Carryover Authorized Carryover of unobligated balances in the amount of <input type="text"/> from period <input type="text"/> - <input type="text"/> to period <input type="text"/> - <input type="text"/> is hereby authorized. <small>If carryover is not automatic, the "Total Amount of Funds Obligated to Date" stated above may not reflect the actual balance available. The Subrecipient is responsible for tracking unobligated balances and subsequent carryover approvals from prior budget periods. In the event that funding was not fully expended by the Subrecipient during the prior period, the Subrecipient is not authorized to use funds from any prior periods, unless approval is granted by the PTE.</small> <input checked="" type="checkbox"/> Detailed Budget/Scope of Work/Notice of Award Attached (Specify if the Budget and Scope of Work are "New", "Revised", or "Supplemental" in dropdown or "Other") <input type="text"/> is incorporated by attachment to this Amendment. <input type="checkbox"/> Other (See Below)		
<p align="center"><i>For clarity: all amounts stated in this amendment are in United States Dollars.</i></p> <p align="center">All other terms and conditions of this Subaward Agreement remain in full force and effect.</p>		
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<input type="text"/>	Date	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
Name <input type="text"/>	Name <input type="text"/>	
Title <input type="text"/>	Title <input type="text"/>	



Subaward Template Update

FDP Subaward Amendment		
Amendment No. []	Subaward No. []	
Pass-Through Entity (PTE)	Subrecipient	
[]	Entity Name	[]
[]	Contact Email	[]
[]	Principal Investigator	[]
Project Title []		
PTE/Prime Award No. []	Awarding Agency [Select from drop down options or type in]	
Subaward Period of Performance	Amount Funded This Action	Total Amount of Funds Obligated to Date
Start Date: [] End Date: []	[]	[]
Subrecipient Cost Share <input type="checkbox"/>	Subject to FFATA <input type="checkbox"/>	
Amendment(s) to Original Terms and Conditions		
This Amendment revises the above-referenced Subaward Agreement as follows:		
<input type="checkbox"/> Additional Period of Performance <input type="checkbox"/> No Cost Extension <input type="checkbox"/> Additional Funding Carryover is [] <input type="checkbox"/> Carryover Authorized <input type="checkbox"/> Detailed Budget/Scope of Work Attached		
<p align="center">For all other contractual changes, the PTE must use the bilateral modification template</p> <p align="center"><i>For clarity, all amounts stated in this amendment are in United States Dollars.</i></p> <p align="center">All other terms and conditions of this Subaward Agreement remain in full force and effect.</p>		
By an Authorized Official of PTE:	Date	The Subrecipient is not required to countersign this amendment. Unilateral acceptance of this modification does not bypass internal approval processes of the Subrecipient. If Subrecipient would like to terminate this action, a request should be directed to PTE's Administrative Contact.
Name []	[]	
Title []	[]	
[]	[]	

FDP Subaward Amendment		
Amendment No. []	Subaward No. []	
Pass-Through Entity (PTE)	Subrecipient	
[]	Entity Name	[]
[]	Contact Email	[]
[]	Principal Investigator	[]
Project Title []		
PTE/Prime Award No. []	Awarding Agency [Select from drop down options or type in]	
Subaward Period of Performance	Amount Funded This Action	Total Amount of Funds Obligated to Date
Start Date: [] End Date: []	[]	[]
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<input checked="" type="checkbox"/> Additional Period of Performance [] - [] is hereby added to the Subaward Period of Performance. <input checked="" type="checkbox"/> No Cost Extension This is a No Cost Extension. The Period of Performance is hereby extended through [] <input checked="" type="checkbox"/> Additional Funding Additional funding in the amount of [] is hereby obligated. Carryover is Not Automatic - Carryover across budget periods requires prior approval. <input checked="" type="checkbox"/> Carryover Authorized (The PTE hereby affirms the budget was not out or was out by less than 10% from the proposed budget for the current period.) Carryover of unobligated balances in the amount of [] from period [] - [] to period [] - [] is hereby authorized. <small>If carryover is not automatic, the "Total Amount of Funds Obligated to Date" stated above may not reflect the actual balance available. The Subrecipient is responsible for tracking unobligated balances and subsequent carryover approvals from prior budget periods. In the event that funding was not fully expended by the Subrecipient during the prior period, the Subrecipient is not authorized to use funds from any prior periods, unless approval is granted by the PTE.</small> <input checked="" type="checkbox"/> Detailed Budget/Scope of Work Attached (Select any that apply) <input type="checkbox"/> New Budget <input type="checkbox"/> Supplemental Budget <input type="checkbox"/> Notice of Award <input type="checkbox"/> Revised Budget <input type="checkbox"/> Carryover Budget The selected document(s) are hereby incorporated by attachment to this Amendment. The scope of work remains unchanged.		
<p align="center">For all other contractual changes, the PTE must use the bilateral modification template</p> <p align="center"><i>For clarity, all amounts stated in this amendment are in United States Dollars.</i></p> <p align="center">All other terms and conditions of this Subaward Agreement remain in full force and effect.</p>		
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Name []	[]	
Title []	[]	
[]	[]	



Subcontract Sample Guidance

- Coming soon for comment to a list serv near you
- Will be more in the format of a user guide, walking users through how to complete the sample
- Subawards will be looking at how to mirror that to further align tools and resources for consistency



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.



COVID-19 & Subawards

REMINDER:

- 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



Contact Us

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Automatically goes to all co-chairs:

Amanda Hamaker, Purdue University

Amanda Humphrey, Northeastern University

Kevin Ritchie, Harvard University

Stephanie Scott, Columbia University