



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

# Expanded Clearinghouse Workgroup

Lynette Arias, University of Washington  
Jennifer Barron, Johns Hopkins University  
Pamela Webb, University of Minnesota



# Expanded Clearinghouse Workgroup Agenda

- Overview of Proposed Pilot
- Entity Profile
- Financial Questionnaire
- Transaction Specific Form
- Forms analysis summary
- Audit profile summary
- Review & next steps
- Questions & Discussion



# Proposed Expanded Clearinghouse Pilot

- Background & Supporting Information
- Description of Pilot
- Significance to FDP
- Participants & Responsibilities
- Timeline
- Success Criteria
- Plans for evaluation



# Background & Supporting Information

- Success of FCOI Clearinghouse
- Need for additional information in clearinghouse
- Uniform Guidance
- Proliferation of forms
- Forms analysis & development of “Entity Profile”
- Test Profile and repository feasibility
- Future phases could include developing online system
- These efforts also help support Safe Harbor



# Description of Pilot

- Institutions participate as both a subrecipient and as a pass-through entity
- Participants formally agree to terms of the Pilot
- Participants create their own Entity Profile
  - *Instructions to be provided*
- FDP posts each participant's Entity Profile
- PTEs access their participating subrecipient's on-line Entity Profile **in lieu of** sending a subrecipient commitment form for each subaward between the parties
  - *Optional transactional form may be exchanged if needed*



# Origin of Entity Profile Template

133 FDP Institution  
Subrecipient  
Commitment Forms



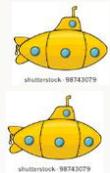
**Entity Profile**  
(Excel)



# Expanded Clearinghouse – Phase I



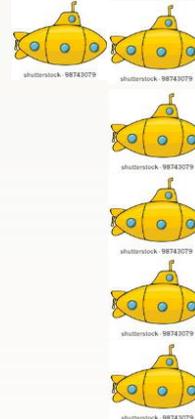
Institution 1



Institution 2



Institution 3



Institution 4



**SIMPLE EXAMPLE:**  
4 Standard Templates OR  
13 Variant Sub Commitment Forms



# Significance to FDP

- Test feasibility of standardized data repository of Entity Profiles
- Will such a repository reduce admin burden, while still ensuring stewardship?
- If successful, it will demonstrate a more effective model
- If not successful, information gathered still very useful



# Participants

- Approximately 40 FDP Institutions to start
  - Working group institutions
  - Institutions that have expressed interest in the past
- Expansion dependent on early results and stability of profile and repository



# Institutions who have Volunteered

*Red = Beta Tester*

- **Brown University**
- California Institute of Technology
- Cedars-Sinai Health Systems
- Dana Farber Cancer Institute
- Duke University Medical Center
- **Florida State University**
- Georgia Institute of Technology
- George Regents University
- Harvard Medical School
- Harvard University
- **Johns Hopkins University**
- **Icahn School of Medicine at Mount Sinai**
- **Institute for Systems Biology**
- Northern Illinois University
- **Northwestern University**
- **Purdue University**
- Oregon Health & Science University
- Partners Healthcare
- Tufts University
- **University of Alabama**
- University of California Merced
- University of California, San Diego
- University of Cincinnati
- University of Florida
- University of Kansas
- **University of Minnesota**
- University of North Carolina
- University of North Carolina , Chapel Hill
- University of Tennessee
- University of Tennessee Health Sciences Center
- **University of Texas at Austin**
- University of Texas Health Sciences Center
- **University of Washington**
- **University of Wisconsin**
- Vanderbilt University
- Washington University
- Wayne State University



# Participant Responsibilities

- Participants expected to:
  - Create profiles & have approved by Authorized Official
  - Send profile to Working Group Co-Chair for review
  - Agree that profile can be posted publically
  - Agree to update profile timely and at least annually
  - Forego use of other entity form or request for entity info
  - Track number of subawards issued using this mechanism
  - Suggest improvements & evaluate at least twice
  - Optional –
    - Help test the use of a standard Transaction Specific Form
    - Post link to profile on webpage for use by other FDP institutions and non-FDP institutions
    - Terminate participation at any time



# Timeline

- Estimated: 2/1/2016 – 6/30/2017
- Anticipate initial Phase 1 to be approx. 6 months
  - Evaluation – stop, refine, continue, and/or expand
- Possible expansion to additional set of FDP Institutions
- Updates provided regularly and via FDP Meetings



# Success Criteria

- Participants are able to efficiently and accurately complete the Entity Profile template
- Entity Profile forms are certified to be accurate by authorized institutional officials
- Entity Profile templates are able to be posted in a timely manner and easily accessed on the FDP web site
- Participants routinely access and use the Entity Profile to obtain annual/static information needed for subaward issuance or modification.
- Participants are able to update their Entity Profile forms efficiently, and do so at least one time per year
- Participants determine that access to the Expanded Clearinghouse is more efficient than sharing of individual Subaward Commitment forms.



# Plans for evaluation

- At least two evaluations will be electronically sent to all participating institutions to ascertain the efficiency and the effectiveness of the entity profile form.
  - Number of times the form was used for subaward issuance will be collected so that it can be determined how many individual subrecipient commitment forms were replaced.
- In addition, situation-specific data will be collected to better understand the challenges and the usefulness of the data being collected.
- A report will be prepared at the end of the pilot recommending next steps.



# Entity Profile – Entity Info

Legal Entity Name ( <i>Legal name associated with DUNS Number</i> )	
Legal Entity Address	
Legal Entity City	
Legal Entity State	
Legal Entity Zip + 4	
Legal Entity Country	
Legal Entity Payment Address	
Legal Entity Congressional District ( <i>please format information as "WA-007"</i> )	
Legal Entity Fiscal Period End Date ( <i>MM/DD</i> )	
<b>Entity Type</b>	
Please select your Entity type from list:	
<input type="checkbox"/>	If entity type is not listed, please enter in the adjacent cell:
<b>Small Business Concern</b>	
Entity represents that it is a small business concern as defined in 13 CFR 124.1002. (Yes/No)	
<input type="checkbox"/>	If Yes: Entity represents that it is the following type of entity:
<input type="checkbox"/>	If Other, please specify in the adjacent cell:
<b>Parent/State Entity Information (<i>If Entity is owned or controlled by a parent/state entity</i>)</b>	
Parent/State Entity Legal Entity Name	
Parent/State Entity Legal Entity Address	
Parent/State Entity Legal Entity City	
Parent/State Entity Legal Entity State	
Parent/State Entity Legal Entity Zip + 4	
Parent/State Entity Congressional District	
Parent/State Entity Country	
Parent/State Entity EIN Number	
Parent/State Entity DUNS Number	
<b>Parent/State Entity Contact Information</b>	
Parent/State Entity Contact Name	
Parent/State Entity Contact Name Phone Number	
Parent/State Entity Contact Name Email	



# Rate Agreements & Reg #'s

<b>Entity Identification Numbers and Codes</b>	
Entity EIN ( <i>Employer Identification Number</i> )	
Entity IRS Tax Determination Letter <i>[optional field]</i>	
Entity IRS/W-9 <i>[optional field]</i>	
Entity NAICS Code ( <i>North American Industry Classification System</i> )	
Entity DUNS Number ( <i>Data Universal Numbering System</i> )	
Entity SAM status ( <i>System for Award Management / Central Contractor Registration</i> )	
	Entity SAM Expiration Date ( <i>MM/DD/YYYY</i> )
Entity State Wide Vendor Number (if State Entity) <i>[optional field]</i>	
<b>Entity Rate Agreements</b>	
Does Entity have a negotiated Facilities & Administrative (F&A) Rate Agreement? (Yes/No)	
	If Yes, please provide a link to Entity's F&A Rate Agreement in Relevant Links
Does Entity have a negotiated Fringe Benefit (FB) Rate Agreement? (Yes/No)	
	If Yes, please provide a link to Entity's FB Rate Agreement in Relevant Links
<b>Department of Defense Registration Numbers</b>	
Entity CAGE Code ( <i>Commercial And Government Entity</i> )	
Entity NCAGE Code International ( <i>if Entity is a foreign organization</i> )	
Entity Contractor Establishment Code (CEC) <i>[optional field]</i>	
Entity Directorate of Defense Trade Controls (DDTC) Registration Code <i>[optional field]</i>	
Entity Office of Postsecondary Education (OPE) ID Number ( <i>formerly known as FICE Code</i> ) <i>[optional field]</i>	
Entity Integrated Postsecondary Education Data System (IPEDS) Number <i>[optional field]</i>	



# Assurances / Approvals

<b>Assurances and Agency Approvals</b>	
Entity HHS ( <i>US Department of Health and Human Services</i> ) /OHRP ( <i>Office of Human Research Protection</i> ) Human Subjects Federal Wide Assurance (FWA) Number	
	Entity HHS/OHRP Human Subjects Federal Wide Assurance Expiration Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]
Entity DOD ( <i>Department of Defense</i> ) Human Subjects FWA Addendum [ <i>optional field</i> ]	
Entity PHS ( <i>Public Health Service</i> ) /OLAW ( <i>Office of Laboratory Animal Welfare</i> ) Assurance Number	
	Entity PHS/OLAW Animal Welfare Assurance Approval Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]
	Entity PHS/OLAW Animal Welfare Assurance Approval Expiration Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]
Entity AAALAC ( <i>Association for Assessment and Accreditation of Laboratory Animal Care International</i> ) Accreditation Assurance Number	
	Entity AAALAC Accreditation Assurance Issue Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]
Entity USDA ( <i>United States Department of Agriculture</i> ) Research Registration Number [ <i>optional field</i> ]	
	Entity USDA Research Registration Expiration Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]
Entity USDA Type of Performing Institution Designation [ <i>optional field</i> ]	
Entity NRC ( <i>Nuclear Regulatory Commission</i> ) Radioactive Materials License Number [ <i>optional field</i> ]	
<b>Department of Defense (DOD) /Office of Naval Research (ONR) System Review/Audit Questions</b>	
Entity Property Management System Audit (PMSA) - Approval Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]	
Entity Contractor Purchasing System Review (CPSR) - Approval Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]	
	Entity Contractor Purchasing System Review (CPSR) - Approval Expiration Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]
Entity Defense Contract Audit Agency (DCAA) - Report on Audit of Estimating System Approval Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]	
Entity Defense Contract Audit Agency (DCAA) - Report on Audit of Billing System Approval Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]	
Entity Defense Contract Audit Agency (DCAA) - Report on Audit of Accounting System Internal Control Approval Date ( <i>MM/DD/YYYY</i> ) [ <i>optional field</i> ]	
ONR Administrative Contracting Officer (ACO) [ <i>optional field</i> ]	



# Entity Contacts

<b>Entity Contacts</b>
Entity Primary Authorized Signing Official Name
Entity Primary Authorized Signing Official Name Title
Entity Primary Authorized Signing Official Name Email
Entity Financial Officer/Contact Name
Entity Financial Officer/Contact Name Title
Entity Financial Officer/Contact Name Email
Entity Contact for F&A Cost Rate Negotiation Name
Entity Contact for F&A Cost Rate Negotiation Name Email
Entity Audit Contact Name
Entity Audit Contact Name Email
Entity SAM Point of Contact Name
Entity SAM Point of Contact Name Email
Entity FFATA Contact Name
Entity FFATA Contact Name Email
Entity Office of Sponsored Programs (link) in Relevant Links



# Certifications

<b>Conflict of Interest</b>	
Conflict of Interest ( <i>applicable to PHS funded sponsors or those that have adopted the federal financial disclosure requirements as defined in 42 CFR part 50 Subpart F and 42 CFR part 94</i> ): Please select one of the following options (defined below) from the dropdown list to the right:	
	<b>Entity is registered in the FDP FCOI Clearinghouse</b> certifying that it has an active and enforced Conflict of Interest Policy that is consistent with the provision of 42 CFR part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research and 42 CFR part 94.”
	<b>Entity is NOT registered in the FDP FCOI Clearinghouse, however does certify that it has an active and enforced Conflict of Interest policy</b> that is consistent with the provision of 42 CFR Part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research” and 45 CFR Part 94 “Responsible Prospective Contractors.”
	<b>Entity does not have an active and/or enforced Conflict of Interest policy and agrees to adopt PTE policy.</b> Entity will coordinate with PTE on Instructions for following PTE policy at time of proposal and award. Names of “investigators” and their Significant Financial Interests (SFIs), if existing, will be provided to PTE at time of proposal and award, or as needed.
	<i>Please note: Regardless of option selected, it is the Entity’s responsibility to report to Pass-Through Entity (PTE) all conflicts determined to be Financial Conflicts of Interest (FCOI) by the Entity site within a timely manner sufficient to enable timely FCOI reporting by PTE, as required by PHS or other regulations.</i>
<b>Debarment and Suspension</b>	
The Entity certifies they are (Respond on each box that applies):	
	Presently debarred, suspended, proposed for debarment, or declared ineligible for award of federal contracts. (Yes/No)
	Presently indicted for, or otherwise criminally or civilly charged by a government entity. (Yes/No)
The Entity certifies the following: (Respond on each box that applies):	
	Within three (3) previous years, entity has been convicted of or had a civil judgment rendered against them for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) contract of subcontract; violation of Federal or State antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property. (Yes/No)
	Within three (3) previous years, entity has had one or more contracts terminated for default by any federal agency. (Yes/No)



# Certifications

<b>Lobbying</b>	
Lobbying (for U.S. federal projects only):	
	Entity certifies that it will not pay any person for influencing or attempting to influence any officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress. (Yes/No)
	If "No," please explain in the adjacent cell:
<b>Affirmative Action Compliance</b>	
In accordance with the rules and regulations of the Secretary of Labor (41 CFR 60-1 and 60-2), indicate which of the statements to the right apply to entity regarding affirmative action.	
<b>FFATA - Report Executive Compensation</b>	
	Is Entity exempt from reporting compensation? (Yes/No)
	<i>Please note: Executive compensation information for the Entity must be reported if (1) more than 80% of annual gross revenues are from the Federal government <b>AND</b> (2) those revenues are greater than \$25M annually, <b>AND</b> (3) compensation information is not already available through reporting to the Security &amp; Exchange Commission (SEC).</i>
	If "No", provide information requested for the top five paid officers in the adjacent cell.



# Single Audit

<b>Single Audit Status</b>	
Is Entity subject to the Single Audit requirements in 2 CFR Part 200? (Yes/No)	
	If Yes, please complete lines 151 - 158
	If No, please complete line 161 and complete the Financial Questionnaire tab
	<b>If Yes:</b>
	Most recent fiscal year with completed Single Audit:
	Is Entity qualified as low-risk entity? (Yes/No)
	Did the Entity's most recent Single Audit contain any findings? (Yes/No)
	Did the Entity's most recent Single Audit contain any Significant Decencies? (Yes/No)
	Did the Entity's most recent Single Audit contain any Material Weaknesses? (Yes/No)
	Were any of the findings related specifically to any pass-through federal funding to the entity? (Yes/No)
	Please provide link to most recent completed Single Audit Report in Relevant Links
	Please provide links to Entity Single Audit Reports from previous Three Fiscal Years in Relevant Links
	<b>If No:</b>
	Entity IS NOT subject to the Single Audit requirements in 2 CFR Part 200 due to being the following type of entity:



# Authorized Official Approval

<b>Entity Authorized Official Approval/Certification</b>	
The information, certifications and representations above are accurate and current information and have been read and made by an official of the Entity named herein that is authorized to make such certification on behalf of the entity.	
	Entity Authorized Official Name
	Entity Authorized Official Title
	Entity Authorized Official Email
	Entity Authorized Official Phone
	Date of Authorized Official Approval (MM/DD/YYYY)
	Entity Profile Preparer Name
	Entity Profile Preparer Name Email



# Financial Questionnaire

- To be used for Entities NOT subject to Single Audit
- Series of questions to help assess Entity overall
  - General Information
  - Fiscal Responsibility
  - Cost Accounting System
  - Facilities & Administrative Costs
  - Cost Sharing
  - Cash Management
  - Payroll
  - Procurement
  - Property Management
  - Cost Transfers
  - Program Income



# Transaction Specific Form

- One is being developed – based on forms analysis
- However.....
- Would we all be able to accept the risk and rely on other Single Audit Entity's sound processes?
- If we do need to ask a set of questions / obtain a set of certifications, at what part of the grants lifecycle do we need this?
- Can we all agree to move away from requesting at proposal time?



# Forms at Proposal Time info

- 154 FDP Institutions
  - 128 Research Institutions
  - 26 Emerging Research Institutions
- 175 Research Institutions – if “sub entities” included
- Of 175, approx. 133 have some type of “Subrecipient Commitment Form”
- 57 of those appear to require or suggest that it is required at time of proposal (enforcement unknown)
  - 43% of those with forms
  - 33% of all Research Institutions (plus sub entities)



# Audit Profile Summary

- 154 Total FDP Institutions
  - 128 Research Institutions – 100% subject to Single Audit
  - 26 Emerging Research Institutions – 65% (at least) subject to Single Audit (still collecting info)
  - Of total – at least 94% subject to Single Audit
- Since we are all subawarding to each other – the Pilot will cover a large # of entities and actions
- Results similar if you extrapolate out to FDP Institutions and their sub entities
- That's a whole lot of admin burden reduction!!!



# Audit Profile Summary

- University of Washington as case study
  - 682 currently active subrecipient entities
  - 437 (64%) Subject to Single Audit
  - 245 (36%) NOT Subject to Single Audit
    - Federal Government - 7
    - Foreign – 116
    - Healthcare – 22
    - Higher Ed - 9
    - Other non-profit - 36
    - For profit/Industry - 53
    - State and Local Government - 2



- Assessing feasibility and benefit of connecting
  - Entity Profile
  - Financial Questionnaire (if needed)
  - Transaction Specific Form
  - Risk Assessment Questionnaire
- Having completed forms flow into Risk Assessment Questionnaire to create a starting point





# Review & Next Steps

- Executive Committee Approved!
- Completion of Beta Test of Entity Profile
- Subgroups:
  - Pilot Instructions & Evaluation Process
  - Final Technical Assistance
  - Transaction Specific Form
- Develop FDP Website - Repository
- Confirm Pilot Entities participation
- Once Pilot is underway, will circle back to “forms” for non-FDP entities
- Keeping a close eye on DATA Act data elements
- Pursuing option for SAM & FAC interfaces or uploads?



# Workgroup & Subgroups

WORKGROUP MEMBERS	
Lynette Arias	University of Washington
Jennifer Barron	John Hopkins University
Pamela Webb	University of Minnesota
Patrice Carroll	Brown University
Marcy Friedle (RAQ Group)	Florida State University
Sara Judd	Fred Hutchinson Cancer Research Center
Rebecca Balentine	Icahn School of Medicine at Mount Sinai
Julie Thatcher	Institute for Systems Biology (ERI)
Amanda Hamaker	Purdue University
Gloria Greene	University of Alabama
Steve Carter (RAQ Group)	University of California, San Diego
Sharon Brooks	University of North Carolina
Jennifer Rodis (RAQ Group)	University of Wisconsin-Madison
Sara Clough (RAQ Group)	UT Austin
	UT Austin
Courtney Swaney (eRA) (Lead)	
Robert Prentiss (RAQ Group)	UT Austin
Tyra Patrice Darville-Layne (RAQ Group)	Northwestern University
Christopher Renner	Vanderbilt University

## SUBGROUPS

### Pilot Instructions/Evaluations

Julie Thatcher (Lead)	Institute for Systems Biology (ERI)
Rebecca Balentine	Icahn School of Medicine at Mount Sinai
Tyra Patrice Darville-Layne (RAQ Group)	Northwestern University
Patrice Carroll	Brown University
Jennifer Rodis (RAQ Group)	University of Wisconsin-Madison

### Technical Assistance

Courtney Swaney (eRA Comm) (Lead)	UT Austin
Sara Clough (RAQ Group)	UT Austin
Robert Prentiss (RAQ Group)	UT Austin

### Transaction Specific Form

Amanda Hamaker (Lead)	Purdue University
Marcy Friedle (RAQ Group)	Florida State University
Jennifer Rodis (RAQ Group)	University of Wisconsin-Madison
Tyra Patrice Darville-Layne (RAQ Group)	Northwestern University



# Kudos and credit to:

**Lulu Sun**

UW Work study student



She completed the majority of the forms gathering & analysis as well as the audit profile info collection & analysis





# Questions & Discussion

- What has been missed?
- How feasible does this seem?
- Can people envision their entities approving use of such a Profile Repository system?
- Does this still seem like worthwhile efforts?
- Will the Seahawks win the Super Bowl?
- Will the Packers win the Super Bowl?
- Who will play the Patriots in the Super Bowl, the Seahawks or the Packers?





# Contact Info

- Lynette Arias
  - University of Washington
  - [ariasl@uw.edu](mailto:ariasl@uw.edu)
- Pamela Webb
  - University of Minnesota
  - [pwebb@umn.edu](mailto:pwebb@umn.edu)
- Jennifer Barron
  - Johns Hopkins University
  - [jlb@jhu.edu](mailto:jlb@jhu.edu)

