Expanded Clearinghouse

- Original Working Group had 4 subgroups:
  - Institutional Profile
  - Audit
  - F&A
  - Risk Assessment
- UG related delays
- Evolving goals

Expanded Clearinghouse

- Goal is one stop shopping for entity info
- Eliminate unnecessary forms
- Identify proper timing of data collection
- Utilize existing systems
- Facilitate risk assessments of subrecipients
- Start with FDP institutions, hope to expand

Expanded Clearinghouse

- 155 FDP organizations

- Collecting and reviewing as many forms as possible (approx 80 to date) – Purpose, content & timing?

- Summarizing/Assessing:
  - "Standard Questions"
  - Entity Related Questions & Project Specific Questions
  - Adding in non-standard questions for assessment
  - Where does info already exist? (SAM/FAC/Future FAC)
  - Existing FDP Clearinghouse?
  - When are forms required?
  - Future FDP Clearinghouse – Proposed Entity based info
  - Develop FDP Standard Project Specific Form

Expanded Clearinghouse

- University of Washington – example of one model
- 3 Forms
  - **New Entity:** Entity related information only collected once, as new subrecipient. Includes "financial questions" if not A133
  - **Project Specific:** For each subaward project at time of initial subaward and renewal
  - **Annual Audit Certification Form:** Only needed if we can not obtain audit through FAC or web (confirm findings not related to UW via email)
- Not collected at proposal time
- Forms available online for UW departments to start process early – if sub is new to UW & to prep early
- Annual audit review process happens in the background – not via the forms. Don't ask entity questions multiple times.

Risk Assessment Questionnaire

- An optional tool to help get institutions started with subrecipient risk assessment

- Not intended to be a best practice

Regulatory Considerations

A-133 Compliance Supplement, part 3, section M

- *Program complexity*
- *Percentage passed through*
- *Amount of awards*
- Generally, new sub's would require closer monitoring.
- For existing subrecipients
  - history of non-compliance as either recipient or sub?
  - new personnel, or
  - new or substantially changed systems?
  - may consider extent of Federal monitoring of subrecipient entities that also are recipients.

Regulatory Considerations ii

UG 200.331(b)

Evaluate … risk of noncompliance with … statutes, regulations, and T&Cs …, which may include consideration of such factors as:

- sub's prior experience with same or similar subawards;
- the results of previous audits
- whether the subrecipient has new personnel or new or substantially changed systems; and
- extent and results of awarding agency monitoring…

How to Organize a RAQ?

- Hierarchical, grouped, or nested (complicated)
  - example, 1) is sub foreign? If yes then, 2) does sub have prior experience with federal awards?

- One scored, master list (problems)
  - Drowns out deal-breakers (super-weight debarred)
  - Drowns out a couple of answers that when combined, should equate to high risk

- Break out sets of questions by category
  - Institutional Risk vs Project-Specific Risk

Considerations

- Many departments handle risk assessment

- Some institutions – 'no show stoppers'

- Lack of experience in risk assessment

- Want RAQ usable for all sponsored projects

Results – RAQ organization

- Threshold Questions – unscored
  - Possible go/no-go questions
  - Issues that should be triaged early
- Other Considerations – unscored
  - Significant process/workload-related questions
- Institutional Questions – scored
- Project Specific Questions – scored

RAQ - Scoring

- Institution & Project Questions sub-totaled
- Use combined totals or sub-totals?
  - Institution's Choice
- High-middle-low risk or just high-low?
  - Institution's Choice
- Recommended thresholds?
  - How did we come up with them?
    - Subjectively based on experience
    - UT Austin model

RAQ – input and timeline

- Hope to finalize within a few weeks
- Comment on RAQ & Guidance documents
- Comments and suggestions:
  - respond to 5/8/15 email (on FDP subaward list)
  - stevecarter@ucsd.edu (incl. RAQ in subject)
- FAQ's to be posted on Subaward Agreement Forms page
- Also send annual RAQ samples with performance considerations

Comments & Questions?

Considerations during award

- UG – 200.331(d) Monitor … to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:
  - Reviewing financial & performance reports required by PTE.
  - Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.
  - Issuing a management decision for audit findings pertaining to the Federal award … as required by §200.521 Management decision.

Considerations during award ii

200.301 – Performance Measurement

- awarding agency must:
  - require recipient to use OMB-approved standard information collections when providing financial and performance information
  - Require recipient to relate financial data to performance accomplishments of the award.
- recipients must provide cost information to demonstrate cost effective practices (e.g., through unit cost data).
- The recipient's performance should be measured in a way that will help the awarding agency and other non-Federal entities to improve program outcomes, share lessons learned, and spread the adoption of promising practices.
- awarding agency should provide recipients with clear performance goals, indicators, and milestones as described in §200.210
- Performance reporting frequency and content should be established to not only allow the Federal awarding agency to understand the recipient progress but also to facilitate identification of promising practices …