



FEDERAL DEMONSTRATION PARTNERSHIP

Redefining the Government & University Research Partnership

Expanded Clearinghouse Workgroup

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Expanded Clearinghouse Workgroup Agenda

- Goal / Purpose
- Background
- Current Subrecipient Monitoring “standards”
- Oh, how forms have expanded and multiplied!
- Forms inventory & analysis
- Phased Process to Expanded Clearinghouse
- FDP Demonstration
- Next steps & discussion

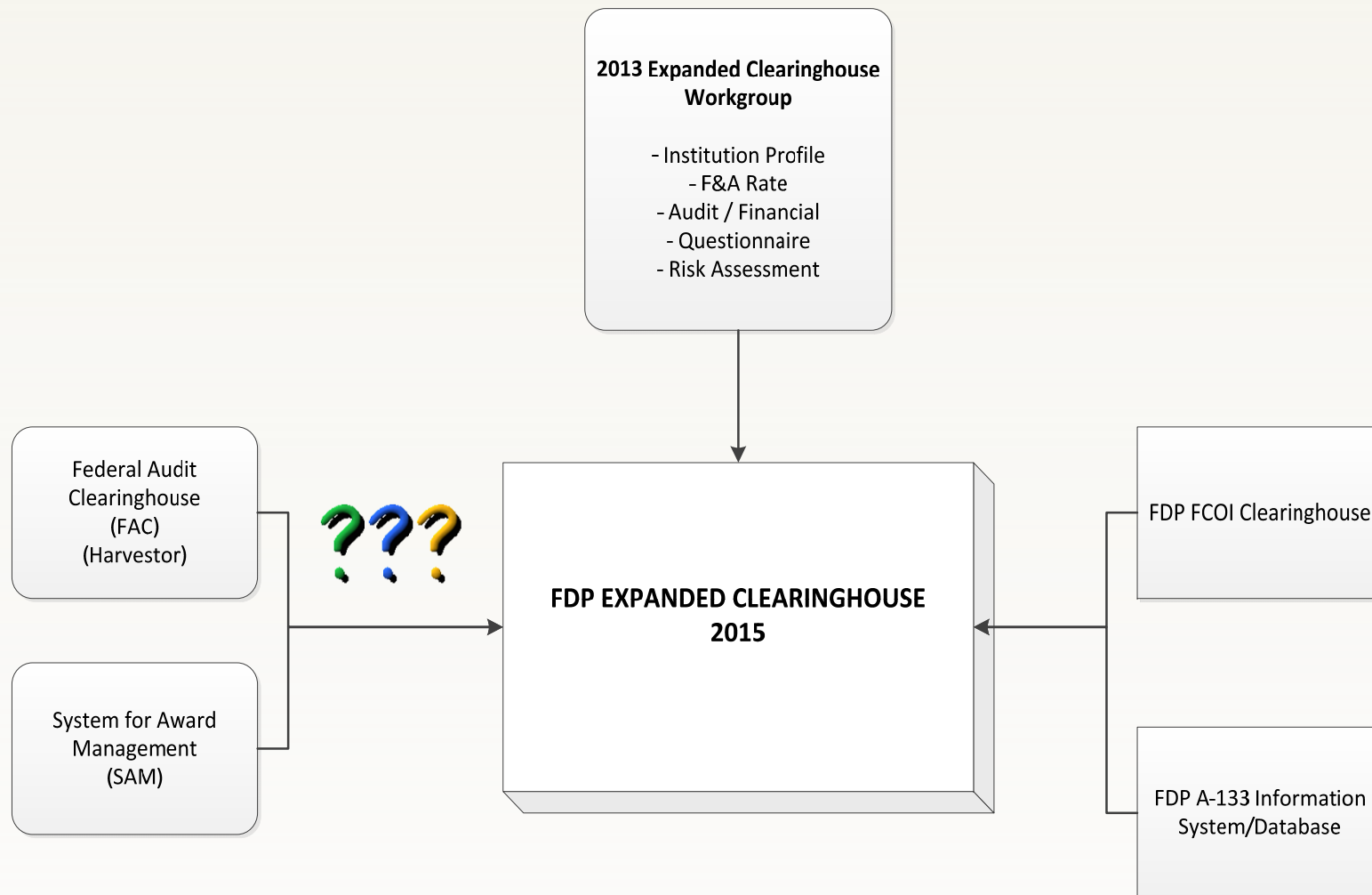


Goal / Purpose

- To support Subrecipient Monitoring
 - Uniform Guidance
 - From best practices to requirements
 - Thanks to our friend “The Compliance Supplement”
- Long term goal – Safe Harbor
 - Admin burden relief & focus efforts on high risk subs
- In the meantime – we need relief now!
 - Reduce administrative burden
 - Demonstrate the benefits of “one-stop shopping”
 - Demonstrate low risk of majority of Single Audit institutions – supports request for Safe Harbor



Some background – FDP Steps towards Clearinghouse





Original Expanded Clearinghouse Efforts - 2013

- **Working Paper #1 – Goal:**
 - Prepare a proposal for approval by the FDP Executive Committee that would create an Expanded FDP Clearinghouse.
 - As approved by the Executive Committee, design and implement the Expanded Clearinghouse, including its functional and technical design, testing, and rollout.
 - Create instructions for it's use, monitor the quality and quantity of its data, and evaluate its effectiveness at reducing administrative burden.
 - Refine or expand the Clearinghouse as needed.
 - Recommend that the Clearinghouse be sun-setted if it is no longer needed or if it is not successful in streamlining administration



Original Expanded Clearinghouse Efforts - 2013

- Subgroups

- Institutional Profile (Carlos Romero & Dan Salvati)
- F&A Rates (Amanda Hamaker)
- Audit & Financial Questionnaire (Jennifer Barron)
- Risk Assessment (RAQ – Steve Carter)

- Outcomes

- Mocked up Clearinghouse concept
- Risk Assessment Questionnaire
- Expanded Clearinghouse Field Listing
- Work began to collect and understand forms (Audit & FQ)



Original Expanded Clearinghouse Mocked up Webpage & RAQ

FDP Clearinghouse

Institutional Profile

Audit Status

F&A Rates

FCOI Certification

Risk Assessment

Step 1 - Please enter the information for your institution's institutional profile below and click the "Submit" button. You may either select "Submit" to end your session or "Submit and Continue" to continue completing the entry for each area of interest as outlined in *phases to the*

Step 2 - Verify the information you entered when you receive the email from Step 1. You will be required to click on a link in the email received to complete your FDP Clearinghouse

Institution Legal Name:

Street and Mailing Address:

Country:

Congressional District:

DUNS:

EIN:

Organization Type:

Human Subjects Federal Wide Assurance Number:

Animal Welfare Assurance Number:

Risk Assessment Questionnaire

Note: Entities wishing to participate in pilot program must use form as-is.

Subrecipient Institution	
Internal Project Identifier	
Prime Sponsor	
Project Title	
DUNS	
FAC EIN	

Threshold Questions (Not Scored)

Y N

If yes to 1, 2, or 3, consider alternatives to initiating agreement:

1. Is the Subrecipient Institution presently debarred or suspended? ☐
2. Is the Subrecipient Institution's PI presently debarred or suspended? ☐
3. Does the Subrecipient show "delinquent federal debt" in SAM? ☐

If no to 4, 5, 6, or 7, consider alternatives to initiating agreement:

4. If required by the sponsor, does the Subrecipient have a compliant conflict of interest policy? ☐
5. Does the Subrecipient have an acceptable accounting system? ☐
6. Does the Subrecipient have an acceptable procurement system? ☐
7. If required, has the Subrecipient completed audit under A-133 or Uniform Guidance for the most recent fiscal year? ☐

Other Considerations (Not Scored)

8. Has there been a PTE-issued management decision on audit finding that may affect this award? ☐
9. Does the Subrecipient have a negotiated indirect cost rate (or experience setting up such a rate)? ☐
10. Does the project include work covered by ITAR or EAR (at Subrecipient, or Subrecipient accessing at PTE)? ☐
11. Is there a potential or identified conflict of interest? ☐
12. Is cost-share required or included? ☐
13. Is participant support included in the Subrecipient's budget? ☐
14. Does the Subrecipient have adequate experience receiving same or similar federal awards? ☐
15. Have other risks been identified? *If yes, explain in Notes below.* ☐

Institution Questions (Scored)

Score

16. Is the Subrecipient institution foreign or domestic?
17. What is the Subrecipient Organization type?
18. Does the Subrecipient have a Negotiated Indirect Cost Rate Agreement?
19. Were the results of the most recent audit under A-133/Uniform Guidance (or similar) satisfactory?
20. Is the Subrecipient Institution mature?
21. Does the Subrecipient Institution have experience with determining conflicts of interest (evidence of an acceptable Conflict of Interest Policy)?

Project Questions (Scored)

22. What is the Prime Sponsor type?
23. What is the Prime Award type?
24. Amount of Outgoing Funds?
25. What is the percentage of the Prime Award being subcontracted (specific to this Subrecipient—not total)?
26. Does the work include Human Subjects, Animal Subjects, or Embryonic stem cells?
27. What are the Subrecipient's Scope of Work/Deliverables?
28. Where is the Place of Performance?

Assessment Performed:

Initials	Date

Assessed Risk

Score

Institution	0
Project	0
Total	0



Original Expanded Clearinghouse Institutional Profile Field Listing

	Description	Example	Include	Exclude	Reason
1	Legal Name	The General Hospital Corporation doing business as Massachusetts General Hospital	X		
2	Street and Mailing Address	55 Fruit Street Boston, Massachusetts 02114-2696	X		Clarify if this is the physical address, mailing address, and/or performance site. Including all addresses?
3	Office of Sponsored Programs	OSP Link	X		Several folks suggested we include a link to the Sponsor Programs Office
4	Current Federally Negotiated Rate Agreement	Rate Agreement			Pending outcome from F&A subgroup. Some members voiced concerns about confidentiality
5	Current Fringe Benefit Rates	Fringe Benefits Rates			Pending outcome from fringe benefits subgroup
6	Audit Report - Current Report and Contact	A-133 phsa133@partners.org	X		Include yes/no check box on profile page if finding.
7	Audit Report - Previous Three Years	A-133	X		
8	Escalation – Invoices (90 days from invoice date payment not received)	Daniel Salvati; dsalvati@partners.org ; 617-954-9775	X	X	Currently the Financial Contact. The idea behind this is to name a person or list a specific email address to assist the sub-recipient if any invoice is outstanding for X number of days since submission.
9	Escalation – Subcontracts (90 days from budget start date; new or renewal not received)	Daniel Salvati; dsalvati@partners.org ; 617-954-9775	X	X	Administrative Contact. Same as above.
10	FFATA Contact	Daniel Salvati; dsalvati@partners.org ; 617-954-9775	X		



And then....

While these various activities were being discussed and developed...

- Uniform Guidance begins rolling out



- Additional subrecipient monitoring requirements brought in from Compliance Supplement
- Expanded Clearinghouse activities go on hold to divert resources to Uniform Guidance activities
- And the forms proliferate!





Current Subrecipient Monitoring

- The backbone of many institutions SRM Programs include forms, forms and more forms:
 - **Entity based** info to perform risk assessment of entity
 - **Project based** information to perform non fiscal/audit compliance and risk assessment reviews per project
 - Collected at **various times**, sometimes **multiple times**
 - Information **not maintained centrally** typically
 - Process and form **overkill**
 - Forms require completion by **multiple individuals**
 - Some have gone electronic, but only allow one person to complete form



Forms Are Us!

- Entities that didn't have forms, started to create them
- Wide variety of forms and questions being used (1-10 pages)
- Started potentially with a Stanford form years ago
- Things have branched off since then
- Many took Stanford's lead
- Looks a little something like this....



SUBRECIPIENT COMMITMENT FORM

Subs equipt	Legal Name:	<u>University of Washington</u>		
Subs equipt	PI Name:	<u>Glenn John Steward</u>		
	Address:	<u>320 John Steward, Box 352220</u>	City:	<u>Seattle</u>
		<u>320 John Steward, Box 352220</u>	City:	<u>Seattle</u>
Subs equipt	where research will be performed:	<u>320 John Steward, Box 352220</u>	City:	<u>Seattle</u>
Proposed Date:	<u>Immune response of patient teeth</u>			
Performance Period Begin Date:	<u>2/1/15</u>		End Date:	<u>2/31/20</u>
Student's PI Name:	<u>Catherine E. Roth & Raviresh K. Pillai</u>			
Student's Name:	<u>NAI</u>			

SECTION A - Typical Documents

The following documents are included in our proposed submission and covered by the confidentiality policy (check):

- ☐ STATEMENT OF WORK (required)
☐ BUDGET AND BUDGET JUSTIFICATION (required)
☐ Small Tractor Declassified: Business Subcontracting Plan, in agency+required format
☐ Reevaluation of all Key Personnel, in agency+required format
☐ Other _____
☐ Other _____

SECTION B - Answer any 3

1. **Individual and Administrative Values included in this proposal have been calculated based on:**
- ☒ **The federally-regulated FSA rate for this type of work, or a reduced FSA rate that we mutually agree.**
 - ☐ **The small concern case, or a copy of the rate agreement or contract a USF, with the agreement.**
 - ☐ **Other rates (please specify the basis on which the rate has been calculated in Section D Covered).**
2. **Franchise Franchise Values included in this proposal have been calculated based on:**
- ☒ **Rates consistent with or lower than the federally-regulated rates.**
 - ☐ **If the small concern case, or a copy of the rate agreement or contract a USF, with the agreement.**
 - ☐ **Other rates (please specify the basis on which the rate has been calculated in Section D Covered).**
3. **Small Business Concern** ☒ **Yes** ☐ **No**
Subsequent represents that it is a small business concern as defined in 12 CFR 124.1022.
- If "Yes", Subsequent represents that it is a:**
- ☐ **Small disadvantaged business as certified by the Small Business Administration**
 - ☐ **Woman-owned small business concern**
 - ☐ **Veteran-owned small business concern**
 - ☐ **Service-disabled veteran-owned small business concern**
 - ☐ **HUBZone small business concern**
4. **Cost Sharing** ☒ **Yes** ☐ **No** Amount: _____
Cost sharing is defined as: the amount of the project's budget
5. **Human Subjects** ☒ **Yes** ☐ **No** **Applicable Law: all will meet the IRB and will not**
- If "Yes":** Copies of the IRB approval and approved "Informed Consent" form must be provided before we accept. Please provide these documents to Standards PI and Standards Office of Sponsored Research before we accept. (In accordance with Standard Policy, Standards PI must conduct a secondary review and issue a comparison letter before any subaward will be issued.)
- If "Yes", How will any personnel involved conduct Human Subjects training?** ☒ **Yes** ☐ **No**
6. **Animal Subjects** ☒ **Yes** ☐ **No** **Applicable Law: _____**
- If "Yes":** A copy of the ACUE approval must be provided before any subaward will be accepted. Please to Standards PI and Standards Office of Sponsored Research as soon as it becomes available. (In accordance with Standard Policy, Standards PI must conduct a secondary review of the subaward review and issue a comparison letter before any subaward will be issued.)

SUBRECIPIENT COMMITMENT FORM

Cities of Sponsored Research

- Control or Internet applicable to RIG listed sponsor or their disclosure adopted the federal financial disclosure requirements.

- ☐ Not applicable, because this project is not being funded by PHS (NIH, CDC, AHRQ, etc.), or any other agency that has adopted the federal financial disclosure requirements (FSE, etc.).
- ☒ Subacceptor Organization certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 56, Subpart F. "Eligibility of Applicants for Promoting Objectivity in 42 CFR Part 56." "Appropriate Conflicts": "Subacceptor also certifies that, to the best of its knowledge, (1) all financial relationships will be made related to the activities that may be funded by its agreement, and reported by its conflict of interest policy; and (2) all identified conflicts of interest have or will be actively managed, reduced or eliminated in accordance with acceptor's conflict of interest policy regardless of any funds under any resultant agreement and within a timely manner sufficient to enable reporting.
- ☐ Subacceptor does not have an active and/or enforced conflict of interest policy, but will have a PHS compliance document published at the time of award. (A sample FCOI policy can be found at http://aiaa.org/procurement/FCOI/FCOIPolicyES&A_000001).
- ☐ Subacceptor does not have an active and/or enforced conflict of interest policy and agrees to adopt Star by signing below. "Subacceptor certifies that the required training will be completed by each investigator on any research related to any PHS funded conflict of interest. For those adopting Star's policy, the training is available at http://www.aiaa.org/procurement/FCOI/FCOIPolicyES&A_000001.

2. Movement and Supervision

Is the PI or any other employee or student participating in this project detained, suspended or otherwise not eligible for participation in federal assistance programs or activities? ☐ Yes ☒ No

The Subsequent self/salvey. (proves all qualifica below)

- | | | | | | | |
|-----------|-------------|-----------|------------|------------|-------------|--|
| do | have | is | are | was | were | presently detained, suspended, proposed, a detainee, a detained, multiple /a confined |
| do | have | is | are | was | were | presently indicted /a, as otherwise commonly is only charged by a government or
when less than 10 years a preceding this of/a, been convicted of /a had a civil judgment
against them for commission of fraud or criminal offense in connection with obtaining
obtain, or performing a public /a duty, as is locally confined of subordinated, verbal
State or federal statutes relating to the submission of /a, or commission of verbal
frequently, severely, fabricated or destruction of falsity, making /a false statement or is
respectively |
| do | have | is | are | was | were | when these (5) years a preceding this of/a, had one or more criminal /a sentenced to
respectively |

SECCION C - Audit System

- ☐ **Subsidiary** receives an annual audit in accordance with OMB Circular A-122.
 Most recent fiscal year completed: FY _____
 (Please any audit findings reported? If "Yes," explain in Section D, Comments, below.) ☐ Yes ☐ No
- Where (check) complete copy of your most recent A-122 audit report or provide the URL to a complete report: _____
- ☐ **Subsidiary** DOES NOT receive an annual audit in accordance with OMB Circular A-122.
 Subsequent to: ☐ Nonprofit entity (under federal funding threshold)
☐ Foreign entity
☐ For-profit entity
☐ Government entity

Please complete an Audit Certification and Financial Status Questionnaire (QSR Form P-4). A fee may be required before a subpoena will be issued.

SUBRECIPIENT COMMITMENT FORM

Offices of Specialized Branches

SECTION II - Comments

ANNALES DE LA FACULTÉ DES SCIENCES

The information, calculations and representations above have been read, agreed and made by an authorized official of the Subrecipient named herein. The applicable programmatic and administrative personnel involved in this application are aware of agency policy in regard to subawards and are prepared to establish the necessary inter-organizational agreements consistent with those policies. Any work begun under supervision informed prior to execution of a subaward agreement will be the Subrecipient's own risk.

[illegible]

Is Subrecipient owned or controlled by a parent unit? ☐ Yes ☒ No

If "Yes", please provide the following:

Edward C. Kelly, Legal Name

Parent Entity Address, City, State, Zip.

Parent Entity Congressional District:

Parent Entity DUNS.

PAID CITY EN.



The Beauty of a Clearinghouse

- Online resource to house entity based information
- Entity based forms would no longer be needed
- Institutions enter their information once, and update annually or as needed
- Entity information available at all times
 - Real time
 - Does not hold up proposal, subaward or invoicing
 - Allows for entity risk assessment for new & annual
 - Streamline entity review and assessment process
 - Reduce resource needs at institutions





Ok Cool! How do we get there?

- #1 – Inventory & analyze what we are all doing
 - Inventory and analyze as many forms in use as possible
 - What are institutions asking for on their forms?
 - Commonalities ? Differences?
 - Should “standard questions” stay standard?
 - Should some differences be adopted by all?
 - What is really needed to support requirements/RAQ
- #2 - Pilot “standard” questions via a Standard Form
 - Achieve consensus on form content/data elements



Ok Cool! How do we get there?

- #3 – Data elements become requirements for online system
- #4 – Develop online system
- #5 – Develop support structure
 - Users group to maintain and review changes needed
 - Users manual
- #6 – Roll out of Expanded Clearinghouse



Type & timing of forms

- Remember – forms come in many shapes and sizes
- Typical categories of information being collected:
 - Entity Profile & Certifications
 - Audit related / includes Financial Questionnaire
 - Project specific
- Form information collected at various times:
 - Proposal
 - Award
 - Subaward
 - Annual
- Expanded Clearinghouse would include “Entity Information”



Forms Gathering

- Process utilized:
 - We researched on our own – entity websites
 - Also utilized information known by UW and other Workgroup member schools
 - Contacted entity contacts, as needed
- Looking for:
 - Some type of form (“Commitment Form”)
 - Collected at any time during lifecycle
 - Required to be completed and signed by entity



Analysis of FDP Institution Forms

128	Research Institutions	100%
84	Some form of SRC	66%
14	Evidence or confirmation of no SRC	11%
30	Still researching	23%

26	Emerging Research Institutions	100%
15	Some form of SRC	58%
3	Evidence or confirmation of no SRC	12%
8	Still researching	30%

- SRC = “Subrecipient Commitment Form”
- These go by many names
- A form that is sent to, completed and signed by a Subrecipient Entity



Content of Forms

- Categories of information
 - Entity related information
 - General / Profile
 - Certifications
 - Audit
 - Entity certification signature
 - Entity Attachments
 - Financial or “Mini-Audit” Questionnaire
 - Project related information
 - General
 - Proposal information
 - Project Specific Compliance



Entity Profile

- Entity Name and Address
- Parent or Audit Entity Name and Address
- Contacts (Entity, Parent Entity, Audit, OSP, etc.)
- Entity Type (Domestic/Foreign, Non-Profit/For Profit, Institute of Higher Education, State/Local govt, Small Bus)
- Registration #'s (EIN, SAM, CAGE Code, etc)
- Assurances (Human and Animal)
- Systems review approvals (Procurement, Property, etc.)



Entity Certifications

- Conflict of Interest
- Debarment and Suspension
- Lobbying
- Affirmative Action



Audit

- Audit
 - Entity audit requirements (Single audit or not)
 - If not Single audit covered – why? Type of entity
 - Financial Questionnaire required
 - Audit questions (findings, relation to prime funds, etc.)
 - Audit report or link – most recent FY



Entity Signature/Certification Attachments

- Entity Authorized Signature/Certification
- Entity Attachments
 - F & A / Fringe Benefit Rate Agreement
 - Single Audit report/Financial Statements



Financial Questionnaire / “Mini-Audit”

- Fiscal responsibilities
- F & A Costs
- Cost Sharing
- Cash Management
- Payroll
- Procurement
- Property Management
- Cost Transfers
- Compliance



Phased Process to Clearinghouse

- Status of request for Safe Harbor
 - Should we wait for this?
- Would we benefit from feed from FAC?
 - Began testing download capabilities (I swear I had nothing to do with the hack!)
- Would we benefit from feed from SAM?
 - What information is duplicated?
- Partnership with eRA Committee
 - Expanded Clearinghouse Workgroup – content development
 - eRA Committee/subgroup – support system development



Phased process to Clearinghouse

- Phase 1

- Demonstration to be developed for membership and Executive Committee Approval
- Develop standard FDP Form/Data set
 - “FDP Subrecipient Certification Form”
 - To be used for new entities only
 - One time only! Or at minimum, annually
 - Ensure information intake supports use of RAQ
- Develop Best Practices for use of these forms
- Pilot group of FDP Institutions use for pilot period
- Evaluate use of standard form and questions
- Specifications then created based on this pilot phase



Phased process to Clearinghouse

- Phase 2

- Convert form to online database system
- Working closely with FDP eRA Committee
- Options for development
 - Request for Proposals to develop system
 - 3rd Party Vendor
 - Partner with an FDP Institution
 - Others
- Assessing cost and feasibility for FDP
- Feasibility of FDP hosting and maintaining



Phased process to Clearinghouse

- Phase 3
 - Development & Testing
- Phase 4 – Roll out
 - Users group to maintain and update as needed
 - Users manual developed to support use
 - 1st - Working Group member institutions
 - 2nd – Other FDP Institutions – volunteers
 - 3rd – All FDP Institutions – Required ?
 - 4th – Non FDP Institutions – Subject to Executive Committee Approval



Estimated Timeline

- Sept 2015 Meeting
 - Obtain consensus on approach
 - Executive Committee support to continue moving forward
 - Develop partnership with eRA Committee
- Sept 2015 – Jan 2016
 - Standard FDP Subrecipient Certification Form developed
 - Obtain feedback on wording/content of standard questions/areas
 - Submit formal Request for Demonstration
- Jan 2016 Meeting
 - Roll out Standard Form/Data set
 - Workgroup meeting used for in person discussion of form



Estimated Timeline

- Jan – May 2016
 - Group of FDP Institutions pilot use of form
 - Gather feedback during last month of pilot
 - Make any necessary changes to final version
- May 2016 Meeting
 - Roll out for use by all FDP Institutions



Expanded Clearinghouse

- Other Workgroup Activities
 - Develop other standard FDP Forms/Data set
 - “Project Specific Form”
 - “Annual Audit Certification Form”
 - Develop Best Practices for use of these forms
 - Develop Subrecipient Monitoring Best Practices overall



Website updates

- Merging several sections of FDP Webpage
 - Research Administration Committee
 - Subrecipient Monitoring Subcommittee becomes Expanded Clearinghouse Workgroup
 - Content being updated – summary of charge, initiatives, etc.
 - Current Initiatives
 - Subrecipient Monitoring
 - A-133 Information System / Database
 - FCOI Clearinghouse
 - These will all be merged together under the Expanded Clearinghouse webpage above



Discussion

- Does approach seem viable?
- Concerns?
- Additional ideas or areas to focus on?
- Entities experiences with current forms and processes?



Wrap up

- Final questions?
- Thanks to workgroup members and all institutions that are helping provide forms and process information
- Other volunteers welcome!
- Go Hawks!!
- Go Packers!!
- #vindicated





Contact Info

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