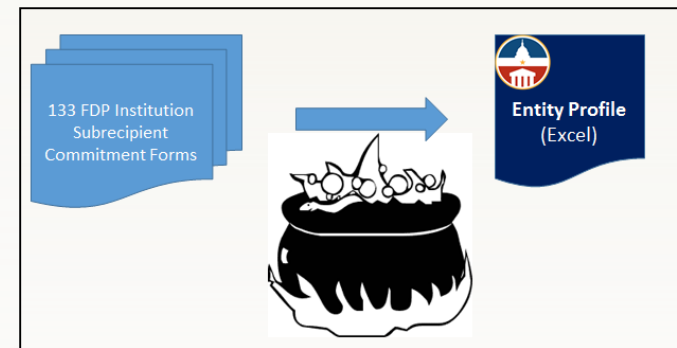# Expanded Clearinghouse Pilot Phase II

Will be part of 80 institutions nationwide to participate in the Clearinghouse.

# Goal of Pilot

- ***Reduce administrative burden associated with verifying standard information required for subrecipient issuance and monitoring***

- Eliminate swapping of subrecipient commitment forms completed on a transaction-by-transaction basis in favor of accessing an on-line, up-to-date standardized, streamlined subrecipient data repository (an "entity profile")

  - Determine whether such a repository effectively reduces the data collection and review burden for pass-through entities and subrecipients alike



133 FDP Institution Subrecipient Commitment Forms

Entity Profile (Excel)

# Contents of Profile

- Entity Certifications
  - Conflict of Interest
  - Debarment and Suspension
  - Lobbying
  - Affirmative Action Compliance
  - FFATA
- Single Audit Information  (will eventually also include Financial Questionnaire option)
  - Single Audit Status & Links
  - Core info about any findings, deficiencies, material weaknesses
- Entity Official Certification
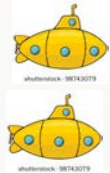
# Contents of Profile

- Entity Information
  - Demographic Information (name, address, type, small business status, parent information, etc.)
  - Entity Identification Numbers and Codes
  - Entity Rate Agreements
  - Department of Defense Registration Numbers
  - Department of Education Registration Numbers
  - Assurances and Agency Approvals (Accreditations)
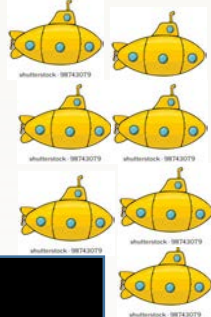  - DOD/ONR System Reviews
  - Entity Key Contacts

# Expanded Clearinghouse – Phase II (~80 institutions)

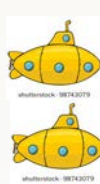| | | REPOSITORY ON FDP WEB SITE | | |
|---|---|---|---|---|
| **Institution 1 Entity Profile** | **Institution 2 Entity Profile** | | | **Institution 4 Entity Profile** |

Institution 1

Institution 2

Colorado State

Institution 4

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

# Core Elements of Pilot

- Institutions participate as both a subrecipient and as a pass-through entity
- Participants formally agree to terms of the Pilot *(done)*
- Participants create their Entity Profile (Late July)
- FDP posts each participant's Entity Profile (Mid August or Early Sept.)
- PTEs access their participating subrecipients' on-line Entity Profile **in lieu of** sending a subrecipient commitment form for each subaward between the parties (throughout the pilot)
    - *Transaction-specific information may still be shared*
- Participants track how many subwards are transacted via this mechanism (throughout the pilot, reported quarterly)
- Participants evaluate the pilot  (at least twice)

# At Time of Proposal

- Still acceptable & expected to collect from the Subrecipient at time of proposal:
  - **Statement of Work**
  - **Budget**
  - **Any other forms needed for the proposal**
    - Small business plans, biosketches or other support, certifications required at time of proposal, etc.
  - **Subrecipient's proposal endorsement**
    - Signature of the Subrecipient's SPA office and/or indication they are willing to enter into a subaward if proposal is funded

## BUT …

# Process Changes to Plan For

## When We are the Pass-through Entity:

DO NOT COLLECT a Subrecipient Commitment Form from another participating pilot institution

## When We are the Subrecipient:

- DO NOT COMPLETE a Subrecipient Commitment Form for a pass-through entity participating in the pilot
  - Instead, please remind the other institution that we are a pilot Expanded Clearinghouse institution – see sample language on the next slide
  - Please be kind - remembering that many pilot institutions are large and decentralized – so it may take awhile for this updated process to filter down to all parts of the organization.
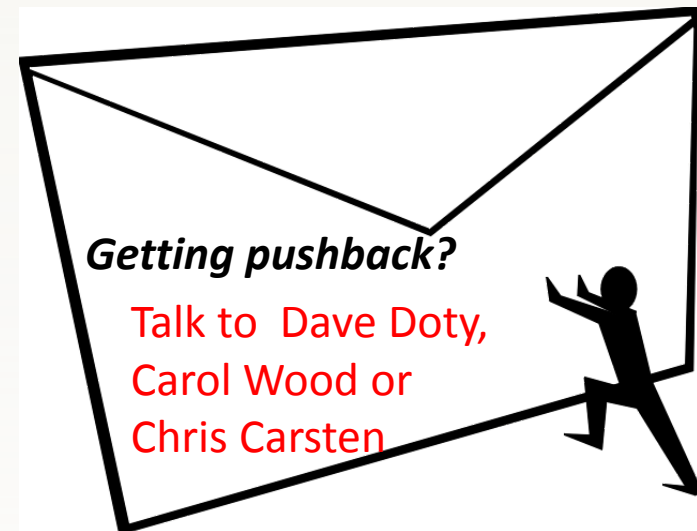
# Sample Language for Pushing Back if you are asked to complete a Subrecipient Commitment form by another pilot institution

- *"I am writing to let you know that Colorado State University is a pilot participant in the FDP Expanded Clearinghouse. It is my understanding that your organization is also a pilot participant. As a part of the pilot, both our organizations have agreed that we will not send or require completion of a subrecipient commitment forms, but will instead use our profile that is posted on-line at the FDP Expanded Clearinghouse site. Please use our profile to obtain the information you need about the Colorado State University. If you have transaction-specific requirements, I will be happy to provide those but I will need you to tell me precisely what you need via an email or a transaction-specific request form (one that does not also include data elements found in our profile.)"*

# At Time of Proposal or Award

- Okay to ask for or to complete a "transaction-specific" request but only for data elements NOT included on the entity profile, such as:
  - Human subjects approval for that project
  - Animal subjects approval for that project

*Getting pushback?*

Talk to Dave Doty, Carol Wood or Chris Carsten

# Participating Institutions

Participating Institutions can be found here:

- http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_173303.pdf

# Next Steps

- Approximately in Mid to Late August, we will "Go-Live" with the Phase II Pilot (OSP will tell you when)
  - No change until then
- At that time:
  - We will inform all Pre-Award support personnel to not collect or complete subrecipient forms from participating institutions.
  - At time of award, we will use the Clearinghouse to obtain the information needed to issue a subaward or to do a risk assessment for participating institutions (more details coming).
  - Carol Wood will be doing our subaward tracking under the pilot.
  - You may be asked to participate in evaluations, as appropriate.