Federal Demonstration Partnership (FDP) Expanded Clearinghouse Pilot for Subawards

The “FDP Pilot” relates to incoming and outgoing Subawards
Per ORA News of 8/2/16 and 8/22/16
What:

- Effective August 18th, when working with an FDP Expanded Clearinghouse **Pilot Participant Institution**, use a short **Letter of Intent** instead of a full **Subrecipient Commitment Form**.

The Letter of Intent (LOI) provides *project specific information* and eliminates *institutional information*

Ex: UCLA Commitment = 5 pages vs. UCLA LOI = 1 page

Who:

A list of the 79 **pilot participant institutions** is at: [http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_173303.pdf](http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_173303.pdf).

**NOTE**: If an institution is **not** listed as a pilot participant institution, there is no change to our current process (i.e. sending or receiving full Subrecipient Commitment Form).
Why:

• The U.S. Federal Government requires that each Pass Through Entity (PTE) conducts a Risk Assessment prior to issuing any Subaward/Subaward Amendment. Traditionally, PTEs collect initial institutional information for this Risk Assessment via Subrecipient Commitment Forms.

• Risk Assessments, thus Subrecipient Commitment Forms, typically require institutional information such as audit status/findings, FCOI policy status, EIN/NAICS No., Federalwide Assurances, debarments, registrations, collection of IDC and fringe rate agreements, etc.

• In order to reduce the administrative burden related to incoming and outgoing subawards, pilot participant institution central offices (i.e. OCGA) will be relying on institutional information from profiles housed on the FDP website, instead of institutional information from individual Subrecipient Commitment Forms.
When:

- **Incoming Subawards:** If you are asked to complete a *Subrecipient Commitment Form* by a pilot institution on/after August 18, 2016, please politely tell the other pilot institution that both parties are FDP Expanded Clearinghouse Pilot Participants and that a *LOI* with *project specific information* should be used instead. UCLA’s *institutional information* can be obtained from our profile on the FDP Expanded Clearinghouse site. This will eliminate the need to provide institutional information via a Subrecipient Commitment Form.

- **Outgoing Subawards:** At time of proposal, you should continue to collect necessary authorized project-specific documents from pilot Subrecipients. Instead of the 5-page *UCLA Subrecipient Commitment Form*, you will request the *project specific 1-page UCLA Letter of Intent (LOI)*, with authorized signature(s), statement of work, budget(s) and justification(s), plus any other documents required by sponsor guidelines [biosketches, facilities, current and pending support, etc.].

- **Push Back:** It will take some time for everyone at pilot institutions to be fully aware of pilot participation, so please be patient as this information trickles down to all staff. However, the FDP has provided sample push back language to assist pilot participants. Note that UCLA will likely receive push back if we request our Subrecipient Commitment Form be completed by pilot participants.
**To Reiterate –**

**Change:**

- For Subawards to-from *pilot participant institutions*, no completing *institutional information* as requested on Subrecipient Commitment Forms.
- Instead of requesting/completing a Subrecipient Commitment Form, complete *project specific information* only via a short Letter of Intent (LOI).

**No change:**

- *Pilot participant institution* Subrecipients still need to provide their statement of work, line-item budget(s) and justification(s), plus any other documents required by prime sponsor guidelines [biosketches, facilities, current and pending support, etc.].
- At time of award, Subrecipient subject use approvals (if any) need to be provided.
- If an institution is *not* listed as a pilot participant institution, there will be *no change* to our current process (i.e. sending or receiving full Subrecipient Commitment Forms at the time of proposal, plus applicable attachments).
Example: *Outgoing Subawards*

**Subrecipient = USC**

**Proposal Stage**
- UCLA PI competes Determination Checklist
- Collect from *non*-Pilot Subrecipient
  - *Commitment Form*, with authorized signature(s), and documents *triggered* by Commitment (as applicable):
    - Copy of IDC/fringe rate agreements, PHS Financial Disclosure Form and Assurance Compliance, Audit Certification of Compliance or Financial Audit Management Questionnaire, etc.
    - statement of work, including deliverables,
    - line-item budget(s) and justification(s),
    - plus any other documents required by sponsor guidelines [ex. biosketches, facilities, current & pending support, etc.].

**Award Stage (no change)**
- Collect subject use approvals (as applicable)
- Submit OCGA Subaward Checklist

**Subrecipient = CalTech**

**Proposal Stage**
- UCLA PI competes Determination Checklist
- Collect from *Pilot* Subrecipient
  - *Letter of Intent (LOI)*, with authorized signature(s), and documents *triggered* by LOI (as applicable):
    - No additional docs triggered by LOI
    - statement of work, including deliverables,
    - line-item budget(s) and justification(s),
    - plus any other documents required by sponsor guidelines [ex. biosketches, facilities, current & pending support, etc.].

**Award Stage (no change)**
- Collect subject use approvals (as applicable)
- Submit OCGA Subaward Checklist
FAQs:

• It is a “Pilot” expected to continue through June 30, 2017; ORA News will keep you posted.

• For Subrecipients that are part of system, if one site is listed as pilot participant it does NOT automatically mean all the system-sites are pilot participants (ex. UT Austin = Pilot; UT El Paso = NON Pilot). Check and make sure the specific entity is named on the list.

• The FDP Pilot applies to all incoming and outgoing Subawards handled by OCGA (for outgoing Subawards the FDP Pilot applies even if the Prime Sponsor is not federal).

• If we have an upcoming proposal with a pilot participant Subrecipient that has already filled out the Subrecipient Commitment Form, we will accept it instead of the LOI. DO NOT have them also fill out a LOI.

• If we have an existing project with a pilot participant Subrecipient that has filled out the Subrecipient Commitment Form for the entire project period (ex. 5 years) and nothing has changed, we will continue to use it. DO NOT have them also fill out the LOI.

• If we have an existing project with a pilot participant Subrecipient that has filled out the Subrecipient Commitment Form for only part of the entire project period (ex. 1 of 5 years), have them fill out the LOI to add any out year(s) [or for any additional/supplemental funds].
• Please share this information with investigators and research administrators in your department/unit.
  ▫ FDP Expanded Clearinghouse: http://sites.nationalacademies.org/PGA/fdp/PGA_171520

• If you have to provide continuing push back to another pilot institution, please let the OCGA Outgoing Subaward Team know, and we can contact that institution on your behalf.

• In addition, if you have any questions about the pilot, please contact the OCGA Outgoing Subaward Team:
  ▫ Assistant Director of Outgoing Subawards, Sharon Lam, slam@research.ucla.edu
  ▫ Subaward Officer, Mary Haskins, mhaskins@research.ucla.edu
  ▫ Website: http://www.research.ucla.edu/ocga/sr2/Subawards.htm

• General questions? Thank you!