

# The FDP Expanded Clearinghouse: Making Subrecipient Monitoring Efficient One Profile at a Time

Amanda Hamaker; FDP Expanded Clearinghouse Co-Chair; Purdue University, Sponsored Program Services, Director of Pre-Award

# What is the FDP?



# **Mission**

The Federal Demonstration Partnership (FDP) is an association of federal agencies, academic research institutions with administrative, faculty and technical representation, and research policy organizations that work to streamline the administration of federally sponsored research.



# What is the FDP?



# Membership

- -10 federal agencies
- -217 institutional recipients of federal funds

#### **FDP Success Stories**

- FDP Expanded Clearinghouse
- "Expanded Authorities": 90 day pre-award costs, 1-year automatic no-cost extensions, automatic carryforward (some awards)
- FDP Subaward Templates: agreed-upon terms & conditions to streamline the subaward process



# What is the FDP Expanded Clearinghouse?

- Publicly available website providing online organizational profiles containing entity-based information needed by pass-through entities (PTEs) when they are issuing subawards or monitoring their subrecipient entities
- Result of the FDP Pilot Project demonstrating 18k+ hours of administrative burden reduction

# Participants (332+ profiles and counting)

- All FDP members (216 profiles)
- Non-FDP members who are subject to Single Audit (116 profiles as of September 2023 – US and Canada)



# Where is the burden reduction?

- Reduces burden at both proposal and award stages
- Intended to replace unique pass-through entity letter of intent or commitment forms
- FDP-provided sample Letter of Intent and "pushback language": https://fdpclearinghouse.org/resources



# Accessing the FDP Expanded Clearinghouse https://fdpclearinghouse.org/



Home Participating Organizations Data Access Help FDP Website

FDP Expanded Clearinghouse

Welcome to the FDP Expanded Clearinghouse online system. This public website and user system are the products of an FDP Pilot Project to test the efficiency organization Profiles in lieu of subrecipient commitment forms to obtain information needed by pass-through entities when they are issuing subawards or What information is available in the organization Profiles?

Data included on each published organization profile has been certified correct by an applicable institutional official and includes data about the entity's n fringe benefit rates as well as suspension and debarment, PHS financial conflict of interest policy status. Federal Wide Assurance number, other compliar variety of federal codes (DUNS, EIN, CAGE, etc) and contact information (senior authorized official, FFATA, financial, COI, etc) that are commonly needed f published profiles can be accessed by clicking on "Participating Organizations" above and are publically available without logging into the system. The FD regularly to ensure the data is current. The accuracy of the Profile information is the responsibility of the Pilot organization.

View the Organization Profiles



# Information Available on the FDP Expanded Clearinghouse

State University

General Information Contacts Registrations & IDs Certifications Audits Assurances Authorization

- General Information
- Contacts
- Registrations & IDs
- Certifications

- Audits
- Assurances
- Authorization



# A peek behind the curtain...

Institutional Profile Editor Submits Update

Contacts are Sent
Reminders of
Expiring
Certifications

Institutional
Authorized
Certifier Approves
Update

FDP EC
Subcommittee
Publishes After
Complete Review

FDP EC Profile Reviewer Reviews Update



# **Common Errors**

- Broken weblinks
- Uploads that require a login
- SAM.gov expiration
- Outdated comments
- Outdated documents (e.g., rate agreements and Single Audit Reports)
- Incorrect Audit responses



# **General Information**

Legal Entity Name

Common Name

Address

Congressional District

EIN

DUNS

Federal/SAM.gov UEI

Is entity a member of the FDP?

Entity Type

Entity represents that it is a small business concern as defined in 13 CFR 124.1002

Fiscal Period End Date

Payment Address

Link to institution's Office of Sponsored Programs (or equivalent) website

Most Recent Negotiated Facilities & Administrative (F&A) Rate Agreement

Most Recent Negotiated Fringe Benefit Rate Agreement or Organization's Fringe Benefit Guidance Information



# **General Information (continued)**

#### **Primary Audit Entity**

Is this entity's Single Audit part of a large comprehensive audit (i.e., state or system audit) as found in the Federal Audit Clearinghouse (FAC)?

Primary Auditee Name

Primary Auditee Employer Identification Number (EIN)

Primary Auditee Contact Person



# **General Information Resources**

#### Legal Entity Name

https://sam.gov/content/home

#### **Primary Congressional District**

https://www.house.gov/representatives/find-your-representative

## **DUNS/UEIs**

<u>www.usaspending.gov</u> (Profiles → Recipients)



# **Entity Contacts**

- Primary
- Authorized Profile Certifier
- Primary Authorized Signing Official
- SAM Point of Contact / Government Business POC
- Financial Officer
- F&A Cost Rate Negotiation
- Audit
- FFATA



# **Registration & IDs**

Entity Identification Numbers and Codes	Department of Defense Registration Numbers
Primary Employer Identification Number (EIN)	Commercial and Government Entity (CAGE) Code
Primary Data Universal Numbering System (DUNS)	Department of Education Registration Numbers
Federal/SAM.gov UEI	
IRS Tax Determination Letter	Office of Postsecondary Education (OPE) ID Number (formerly known as FICE code)
IDC VV	Integrated Postsecondary Education Data System (IPEDS) Number
IRS W-9	
Primary North American Industry Classification System	(NAICS) Code
System for Award Management (SAM) Status	



SAM Expiration Date

# **Registration & IDs Resources**

Office of Postsecondary Education (OPE) ID Number (formerly known as FICE code)
Integrated Postsecondary Education Data System (IPEDS)
Number

https://ope.ed.gov/dapip/#/home

System for Award Management (SAM) Status SAM Expiration Date

https://sam.gov/content/home

Commercial and Government Entity (CAGE) Code

https://cage.dla.mil/



# **Certifications**

- Conflict of Interest (PHS, NSF, NASA, Dept of Energy, Other Agencies)
- Affirmative Action
- FFATA Exempt Reporting
- Debarment and Suspension
- Lobbying



# **Audit**

#### Single Audit

Is entity subject to the Single Audit requirements in 2 CFR part 200?

Most recent fiscal year with completed Single Audit

Is entity qualified as low-risk entity by Auditor or as defined in 2 CFR 200?

Did the entity's most recent Single Audit contain any findings?

Did the entity's most recent Single Audit contain any Significant Deficiencies?

Did the entity's most recent Single Audit contain any Material Weaknesses?

Most recent complete Single Audit Report

Single Audit Report from previous fiscal year

Management letter (if issued)



Year of Audit

#### Section I-Summary of Auditor's Results

#### Financial Statements

	Type of report the auditor issued on whether the financial statements audited were prepared in accordance with GAAP:	Unmodified	
	Internal control over financial reporting: Material weakness(es) identified? Significant deficiency(ies) identified? Noncompliance material to financial statements noted?	Yes Yes Yes	X No X None reported X No
Material Weakness	Federal Awards		
	Internal control over major federal programs: Material weakness(es) identified? Significant deficiency(ies) identified?	Yes Yes	X No None reported
Significant Deficiency	Type of auditor's report issued on compliance for major federal programs:		Unmodified
Any findings?	—Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?	Yes	XNo
Low-risk auditee?	-Auditee qualified as low-risk auditee?	Yes	X No



# **Audit (continued)**

#### Department of Defense / Office of Naval Research System Review

Property Management System Audit approval date

Contractor Purchasing System Review (CPSR) approval date

**CPSR Expiration Date** 

#### Defense Contract Audit Agency (DCAA)

DCAA report on audit of Estimating System approval date

DCAA report on audit of Billing System approval date

DCAA report on audit of Accounting System Internal Control approval date

ONR Administrative Contracting Officer (ACO)



# **Certification and Audit Resources**

#### Conflict of Interest certification

Public Health Service (<a href="https://thefdp.org/default/fcoi-clearinghouse/compliant-entities/">https://thefdp.org/default/fcoi-clearinghouse/compliant-entities/</a>)

#### Audit (most recent and previous year)

https://facdissem.census.gov/



# **Assurances**

Assu	rar	2021
Maau		1653

**Human Subjects** 

US Department of Health and Human Services / Office of Human Research Protection (HHS/OHRP)

Does entity have HHS/OHRP Human Subjects Federal Wide Assurance (FWA) approval?

Primary HHS / OHRP Human Subjects FWA Number

0000

Yes

Primary Department of Defense (DOD) Human Subjects FWA Addendum

Not A

Association for the Accreditation of Human Research Protection Programs (AAHRPP)

Is entity AAHRPP accredited?

No



# **Assurances (continued)**

#### **Animal Subjects**

Public Health Service / Office of Laboratory Animal Welfare (PHS/OLAW)

Does entity have PHS/OLAW approval?

Primary PHS/OLAW Assurance Number

Association for Assessment and Accreditation of Laboratory Animal Care Interational (AAALAC)

Is entity AAALAC accredited?

Primary AAALAC Accreditation Assurance Number

US Department of Agriculture (USDA) Research Registration

Does the entity have a USDA Research Registration number?

Primary USDA Research Registration Number



## **Assurance Resources**

**USDA** 

Link to list: https://www.aphis.usda.gov/animal\_welfare/downloads/List-of-Active-

Licensees-and-Registrants.pdf

General page: https://www.aphis.usda.gov/aphis/ourfocus/animalwelfare/new-lic

Primary HHS / OHRP Human Subjects FWA Expiration Date

https://ohrp.cit.nih.gov/search/fwasearch.aspx

Is entity AAHRPP accredited?

https://www.aahrpp.org/find-an-accredited-organization

Primary PHS/OLAW Assurance Number

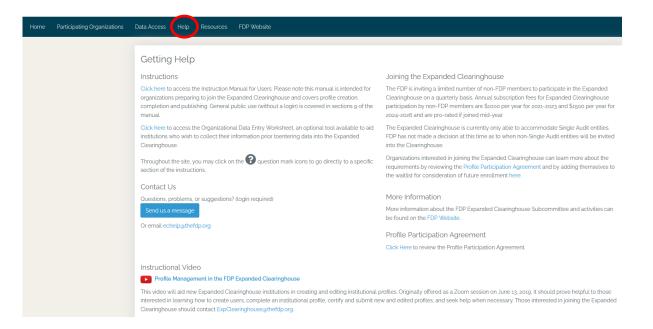
https://olaw.nih.gov/assured/app/index.html

Is entity AAALAC accredited?

https://www.aaalac.org/accreditation-program/directory/directory-of-accredited-organizations/



# Getting Help (echelp@thefdp.org)





# **January 2024 System Updates**

- Removal of the DUNS field
- SAM expiration date auto-update
  - Auto-update will only occur when the organization's SAM registration is active and the SAM expiration date is later than the Clearinghouse SAM date
  - Participants will be able to turn off auto-updating and update manually
- Expansion to allow participants in Australia & the UK that are subject to the Single Audit, or a Program-Specific Audit under the Uniform Guidance
- Expansion to allow participants not subject to the Single Audit (NSAP Pilot)
- Invoicing contact for non-FDP participants
  - Located on the Contacts tab
  - For use internally, but not visible on the public profile



# **Ongoing and Future Initiatives**

#### Ongoing initiatives include:

- Expansion of non-FDP member entities
- Accommodation for additional non-US single audit institutions
- Data integrity enhancements validations/notifications
- Raising awareness of Clearinghouse with Federal agencies

#### Future initiatives include:

- Interfaces from federal data systems like SAM.gov & General Services Administration (after single audit migration from Audit Clearinghouse)
- NSPM-33 Research Security Certification



# Want to join the FDP Expanded Clearinghouse?

- Invitations sent twice a year to Single-Audit entities.
- Annual subscription fees are \$1500 per year for 2024 2026, pro-rated if joining mid-year.
- Wait list:

https://nas.qualtrics.com/jfe/form/SV\_e3QgjcfDb8dusUm



# FDP Expanded Clearinghouse Subcommittee

- Co-Chairs:
  - Amanda Hamaker, Purdue University
  - Robert Prentiss, Yale University
  - Jennifer Rodis, University of Wisconsin Madison
- Profile Reviewers (led by Robert Prentiss):
  - Emily Lacy, University of Texas Dallas
  - Jackie Lucas, Beckman Research Institute City of Hope
  - Carrie MacCue The Research Foundation for the State University of New York
  - Tameria Mace, University of Central Florida
  - Jennifer Rodis, University of Wisconsin Madison



## **Contact Us**

#### Subcommittee Webpage:

 https://thefdp.org/committees-subcommittees/research-administrationcommittee/expanded-clearinghouse-subcommittee/

General Questions: <a href="mailto:ExpClearinghouse@thefdp.org">ExpClearinghouse@thefdp.org</a>

