

REQUEST TO ENTER INTO AN FDP PILOT

REQUEST DATE:	January 5, 2016
EXECUTIVE TEAM DECISION (& DATE)	Approved on January 10, 2016
TITLE OF PILOT:	<b>Expanded Clearinghouse, Phase I</b>
REQUESTING GROUP:	Expanded Clearinghouse Working Group Research Administration Committee
HAS THIS PILOT BEEN APPROVED BY THE STANDING COMMITTEE CO-CHAIRS?	Yes (Pamela Webb and Debbie Rafi)
CONTACT INDIVIDUALS:	Lynette Arias, University of Washington, Co-Chair Jennifer Barron, Johns Hopkins University, Co-Chair Pamela Webb, University of Minnesota, Co-Chair
BACKGROUND AND SUPPORTING INFORMATION	<p>In 2011, the FDP created a PHS Financial Conflict of Interest (FCOI) Clearinghouse as a mechanism for FDP member and non-FDP member institutions to document that they had a PHS FCOI compliant policy in place. This repository allowed participants to forego the exchange of thousands of individual transaction-specific documents. As of January 2016, 962 institutions are listed in the Clearinghouse.</p> <p>The success of this initiative led to the concept of an expanded Clearinghouse that would contain audit, demographic and fiscal information needed by pass-through entities (PTEs) when they are issuing subawards. The need for a national repository was exacerbated by release of the Uniform Guidance, which expands subaward risk assessment and monitoring obligations. Many institutions have created "Subrecipient Commitment Forms" to collect such data, but the proliferation of many different forms collecting mostly similar information has underscored the need for national consistency and a more efficient process. In 2015, the FDP collected 133 subrecipient commitment forms from its members, and analyzed the data elements to derive a single, common profile that can be broadly used for this purpose. The Expanded Clearinghouse, Phase I, seeks to test this profile, including using a national repository of posted information as a less burdensome alternative to achieve the stewardship obligations expected in the subaward issuance and oversight process.</p> <p>If successful, subsequent phases of the Expanded Clearinghouse might include automated data entry into a database structure from federally available data sources, such as SAM records and the Federal Audit Clearinghouse, or alternatively influencing one of those national repositories to record and make publically available the data elements needed by institutions issuing subawards. The approval of the current phase does not pre-suppose approval will be granted for any subsequent phase. A separate pilot request would be made for that phase.</p> <p>Finally, a related initiative involves trying to obtain regulatory relief from the need to share and monitor audit data among Single Audit recipients. Removal of this portion of the data need would, in and of itself, provide significant relief and would influence the need for and the breadth of data that would need to be collected. In the event that occurs within the pilot period, the scope of this pilot would be revised by the Workgroup Co-Chairs with the approval of the Research Administration Committee and the FDP Executive Committee.</p>

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<p>BRIEF DESCRIPTION OF PILOT:</p>	<p>Participants from FDP member institutions will create entity profiles based on a standard Excel template, and have those profiles certified by an authorized institutional official and submitted to the Expanded Clearinghouse Working Group. Entity profiles will be posted on the FDP web site after a brief review process. Participating institutions will agree to their profile being publically available and will agree to update their profile on a timely basis when needed (e.g., for new audit results or when their F&amp;A or fringe benefit rates change). Participating institutions will be expected to forego use of their individual subrecipient commitment forms (the portions that collect Entity based data/information) when issuing subawards to other pilot participants, in favor of accessing the posted entity profiles to obtain needed static/annual data from their proposed subrecipient. It is recognized that additional, transaction-specific data (e.g., IRB and IACUC approvals, etc.) will still need to be collected. A standardized Transaction Specific Form will be created and tested as a companion document to the Entity Profile in early 2016.</p> <p>The entity profile will contain data about the participating institution including demographic data, audit or financial questionnaire results, F&amp;A rates, fringe benefit rates, PHS conflict of interest policy status, debarment and suspension status, and other reps and certifications. Detailed instructions will be provided to the participants on profile creation, updating, approval, and submission as well as specific expectations for participants.</p> <p>A hard copy of the entity profile template is attached.</p>
<p>SIGNIFICANCE TO FDP</p>	<p>This pilot seeks to test whether a standardized, streamlined subrecipient data repository is feasible, and whether such a repository effectively reduces the data collection and review burden for pass-through entities and subrecipients alike, while still ensuring stewardship over federal funding. If successful, this pilot will demonstrate a more efficient stewardship model than that in common use today. If unsuccessful, valuable information will be learned that helps articulate the scope, magnitude and complexity of the subrecipient oversight burden on pass-through entities. This information can in turn be shared with agencies to help develop more effective policies and practices.</p>
<p>PARTICIPANTS</p>	<p>Approximately 40 FDP institutions have previously expressed interest in participating. We plan to start with those 40 institutions as well as the working group institutions for this first phase of the pilot. At some point during the proposed eighteen month period, we would add the remaining FDP institutions. The timing for the expansion would be driven by a determination by the Working Group Co-Chairs that the entity profile template is reasonably stable and early results are promising.</p> <p>Participants from FDP member institutions will be expected to:</p> <ul style="list-style-type: none"> <li>• Create entity profiles based on a standard Excel template, and have those profiles certified by an authorized institutional official.</li> <li>• Send their completed and authorized profile to the designated working group co-chair for review prior to being sent to FDP for posting to the FDP web site.</li> <li>• Agree that their profile can be posted as public information on the FDP web site</li> <li>• Agree to timely update their profile (e.g., for new audit results, updated F&amp;A</li> </ul>

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	<p>rates, any changes in answers to key questions, etc.).</p> <ul style="list-style-type: none"> <li>• Forego use of their individual subrecipient commitment forms to collect entity data when issuing subawards to other pilot participants, in favor of accessing the posted entity profiles to obtain needed static/annual data from their proposed subrecipient. It is recognized that additional, transaction-specific data (e.g., IRB and IACUC approvals, etc.) will still need to be collected. When the transaction-specific template becomes available, pilot members will be asked to test use of this form as well. Use of the transaction-specific form will be voluntary but recommended.</li> <li>• Provide suggestions for improvement on the entity profile template and the transaction-specific template</li> <li>• Provide a minimum of one annual update to their profile</li> <li>• Evaluate the effectiveness and impact of the tool at least twice during the pilot period.</li> </ul> <p>Participants will have the option to:</p> <ul style="list-style-type: none"> <li>• Place a link to their FDP-posted template on their own local web pages for use by non-pilot participants who are interested in seeing the data, or for local use by SPA or departmental staff needing access to the “institutional factoid” data (DUNS number, CAGE codes, etc.) contained in the template.</li> <li>• Terminate their participation in the pilot at any time. If they elect to terminate their participation, their template will be removed from the FDP web site.</li> </ul> <p>FDP staff would be expected to:</p> <ul style="list-style-type: none"> <li>• Post original or updated templates from the pilot members after receiving the approved version from a Working Group co-chair.</li> <li>• Answer questions about the pilot, working in conjunction with the Working Group co-chairs.</li> </ul>
<p>PILOT TIMETABLE:</p>	<p>February 2016 – June 2017</p> <p>We anticipate the initial time period of Phase 1 to be approximately 6 months with evaluation near the end of this period that would lead to a decision to stop, refine, continue, or expand the pilot to other FDP institutions. A second evaluation with a broader group of participants would provide more data to determine whether the FDP should adopt this as a standard practice for its institutions, and whether there are potential opportunities for its use more broadly.</p>
<p>SUCCESS CRITERIA:</p>	<ol style="list-style-type: none"> <li>1. Participants are able to efficiently and accurately complete the Entity Profile template</li> <li>2. Entity Profile forms are certified to be accurate by authorized institutional officials.</li> <li>3. Entity Profile templates are able to be posted in a timely manner and easily accessed on the FDP web site</li> <li>4. Participants routinely access and use the Entity Profile to obtain annual/static information needed for subaward issuance or modification. [Note it is recognized that a limited amount of data that is transaction-specific will still need to be collected]</li> <li>5. Participants are able to update their Entity Profile forms efficiently, and do so at least one time per year.</li> <li>6. Participants determine that access to the Expanded Clearinghouse is more efficient than sharing of individual Subaward Commitment forms.</li> </ol>
<p>PLANS FOR EVALUATION:</p>	<ol style="list-style-type: none"> <li>1. At least two evaluations will be electronically sent to all participating institutions to ascertain the efficiency and the effectiveness of the entity</li> </ol>

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	<p>profile form. The number of times the form was used for subaward issuance will be collected so that it can be determined how many individual subrecipient commitment forms were replaced.</p> <ol style="list-style-type: none"><li>2. In addition, situation-specific data will be collected to better understand the challenges and the usefulness of the data being collected.</li><li>3. A report will be prepared at the end of the pilot recommending next steps.</li></ol>
EARLY TERMINATION PLAN	<p>Continuous evaluation will take place throughout the pilot phase. At any point during the pilot if things are not going well or the process is causing undue complications for the pilot institutions the working group will review for possible termination. A summary report of activity and supporting justification will be provided to the Executive Committee for concurrence prior to official termination. If this were to occur, profiles will be removed from the FDP website and pilot institutions would revert to their previous processes related to subrecipient certification form collection for the other pilot institutions.</p>