FDP Subrecipient Pilot
Effective August 15, 2016

Yale
Asked to participate in Phase 2
What is FDP?

The Federal Demonstration Partnership is:

• Is a cooperative initiative among 10 federal agencies and 155 institutional recipients of federal funds.
• Its purpose is to reduce the administrative burdens associated with research grants and contracts.
• A unique forum for individuals from universities and nonprofits to work collaboratively with federal agency officials to improve the national research enterprise.
Goal of Pilot

• Reduce administrative burden associated with verifying standard information required for subaward issuance and subrecipient monitoring

• Access subrecipient required information an on-line, (FDP “entity profile”)
  • Determine whether such a repository effectively reduces the data collection and review burden for pass-through entities and subrecipients alike
Entity Profile Content

- 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
• Entity Certifications
  • Conflict of Interest
  • Debarment and Suspension
  • Lobbying
  • Affirmative Action Compliance
  • FFATA

• Single Audit Information
  • Single Audit Status & Links
  • Core info about any findings, deficiencies, material weaknesses

• Entity Official Certification
Elements of Pilot

- Institutions participate as both a subrecipient and as a pass-through entity
- Participants formally agree to terms of the Pilot
- Participants create their Entity Profile (July)
- FDP posts each participant’s Entity Profile (July)
- PTEs access the participating subrecipients’ on-line Entity Profile in lieu of sending current SIC for each subaward between the parties
  - Modified, less cumbersome “Letter of Intent and Certification (LOI)” will be used
- OSP tracks how many subawards are transacted
At Time of Proposal

• Yale is still expected to collect from the subrecipient:
  • Statement of Work
  • Budget and Budget Justification
  • 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 indication they are willing to enter into a subaward if proposal is funded

BUT ...
When Yale is the Pass-through Entity (PTE):

We will ask the FDP participating pilot institution to complete a LOI.
Process Changes

Letter of Intent and Certification (LOI)

See Handout
When Yale is the Subrecipient:

- Yale may be asked to complete a LOI from the FDP pass-through entity (PTE) participating in the pilot
  - If we are asked to provide information that is already included in Yale’s FDP profile, OSP will contact the PTE and/or the FDP Pilot chairs to discuss. We should NOT be asked to provide information that already exists 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:
  • Whether or not human subjects research is included in the scope of work
  • Whether or not animal subjects research is included in the scope of work
  • Debarment and suspension certification of all individuals
  • For NSF proposals, COI certification
Next Steps

• On August 15, 2016, we will “Go-Live” with the pilot
  • No change until then

• At that time:
  • Departments will ask subrecipients participating in the FDP Pilot to complete the LOI
  • At time of award, OSP will use the FDP Entity Profile to obtain the information it needs to issue a subaward to a participating FDP institution, documenting the review.
Process Changes

Participating FDP Institutions

See Handout
Take aways

• Check the FDP list to see if the subrecipient is participating in the FDP Pilot
• Ensure that FDP subrecipients complete an LOI
  • A SIC is unnecessary
• If Yale is the subrecipient, make sure the pass-through entity if an FDP pilot participant provides a LOI that does not request unnecessary information
• Call OSP if the FDP pass-through entity is insisting that Yale provide unnecessary information.
Questions?

Answers