



EMORY
UNIVERSITY

Office of Sponsored Programs
Research Administration

EMORY UNIVERSITY

PARTICIPATION IN THE

FEDERAL DEMONSTRATION PARTNERSHIP'S

EXPANDED CLEARINGHOUSE DEMONSTRATION



FEDERAL DEMONSTRATION PARTNERSHIP
Redefining the Government & University Research Partnership

General Information

As a member of the Federal Demonstration Partnership (FDP), Emory University has the opportunity to participate in demonstration projects designed to reduce administrative burden. One example of such demonstrations is Emory's participation in the FDP FCOI Clearinghouse which allows institutions to verify that Emory, along with other participating institutions, has a PHS-compliant Conflict of Interest policy without the need for each institution to sign individual certifications. We have been participating in this FDP FCOI Clearinghouse since shortly after the current PHS FCOI regulations went into effect.

Emory will now be joining the FDP Expanded Clearinghouse demonstration! The goal of this demonstration is to reduce administrative burden associated with the requirements related to subrecipient issuance and monitoring that are detailed in the Uniform Guidance. The pilot will address this burden by simplifying access to standard, and certified, institutional information.

Through Emory's participation in the pilot, we will be able to eliminate the swapping of subrecipient institutional profiles on a transaction-by-transaction basis and will instead be able to access an online, up-to-date standardized, streamlined subrecipient data repository (an "entity profile"). As a member of this pilot, Emory will help the FDP determine whether such a repository effectively reduces the data collection and review burden for both pass-through entities (prime recipients) and subrecipients alike.

The entity profile utilized in this demonstration contains standard institutional information which includes:

- 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 (will eventually also include Financial Questionnaire option)
 - Single Audit Status & Links

- Core info about any findings, deficiencies, material weaknesses
- Entity Official Certification

Implementation

Emory will participate in the pilot as both a pass-through entity and a subrecipient. It is important to note that our participation will result in changes to the Emory Subrecipient Monitoring Policy that is currently in effect. These changes are described below.

Participation in the pilot means that, as of and after the launch date of the pilot, we will:

- Not request the Emory-drafted Subrecipient Commitment Form and Institutional Profile for any other institution participating in the pilot. (A list of pilot institutions will be posted on Emory's website.) Rather, we will access institutional information via the FDP's Expanded Clearinghouse repository.
- We will request a signed transaction-specific (proposal-specific) Letter of Intent (consortium letter), using a simplified template designed specifically for the pilot. The template is available on the OSP website at: <http://osp.emory.edu/policies/sub-request.html>. No other letter of intent should be used for pilot institutions. This letter will provide the subrecipient's endorsement of the proposal and should be accompanied by the standard materials required from a subrecipient for a 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.
- Not complete a detailed institutional profile requested from any institution who is also participating in the pilot. (As a member of the pilot, they are agreeing to use the information provided by us via the online entity profile which Emory has provided.) If you are asked by another pilot institution to complete a full institutional profile or questionnaire, please gently remind them that Emory is now a pilot participant. (You may utilize the sample "push-back" language available on the OSP website if you are asked to complete such a form by a pilot participant.)
- Will sign a transaction-specific (proposal-specific) Letter of Intent when we are a subrecipient if such Letter of Intent is simplified in nature and doesn't ask for institutional information, beyond our DUNS number, that is provided in our entity profile.
- At the time of subaward issuance, review all pilot participants' institutional information via the online repository rather than through a signed institutional profile. OSP will handle this task and will proceed with our standard risk assessment using the FDP repository rather than Emory's standard institutional profile.

Monitoring the Success of the Pilot

As with all FDP demonstrations, the FDP will work to determine whether the processes implemented by a demonstration result in reduced burden for participating institutions. As part of those efforts, Emory will be tracking how many subawards we issue to other institutions participating in the pilot. Each institution will track only their outgoing subawards. OSP, as part of the subaward issuance process, will conduct the tracking activities using the tracking sheet provided by the FDP. We will also participate in any evaluations requested by the FDP to determine whether the pilot is a success.

Conclusion and Reminders

We believe this is an excellent opportunity to both reduce the administrative burden here at Emory and to provide information to the FDP on the results of these efforts.

Just remember:

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
 - 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.