

VCU Office of Sponsored Programs: Process When Proposal Involves a Subrecipient (VCU Serving as Pass-through Entity)



Federal Demonstration Partnership Expanded Clearinghouse (FDP EC)

- VCU is an institutional member of the Federal Demonstration Partnership, an initiative comprised of 10 federal agencies and over 150 institutions working to improve processes relating to research administration.
- The “Expanded Clearinghouse” is a specific FDP project that aims to reduce the need for the “subrecipient commitment forms” that have proliferated following the implementation of Uniform Guidance.

Federal Demonstration Partnership Expanded Clearinghouse (FDP EC)

- The FDP EC allows for collaborating institutions, of which VCU is one, to provide institutional profile information posted to the following FDP url:
<https://fdpclearinghouse.org/>
- The aim is for important **entity-specific** information to be posted centrally so that a potential Pass-through Entity (PTE) can review and assess the viability and risk of a potential proposed subrecipient without need for extensive additional forms to be completed.

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE)

- When VCU is serving in the role of “Pass-through Entity” or prime recipient of sponsor funds, and one or more subrecipients is proposed to collaborate on the project, VCU must assess the risk of each subrecipient. We do this by obtaining **entity** and **project** specific information from the subrecipient including face page, scope of work, budget, budget justification, biosketches, etc.

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE)

- Effective July 5, 2017, some aspects of the process for documenting inclusion of a subrecipient in a VCU sponsored project proposal in RAMS-SPOT will stay the **same**, and some will **change**.
- Let's start with what stays the same...

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE)

- **ALL** proposed subrecipients provide “subrecipient mini package” at proposal time to include:
 - Signed AOR Authorization*
 - Scope of work
 - Line item budget
 - Budget justification
 - CV/biosketches for key personnel

This is **NOT**
a change
to current
process!

Note: PI/Study Staff (SS) upload the subrecipient mini package to the RAMS-SPOT Primary Budget, External Collaborator view

*See next slide for details

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE)

- Who is the Authorized Organizational Representative (AOR)?
 - A person with signature authority to legally bind the institution, typically a person in the Office of Sponsored Programs.
- What can serve as Signed AOR Authorization?
 - AOR-signed Sponsor face page, or
 - AOR-signed “Subrecipient Project-Specific Consortium Letter” (available on VCU OSP website, Forms page http://www.research.vcu.edu/forms/index.htm#osp_forms), Or
 - AOR-signed Consortium letter (subrecipient may use their own)

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE)

- The “Subrecipient Commitment Form”, which has been in use at VCU since August 2012 (when the PHS Conflict of Interest policy went into effect), will be discontinued entirely in early July, 2017.

**This IS a
change
to current
process!**

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE)

- **VCU PI/Study Staff** will evaluate the Federal Demonstration Partnership Expanded Clearinghouse list of participants and discern whether VCU's proposed subrecipient is **on the list**, or is **not on the list**.
- FDP EC List is available at this url:
<https://fdpclearinghouse.org/>

**This IS a
change
to current
process!**

Process When Proposals Involve a Subrecipient

Check FDP: <https://fdpclearinghouse.org/>

If VCU PI/SS see that...

Subrecipient not on FDP EC list

Provide the following in addition to the subrecipient mini package items:

- Completed and signed “VCU Entity Form for non-FDP EC Subrecipients” *

(All forms are available on VCU OSP website, Forms page http://www.research.vcu.edu/forms/index.htm#osp_forms)

- Rate agreement, if applicable

*If subrecipient indicates on the “VCU Entity Form for non-FDP EC Subrecipients” that they will be relying on VCU’s COI policy because they do not have one of their own, then additional forms must be completed. Please refer to the OSP website Navigator, Proposal Tab, “VCU Serving in Role of PTE with Subrecipients” accordion page for details.

If VCU PI/SS see that...

Subrecipient on FDP EC list

- No additional forms should be requested. (If you ask for additional forms, they will say “NO!”)

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE) SUMMARY

Subrecipient not on FDP EC list

Upload the following Subrecipient documents to RAMS-SPOT at the time of proposal submission:

- Signed AOR Authorization
- Scope of work
- Line item budget
- Budget justification
- CV/biosketches for key personnel
- Completed and signed “VCU Entity form for non-FDP Expanded Clearinghouse Subrecipients” (available on VCU OSP website, Forms page http://www.research.vcu.edu/forms/index.htm#osp_forms)
- Rate agreement, if applicable

Subrecipient on FDP EC list

Upload the following Subrecipient documents to RAMS-SPOT at the time of proposal submission:

- Signed AOR Authorization
- Scope of work
- Line item budget
- Budget justification
- CV/biosketches for key personnel
- No additional forms should be requested by VCU at this time.

Process When Proposals Involve a Subrecipient

VCU serving in the role of Pass Through Entity (PTE)

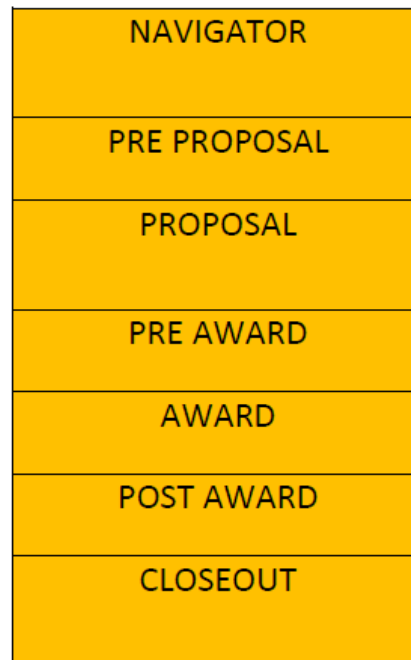
Additional Resources on OSP website:

<http://www.research.vcu.edu/osp/index.htm>

- Go to OSP Website “Navigator” tool
- Go to “Proposal”
- Go to “VCU Serving in Role of PTE with Subrecipients” accordion tab

Proposal & Awards located at this url: <http://www.research.vcu.edu/osp/index.htm>

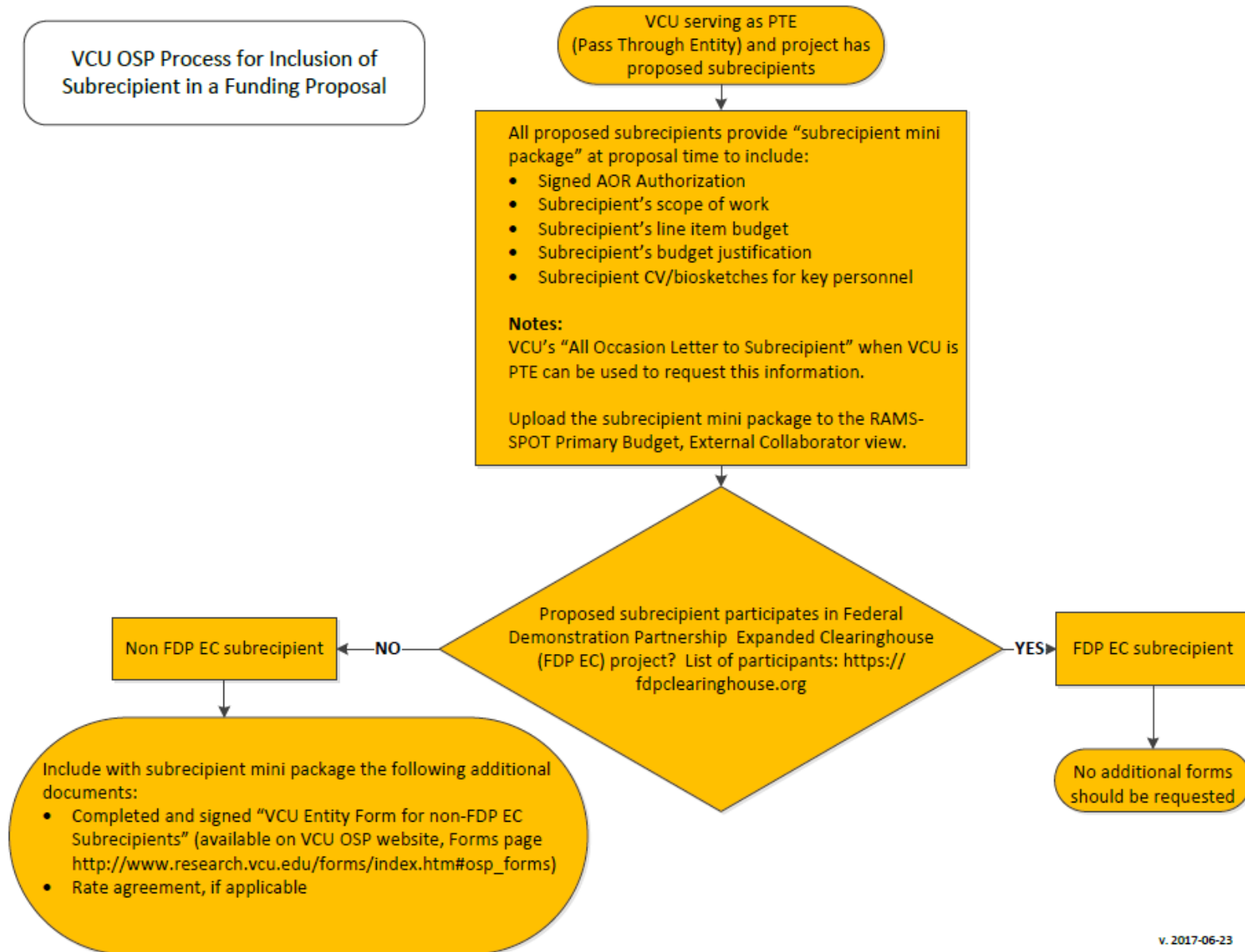
The Office of Sponsored Programs (OSP) is Virginia Commonwealth University’s central office authorized to submit extramural proposals and receive awards from all funding sources on behalf of the University. OSP is also the official contact for the University on administrative award-related matters.



NAVIGATOR
PRE PROPOSAL
PROPOSAL
PRE AWARD
AWARD
POST AWARD
CLOSEOUT

Proposals & Awards
Forms
Institutional Facts & Reference Documents
Negotiated Rate Agreement
RAMS-SPOT
Access RAMS-SPOT
RAMS-SPOT Updates & Training
Suggestion, Comments & Compliments
Policies & Regulations
Policies & Regulations (New guidance!)
VCU Compliance Notices
Contact
About OSP
Find Your Team
OSP Organizational Chart
Un/Subscribe to Listserve
Other Useful Links
Training Opportunities
Roles and Responsibilities Matrix
Additional References

Decision Tree

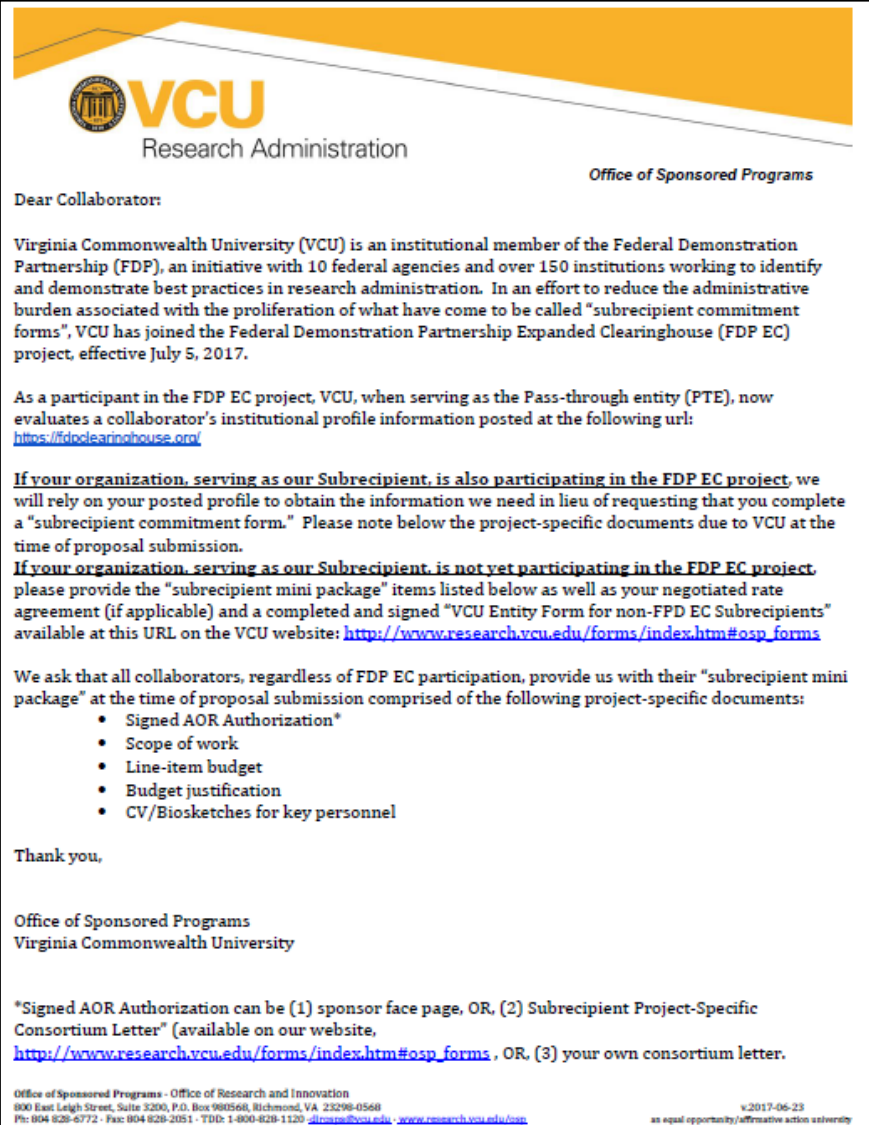



v. 2017-06-23

Process When Proposals Involve a Subrecipient VCU serving in the role of Pass Through Entity (PTE)

Additional Resources on
OSP website:

- “All occasion letter to Subrecipient when VCU is PTE” ...url:
 - Send this to your proposed subawardee to let them know what to provide at proposal time!



 **VCU**
Research Administration
Office of Sponsored Programs

Dear Collaborator:

Virginia Commonwealth University (VCU) is an institutional member of the Federal Demonstration Partnership (FDP), an initiative with 10 federal agencies and over 150 institutions working to identify and demonstrate best practices in research administration. In an effort to reduce the administrative burden associated with the proliferation of what have come to be called "subrecipient commitment forms", VCU has joined the Federal Demonstration Partnership Expanded Clearinghouse (FDP EC) project, effective July 5, 2017.

As a participant in the FDP EC project, VCU, when serving as the Pass-through entity (PTE), now evaluates a collaborator's institutional profile information posted at the following url:
<https://fdpclearinghouse.org/>

If your organization, serving as our Subrecipient, is also participating in the FDP EC project, we will rely on your posted profile to obtain the information we need in lieu of requesting that you complete a "subrecipient commitment form." Please note below the project-specific documents due to VCU at the time of proposal submission.

If your organization, serving as our Subrecipient, is not yet participating in the FDP EC project, please provide the "subrecipient mini package" items listed below as well as your negotiated rate agreement (if applicable) and a completed and signed "VCU Entity Form for non-FPD EC Subrecipients" available at this URL on the VCU website: http://www.research.vcu.edu/forms/index.htm#osp_forms

We ask that all collaborators, regardless of FDP EC participation, provide us with their "subrecipient mini package" at the time of proposal submission comprised of the following project-specific documents:

- Signed AOR Authorization*
- Scope of work
- Line-item budget
- Budget justification
- CV/Biosketches for key personnel

Thank you,

Office of Sponsored Programs
Virginia Commonwealth University

*Signed AOR Authorization can be (1) sponsor face page, OR, (2) Subrecipient Project-Specific Consortium Letter" (available on our website, http://www.research.vcu.edu/forms/index.htm#osp_forms), OR, (3) your own consortium letter.

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