

Thursday, May 7<sup>th</sup>, 2020

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# GRANT MANAGER OCGA SPA MEETING



# AGENDA

- Welcome
- Announcements – OCGA & SPA
- Training Tidbit – Subrecipient Monitoring for Subawards
- Next Meeting
- Q&A



**WEBSITE:**  
[PollEv.com/laurelduncan133](https://Pollev.com/laurelduncan133)

**DOWNLOAD APPLICATION:**

- phone
- table



# ANNOUNCEMENTS

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- **OCGA**
- **SPA**

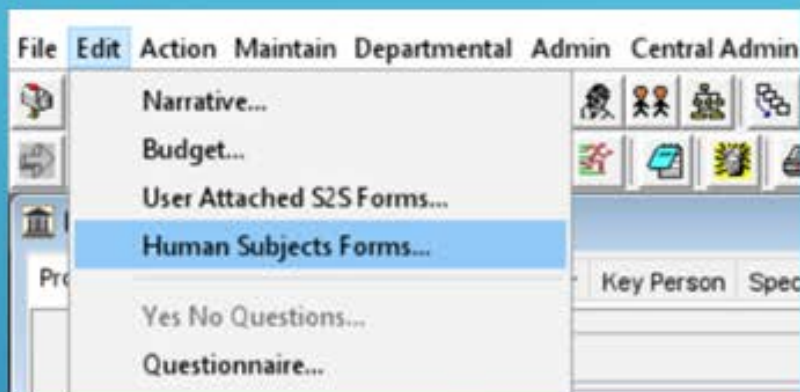






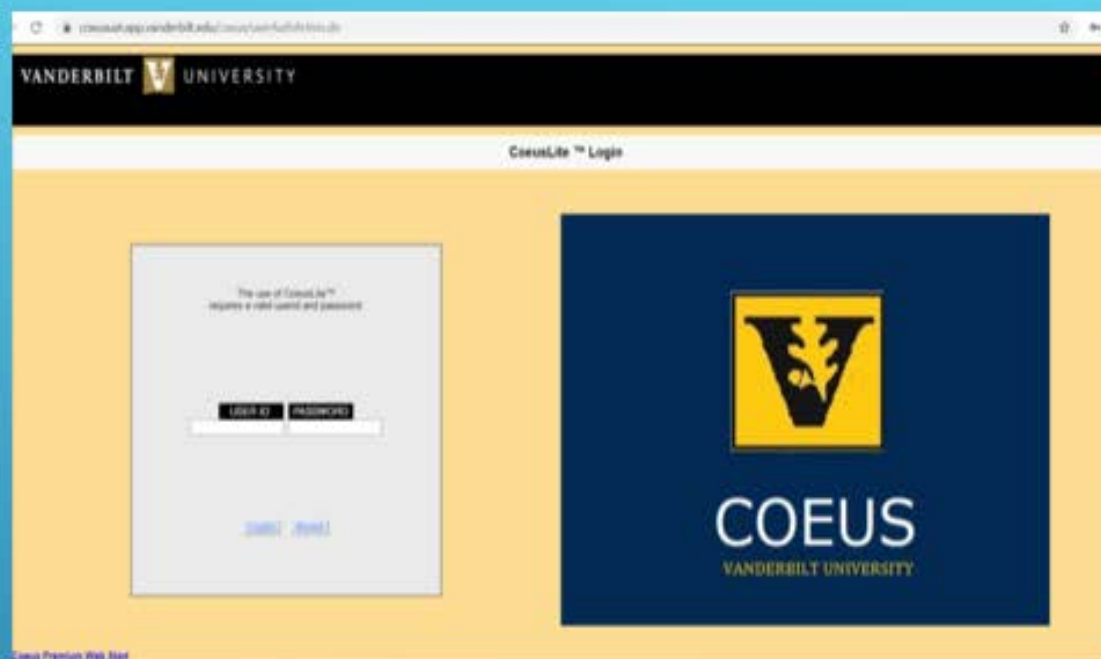
# COEUS FORMS E UPDATE

# COEUS PREMIUM



Go to the main proposal development screen.

- Click on **Edit**.
- Then select **Human Subjects Forms**.



Coeus Life will open in your default web browser. Enter your User ID and password.



Proposal Summary	Investigator: Rhoden Bethany Andrews Agency/Sponsor: 000772 - National Institutes of Health/Unknown Title: TEST for new forms - 3 Lead Unit: 120030 - Physics And Astronomy Last Updated: 2020-03-10 12:51:18.0 by DeTuflo,John Louis
General Info	Proposal #: U0049246 (In Progress) Proposal Period: 01/01/2021 - 12/31/2024
Organization	
Investigators/Key Persons	
Credit Split	
Special Review	
Abstract	
Science Code	
Others	
YNQ	
Proposal Roles	
Questionnaire	
Questionnaire for all proposals	
Grants.Gov	
User Attached S2S Forms	
Human Subjects and Clinical Trials >>	
Budget	
Upload Attachments	
Submit for Approval	
Print	
Delete Proposal	
Copy Proposal	
Email	
Add New Rolodex Entry	

PHS Human Subjects and Clinical Trials Information

Please add Human Subjects on the Special Review tab and identify the appropriate approval status and exemption.

The following items are taken from the special Review tab and displayed here for your reference. Any changes to these fields must be made on the Special Review tab and may impact the data items you are required to complete on this form.

Are Human Subjects Involved?  Yes  No

Is the Project Exempt from Federal regulations?  Yes  No

Exemption number:  1  2  3  4  5  6  7  8

If Yes to Human Subjects

You must add at least 1 of the following:

- A Human Subjects Study record for each proposed Human Subject Study by adding the description, choosing the file, and clicking the 'Add' button.
- A Delayed Onset Study in the Delayed Studies section(s) by adding the study title, choosing the file, and clicking the 'Add' button.

*Delayed onset studies are those for which there is no well-defined plan for human subject involvement at the time of submission, per agency policies on delayed onset studies. For delayed onset studies, you will provide the study name and a justification for omission of the human subject study information.*

Human Subject Study Record(s) [click here to extract Human Subject Study Record Attachment](#)

Description:

File:  No file chosen

Delayed Onset Study(ies)

Study Title:

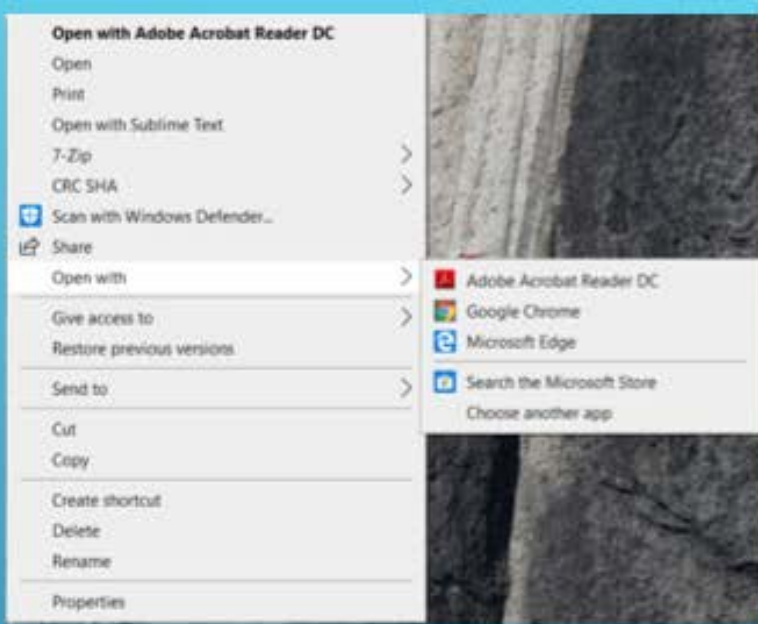
Anticipated Clinical Trial?

Justification:  No file chosen

Other Requested Information

File:  No file chosen

The **Human subjects and Clinical Trials** tab will open. You can download the form by clicking the button highlighted or by going to: [https://www.vanderbilt.edu/sponsoredprograms/docs/HumanSubjectStudy\\_V1.0.pdf](https://www.vanderbilt.edu/sponsoredprograms/docs/HumanSubjectStudy_V1.0.pdf)



To open this as a fillable PDF you can right click on it, go to **Open with**, then select open **Adobe Acrobat Reader DC**

SubjectStudy\_V13.0.pdf - Adobe Acrobat Reader DC

View Window Help

Tools HumanSubjectStud... x

Check Form for Errors Save

### Study Record: PHS Human Subjects and Clinical Trials Information

OMB Number: 0925-0001  
Expiration Date: 03/31/2020

\* Always required field

#### Section 1 - Basic Information

1.1. \* Study Title (each study title must be unique)

1.2. \* Is this Study Exempt from Federal Regulations?  Yes  No

1.3. Exemption Number  1  2  3  4  5  6  7  8

1.4. \* Clinical Trial Questionnaire

If the answers to all four questions below are yes, this study meets the definition of a Clinical Trial.

1.4.a. Does the study involve human participants?  Yes  No

1.4.b. Are the participants prospectively assigned to an intervention?  Yes  No

1.4.c. Is the study designed to evaluate the effect of the intervention on the participants?  Yes  No

1.4.d. Is the effect that will be evaluated a health-related, biomedical, or behavioral outcome?  Yes  No

1.5. Provide the ClinicalTrials.gov Identifier (e.g., NCT87654321) for this trial, if applicable



**Proposal Summary**

- ✓ General Info
- ✓ Organization
- ✓ Investigators/Key Persons
- ✓ Credit Split
- ✓ Special Review
- Abstract
- Science Code
- ✓ Others
- YNG
- ✓ Proposal Roles

**Questionnaire**

- ✓ Questionnaire for all proposals

Grants.Gov

User Attached 525 Forms

Human Subjects and Clinical Trials >>

Budget

✓ Upload Attachments

Submit for Approval

Print

Delete Proposal

Copy Proposal

Email

Add New Rolodex Entry

Investigator: Rhoden, Bethany Andrews  
 Agency Sponsor: 000772 - National Institutes of Health/Unknown  
 Title: TEST for new forms - 3  
 Lead Unit: 120630 - Physics And Astronomy  
 Last Updated: 2020-03-10 12:51:18.0 by DeTullo, John Louis

Proposal #: J0045246 (In Progress)  
 Proposal Period: 01/01/2021 - 12/31/2024

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Human Subject Study Record(s) [click here to extract Human Subject Study Record Attachment](#)

Description:

File:  HumanSubjec...y\_V1.0.pdf

Delayed Onset Study(ies)

Study Title:

Anticipated Clinical Trial?

Justification:  No file chosen

Other Requested Information

File:  No file chosen

To upload the PDF you click on **Choose File**. After you see the correct PDF name appear click **Add**. The **description** section is optional. Make sure to **Save** your work as you go.



# COEUS LITE



**Sponsored Programs**

**For COEUS & PEER help**

- 1) submit your request via email to coeus@vanderbilt.edu for COEUS requests or to peer@vanderbilt.edu for PEER requests
- 2) submit your COEUS or PEER request using the Action Request menu in PEER
- 3) submit your COEUS or PEER request using the help menu in PEER

### COEUS Resources

COEUS Overview

Coeus is a cradle-to-grave research administration tool to facilitate proposal development, award management and system-to-system electronic submissions. The comprehensive system centralizes information making it more efficient to prepare and manage proposals, which includes routing them internally to obtain proper approvals and submitting them to sponsors electronically.

COEUS TOOLS

- [Launching COEUS](#)
- [Launching COEUS Lite](#)
- [A Coeus 6.0 and PEER After The Split PowerPoint Presentation](#)
- [Log into PEER to log a COEUS Proposal](#)

### QUICKEST LINKS

- Home
- COEUS
- PEER
- Forms Library
- 3021 NCI/CAO website
- SPA Fact Sheet

### QUICK LINKS

- News
- Types of Agreements @ VU



VANDERBILT UNIVERSITY

CoeusLite™ Login

The use of CoeusLite™ requires a valid login and password.

USER ID:  PASSWORD:

[Login](#) [Reset](#)



**COEUS**  
VANDERBILT UNIVERSITY

[Coeus Premium Web Site](#)

© 2008, MIT CoeusLite Version 6.2

You can access Coeus Lite by going to the SPA website and Click **Launching COEUS lite** (<https://www.vanderbilt.edu/sponsoredprograms/coeusatvu.php>)

Or you can go to <https://coeus.app.vanderbilt.edu/coeus/userAuthAction.do>

VANDERBILT UNIVERSITY COEUSLITE™ User: DelTufio,John Louis

Coeus Home My Proposals My Awards Inbox Current Locks Logout

Coeus Life  
Grants.gov

### Welcome to CoeusLite

**Primary Features of Coeus Lite include:**

**My Protocols** - Allows Principal Investigators to prepare and submit protocol applications and review detailed information associated with their existing protocols.

**My Proposals** - Allows Users to view and prepare grant applications and route their applications for Institutional Approval. Institution Administrators can see and approve grant applications. Institute Approvers can view, approve, or reject proposals for correction. OSP Authorized Administrators can submit applications to Grants.gov.

**COI Disclosure** - Allows Individuals to provide data and required updates on entities in which they hold interest.

**Inbox** - List of Resolved and Unresolved messages from Coeus application with active links to Coeus Lite proposals listed by title and number.

Change Password

Coeus Mission  
To create, maintain and support the most robust electronic solution to manage all components of sponsored projects from proposal development through award closeout while fostering best practices by joining innovative technology with the knowledge base of a national consortium of research stakeholders.

Coeus Premium  
Launch Coeus Premium

On the Coeus Lite Home Click My Proposals.

VANDERBILT UNIVERSITY COEUSLITE™ User: DelTufio,John Louis

Coeus Home My Proposals My Awards Inbox Current Locks Logout

All Proposals | Proposals In Progress | Create New Proposal | Proposal Search | Grants.gov Opportunity Search

List of Proposals In Progress

Proposal Number	Status	Title	Lead Unit	PI	Budget
U0049247	In Progress	test	000001	Roy,Roshin	Budget
U0049230	In Progress	Learning the Visual and cognitive bases of lung nodule...	000001	Tong, Frank	Budget

On the My Proposals tab you can select the appropriate Proposal from the list or Search for the proposal by selecting Proposal Search located just below the Inbox button.

proposalSearch - Google Chrome

coeusuat.app.vanderbilt.edu/coeus//generalProposalSearch.do?type=proposalSearch&search=true&searchNam...

Please enter search criteria of the form "value" or "value or value" in any of search fields.

Proposal Number: <input type="text" value="U0049247"/>	Proposal Type: <input type="text"/>
Status: <input type="text"/>	Deadline Date: <input type="text"/>
Investigator: <input type="text"/>	Unit Number: <input type="text"/>
Unit Name: <input type="text"/>	Title: <input type="text"/>
Sponsor Code: <input type="text"/>	Sponsor Name: <input type="text"/>
Center: <input type="text"/>	Opp ID: <input type="text"/>
Program Title: <input type="text"/>	

Coeus Lite proposal search



Proposal Summary
✓ General Info >>
✓ Organization
✓ Investigators/Key Persons
✓ Credit Split
✓ Special Review
Abstract
Science Code
✓ Others
YNO
✓ Proposal Roles
Questionnaire
Questionnaire for all proposals
✓ Grants.Gov
Use Attached SPS Forms
<b>Human Subjects and Clinical Trials</b>
Budget
Upload Attachments
Submit for Approval
Print
Delete Proposal
Copy Proposal
Email
Add New Rolodex Entry

Investigator: Roy Roshin      Proposal #: U0049247 (In Progress)

Agency/Sponsor: 000018 : Administration For Children and Families      Proposal Period: 03/10/2020 - 03/30/2020

Title: test

Lead Unit: 000001 : Vanderbilt University

Last Updated: 2020-03-11 00:19:23.0 by Roy Roshin

GRANTS.GOV™

General Proposal Information      Budget: ✖      Narrative: ||

**\*Indicates Mandatory Fields**

\*Proposal Type: New      \*Activity Type: Research

\*Start Date: 03/10/2020      \*End Date: 03/30/2020

Original Proposal Number:  Search      Award #:  Search

\*Agency/Sponsor: 000018 Search Administration For Children and Families

Prime Sponsor:  Search

Proposal Deadline Date:        Receipt  Postmarked

NSF Science Code:  Please Select

Anticipated Award Type:  Please Select

Sponsor Proposal No:

\*Title: test

Program Title: G.g. Training and NIH Ext-UAT FOA (R01-Clinical Trial Required-Infrastructure)

Proposal in Response:  Please Select      Sub Contract:

Funding Opportunity Number: PA-EI-R01      CFDA Number: 93.865

Agency Program Code:       Agency Div Code:

Agency Routing Identifier:       Previous Grants.gov Tracking ID:

Save

On the left-hand side you can select **Human Subjects and Clinical Trials**.



# PRINTING USING FORMS E

Grants Gov Submission Details

Proposal Number : U0049270  
Sponsor : 000772 : National Institutes of Health/Unknown

Opportunity Forms Submission Status

Form Name

Form Name	Mandatory	Inclu...	Availability
RR_SF_424_V2-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
Performance Site V2-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
RR_Other_Projects_V1-4	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
RR_Key_Person_Expanded_V2-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
RR_Budget_V1-4	<input type="checkbox"/>	<input type="checkbox"/>	Available
RR_SubAward_Budget_30_V1.4	<input type="checkbox"/>	<input type="checkbox"/>	Available
PHS398_Cover_Page_Supplement_V4-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
PHS398_Modular_Budget_V1-2	<input type="checkbox"/>	<input type="checkbox"/>	Available
PHS398_ResearchPlan_4_0-V4.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
PHS_HumanSubjects_And_ClinicalTrialsInf...	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
PHS_AssignmentRequestForm_2_0-V2.0	<input type="checkbox"/>	<input type="checkbox"/>	Not Available

The Form PHS HumanSubjects And ClinicalTrialsInf V1-2 is not available for printing.

OK

Select Opportunity:  
Delete Opportunity:  
Validate  
Submit  
Refresh  
Save  
Print  
Close

Printing is not enabled for the human subjects' forms. If you select This and try to print you will receive the following error.

Grants Gov Submission Details

Proposal Number : U0049270  
Sponsor : 000772 : National Institutes of Health/Unknown

Opportunity Forms Submission Status

Form Name	Mandatory	Inclu...	Availability
RR_SF_424_V2-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
Performance Site V2-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
RR_Other_Projects_V1-4	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
RR_Key_Person_Expanded_V2-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
RR_Budget_V1-4	<input type="checkbox"/>	<input type="checkbox"/>	Available
RR_SubAward_Budget_30_V1.4	<input type="checkbox"/>	<input type="checkbox"/>	Available
PHS398_Cover_Page_Supplement_V4-0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
PHS398_Modular_Budget_V1-2	<input type="checkbox"/>	<input type="checkbox"/>	Available
PHS398_ResearchPlan_4_0-V4.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
PHS_HumanSubjects_And_ClinicalTrialsInf...	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Available
PHS_AssignmentRequestForm_2_0-V2.0	<input type="checkbox"/>	<input type="checkbox"/>	Not Available

Select Opportunity:  
Delete Opportunity:  
Validate  
Submit  
Refresh  
Save  
Print  
Close

You are still able to print the other Documents uploaded before submission except the Human subjects form.

**Questionnaire**

✓ Questionnaire for all proposals

---

Grants.Gov

User Attached S2S Forms

Human Subjects and Clinical Trials >>

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✓ Budget

✓ Upload Attachments

---

Submit for Approval

---

Print

Copy Proposal

Email

Add New Rolodex Entry

**If Yes to Human Subjects**

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Human Subject Study Record(s) [click here to extract Human Subject Study Record Attachment](#)

Description:

File:  No file chosen

List of Human Subject Study Records

FileName	PDF	XML			
HumanSubjectStudy_V1.0.pdf	✓	✓	<a href="#">View Form</a>	<a href="#">View XML</a>	<a href="#">Remove</a>

Delayed Onset Study(ies)

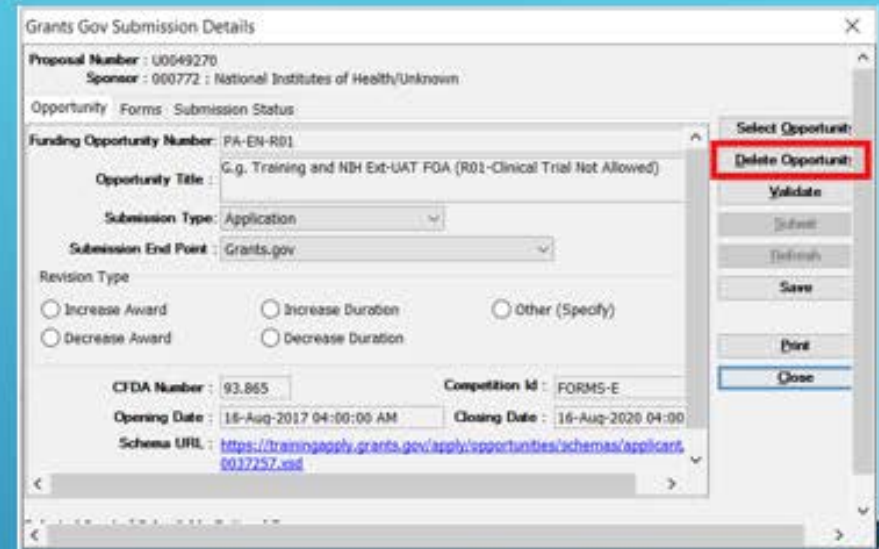
Study Title:

Anticipated Clinical Trail?

Justification:  No file chosen

If you would like to proofread the Human Subjects form before you submit it, you can do it through Coeus LITE. Click on **View Form** and it will download a copy of the PDF attached to the proposal.

# POTENTIAL ERRORS & SOLUTION



If you get this validation error. Delete the opportunity Number from the Grants Gov Submission Details page and then add it back in on the Main Proposal Page.





## OPEN OFFICE HOURS

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- Drop in & ask us questions!
- All SPA Teams represented

## Next SPA Office Hours


- May 20<sup>th</sup> at 11am
- via Zoom



## SUBCONTRACTS 101

- refresher on subcontracts
  - federal awards

# AWARDING AGENCIES

- Federal 
- State
- Foundation
- Non-profit

Federal **80%** 

## AWARDING AGENCIES FEDERAL

- Department of Defense (DOD) **5%**
- Department of Education (ED) **5%**
- Department of Energy (DOE) **2%**
- National Aeronautics & Space Administration (NASA) **2%**
- National Institute of Health (NIH) **53%**
- National Science Foundation (NSF) **8%**
- Other Federal **5%**



# SUBRECIPIENT TYPES

## FDP VS. NON-FDP

### What is the Federal Demonstration Partnership (FDP)?

- **WHO:** a cooperative initiative among 10 federal agencies & 154 institutional recipients of federal funds
- **WHAT:** a public website & online system
- **WHY:** An effort to reduce administrative burden – to streamline the administration of federally sponsored research
- **Several initiatives:** FCOI Clearinghouse & FDP Expanded Clearinghouse
- **FCOI Compliant Entities**
  - **1283**
- **FDP-Expanded Clearinghouse** includes approximately:
  - **237** institutional members (e.g., VU & VUMC, Boston University, Cornell University, MIT, Penn State, Ohio State, Yale university)

### Why does it matter?

It makes the subawarding process quicker, easier and less risky.

# SUBRECIPIENT MONITORING OF SUBAWARDS

keeping an eye on things.

VU SPONSORED PROGRAMS ADMINISTRATION

2020

Office of the Vice Provost for Research

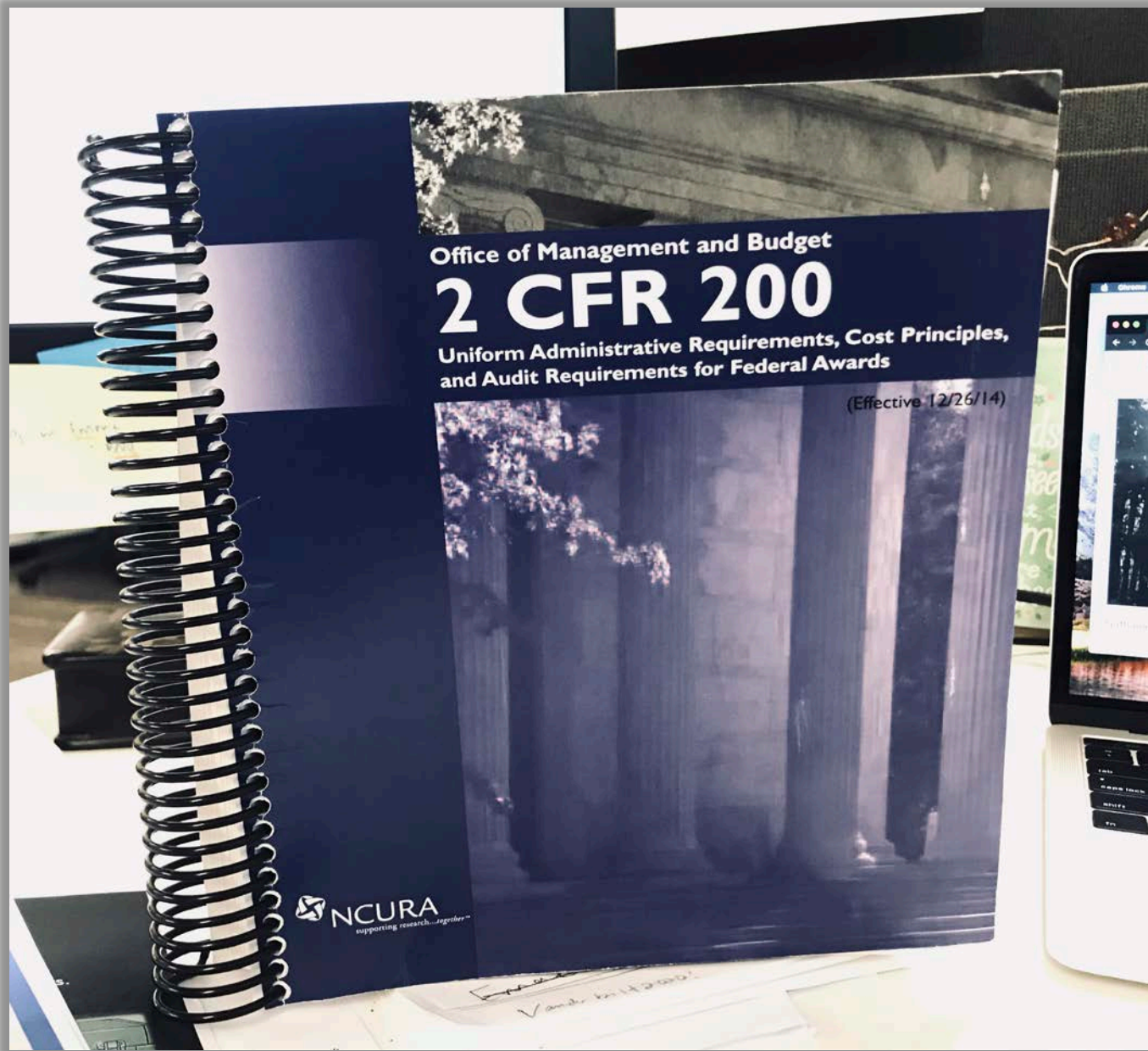
- Why do we monitor?
- What tools are used?
- What VU resources are used?
- What external resources are utilized?



## ROADMAP







## WHY DO WE MONITOR?

Keeping an eye on things.



### e-CFR Navigation Aids

Browse  
Simple Search

#### Advanced Search

- Boolean
- Proximity

Search History  
Search Tips  
Corrections  
Latest Updates  
User Info  
FAQs  
Agency List  
Income

Logo

The Code of Federal Regulations (CFR) annual edition is the codification of the general and permanent rules published in the FEDERAL REGISTER by the departments and agencies of the Federal Government produced by the Office of the Federal Register (OFR) and the Government Publishing Office.

## Electronic Code of Federal Regulations

e-CFR data is current as of **February 25, 2020**

[Title 2](#) → [Subtitle A](#) → [Chapter II](#) → [Part 200](#)

[Browse Part](#) [Browse Next](#)

[Title 2](#) [Grants and Agreements](#)

### PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND ALLOCATION REQUIREMENTS FOR FEDERAL AWARDS

Contents

#### Subpart A—Acquisition

##### ACRONYMS

- \$200.0 Acronyms.
- \$200.1 Definitions.
- \$200.2 Acquisition cost.
- \$200.3 Advance payment.
- \$200.4 Allocation.
- \$200.5 Audit finding.
- \$200.6 Auditee.
- \$200.7 Auditor.
- \$200.8 Budget.
- \$200.9 Central service cost allocation plan.
- \$200.10 Catalog of Federal Domestic Assistance (CFDA) number.
- \$200.11 CFDA program title.



WHY DO WE  
MONITOR?

Keeping an eye on things.



WHY?

HOW?

~~2 CFR 200.331~~  
Uniform Guidance  
~~2 CFR 200.330~~  
2 CFR 200.318 (c)(2)

SSCI  
RAQ  
CAT  
FDP Templates

Subrecipient Statement of Collaborative Intent (SSCI)  
Risk Assessment Questionnaire (RAQ)  
Continuing Assessment Tool (CAT)  
Federal Demonstration Partnership (FDP) Templates

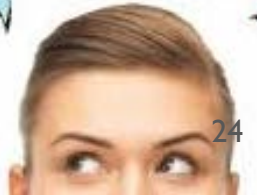






**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331**



## §200.331 Requirements for pass-through entities.

All pass-through entities must:

(a) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward. Required information includes:

(1) Federal Award Identification.

(i) Subrecipient name (which must match the name associated with its unique entity identifier);

(ii) Subrecipient's unique entity identifier;

(iii) Federal Award Identification Number (FAIN);

(iv) Federal Award Date (see §200.39 Federal award date) of award to the recipient by the Federal agency;

(v) Subaward Period of Performance Start and End Date;

(vi) Amount of Federal Funds Obligated by this action by the pass-through entity to the subrecipient;

(vii) Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current obligation;

(viii) Total Amount of the Federal Award committed to the subrecipient by the pass-through entity;

(ix) Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);

(x) Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity;

(xi) CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement;

(xii) Identification of whether the award is R&D; and

(xiii) Indirect cost rate for the Federal award (including if the de minimis rate is charged per §200.414 Indirect (F&A) costs).

(2) All requirements imposed by the pass-through entity on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award;

(3) Any additional requirements that the pass-through entity imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports;

(4) An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with this part), or a de minimis indirect cost rate as defined in §200.414 Indirect (F&A) costs, paragraph (f);

(5) A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part; and

(6) Appropriate terms and conditions concerning closeout of the subaward.

(b) Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as:

(1) The subrecipient's prior experience with the same or similar subawards;

(2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program;

(3) Whether the subrecipient has new personnel or new or substantially changed systems; and

(4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).

(c) Consider imposing specific subaward conditions upon a subrecipient if appropriate as described in §200.207 Specific conditions.

(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:

(1) Reviewing financial and performance reports required by the pass-through entity.

(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.

(3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by §200.521 Management decision.

(e) Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:

(1) Providing subrecipients with training and technical assistance on program-related matters; and

(2) Performing on-site reviews of the subrecipient's program operations;

(3) Arranging for agreed-upon-procedures engagements as described in §200.425 Audit services.

(f) Verify that every subrecipient is audited as required by Subpart F—Audit Requirements of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501 Audit requirements.

(g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

(h) Consider taking enforcement action against noncompliant subrecipients as described in §200.338 Remedies for noncompliance of this part and in program regulations.

SPA organizes

DEPT/PI & OCGA

OCGA

DEPT/PI & OCGA

2 CFR 200.331	a	b	c	d	e	f	g	h
SSCI	X	✓	X	↓	↓	↓	↓	↓
RAQ	X	✓	✓					
CAT	X	✓	✓					
FDP Template	✓	X	✓					

DEPT/PI

Discussion between SPA, DEPT/PI & OCGA





**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (a)**

**All pass-through entities must:**  
Ensure that every subaward is clearly identified to the subrecipient  
as a subaward  
&  
Includes the following information at the time of the subaward...



## § 200.331 Requirements for pass-through entities.

All pass-through entities must:

(a) Ensure that every subaward is clearly identified to the subrecipient as

(a) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward. Required information includes:

Breaking Down  
200.331 (a)



SSCI

RAQ

CAT

FDP Templates



# FDP Templates

✓ (1) Federal Award Identification

✓ **Facepage, Attachments 2, 3B pages 1 & 2, 5 and 6**

✓ (2) All requirements imposed by the pass-through entity **on the subrecipient** so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award

✓ **Facepage, Attachments 1, 2 and 4**

✓ (3) Any additional requirements that the pass-through entity imposes on the subrecipient in order for the passthrough entity to meet its own (**VANDERBILT's**) responsibility to the Federal awarding agency including identification of any required financial and performance reports

- **Facepage**
- **Attachment 2** - Federal Award Terms and Conditions
  - Includes “Additional Terms” section
- **Attachment 4** - Reporting and Prior Approval Terms
  - Includes “Additional Technical and Reporting Requirements” section

✓ (6) **Appropriate terms and conditions concerning closeout of the subaward.**

**Facepage and Attachment 2 - Reporting and Prior Approval Terms**

(4) An approved **federally recognized indirect cost rate negotiated between the subrecipient and the Federal government** or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with this part), or a de minimis indirect cost rate as defined in § 200.414 Indirect (F&A) costs, paragraph (b) of this part.

✓ SSCI

Part II, Certifications, Item #1

1. **Facilities & Administrative Rates** included in this proposal have been calculated based on the following:
- Our federally negotiated F&A rate for this type of work. Our negotiated rate agreement is provided.
  - No federal negotiated rate and we hereby agree to accept the 10% de minimis MTDC rate as a subrecipient.
  - A reduced F&A rate dictated by the prime sponsor that we hereby agree to accept. Rate:  Base:
  - Not applicable (no indirect cost are requested). If checked, please specify rationale in Comment Section below.
  - Indirect costs are not separately requested as costs are fully burdened.

✓ RAQ

Item #18

18. Does the Subrecipient have a Negotiated IDC Rate Agreement?  
<click to select>

✓ CAT

Item # 10 (if foreign or for-profit subrecipient considerations)

10 Has subrecipient's overhead or other rates changed materially?

✓ FDP Templates

(5) A requirement that the **subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary** for the passthrough entity to meet the requirements of this section, §§ 200.300 Statutory and national policy requirements through 200.309 Period of performance, and Subpart F—Audit Requirements of this part; and



## SSCI

### Part II, Audit Status, Item #1

1. Was the subrecipient required to conduct an annual audit in accordance with the *Single Audit Act or Uniform Guidance Subpart F, Audit Requirements* for the most recent Audit year? \*YES  NO 
  - a) Was an audit in accordance with the *Single Audit Act* completed for the most recent fiscal year? Yes  No
  - b) Were there any audit findings reported?.... Yes  No  *If Yes, please clarify in the comments below.*

\* If YES is checked, a complete copy of subrecipient's most recent audit report, or the Internet URL link to a complete copy, must be furnished to VU before a subaward will be issued. URL:

If NO audit was completed OR If Subrecipient is NOT subject to the Single Audit Act or Uniform Guidance, additional methods may be required to assess compliance.



## RAQ

### RAQ: Item # 19

19. Were the results of the most recent Single audit (or similar) satisfactory?  
<click to select>

(5) A requirement that the **subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary** for the passthrough entity to meet the requirements of this section, §§ 200.300 Statutory and national policy requirements through 200.309 Period of performance, and Subpart F—Audit Requirements of this part; and

# ✓ CAT

Items # 2, 3, 4, 9, & 11

(if foreign or for-profit subrecipient considerations)

2 Does the Subrecipient show "delinquent federal debt" or other problems in SAM or other federal sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 Are there concerns with respect to single audit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4 Have any concerns been raised through monitoring, e.g. review of financial or performance reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9 Did the Subrecipient have required corrective action(s) that resulted from monitoring or audits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	--------------------------

11 Have any financial concerns been identified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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# ✓ FDP Templates

Attachment 1 -

## Attachment 1 Certifications and Assurances

**Audit and Access to Records**  
Per 2 CFR 200.501- 200.521, Subrecipient certifies that it will provide notice of any adverse findings which impact this Subaward and will provide access to records as required by parts 2 CFR 200.336, 200.337, and 200.201 as applicable. If Subrecipient is not subject to the Single Audit Act, then Subrecipient will provide notice of the completion of any required audits and provide access to such audits upon request.





**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (b)**

**All pass-through entities must:**  
**Evaluate** each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as: ...



## § 200.331 Requirements for pass-through entities.

All pass-through entities must:

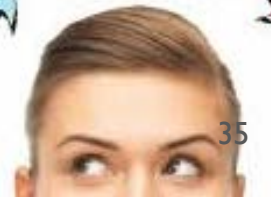
(a) Ensure that every subaward is clearly identified to the subrecipient as

(6) Appropriate terms and conditions concerning closeout of the subaward.

(b) Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as:

(1) The subrecipient's prior experi-

Breaking Down  
200.331 (b)



SSCI



RAQ



CAT



FDP Templates



2 CFR 200.331 (b)	1	2	3	4
SSCI	X	✓	X	✓
RAQ	✓	✓	?	✓
CAT	X	✓	X	✓
FDP Template	X	X	X	X

# SSCI

- (1) The subrecipient's prior experience with the same or similar subawards
  
- (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program
  
- (3) Whether the subrecipient has new personnel or new or substantially changed systems
  
- (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)



# SSCI

(1) The subrecipient's prior experience with the same or similar subawards



(2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program

## Part II, Audit Status, Item I

1. Was the subrecipient required to conduct an annual audit in accordance with the *Single Audit Act* or *Uniform Guidance Subpart F, Audit Requirements* for the most recent Audit year? \*YES  NO

a) Was an audit in accordance with the *Single Audit Act* completed for the most recent fiscal year? Yes  No

b) Were there any audit findings reported?.... Yes  No  *If Yes*, please clarify in the comments below.

\* *If YES* is checked, a complete copy of subrecipient's most recent audit report, or the Internet URL link to a complete copy, must be furnished to VU before a subaward will be issued. URL: \_\_\_\_\_

If NO audit was completed OR If Subrecipient is NOT subject to the *Single Audit Act* or *Uniform Guidance*, additional methods may be required to assess compliance.

(3) Whether the subrecipient has new personnel or new or substantially changed systems



(4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)

## Part II, Subrecipient Institutional Information, Item I

1. Is subrecipient currently registered in Central Contractor Registration via SAM? ([www.sam.gov](http://www.sam.gov)) YES  NO

*If NO, organization must have a DUNS #.*

2. DUNS #:  3. EIN #:

3. The year in which the current iteration of this Institution was established?

# RAQ

- (1) The subrecipient's prior experience with the same or similar subawards
  
- (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program
  
- (3) Whether the subrecipient has new personnel or new or substantially changed systems
  
- (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)

# RAQ

✓ (1) The subrecipient's prior experience with the same or similar subawards

## Item #14

14. Does the Subrecipient have adequate experience receiving same or similar federal awards?

- Using NIH REPORTER, USA Spending.gov, Sub's website, VU internal systems

✓ (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program

## Item #19

19. Were the results of the most recent Single audit (or similar) satisfactory?  
<click to select>

? (3) Whether the subrecipient has new personnel or new or substantially changed systems

● Items # 5, 6 – sort of addresses...

5. Does the Subrecipient have an acceptable accounting system?  
6. Does the Subrecipient have an acceptable procurement system?

✓ (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)

Items # 1, 2, 4, 7, 8, 15

DUNS	
1. Is the Subrecipient Institution presently debarred or suspended?	<input type="checkbox"/> <input type="checkbox"/>
2. Is the Subrecipient Institution's PI presently debarred or suspended?	<input type="checkbox"/> <input type="checkbox"/>
4. If required by the sponsor, does the Subrecipient have a compliant conflict of interest policy?	<input type="checkbox"/> <input type="checkbox"/>
7. If required, has the Subrecipient completed audit under A-133 or Uniform Guidance for the most recent fiscal year?	<input type="checkbox"/> <input type="checkbox"/>
8. Has there been a PTE-issued management decision on audit findings that may affect this award?	<input type="checkbox"/> <input type="checkbox"/>
15. Have other risks been identified? If yes, explain in Notes below.	<input type="checkbox"/> <input type="checkbox"/>

# CAT

- (1) The subrecipient's prior experience with the same or similar subawards
  
- (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program
  
- (3) Whether the subrecipient has new personnel or new or substantially changed systems
  
- (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)



# CAT

(1) The subrecipient's prior experience with the same or similar subawards



(2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program

## Item #3

3 Are there concerns with respect to single audit?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

(3) Whether the subrecipient has new personnel or new or substantially changed systems



(4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)

## Items #1, 2, 3, 4

1 Is either the Subrecipient Institution or its PI presently debarred or suspended?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

2 Does the Subrecipient show "delinquent federal debt" or other problems in SAM or other federal sources?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

3 Are there concerns with respect to single audit?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

4 Have any concerns been raised through monitoring, e.g. review of financial or performance reports?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

# FDP Templates

- (1) The subrecipient's prior experience with the same or similar subawards
  
- (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program
  
- (3) Whether the subrecipient has new personnel or new or substantially changed systems
  
- (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)

# FDP Templates

(1) The subrecipient's prior experience with the same or similar subawards



(2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program



(3) Whether the subrecipient has new personnel or new or substantially changed systems



(4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)





**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (c)**

**All pass-through entities must:**  
Consider imposing specific subaward conditions upon a subrecipient if appropriate as described in §200.207 Specific conditions.





SSCI



RAQ



CAT



FDP Templates



(c) Consider imposing specific subaward conditions upon a subrecipient if appropriate as described in [§ 200.207 Specific conditions](#)

**\*\*if high risk read § 200.207 before talking with DEPT/PI**

(c) Consider imposing specific subaward conditions upon a subrecipient if appropriate as described in § 200.207 Specific conditions

**\*\*if high risk read § 200.207 before talking with DEPT/PI**

## RAQ

Consider Items # 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 14, 15

## CAT

Consider Items # 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11

## FDP Templates

Attachment 2: Federal Award Terms and Conditions (Additional Terms section)

Attachment 4: Reporting and Prior Approval Terms (Additional Technical and Reporting Requirements section)



**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (d)**

**All pass-through entities must:**  
Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:



(d) **Monitor the activities of the subrecipient as necessary** to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:

## **DEPT/PI & OCGA**

- (1) **Reviewing** financial and programmatic reports required by the pass-through entity.
- (2) **Following-up** and **ensuring** that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the passthrough entity detected through audits, on-site reviews, and other means.
- (3) **Issuing a management decision** for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by **§ 200.521 Management decision.**

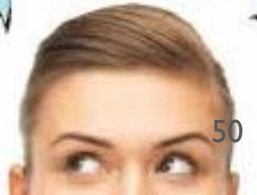




**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (e)**

**All pass-through entities must:**  
Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:



(e) **Depending upon the pass-through entity's assessment of risk posed by the subrecipient** (as described in paragraph (b) of this section), the **following monitoring tools may be useful** for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:

## **DEPT/PI – SPA – OCGA**

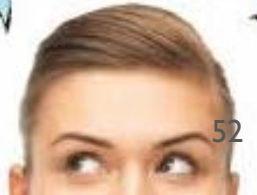
- (1) **Providing subrecipients** with training and technical assistance on program-related matters; and
- (2) **Performing** on-site reviews of the subrecipient's program operations;
- (3) **Arranging** for agreed-upon-procedures engagements as described in §200.425 Audit services.



**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (f)**

**All pass-through entities must:**  
Verify that every subrecipient is audited as required by Subpart F— Audit Requirements of this part when it is expected that the subrecipient’s Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501 Audit requirements.



(f) **Verify that every subrecipient is audited as required by Subpart F— Audit Requirements** of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in § 200.501 Audit requirements.

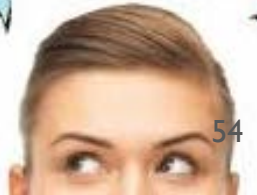
**OCGA**



**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (g)**

**All pass-through entities must:**  
Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.





(g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

## **DEPT/PI – OCGA – SPA**

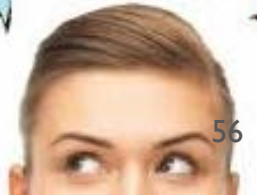
### Discussion



**2 CFR 200.331**  
2 CFR 200.330  
2 CFR 200.318 (c)(2)

**Breaking Down  
200.331 (h)**

**All pass-through entities must:**  
Consider taking enforcement action against noncompliant subrecipients as described in §200.338 Remedies for noncompliance of this part and in program regulations.



(h) Consider taking enforcement action against noncompliant subrecipients as described in § 200.338 Remedies for noncompliance of this part and in program regulations.

**DEPT/PI – OCGA – SPA ...**

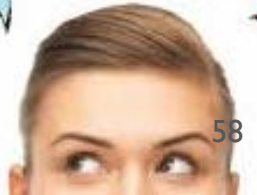
Discussion amongst all parties



2 CFR 200.331  
**2 CFR 200.330**  
2 CFR 200.318 (c)(2)

Breaking  
Down 200.330

**Subrecipient and contractor determinations**



## §200.330 Subrecipient and contractor determinations.

The non-Federal entity may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities. **Therefore, a pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor.** The Federal awarding agency may supply and require recipients to comply with additional guidance to support these determinations provided such guidance does not conflict with this section.

**(a) Subrecipients.** A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. See §200.92 Subaward. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- (1) Determines who is eligible to receive what Federal assistance;
- (2) Has its performance measured in relation to whether objectives of a Federal program were met;
- (3) Has responsibility for programmatic decision making;
- (4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- (5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

**(b) Contractors.** A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. See §200.22 Contract. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:

- (1) Provides the goods and services within normal business operations;
- (2) Provides similar goods or services to many different purchasers;
- (3) Normally operates in a competitive environment;
- (4) Provides goods or services that are ancillary to the operation of the Federal program; and
- (5) Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

**(c) Use of judgment in making determination.** In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

**(c) Use of judgment in making determination.** In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.



SSCI



RAQ



CAT



FDP Templates



### Part III, Subrecipient vs Contractor Determination

#### Part III: Vanderbilt University DEPARTMENT COMPLETES - REQUIRED

##### SUBRECIPIENT VS. CONTRACTOR DETERMINATION

The Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly called "Uniform Guidance") requires that a pass through entity must make a case-by-case determination whether each agreement it makes with another entity is a subrecipient or a contractor.

- This is a significant decision because it determines the allocation of responsibilities to the other entity and influences the appropriate application of Vanderbilt University's F&A rates.
- In the case of a subagreement, it is incumbent upon the prime recipient (Vanderbilt University) to ensure that subrecipients conduct their portions of research projects in compliance with all applicable terms and conditions of awards and subawards and that project costs incurred by subrecipients are reasonable and allowable.
- Agreements with contractors (vendors) for the purchase of services, however, typically do not bind vendors to the full set of sponsor terms and conditions, and are subject to competitive bidding procurement practices, to assure that funds paid to vendors do not exceed fair market value.

Subagreements should have a detailed scope of work and a budget that specifies salary, fringe, supplies, and other direct costs, as well as appropriate F&A costs consistent with the subrecipient's indirect cost rate.

- Terms and conditions from a prime award are typically imposed on the subrecipient to the same degree that they are imposed on Vanderbilt University as the prime recipient.

Principal investigators and local grant administrators are responsible for seeking advice when determining whether an entity that will assist with research under a sponsored award represents a subrecipient or a vendor. Advice may be sought from SPA. For assistance, refer to checklist, click [here](#).

I have reviewed the information on subrecipients and contracts, and I have determined that for the purposes of this proposal, this organization should be categorized as a subrecipient.

##### PLEASE SIGN AND DATE:

PI or PI-designee NAME (PRINT): \_\_\_\_\_

PI or PI-designee SIGNATURE: \_\_\_\_\_

DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_

## Part III, Subrecipient VS. Contractor Determination

### Part III: Vanderbilt University DEPARTMENT COMPLETES - REQUIRED

#### SUBRECIPIENT VS. CONTRACTOR DETERMINATION

The Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly called "Uniform Guidance") requires that a pass through entity must make a case-by-case determination whether each agreement it makes with another entity is a subrecipient or a contractor.

- This is a significant decision because it determines the allocation of responsibilities to the other entity and influences the appropriate application of Vanderbilt University's F&A rates.
- In the case of a subagreement, it is incumbent upon the prime recipient (Vanderbilt University) to ensure that subrecipients conduct their portions of research projects in compliance with all applicable terms and conditions of awards and subawards and that project costs incurred by subrecipients are reasonable and allowable.
- Agreements with contractors (vendors) for the purchase of services, however, typically do not bind vendors to the full set of sponsor terms and conditions, and are subject to competitive bidding procurement practices, to assure that funds paid to vendors do not exceed fair market value.

Subagreements should have a detailed scope of work and a budget that specifies salary, fringe, supplies, and other direct costs, as well as appropriate F&A costs consistent with the subrecipient's indirect cost rate.

- Terms and conditions from a prime award are typically imposed on the subrecipient to the same degree that they are imposed on Vanderbilt University as the prime recipient.

*Principal investigators and local grant administrators* are responsible for seeking advice when determining whether an entity that will assist with research under a sponsored award represents a subrecipient or a vendor. Advice may be sought from SPA. For assistance, refer to checklist, click [here](#).

**I have reviewed the information on subrecipients and contracts, and I have determined that for the purposes of this proposal, this organization should be categorized as a subrecipient.**

**PLEASE SIGN AND DATE:**

PI or PI-designee NAME (PRINT): \_\_\_\_\_

PI or PI-designee SIGNATURE: \_\_\_\_\_

- PAGE 5 of the paper SSCI (see Part III)
- PART 2 of the REDCap Version



2 CFR 200.331  
2 CFR 200.330  
**2 CFR 200.318 (c)(2)**

**Breaking Down  
200.318 (c)(2)**

**Conflict of Interest**



## § 200.318 General procurement standards.

(2) If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is un-

able or appears to be unable to be impartial in conducting a procurement action involving a related organization.

Breaking Down  
200.318 (c)(2)

SSCI



RAQ



CAT



FDP Templates





## SSCI

### Part II, Certifications, Item #3

3. **CONFLICT OF INTEREST**
- (A) Financial Conflict of Interest – National Science Foundation (NSF)**  
Applicable to projects funded by NSF, including NSF flow-through or any sponsor following NSF’s COI Policy.
- Not applicable because this project is not being funded by NSF or any other sponsor following NSF’s COI Policy.
  - Subrecipient organization/institution hereby certifies that it has an active and enforced policy on Conflict of Interest consistent with the provision of NSF Award & Administration Guide Chapter IV.A.
- (B) Financial Conflict of Interest – Public Health Service (PHS)**  
Applicable to projects funded by PHS/NIH, or any sponsor following PHS.
- Not applicable because this project is not being funded by PHS/NIH or any other sponsor following the PHS FCOI Regulations.
  - Subrecipient organization/institution hereby certifies that it has an active and enforced policy on Conflict of Interest consistent with the provision of 42 CFR Part 50 Subpart F.
  - Subrecipient does NOT have an active and/or enforced Conflict of Interest policy and hereby agrees to abide by VU’s policy.  
To comply with VU’s policy as it pertains to PHS financial conflict of interests, please attach a completed PHS disclosure form.
- (C)**  Subrecipient does HAVE a policy on Conflict of Interest, but it is not consistent with NSF or PHS requirements. Please attach policy.

## RAQ

### Items # 4, 21

4. If required by the sponsor, does the Subrecipient have a compliant conflict of interest policy?

21. Does the Subrecipient Institution have experience with determining conflicts of interest (evidence of an acceptable COI Policy)?  
<click to select>

## FDP Templates

### Attachment 2: Federal Award Terms and Conditions in “Promoting Objectivity in Research (COI)”

# INTERNAL RESOURCES

- SSCI
  - PHS FCOI form
- RAQ
- CAT
- FDP Templates
- VU Systems

ANOTHER TOOL IN  
THE SPA TOOLKIT



# INTERNAL RESOURCES

## SSCI\*

### PAPER VERSION

VANDERBILT UNIVERSITY  
Sponsored Programs Administration  
Vers08.14.2018  
PAGE 1 of 5

**Subrecipient Statement of Collaborative Intent (SSCI)**

Dear Vanderbilt University Department-Research Administration:

We have revised the SSCI based on feedback from both VU Departments and the Subrecipient. In order to streamline our processes and abide by FDP guidelines, we have project-specific information, and Sam.gov individual exclusions for all potential participants on a page solely for non-FDP Expanded Clearinghouse participants (page 4), and Contractor determination section just for Department use (page 5).

VANDERBILT UNIVERSITY  
Sponsored Programs Administration  
Vers08.14.2018  
PAGE 3 of 5

**Subrecipient Statement of Collaborative Intent (SSCI)**

**Part I (PAGE 1): ALL subrecipients/subcontractors complete.**

**SUBRECIPIENT INFORMATION**

Legal Name: \_\_\_\_\_  
 Institution Type: Select one of the following:  
 Member of the FDP Expanded Clearinghouse?   
 Address: \_\_\_\_\_  
 Subrecipient PI: \_\_\_\_\_

Authorized Official Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Email: \_\_\_\_\_  
 Financial Contact Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Email: \_\_\_\_\_

Project Title: \_\_\_\_\_  
 Subrecipient Total Proposed Amount: \$ \_\_\_\_\_  
 Subrecipient Project Period: \_\_\_\_\_

ward proposal and covered by the certifications below:

**IF APPLICABLE:**  
 Required Cost-Sharing? AMOUNT: \$ \_\_\_\_\_  
 Voluntary Cost-Sharing? AMOUNT: \$ \_\_\_\_\_

Documentation of Subrecipient's approval(s) may be required

Pending Approval Date: \_\_\_\_\_  
 Pending Approval Date: \_\_\_\_\_  
 Pending Approval Date: \_\_\_\_\_

participating in this project, debarred, suspended or otherwise excluded from or ineligible for activities? YES  NO

VANDERBILT UNIVERSITY  
Sponsored Programs Administration  
Vers01.17.2019  
PAGE 4 of 5

**Subrecipient Statement of Collaborative Intent (SSCI)**

**Part II: Subrecipients/Subcontractors NOT participating in the FDP Clearinghouse Pilot complete.**

**CERTIFICATIONS**

1. **Facilities & Administrative Rates** included in this proposal have been calculated based on the following:  
 Our federally negotiated F&A rate for this type of work. Our negotiated rate agreement is provided.  
 No federal negotiated rate and we hereby agree to accept the 10% de minimis MTDC rate as a subrecipient.  
 A reduced F&A rate dictated by the prime sponsor that we hereby agree to accept. Rate: \_\_\_\_\_ Base: \_\_\_\_\_  
 Not applicable (no indirect cost are requested). If checked, please specify rationale in Comment Section below.  
 Indirect costs are not separately requested as costs are fully burdened.

2. **Fringe Benefit Rates** included in this proposal have been calculated based on the following:  
 Rates are consistent with our federally negotiated rates. Our negotiated rate agreement is attached.  
 Other rates (please specify in Comment Section below the basis on which the rate has been calculated).  
 Fringe Benefits are not separately requested as costs are fully burdened.

3. **CONFLICT OF INTEREST**

(A) **Financial Conflict of Interest – National Science Foundation (NSF)**  
 Applicable to projects funded by NSF, including NSF flow-through or any sponsor following NSF's COI Policy.  
 Not applicable because this project is not being funded by NSF or any other sponsor following NSF's COI Policy.  
 Subrecipient organization/institution hereby certifies that it has an active and enforced policy on Conflict of Interest consistent with the provision of NSF Award & Administration Guide Chapter IV.A.

(B) **Financial Conflict of Interest – Public Health Service (PHS)**  
 Applicable to projects funded by PHS/NIH, or any sponsor following PHS.  
 Not applicable because this project is not being funded by PHS/NIH or any other sponsor following the PHS FCOI Regulations.  
 Subrecipient organization/institution hereby certifies that it has an active and enforced policy on Conflict of Interest consistent with the provision of 42 CFR Part 50 Subpart F.  
 Subrecipient does NOT have an active and/or enforced Conflict of Interest policy and hereby agrees to abide by VU's policy.  
 To comply with VU's policy as it pertains to PHS financial conflict of interests, please attach a completed PHS disclosure form.

(C)  Subrecipient does HAVE a policy on Conflict of Interest, but it is not consistent with NSF or PHS requirements. Please attach policy.

4. **Ethics in Research Training**  
 Applicable to projects funded by NSF or any other programs requiring Ethics in Research Training.  
 Not applicable because this project is not being funded by NSF or any other programs requiring Ethics in Research Training.  
 Subrecipient organization/institution hereby certifies that it will ensure that all undergraduates, graduate students, and postdoctoral researchers who will be supported by this NSF proposal will be trained on the oversight in the responsible and ethical conduct of research.

AUDIT STATUS

### REDCap® VERSION

DEPT/PI Project specific INFO PART 1

Dear VU PI & Department:

Completing this REDCap survey will send the portion of the *Subrecipient Statement of Collaborative Intent (SSCI)* that your proposed Subrecipient must complete in order to be a VU Subawardee.

You are pre-populating information about your Project which will show up for the Subrecipient who is completing their portion of the SSCI in support of working on your Project.

Before you submit and the SSCI is sent to the Subrecipient to complete, you will have the option to complete the Subrecipient VS Contractor Determination yourself, or send it to another person to complete (via email).

If you have any technical questions, please contact Laurel Duncan Biquik @ [laurel.l.duncan@vanderbilt.edu](mailto:laurel.l.duncan@vanderbilt.edu).

Thank you, SPA

**Dear VU PI & Department:**

This REDCap survey will send the portion of the SSCI that your proposed Subrecipient needs to complete in order to be a VU Subawardee.

You are pre-populating information about your VU Project which will be visible to the Subrecipient who is completing the SSCI in support of working on the VU Project.

**For the last section:**  
 You have two (2) options to complete the Subrecipient VS Contractor Determination section of the SSCI:  
 (1) Complete it **yourself**  
 (2) Send it to the **PI** to complete

VU Contact Name completing survey: [Person Submitting] \_\_\_\_\_  
 \* must provide value

VU Contact Email Address: [this is the email address where the SSCI once completed by your Subrecipient will be sent so that you may submit it with your proposal.] \_\_\_\_\_  
 \* must provide value

\*Our internal method for collecting the information & data needed to assess risk to comply with Uniform Guidance (2 CFR §200).

# As part of completing the SSCI Subrecipient PHS Financial Disclosure & Training form


## SUBRECIPIENT MONITORING INTERNAL RESOURCES

### ANOTHER TOOL IN THE SPA TOOLKIT



#### Fun Fact

The Subrecipient PHS Financial Disclosure & Training form is located in the Forms Library of the SPA website.

  
 Sponsored Programs Administration  
**Subrecipient PHS Financial Disclosure & Training**

Please type your responses 1

**I. Investigator's Information- Please complete appropriate column**

For Subrecipients: Your organization has indicated it does not have an active and/or enforced policy on Conflict of Interest consistent with the provision of 42 CFR Part 50 Subpart F. Your organization agrees to abide by Vanderbilt University's policy as it pertain to PHS financial conflicts of interest. See Section E.2 of the [Vanderbilt University Conflict of Interest and Commitment Policy](#).

Subrecipient Investigator: \_\_\_\_\_  
 Subrecipient Institution: \_\_\_\_\_  
 Subrecipient Investigator's Email: \_\_\_\_\_

**II. Project Information**

Vanderbilt University Prime Award Principal Investigator: \_\_\_\_\_  
 Project Title: \_\_\_\_\_

**III. Subaward Investigator**

**1. Financial Interest Disclosure**

Do you, your spouse, child, stepchild, parent, sibling or domestic partner have/anticipate having any of the following significant financial interests **directly related to this project**:

- Total income or payment of services received over the past 12 months and/or equity interest in a publicly traded entity exceeding \$5,000 when aggregated
- Total income or payment of services received over the past 12 months from a non-publicly traded entity exceeding \$5,000
- Any equity interest in a non-publicly traded entity
- Any income from project related intellectual property rights and interests (e.g., patent, copyrights)
- Any travel reimbursement or travel expenses paid on your behalf in the past 12 months which were not funded by your organization and relate to your organizational responsibilities.
  - Yes  No
- Serve as an officer or director of a Business involved in the Research Project?
  - Yes  No
- Are an employee, consultant, advisor, or affiliate of a Business directly involved with activities pertaining to the Research Project?
  - Yes  No

**IV. Training**

Vanderbilt requires each Investigator to complete training regarding conflict of interest prior to engaging in research related to any PHS-compliant award. Please see the [Financial Conflict of Interest Training](#) for training completion. Key components of the training are outlined below:

**Who is considered an "Investigator," and therefore required to disclose?** "Investigator" means the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research including sponsored research or proposed sponsored research.

**When do I need to disclose Significant Financial Interests?** 1.) At the time of proposal submission; 2.) Within thirty days of discovering or acquiring any new Significant Financial Interest; 3.) At least annually throughout the period of the award; 4.) Before joining an on-going PHS-funded research project, new Investigators must also complete a disclosure of Significant Financial Interests.

**Significant Financial Interest:** a Financial Interest consisting of one or more of the following interests of the Member of the University Community (and those of the Member of the University Community's Family):  
 (1) With regard to any publicly traded entity, a Significant Financial Interest exists if the value of any payments or any remuneration received from the publicly traded entity received in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceed \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary, received from the publicly traded entity (e.g. consulting fees,

Vanderbilt University PHS FCOI-October' 2017

  
 Sponsored Programs Administration  
**Subrecipient PHS Financial Disclosure & Training**

2

equity interest includes any stock, stock option, or other ownership interest, as determined through her reasonable measures of market value.

publicly traded entities, a Significant Financial Interest exists if the value of any payments or any non-publicly traded entity in the twelve months preceding the disclosure, when aggregated, exceed of the University Community (or the Member of the University Community's Family) holds any amount stock option, or other ownership interest). For purposes of this definition, remuneration includes services not otherwise identified as salary received from the non-publicly traded entity (e.g. consulting fees) and interests not paid by Vanderbilt (e.g., patents, copyrights), upon receipt of income related to such

**Interests evaluated?**

Disclosures are reviewed in accordance with Vanderbilt University's policy. At the just-in-time stage of Conflict of Interest (COI) staff may contact Investigators who have disclosed any significant financial interest additional information.

The Office of Conflict of Interest and Commitment Management determines whether the disclosed interest represents a financial conflict of interest and if so, whether any management strategies should mitigate the potential for the conflicting financial interests to compromise the objectivity in which the interest is conducted or reported. **NOTE: If Vanderbilt University determines that a conflict of interest exists by Vanderbilt, Vanderbilt will not be able to issue a subaward or may terminate any existing**

**COI:**

Conflict of Interest in Research to include instances in which:  
 the contract, grant, clinical trial, or other research project or collaboration ("Research Project") pertains to the University and a Business or Intellectual Property in which the Member of the University has a Significant Financial Interest, OR  
 the research or Research Project could reasonably be expected to affect the Significant Financial Interest of the University Community or to affect a Business or Intellectual Property in which the Member of the University has a Significant Financial Interest, OR  
 the Member of the University Community or a Family Member is, whether or not compensated, an (i) officer or director of the research or Research Project, or an (ii) employee, consultant, faculty member (or similar position) for the Business or otherwise affiliated with the Business and directly involved with activities of the research or Research Project, if a Significant Financial Interest is discovered  
 or if University officials reasonably determine that the Investigator's Significant Financial Interest could directly affect the design, conduct, or reporting of the research.

**Investigator Certification**

I certify that, to the best of my knowledge, this is a complete and accurate disclosure of all my Financial Interests related to this research project and I have used all reasonable diligence in preparing this Financial Disclosure. I acknowledge that by signing my name below that it is my responsibility to disclose, within 30 days, any Significant Financial Interests obtained during the term of the above proposed project. If I am the Principal Investigator, I certify that I have also completed and returned this form to Vanderbilt University.

I certify that I have read and completed the Vanderbilt University Conflict of Interest Training for Public Health Services as required by the Public Health Service regulations and hereby agree to follow Vanderbilt University's PHS financial conflict of interest.

\_\_\_\_\_  
 Date: \_\_\_\_\_

\_\_\_\_\_  
 released or transmitted to the sponsor, including federal agency representatives.

PHS FCOI-October' 2017



# RAQ (Risk Assessment Questionnaire)

## SUBRECIPIENT MONITORING INTERNAL RESOURCES

### ANOTHER TOOL IN THE SPA TOOLKIT



REDCap survey to complete!

#### Fun Fact

- RAQ developed by FDP workgroup.
- The RAQ is completed by SPA in REDCap.

### Risk Assessment Questionnaire

Subrecipient Institution	
Subject to Single Audit?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Relevant Findings?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Internal Project Identifier	
Prime Sponsor	
DUNS	
FAC EIN	
See other tab for <a href="#">guidance and frequently asked questions</a> .	

#### 1) Threshold Questions (NOT SCORED)

- If yes to 1, 2, or 3, consider alternatives to initiating agreement.*
1. Is the Subrecipient Institution presently debarred or suspended?
  2. Is the Subrecipient Institution's PI presently debarred or suspended?
  3. Does the Subrecipient show "delinquent federal debt" in SAM?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

- If no to 4, 5, 6, or 7, consider alternatives to initiating agreement.*
4. If required by the sponsor, does the Subrecipient have a compliant conflict of interest policy?
  5. Does the Subrecipient have an acceptable accounting system?
  6. Does the Subrecipient have an acceptable procurement system?
  7. If required, has the Subrecipient completed audit under A-133 or Uniform Guidance for the most recent fiscal year?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

#### 2) Other Considerations (NOT SCORED)

8. Has there been a PTE-issued management decision on audit findings that may affect this award?
9. Does the Subrecipient have a negotiated indirect cost rate (or experience setting up such a rate)?
10. Does the project include work covered by ITAR or EAR (at Subrecipient, or Subrecipient accessing at PTE?)
11. Is there a potential or identified conflict of interest?
12. Is cost-share required or included?
13. Is participant support included in the Subrecipient's budget?
14. Does the Subrecipient have adequate experience receiving same or similar federal awards?
15. Have other risks been identified? If yes, explain in Notes below.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

#### 5) NEW - Additional Items: version:01/15/2018

29. Is the subrecipient new...?  
<click to select>
30. What is the distance between the subrecipient and VU? (in miles)

#### 3) Institution Questions (SCORED)

16. Is the Subrecipient institution foreign or domestic? (if foreign, see #30)  
<click to select>
17. What is the Subrecipient Organization type?  
<click to select>
18. Does the Subrecipient have a Negotiated IDC Rate Agreement?  
<click to select>
19. Were the results of the most recent Single audit (or similar) satisfactory?  
<click to select>
20. Is the Subrecipient Institution mature?  
<click to select>
21. Does the Subrecipient Institution have experience with determining conflicts of interest (evidence of an acceptable COI Policy)?  
<click to select>

Score

#### 4) Project Questions (SCORED)

22. What is the Prime Sponsor type?  
<click to select>
23. What is the Prime Award type?  
<click to select>
24. Amount of Outgoing Funds?  
<click to select>
25. What is the percentage of the Prime Award being subcontracted (specific to this Subrecipient—not total)? 0-24% - 24-49% - 50+%  
<click to select>
26. Does the work include Human Subjects, Animal Subjects, or Embryonic stem cells?  
<click to select>
27. What are the Subrecipient's Scope of Work/Deliverables?  
<click to select>
28. Where is the Place of Performance?  
<click to select>

Assessment Performed:	
Initials	Date
Assessment Incomplete	

Assessed Risk	Score
Institution	0
Project	0
Total	0

Notes:

---



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# CAT (Continuing Assessment Tool)

VANDERBILT UNIVERSITY  
Sponsored Programs Administration

Continuing Assessment Tool (CAT) | DEPT

Please complete the survey below.  
Thank you!

Dear VU Department Contact & OCGA,

Beginning in January 2018, SPA began assessing the risk of all non-FDP subrecipients for outgoing subawards. At the annual renewals/amendments, you are being asked to complete your office's portion of the Continuing Assessment Tool (Risk Assessment Questionnaire).

Please complete your section (DEPARTMENT or OCGA) only.

Please note, that if you feel that there is a higher level of risk now as compared to the last time we negotiated with this institution, then please explain what and why in the notes section at the end of this survey.

You can download a Word version of the CAT for reference here. If you prefer to complete this on paper, then please email it back to [subcontracts@vanderbilt.edu](mailto:subcontracts@vanderbilt.edu).

Thank you! Subcontracts Team

Attachment: [FDP Continuing Assessment Tool complete.pdf](#) (0.98 MB)

Your name:   
\* must provide value

Your office/department:   
\* must provide value

Your email:

Are you Department, OCGA or SPA?   
\* must provide value

UNIV60182 | Amendment 1

Budget Start Date: 05-17-2018  
Budget End Date: 05-16-2019

Subrecipient Institution: Arts and Business Council of Greater Nashville

Date completed: 05-04-2018 Today M-D-Y  
\* must provide value

4. Have any concerns been raised through monitoring, e.g. review of financial or performance reports?

5. Have other new concerns been identified?   
\* must provide value

VANDERBILT UNIVERSITY  
Sponsored Programs Administration

Continuing Assessment Tool (CAT) | OCGA

Please complete the survey below.  
Thank you!

Dear VU Department Contact & OCGA,

Beginning in January 2018, SPA began assessing the risk of all non-FDP subrecipients for outgoing subawards. At the annual renewals/amendments, you are being asked to complete your office's portion of the Continuing Assessment Tool (Risk Assessment Questionnaire).

Please complete your section (DEPARTMENT or OCGA) only.

Please note, that if you feel that there is a higher level of risk now as compared to the last time we negotiated with this institution, then please explain what and why in the notes section at the end of this survey.

You can download a Word version of the CAT for reference here. If you prefer to complete this on paper, then please email it back to [subcontracts@vanderbilt.edu](mailto:subcontracts@vanderbilt.edu).

Thank you! Subcontracts Team

Attachment: [FDP Continuing Assessment Tool complete.pdf](#) (0.98 MB)

Your name:   
\* must provide value

Your email:

Are you Department, OCGA or SPA?   
\* must provide value

UNIV60182 | Amendment 1

Budget Start Date: 05-17-2018  
Budget End Date: 05-16-2019

Subrecipient Institution: Arts and Business Council of Greater Nashville

Date completed: 05-04-2018 Today M-D-Y  
\* must provide value

OFFICE OF CONTRACT & GRANT ACCOUNTING (OCGA)

GENERAL CONSIDERATION:  
3. Are there any concerns with respect to single audit?

GENERAL CONSIDERATION:  
4. Have any concerns been raised through

SUBRECIPIENT MONITORING  
INTERNAL RESOURCES

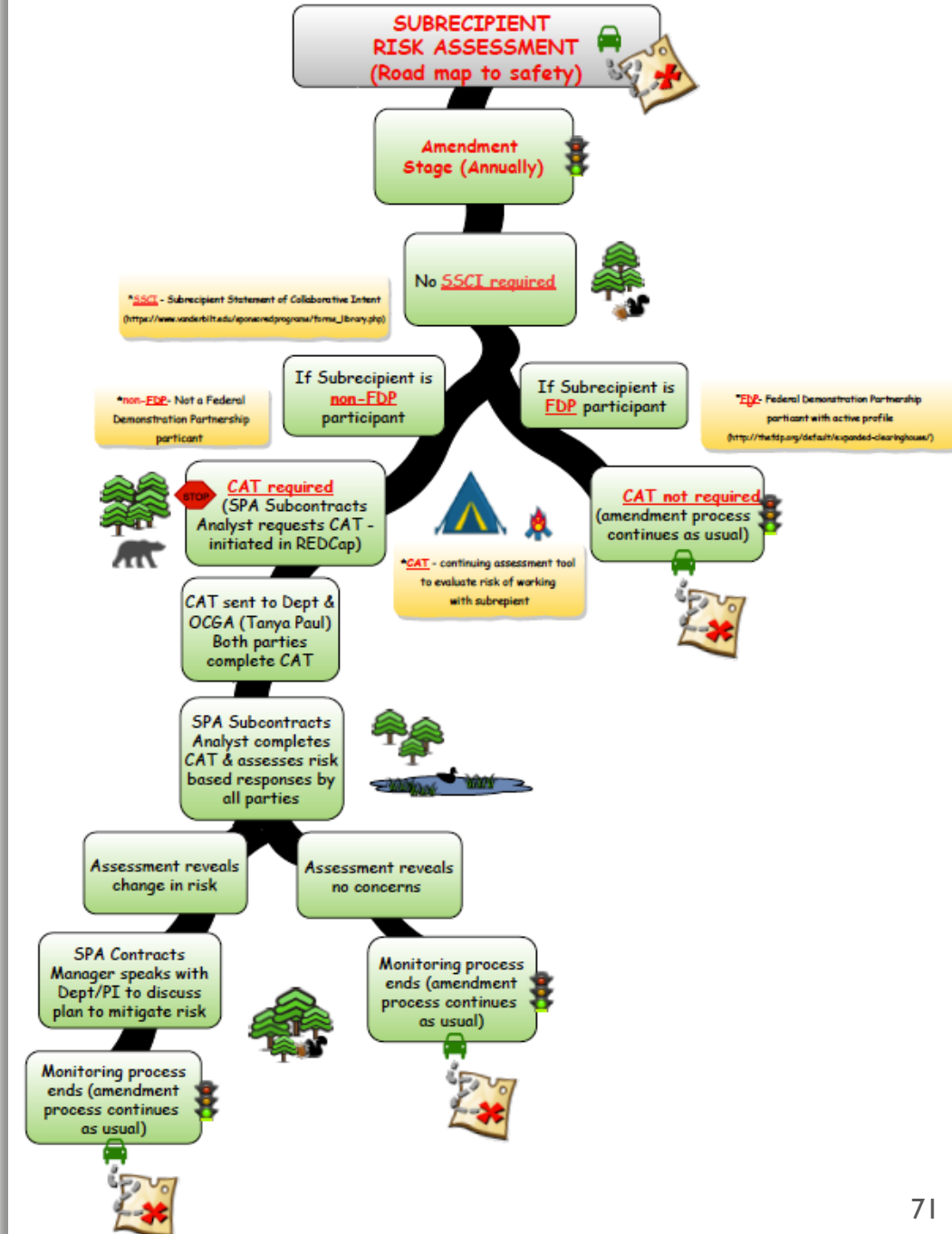
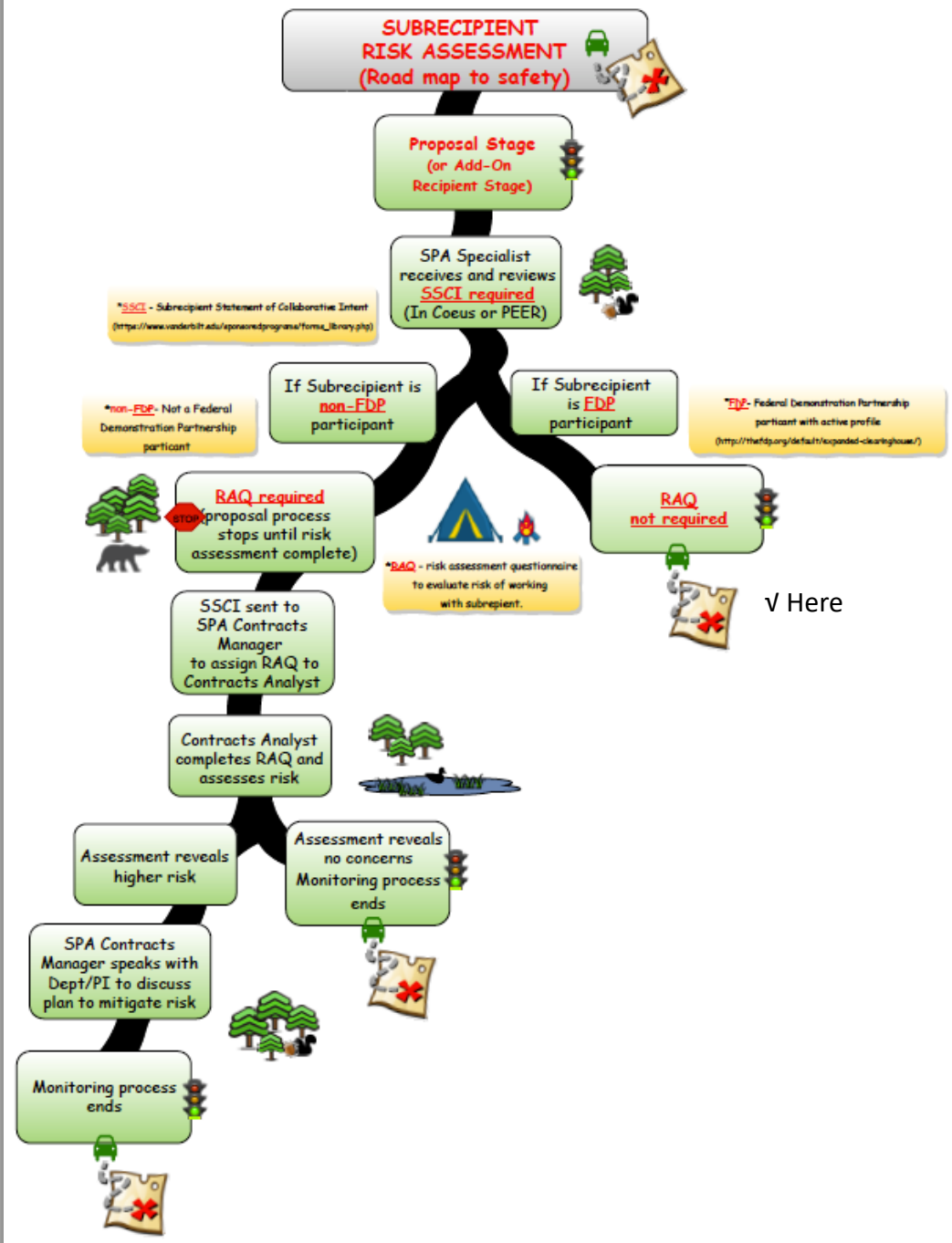
ANOTHER TOOL IN  
THE SPA TOOLKIT



REDCap survey to complete!

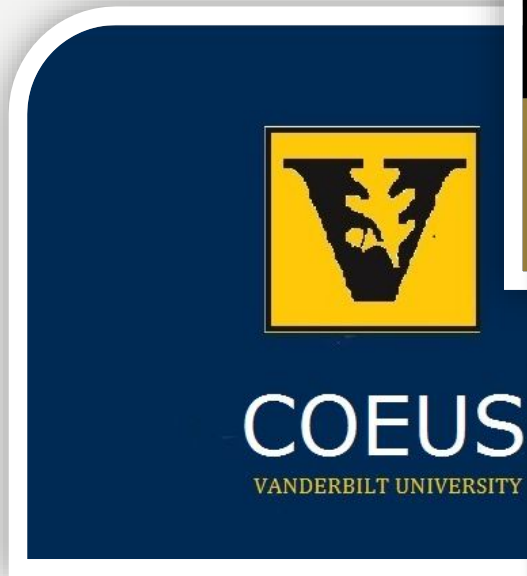
## Fun Fact

- CAT developed by FDP workgroup.
- The RAQ is completed by SPA in REDCap.









**PEER** 

**New  Vanderbilt  
electronic Research  
Administration  
System (VeRA)**  
(Huron Research  
Software Suite)

**Administration  
System (VeRA)**  
(Huron Research  
Software Suite)

SUBRECIPIENT MONITORING  
INTERNAL RESOURCES

**ANOTHER TOOL IN  
THE SPA TOOLKIT**



# INTERNAL RESOURCES

UNIV60965 > [Tracking # 154418](#) > Federal Sub-Recipient Questionnaire # 18481

Print Friendly

Save

Questionnaire has been submitted to Vanderbilt and cannot be altered.

Questionnaire has been s

1. General Info 2. Special Review 3. Financial & Audit 4. Finalize & Submit

## Financial

Facilities and Administrative Rates included in this proposal have been calculated based on:

Other

Options:

- Federally Negotiated - Federally-negotiated F&A rates for this type of work, or a reduced F&A
- Other

If Other, please explain:

N/A since federally negotiated rates aren't required here.

441 character(s) left

Fringe Benefit Rates included in the subcontract budget have been calculated based on:

Other

Options:

- Federally Negotiated - Rates consistent with or lower than Sub-recipient's federally negotiated
- Other

If Other, please explain:

N/A since federally negotiated rates aren't required here.

441 character(s) left

## Affirmative Action Compliance

In accordance with the rules and regulations of the Secretary of Labor (41 CFR 60-1 and 60-2) does the Organization have a written affirmative action program developed and on file?

No

If no, what is the reason Organization does not have a written affirmative action program developed and on file?

Has no previous contracts subject to the written affirmative action program

## Study Subjects

Does sub-recipient's portion of the project include use of Human Subjects?

No

Does sub-recipient's portion of the project include use of Animal Subjects?

No

## Debarment, Suspension and Exclusions

UNIV60965 > [Tracking # 154418](#) > Federal Sub-Recipient Questionnaire # 18481

Print Friendly

Save

Questionnaire has been submitted to Vanderbilt and cannot be altered.

Questionnaire has been signed off by Contract Officer and cannot be

1. General Info 2. Special Review 3. Financial & Audit 4. Finalize & Submit

## Annual OMB Audit

Does Sub-recipient receive an annual audit in accordance with OMB Uniform Guidance?

No

What is your institution's fiscal year end date?  
mm/dd, e.g 06/30, 09/30 or 12/31

12/31

If sub-recipient does not receive an annual audit in accordance with OMB Uniform Guidance, please select the appropriate box indicating why the sub-recipient would not be subject to compliance with single audit certification:

Other

If other, please describe/explain:

N/A

497 character(s) left

## If sub-recipient does not receive single audit, please answer the following:

Does sub-recipient have its financial statements audited or reviewed by an independent accounting firm?

No

If No, please explain:

N/A because no federal requirements apply here.

452 character(s) left

## Additional Financial Information

Does sub-recipient have knowledge of OMB cost principles and administrative requirements applicable to the sub-contract?

No

Does sub-recipient have financial systems capable of the following:

No

- ensure that costs deemed un-allowable under the

# EXTERNAL RESOURCES

- [Harvester](#)
- [FDP](#) (EC & COI CL)
- [Sam.gov](#)
- [USASpending.gov](#)
- [NIH RePORT](#)
- Subrecipient's website

ANOTHER  
**COMPARTMENT**  
IN THE SPA  
TOOLKIT  
(OR, OF SPA'S  
TOOLKIT)





# HARVESTER

The screenshot shows the Federal Audit Clearinghouse Image Management System interface. At the top, there is a header with the logo (a house with a checkmark) and the text "Federal Audit Clearinghouse Image Management System" next to an American flag. Below the header is a navigation bar with links: "Instruction Manual", "Federal Program Contacts", "FAC Home Page", and "FAQs". The main content area features a red heading "Search for Single Audits". Below this heading are three buttons: "Search", "Clear Search Filters", and "Return to IMS Home". A list of four expandable menu items follows: "GENERAL INFORMATION", "FINANCIAL STATEMENTS", "FEDERAL AWARDS", and "FEDERAL AWARDS FINDINGS DETAILS (2013 AND BEYOND)". At the bottom of the menu items, there are again three buttons: "Search", "Clear Search Filters", and "Return to IMS Home". The footer contains contact information: "If you need assistance, please contact the Federal Audit Clearinghouse (FAC) via [e-mail](#) or call 866-306-8779." and the version number "Version: 1.6.5.5".

**Federal Audit Clearinghouse**  
Image Management System

[Instruction Manual](#) [Federal Program Contacts](#) [FAC Home Page](#) [FAQs](#)

**Search for Single Audits**

[Search](#) [Clear Search Filters](#) [Return to IMS Home](#)

- ▶ GENERAL INFORMATION
- ▶ FINANCIAL STATEMENTS
- ▶ FEDERAL AWARDS
- ▶ FEDERAL AWARDS FINDINGS DETAILS (2013 AND BEYOND)

[Search](#) [Clear Search Filters](#) [Return to IMS Home](#)

If you need assistance, please contact the Federal Audit Clearinghouse (FAC) via [e-mail](#) or call 866-306-8779.  
Version: 1.6.5.5

# SUBRECIPIENT TYPES

## FDP VS. NON-FDP

### What is the Federal Demonstration Partnership (FDP)?

- **WHO:** a cooperative initiative among 10 federal agencies & 154 institutional recipients of federal funds
- **WHAT:** a public website & online system
- **WHY:** An effort to reduce administrative burden – to streamline the administration of federally sponsored research
- **Several initiatives:** FCOI Clearinghouse & FDP Expanded Clearinghouse
- **FCOI Compliant Entities**
  - **1283**
- **FDP-Expanded Clearinghouse** includes approximately:
  - **237** institutional members (e.g., VU & VUMC, Boston University, Cornell University, MIT, Penn State, Ohio State, Yale university)

### Why does it matter?

It makes the subawarding process quicker, easier and less risky.

# SAM.GOV \*

Entity **VANDERBILT UNIVERSITY** Status: **Active** +

DUNS: **965087489** CAGE Code: **1CSVo** View Details

**Has Active Exclusion?: No** DoD MFC

Expiration Date: **09/28/2019** Debt Subject to Offset?: **No**

Purpose of Registration: **All Awards**



**A NEW WAY TO SIGN IN** - If you already have a SAM account, use your **SAM email** for login.gov. [Log In](#) [Login.gov FAQs](#)

- [HOME](#)
- [SEARCH RECORDS](#)
- [DATA ACCESS](#)
- [CHECK STATUS](#)
- [ABOUT](#)
- [HELP](#)

**ALERT:** SAM.gov will be down for scheduled maintenance Saturday, 09/14/2019, from 8:00 AM to 1:00 PM (EDT).

**ALERT:** Due to increased volume and additional security requirements, a high number of entity registrations are pending CAGE review. Processing time currently exceeds the normal window of ten business days. Some users may experience processing delays of up to four weeks. Respond promptly if you are contacted by a CAGE Technician for additional information. Contact the [CAGE Help Desk](#) with urgent questions about a registration pending CAGE review.

The System for Award Management (SAM) is an official website of the U.S. government. There is no cost to use SAM. You can use this site for FREE to:

- Register to do business with the U.S. government
- Update or renew your entity registration
- Check status of an entity registration
- Search for entity registration and exclusion records

## Getting Started

Create A User Account



Start by creating a SAM user account.

Register Entity



After creating your SAM user account, log in to register to do business with the U.S. government.

Search Records



Do a public search for existing entity registration records or exclusion records.

Federal users can log in to see additional information.

## Entity Dashboard

**VANDERBILT UNIVERSITY, THE** 20 Rachel Dr  
DUNS: 833203537 CAGE Code: 5VNB1 Nashville, TN, 37214-3609, UNITED STATES  
Status: Active  
Expiration Date: 02/22/2020  
Purpose of Registration: All Awards

- Entity Overview
- Entity Registration
  - Core Data
  - Assertions
  - Reps & Certs
  - POCs
- Exclusions
  - Active Exclusions
  - Inactive Exclusions
  - Excluded Family Members

[RETURN TO SEARCH](#)

### Entity Overview

**Entity Registration Summary**

**Name:** VANDERBILT UNIVERSITY, THE  
**Doing Business As:** Vanderbilt Dialysis Clinic-East  
**Business Type:** Business or Organization  
**Last Updated By:** MARY GARBER  
**Registration Status:** Active  
**Activation Date:** 02/25/2019  
**Expiration Date:** 02/22/2020

**Exclusion Summary**

**Active Exclusion Records?** No

**\* Registration required of all subrecipients of Federal Primes**

# USASPENDING.GOV

In 2018, the government spent **\$4.11 trillion**.<sup>1</sup>

USA Spending tracks federal spending to ensure taxpayers can see how their money is being used in communities across America. Learn more on how this money was spent with tools to help you navigate spending from top to bottom.



## FEATURED CONTENT

### New! - Congressional Budget Justifications

See the rich, detailed documents each agency submits to Congress to justify its annual budget request.

### New! - Your Guide to America's Finances

Your Guide presents straightforward information about the federal government's spending and revenue, as well as the deficit and debt in 2018.

### New! - Recipient Profiles

Find insights into each recipient with the tools and summaries found in our new Recipient Profile pages.

# NIH RePORT

## Research Portfolio Online Reporting Tools (RePORT)

In addition to carrying out its scientific mission, the NIH exemplifies and promotes the highest level of public accountability. To that end, the Research Portfolio Online Reporting Tools provides access to reports, data, and analyses of NIH research activities, including information on NIH expenditures and the results of NIH supported research.

### Spotlight

[NIH Categorical Spending \(RDC\) for FY2018](#) now available, highlighting the annual support level for various research, condition, and disease categories based on grants, contracts, and other funding mechanisms used across the National Institutes of Health (NIH), linked to disease burden data published by the National Center for Health Statistics (NCHS) at the Centers for Disease Control & Prevention (CDC).

### [NIH Inclusion Data by Research and Disease Category Now Available](#)

For over two decades, NIH has required researchers to include women, members of racial and ethnic minority groups, and children in their work absent an acceptable scientific or ethical rationale for their exclusion. Now, for the first time, selected inclusion data on sex/gender and race/ethnicity are publicly available disaggregated for various research, condition, and disease areas. [Read announcement](#)

ADVANCED SEARCH

**Institute/Center:**

ALL
NCI
NEI
NHLBI
NHGRI
NIA
NIAAA

**Fiscal Year:**

ACTIVE
2019
2018
2017
2016
2015
2014

**Principal Investigator:**  
(Last Name, First Name)

**Organization:**

**Project Number:**

1	R01	CA	811099	01	A1S1

# SUB'S WEBSITE

- ✓ AUDIT INFORMATION
- ✓ FINANCIAL STATEMENT
- ✓ ANNUAL REPORT TO PUBLIC
- ✓ CONFLICT OF INTEREST POLICY & EXPERIENCE
- ✓ ESTABLISHED
- ✓ EXPERIENCE WITH RESEARCH & RECEIVING FEDERAL AWARDS



# TIPS

- **DEPT:** If you've had experience with Subrecipient before – let SPA know. Good or bad.
- **Paper SSCI:** make sure that the attachments indicated on the SSCI as attached, are included when you submit the SSCI to SPA for non-FDP subs [i.e., Single Audit, FCOI Policy, F&A, Fringe Rate Agreements...)
- **SAM.gov** registration is **required** for all subrecipients of a Federal Prime Award. We will review this in our Subrecipient Monitoring review, but due to the delay it causes in finalizing agreements – we suggest that for any non-FDP subrecipient institutions that your PI wants to work with, that you encourage them to register in Sam.gov as soon as possible. Registration can take months to complete.



THANK YOU!

# NEXT MEETING



**ANY  
QUESTIONS?**



**See you in June!**

**THANK  
YOU**

