

Effective Strategies for Subrecipient Monitoring

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Learning Objectives

Gain a basic knowledge of how to effectively monitor subrecipients by understanding:

- Subawards in Context
- What is a Subaward
- Prime Recipient Roles and Responsibilities
- Financial Conflict of Interest (FCOI)
- Risk Analysis
- FFATA Reporting
- Looking Ahead: OmniCircular OMB A-81

Subawards in Context

In recent years, colleges and universities have seen a dramatic increase in collaborations and large-scale multidisciplinary projects that unite colleagues not only from within, but frequently across institutions and organizations.



Subawards in Context



In this age of national and worldwide collaboration, the subaward mechanism is the vehicle utilized to facilitate these collaborations. and sets forth the expectations of the parties with regard to the work to be completed, and compliance with terms and conditions of the prime sponsor.

What is a Subaward?

- A binding legal agreement that sets forth the expectations of the parties with regard to the scope of work and budget
- Performance measured against whether the objectives of the sponsored project are met
- Subrecipient responsible for the programmatic decision making relative to its portion of the sponsored project
- Subrecipient must adhere to compliance requirements (IRB, IACUC, FCOI, allowable costs, audit, terms/conditions flowed down from the Prime Sponsor)

Vendor Agreement in Contrast

- Usually issued to individuals or companies with specific expertise and service portfolio
- No programmatic decision making relative to its portion of the sponsored project
- No intellectual property or publication rights
- Flow down of Prime Sponsor terms and conditions usually not required (exceptions depend on Prime Sponsor)

Roles and Responsibilities

- Prime Recipient's PI
- Prime Recipient's Departmental Staff
- Prime Recipient's Sponsored Research Office (SRO)
- Prime Recipient's grant accounting office
- Subrecipient responsibilities

Roles and Responsibilities: Prime Recipient's PI

- Review of technical and/or performance reports:

Ensure that work being conducted by subrecipient is in accordance with the scope of work as outlined in the subaward agreement, that the subrecipient's obligations are met, that required items, reports, and documents are delivered in a timely manner

Roles and Responsibilities: Prime Recipient's PI

- Formally submit request to SRO for issuance of subaward
- Review and approve subrecipient invoices to ensure expenditures are:
 - allowable, reasonable, allocable
 - within the period of performance
 - consistent with the work completed

Roles and Responsibilities: Prime Recipient's Departmental Staff

- Assist PI with formal request to SRO for issuance of subaward
- Review subrecipient invoices to ensure expenditures are:
 - allowable, reasonable, allocable
 - within the period of performance

Roles and Responsibilities: Prime Recipient's Sponsored Research Office

- Issuance, negotiation, and execution of subaward agreements to Subrecipients
- Conduct risk analysis of Subrecipient entity (this includes gathering information)
- Include additional terms or restrictions within the subaward agreement as needed depending on outcome of risk analysis

Roles and Responsibilities: Prime Recipient's Sponsored Research Office

- Include in the subaward agreement appropriate flow down of Prime Sponsor's terms and conditions
- Verify Subrecipient's compliance with PHS or other Prime Sponsor FCOI requirements (must also flow down FCOI requirements within the subaward agreement)

Roles and Responsibilities: Prime Recipient's Grant Accounting Office

- Review and approve subrecipient invoices to ensure expenditures are:
 - allowable, reasonable, allocable
 - within the period of performance
- Verification with the Prime Recipient PI that charges are consistent with the work completed

Roles and Responsibilities: Prime Recipient's Grant Accounting Office

- Communication with the Subrecipient to gather backup documentation for questionable or unique expenditures
- Request revised/corrected invoices
- Authorize payment of Subrecipient invoices
- Send annual A-133 letters to Subrecipients
- Conduct audit of Subrecipients

Roles and Responsibilities: Subrecipient

- Perform work in accordance with the approved budget and Scope of Work
- Comply with the terms and conditions of the subaward agreement; including terms from the Prime award
- Obtain approvals from their IRB or IACUC if human or animal subjects are used in their portion of the work
- Request approval from Prime Recipient when necessary

Financial Conflict of Interest (FCOI)

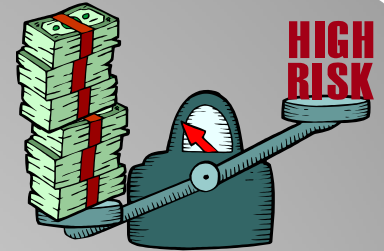
- An institution applying for or receiving Public Health Services funding from a grant or cooperative agreement must be in compliance with all of the revised regulatory requirements as of August 24, 2012.
- The Federal Regulations that monitor FCOI are Title 42 Code of Federal Regulations (CFR) Part 50 Subpart F for grants and cooperative agreements.
- At time of proposal, check the FDP Clearinghouse.

Financial Conflict of Interest (FCOI)

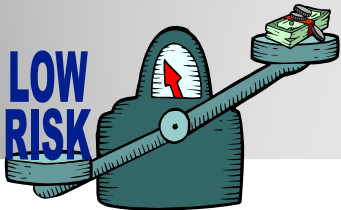
At proposal time, confirm either of the following:

- Subrecipient Organization/Institution certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F "Responsibility of Applicants for Promoting Objectivity in Research."
- Subrecipient does not have an active and/or enforced conflict of interest policy and agrees to abide by Prime Recipient's policy

Risk Analysis



- A-133, section 525 requires prime grantees perform a risk analysis to evaluate the likelihood that a subrecipient will fail to comply with the requirements of the subaward.
- Institutions implement risk analysis through different approaches



Risk Analysis

- UMN performs risk analysis for all subrecipients of Federal funding and all subrecipients that receive over \$25K in non-Federal funding.
- The criteria used in evaluating risk:
 - The subrecipient's audit experience
 - The prior oversight and monitoring the subrecipient has received
 - The nature and complexity of the proposed research project
 - The fiscal maturity of the subrecipient
- The risk analysis entails not only reviewing the subrecipient's most recent audit or financial statement, but also the work to be performed under that subaward (ITAR/EAR, IACUC, IRB, etc.)

Risk Analysis

- NU conducts risk analysis for all subrecipient entities which are foreign, for-profit, other non-profit non-university research organizations
- Whether a Subrecipient entity has a previous relationship with NU and is in good standing is also a determining factor of whether risk analysis is needed
- A completed Subrecipient questionnaire is collected from these subrecipient entities

Risk Analysis

- Information assessed through risk analysis:
 - A-133 or audit report on file
 - Domestic or foreign entity
 - Cumulative direct costs = or < \$499K
 - Cost share involved
 - FCOI policy PHS compliant
 - IACUC or IRB approvals on file
 - Maturity of subrecipient
 - Prime Recipient award type

Risk Analysis

Consider the type of Subrecipient entity:

- Domestic vs. Foreign
 - University vs. Non-University
 - FDP Institution vs. Non-FDP Institution
-

Consider the type of Subaward agreement:

- Cost reimbursable
- Fixed Price

Risk Analysis

- Use Harvester to access subrecipient's audit results:
<http://harvester.census.gov/sac/>
- If audit results show findings, you will need to contact the subrecipient for a copy of their full audit
- If the subrecipient is not subject to A-133, you will need to gather information regarding their financial history and systems through a different method.
 - Both UMN and NU have internally created forms used to gather this data.

Risk Analysis: Debarment - Use SAM (System for Award Management)

Just a refresher:

- SAM created by the GSA to merge existing systems, processes, steps and data to streamline the user experience
- One login links to all the system capabilities
- One database which will eliminate data overlap and improve data quality
- Brings cost savings into the federal data management system by developing only one hosting facility

SAM.gov



USER NAME PASSWORD
[Forgot Username?](#) [Forgot Password?](#) [Create an Account](#)

- HOME
- SEARCH RECORDS
- DATA ACCESS
- GENERAL INFO
- HELP

CREATE USER ACCOUNT

Your CCR username will not work in SAM. You will need a new SAM User Account to register or update your entity records. You will also need to create a SAM User Account if you are a government official and need to create Exclusions or search for FOUO information.

REGISTER/UPDATE ENTITY

You can register your Entity (business, individual, or government agency) to do business with the Federal Government. If you are interested in registering or updating your Entity, you must first create a user account.

SEARCH RECORDS

All entity records from CCR/FedReg and ORCA and exclusion records from EPLS, active or expired, were moved to SAM. You can search these records and new ones created in SAM. If you are a government user logged in with your SAM user account, you will automatically have access to FOUO information.

WHAT IS SAM?

The **System for Award Management (SAM)** is a **Federal Government owned and operated** free web site that consolidates the capabilities in CCR/FedReg, ORCA, and EPLS. Future phases of SAM will add the capabilities of other systems used in Federal procurement and awards processes.

NEWS AND ANNOUNCEMENTS

SAM Management Moves to GSA FAS and CIO

Click on General Info and go to the News and Announcements section for the full story.

Can I use my CCR username in SAM? Click [HERE](#) to find answers to this and other top questions.

USER GUIDES/HELPFUL HINTS

Additional information, such as a full User Guide, Quick Start Guides, Helpful Hints, and Webinars are available on the HELP tab.

Service Desk

URL: <http://www.FSD.gov>

FORMER CCR REGISTRANTS

If you had an active record in CCR, you have an active record in SAM. You do not need to do anything in SAM at this time, unless a change in your business circumstances requires updates to your Entity record(s) in order for you to be paid or to receive an award or you need to renew your Entity(s) prior to its expiration. SAM will send notifications to the registered user via email 60, 30, and 15 days prior to expiration of the Entity. To update or renew your Entity records(s) in SAM you will need to create a SAM User Account and link it to your migrated Entity records. You do not need a user account to search for registered entities in SAM by typing the DUNS number or business name into the search box.

Start search here:



Search Screen



USER NAME

[Forgot Username?](#)

PASSWORD

[Forgot Password?](#)

LOG IN

[Create an Account](#)

HOME

SEARCH RECORDS

DATA ACCESS

GENERAL INFO

HELP

Search Records

You can enter a DUNS number, CAGE code or Business Name to search for the entities that you are interested in reviewing. The top search bar allows you to enter any search term. You can also enter exclusion search terms to search for exclusion records. If you want to search for only a CAGE code or a DUNS number you can use the bottom two search bars. Once a search has returned results, use the filters provided to narrow results.

Government employees must create a SAM user account with their government email address. Log in before searching in order to see FOUO information and those registrants who selected to opt out of the public search.

You can only use one search bar at a time

Enter your specific search term

(Example of search term includes the entity's name, etc.)

DUNS Number Search:

Enter DUNS number ONLY

CAGE Code Search:

Enter CAGE code ONLY

SEARCH

[Need Help?](#)

You can only use one search bar at a time

Regents of the University of Minnesota

(Example of search term includes the entity's name, etc.)

DUNS Number Search:

Enter DUNS number ONLY

CAGE Code Search:

Enter CAGE code ONLY

SEARCH

Need Help?

How to check for Debarment:

- View details

Entity Dashboard

- Entity Overview
- Entity Record
 - Core Data
 - Assertions
 - Reps & Certs
 - POCs
 - Exclusions
 - Active Exclusions
 - Inactive Exclusions

RETURN TO SEARCH

REGENTS OF THE UNIVERSITY OF MINNESOTA
DUNS: 874229131 CAGE Code: 1WFR8
Status: Active

2900 UNIVERSITY AVE
CROOKSTON, MN, 56716-5001
UNITED STATES

Entity Overview

Entity Information

DUNS: 874229131
Name: REGENTS OF THE UNIVERSITY OF MINNESOTA
Doing Business As: UNIVERSITY OF MINNESOTA-CROOKSTON
Business Type: Business or Organization
POC Name: None Specified
Registration Status: Active

Exclusions

Active Exclusion Records? No

Entity

REGENTS OF THE UNIVERSITY OF MINNESOTA

Status: Active +

DUNS: 874229131

CAGE Code: 1WFR8

Has Active Exclusion?: No

DoDAAC:

View Details

REGENTS OF THE UNIVERSITY OF MINNESOTA
DUNS: 874229131 CAGE Code: 1WFR8
Status: Active

2900 UNIVERSITY AVE
CROOKSTON, MN, 56716-5001,
UNITED STATES

Exclusions

Active Exclusions

This entity does not have any active exclusions.

PRINT

What does an Exclusion look like?

You can only use one search bar at a time

(Example of search term includes the entity's name, etc.)

DUNS Number Search:

CAGE Code Search:

SEARCH

Need Help?

Note the visual clue, the purple Exclusion tab

Result page 1 of 1 Sort by Relevance

FILTER RESULTS

By Record Status

Active
 Inactive

By Functional Area

Entity Management
 Performance Information

Your search for "lyvers*" returned the following results...

Exclusion [Redacted]	Status: Active
DUNS: [Redacted]	CAGE Code: [Redacted]
Classification: Individual	View Details

Exclusion [Redacted]	Status: [Redacted]
DUNS: [Redacted]	CAGE Code: [Redacted]
Classification: Individual	View Details

Exclusion Summary

Exclusion Summary

There may be instances when an Individual or Firm has the same or similar name as your search criteria, but is actually a different party. Therefore, it is important that you verify a potential match with the excluding agency identified in the exclusion's details. To confirm or obtain additional information, contact the federal agency that took the action against the listed party. Agency points of contact, including name and telephone number, may be found by navigating to the Agency Exclusion POCs page within SAM Help.

View Exclusion History

Current Record ▾

[VIEW HISTORICAL RECORD](#)

[\[Expand All\]](#) | [\[Collapse All\]](#)

Current Record Details

Exclusion Details:

Exclusion Program:	Reciprocal
Classification Type:	Individual
Exclusion Type:	Prohibition/Restriction

Nature (Cause):

May be subject to sanctions pursuant to the conditions imposed by the U.S. Department of the Treasury (Treasury) Office of Foreign Assets Control (OFAC), or subject to a sanction, restriction or partial denial pursuant to the conditions imposed by the U.S. Department of State (STATE) or Federal agency of the U.S. Government.

Effect:

Exclusions

The *View Detail* tab with an Exclusion status will open information on the Current Record Detail

You may want to print this screen for your file.

Federal Funding Accountability and Transparency Act (FFATA)



- Signed on September 26, 2006 during assembly of the 109th Congress of the U.S.A.
- Intent is to empower Americans with the ability to hold the government accountable for spending decisions
- Grant recipients awarded Federal grants \$25,000 or greater are subject to FFATA Subrecipient reporting

FFATA Reporting

- Prime awardee is required to file a FFATA sub-award report by the end of the month following the month in which the prime recipient awards any subaward \$25,000 or greater
- Reports are submitted through FSRS.gov and then displayed on USASpending.gov

FFATA Reporting – How to manage?

- FFATA reports are submitted by a central office. At UMN and NU, the Sponsored Research offices are responsible for submission
- Do not pre-sign subawards. This gives prime grantee control to meet the FFATA deadline to submit the report by the end of the following month.

Looking Ahead: OmniCircular OMB A-81

Proposed OMB Uniform Guidance: Cost Principles, Audit, and Administrative Requirements for Federal Awards

- Proposed by federal government
January 31, 2013
- Intended to streamline language from eight existing OMB circulars into one document

Looking Ahead: OmniCircular OMB A-81

Impact on Subaward Issuance

- Audit Requirements: Increased threshold for a single audit from \$500K to \$750K
- Cost Principles: Flat F&A rate of 10% for recipients not having a federally negotiated rate
- Administrative Requirements: Proposal review include review for merit and financial risk

Resources

- http://sites.nationalacademies.org/PGA/fdp/PGA_070596
- <https://www.sam.gov/portal/public/SAM/>
- <https://www.fsrs.gov/>
- <http://www.regulations.gov/#!documentDetail;D=OMB-2013-0001-0002>

APPENDICES (in order of appearance)

- FDP Clearinghouse screenshots
- UMN FCOI forms (Forms 1 and 2)
- UMN Risk Analysis form
- NU Risk Assessment form
- FSRS screenshots for FFATA reporting

 Search

QUICK LINKS

- ABOUT FDP
- CHAIR AND VICE CHAIR
- FDP MEMBERS
- CURRENT INITIATIVES
- MEETINGS
- RESOURCES
- COMMITTEES
- FDP SUBWARD FORMS
- FDP CLEARINGHOUSE
- AGENCY EVENTS
- ARCHIVE

FDP Institutional Clearinghouse

Institution Name

Primary DUNS Number

Partial name is allowed in the *Institution Name* field

The list of institutions displayed below contains the institutions whose authorized official have certified that they are compliant with the PHS Financial Conflict of Interest rules and regulations. There are 109 institutions currently participating.

NOTE: There is an issue viewing the entire list in Firefox where the list will not scroll to the bottom. If you are having this is

Click the link under the *Institution* title for Institutional information

Institution	Authorized Representative	Title	DUNS	Date
University of Wisconsin - Madison	Kim Moreland	Assoc. Vice Chancellor for Research Administration	161202122	Jul-13-2012



Institutional Certification of Compliance with PHS FCOI Regulations as of 8/24/12

The institution below has certified on the FDP Clearinghouse that they are or will be compliant with PHS FCOI Regulations as of 8/24/12.

Institution Name	University of Wisconsin - Madison
Authorized Representative	Kim Moreland
Authorized Representative Title	Assoc. Vice Chancellor for Research Administration
Authorized Representative Email Address	kmoreland@rsp.wisc.edu
Primary DUNS Number Optional	161202122

Subrecipient not registered in the FDP Clearinghouse?

University of Minnesota created forms to acquire information needed to be compliance with FCOI if subrecipient is not in FDP Clearinghouse.

- Form 1: Documentation of PHS Subrecipient Financial Conflict of Interest (FCOI Policy)
- Form 2: Subrecipient Disclosure of Significant Financial Interests

Documentation of PHS Subrecipient Financial Conflict of Interest (FCOI) Policy
 University of Minnesota – Office of Sponsored Projects Administration

Required when proposing a subaward for a sponsored research project to be funded under a PHS award.

A. Proposal Information

To be completed by U of M DRA

University of Minnesota PI: _____ UMN PRF #: _____
(if known)

Prime Sponsor: _____

Proposal/Project Title: _____

Subaward Period of Performance: From: _____ To: _____

Proposed Subaward Total: \$ _____ Return Form To: (Email) _____

B. Subrecipient Information

To be completed by subrecipient organization

Subrecipient Organization Legal Name: _____

Organization's Address: (Include ZIP Code/Postal Code) _____

DUNS #: _____

C. Subrecipient FCOI Policy Statement

To be completed by subrecipient organization

(1) I will follow the Conflict of Interest policy established and enforced by _____
(Skip to Section D below) (Subrecipient Organization Name)

(2) I will follow the Conflict of Interest policy established and enforced by the University of Minnesota.
 Names of individuals working on this project who are responsible for design, conduct, or reporting of the research are shown below (Attach Form 2 for each)

	Form 2 Attached?	To be completed by U of M SPA Disclosure (N/P)	Date
Subrecipient PI: _____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Investigator/Key Personnel: _____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Investigator/Key Personnel: _____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Investigator/Key Personnel: _____	<input type="checkbox"/>	<input type="checkbox"/>	_____

(Please attach additional pages if needed.)

D. Approval

To be completed by subrecipient Authorized Organizational Official

I certify that the information listed above is true, complete and accurate to the best of my knowledge, and that I am an Authorized Organizational Official for my institution. The appropriate programmatic and administrative personnel involved in this disclosure are aware of agency policy in regard to subawards and are prepared to establish the necessary inter-institutional agreements and/or FCOI management plans consistent with those policies.

Signature: _____ Date: _____

Printed Name: _____ Title: _____

UMN - Form 1

Provides documentation that subrecipient has current COI policy in compliance with PHS regulations *or* will use the University of Minnesota policy.

UMN – Form 2

If (and only if) the authorized organizational official has checked Box C.2. of Form 1 indicating the University of Minnesota's conflict of interest policy will be followed, then EACH subrecipient investigator must also complete, sign, and return a Form 2 to the University of Minnesota.

FORM 2

Subrecipient Disclosure of Significant Financial Interests

University of Minnesota PHS supported project title:

Name of Subrecipient Entity:

Name of Subrecipient Researcher Completing this Form:

Definitions:
Remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship).
Equity interest includes any stock, stock options, or other ownership interest as determined through reference to public prices or other reasonable measures of market value.

1. Do you (and your spouse and dependent children) have a significant financial interest in a publicly traded entity that when aggregated exceeds \$5,000? When determining your response to this question, please add the value of any equity interest as of the date of this disclosure to any remuneration received from the entity in the twelve months preceding this disclosure.
 No Yes (if yes, provide name of business entity):
2. Do you (or your spouse and dependent children) have the following significant financial interests in a non-publicly traded entity?
 - a. Remuneration that when aggregated exceeds \$5,000.
 No Yes (if yes, provide name of business entity):
 - b. Any equity interest.
 No Yes (if yes, provide name of business entity):
3. Have you (and your spouse and dependent children) received income in excess of \$5,000 during the twelve months preceding this disclosure that is related to intellectual property rights and interests (e.g., patents, copyrights)?
 No Yes (if yes, provide name of business entity):
4. Has any organization sponsored or reimbursed you for any travel you have taken that is related to your work for the University of Minnesota? *Note: You are not required to disclose to travel that is reimbursed or sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.*
 No Yes
If yes, report the name of sponsor/organizer, purpose, destination, and duration of trip:
5. Additional details about reported financial interests:

Investigator Certification

I certify, to the best of my knowledge, that the information reported herein is complete and accurate.

Signature of Investigator _____ Date _____

6/26/2012

Subrecipient Risk Analysis and Compliance Record			
Subrecipient Name:		PO #:	
Prime Sponsor:		Date Completed:	
CON#		Grant Administrator:	
Audit Path <input type="checkbox"/> A-133 <input type="checkbox"/> Financial Questionnaire Step 1		Debarment: <input type="checkbox"/> No <input type="checkbox"/> Yes Step 3	
Audit Weaknesses? <input type="checkbox"/> No <input type="checkbox"/> Yes		Initials: <input type="text"/> Date: <input type="text"/>	
Analysis Matrix Step 2		F&A Rate: <input type="text"/> Date: <input type="text"/>	
Instructions: Mark yes or no.			
Criteria		Wt.	Score
is the entity located outside the U.S.?	<input type="checkbox"/> Y <input type="checkbox"/> N	6	0
Will work be done outside the U.S.?	<input type="checkbox"/> Y <input type="checkbox"/> N	3	0
is entity non-profit or government?	<input type="checkbox"/> Y <input type="checkbox"/> N	3	0
is prime award a contract or subcontract (rather than grant)?	<input type="checkbox"/> Y <input type="checkbox"/> N	4	0
is amount of Subgrant/Subcontract more than 500k?	<input type="checkbox"/> Y <input type="checkbox"/> N	4	0
is amount of subaward 50% or more of total award?	<input type="checkbox"/> Y <input type="checkbox"/> N	5	0
Are accounting systems established?	<input type="checkbox"/> Y <input type="checkbox"/> N	10	0
Do audit results indicate weaknesses in the entity's procurement system?	<input type="checkbox"/> Y <input type="checkbox"/> N	3	0
Does entity have a negotiated indirect cost rate agreement?	<input type="checkbox"/> Y <input type="checkbox"/> N	2	0
is entity subject to A-133?	<input type="checkbox"/> Y <input type="checkbox"/> N	2	0
Any prior negative experience with entity?	<input type="checkbox"/> Y <input type="checkbox"/> N	2	0
is there ITAR/EAR type of work?	<input type="checkbox"/> Y <input type="checkbox"/> N	10	0
is the entity using humans, animals, DNA, stem cells, etc. (compliance)?	<input type="checkbox"/> Y <input type="checkbox"/> N	2	0
is entity mature?	<input type="checkbox"/> Y <input type="checkbox"/> N	6	0
is prime sponsor government owned & contractor operated?	<input type="checkbox"/> Y <input type="checkbox"/> N	10	0
is there potential for COI regarding relationship of subrecipient and PI?	<input type="checkbox"/> Y <input type="checkbox"/> N	10	0
Are deliverables tangible products or pivotal to success?	<input type="checkbox"/> Y <input type="checkbox"/> N	7	0
is "Advantaged" status claimed?	<input type="checkbox"/> Y <input type="checkbox"/> N	1	0
Special Considerations? (provide details in notes)	<input type="checkbox"/> Y <input type="checkbox"/> N		
Total Risk Score (≥ than 15 is high and should be escalated)			0
Escalated to PGA? Y <input type="checkbox"/> N <input type="checkbox"/>			
Completed by:		Date:	
		FFATA and/or ARRA Forms Required: <input type="checkbox"/> No <input type="checkbox"/> Yes Date: <input type="text"/>	
		Returned: <input type="checkbox"/> Date: <input type="text"/>	
		Fair and Reasonable Cost Analysis Form II (if App): Received: <input type="checkbox"/> Date: <input type="text"/>	
		FCOI: FDP <input type="checkbox"/> Forms 1&2 <input type="checkbox"/> Date: <input type="text"/>	
		Closeout - Subaward Step 4	
		Release Form: Received: <input type="checkbox"/> Date: <input type="text"/>	
		Completion Process: <input type="checkbox"/> By: <input type="text"/> Date: <input type="text"/>	
Notes:			

Risk Analysis

UMN created this form for its risk analysis procedures. This form is completed for each subaward under Federal Funding.

Northwestern University Subrecipient Risk Assessment Form

Subrecipient:
Infeed SPA and subaward project #

Criteria	Low Risk (0)	Med Risk (1)	High Risk (2)	Weight	x	Score	=	Weighted Score
A-133 or audit reports on file (initial subaward only - does not apply for modifications)	A-133 on file with no material findings	A-133 pending ASRSP review; A-133 with material findings; Independent Auditor's report with unqualified opinion	Independent Auditor's Report with qualified/adverse opinion	4	x		=	
No audit material available			Subrecipient Questionnaire completed	6	x		=	
Domestic or Foreign	Domestic US		Foreign or domestic with foreign component	4	x		=	
Cumulative direct cost amount of subaward/contract	Total = or < \$499,999		Total = or > \$500,000	2	x		=	
Cumulative % of NU award subawarded/contracted to this subrecipient	Total < 50%		Total = or > 50%	3	x		=	
Cost share involved	No		Yes	4	x		=	
Relationship of sub to PI and potential for COI	COI cleared		COI pending or in review due to existing PI relationship	4	x		=	
FCOI policy	Yes		No	1	x		=	
FCOI positive disclosure	No		Yes	4	x		=	
Export controls compliance	N/A	License in place	License pending	4	x		=	
IACUC compliance	N/A; IACUC approval letter attached		Pending	4	x		=	
IRB compliance	N/A; IRB approval letter attached		Pending	4	x		=	
Maturity of subrecipient organization	Mature > 5 years	4-5 years	Unknown, 0-3 years	4	x		=	
Subrecipient organization type	University, Government, Non-profit	Corporation or industry (for-profit)	Unknown, sole proprietor or consultant	4	x		=	
NU award type	Grant	Cooperative agreement	Subaward or contract/subcontract	2	x		=	
Subaward payment mechanism	Fixed price	Cost reimbursable	Upfront payment	2	x		=	
Subrecipient's prior NU experience	Former sub - positive relationship	new sub - no experience (non-University)	Former sub - negative issues	2	x		=	
NU award is from	Non-profit	Cooperative or for-profit	Government or state	1	x		=	
						Total		

Notes:

Risk Level Assignment & Actions (select risk level assigned)

Low 0-11 No action necessary

Medium 12-50 As appropriate, require detailed invoicing for subrecipient; as appropriate, seek guidance from PI, OGR leadership and/or ASRSP on complex contract or compliance issues.

High 51-83 As appropriate, seek guidance from PI, OGR leadership and/or ASRSP, legal and/or Risk Management on complex contract or compliance issues and the additional monitoring that should be put in place such as more detailed invoices, more frequent/detailed financial and/or programmatic reporting, etc. including how and by whom the monitoring will be done.

Very High 84 or > 84 Monitoring and

OGR Reviewer _____ Date _____

This subaward/modification has been reviewed for compliance with NU and sponsor terms and conditions and is approved for transmittal to subrecipient for review and execution. _____ Signature and Date _____

General Instructions:

Risk assessment form must be completed each time a new subaward is issued to a foreign, for-profit, or other non-University organization (Assessment may be needed for modification to existing subawards, circumstances to be determined.)

The weighted score will determine actions required. Financial thresholds are cumulative. Therefore, modifications may trigger the need to reassess risk. Current audit reports are considered each time risk assessment is conducted. OGR is responsible for gathering initial information to determine whether or not a subrecipient requires additional monitoring. This does not include reviewing A-133 audits and Independent Auditor's Reports.

ASRSP is responsible for requesting and reviewing annual A-133 audit reports. ASRSP will review all audited statements with material findings, qualified opinions and for foreign institutions.

ASRSP and OGR will make determinations on how to address any issues and work closely on these matters. Any circumstances not covered on the risk assessment form may be indicated in the Notes section of this form. The circumstances may increase the risk of the subaward.

Subrecipient annual audit review: ASRSP will notify OGR if after review of an A-133 audit any action is required

Risk Analysis

NU Subrecipient Risk Assessment form is used as a tool to assess and score information gathered from Subrecipients for certain risk elements

FFATA – Search for Prime Award Number in Worklist

Firefox | FFATA Sub-award Reporti... | General Services Administration (US) | https://www.fsrs.gov/?s=contracts | ffata

Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)

Home | Profile | **Worklist** | Create / Review Reports |

awardee worklist | Thursday, March 28, 2013 | 8:58 am | krzyzek@umn.edu | Log-in to eSRS | Logout

My Worklist | Contracts Not Added | Grant Awards Not Added

Note
The Worklist is an organizational tool for convenience. It allows the prime awardee to organize the awards for which they have reporting responsibility. They can search for and add awards (both contracts and grants awarded to their registered DUNS number) to their work list from contracts reported in FPDS-NG and grants reported through the Agency's FAADS+ submissions to USA Spending. They can create new FFATA subaward reports against those prime awards. They can view unassigned prime contracts and/or grants awarded to their registered DUNS number and add them to their worklist. There is no deviation in workflow between managing prime contracts and grants in the Awardee Worklist. Click on the Contracts Not Added or Grants Not Added tab to view any contracts/awards in the system that match your DUNS # and have not been added to your worklist.

Search

Search For and Add Award | Create New Report | Report List | Items 1-20 of 216 | Previous | Jump 1 | Next

Award Number	Top Level Agency	Agency	Type	Options
00E00790	ENVIRONMENTAL PROTECTION AGENCY	ENVIRONMENTAL PROTECTION AGENCY	grant	Remove Existing Reports
00E00813	ENVIRONMENTAL PROTECTION AGENCY	ENVIRONMENTAL PROTECTION AGENCY	grant	Remove Existing Reports
00E01135	ENVIRONMENTAL PROTECTION AGENCY	ENVIRONMENTAL PROTECTION AGENCY	grant	Remove Existing Reports
0940818	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1061308	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1068201	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
10CA11420004147	AGRICULTURE, DEPARTMENT OF	FOREST SERVICE	grant	Remove Existing Reports
1100528	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1105895	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1117153	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1123964	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1123980	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove
1136607	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1139501	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove
1146243	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1146820	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports
1147079	NATIONAL SCIENCE FOUNDATION	NATIONAL SCIENCE FOUNDATION	grant	Remove Existing Reports

FFATA Reporting – Review Prime Award Details

Firefox | FFATA Sub-award Reporti... | General Services Administration (US) | https://www.fsr.gov/index?s=ffata_reports&_mode=_form&_tab=core&_do_edit=1&report_step=4&id= | ffata

Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS)

Home | Profile | Worklist | Create / Review Reports |

FFATA reports | Thursday, March 28, 2013 | 9:01 am | krzyzek@umn.edu | Log-in to eSRSS | Logout

U54NS065768

[BACK TO REPORT LIST](#)

- 1 Instructions
- 2 Enter Award ID (FAIN)
- 3 Grant Award Details
- 4 Prime Award Details**
- 5 Subawardee Data
- 6 Review
- 7 Submit Report

Prime Award Details

Note: Some fields have been pre-populated from data in FAADS+ and CCR; please review the report to identify and complete required fields that have not been pre-populated. For specific data sources by data element, consult the data dictionary found in the Tips section.

Save & Go Back | Cancel | Save | Save & Continue

FFATA Report For Grants

* Indicates a required field

- 1. Federal Award Identifier Number (FAIN)*:**
U54NS065768
- 2. Federal Agency ID*:**
7529
 ? Is this information correct?
 Yes No
- 3. Federal Agency Name*:**
NATIONAL INSTITUTES OF HEALTH
- 4. Prime Awardee DUNS #*:**
555917996
 ? Is this information correct?
 Yes No
- 5. DUNS Number +4:**
- 6. Prime Awardee Name*:**
REGENTS OF THE UNIVERSITY OF MINNESOTA
- 7. Prime Awardee Doing Business As Name:**
OFFICE SPONSORED PROJECTS ADM
- 8. Prime Awardee Address*:**
Street Address*:
200 OAK ST SE
City*:

Progress

- ✓ FFATA Details
- ✓ Federal Award Identifier Number (FAIN)
- ✓ Federal Agency ID
- ✓ Federal Agency Name
- ✓ Awardee DUNS #
- ✓ DUNS Number +4
- ✓ Awardee Name
- ✓ Awardee Doing Business As Name
- ✓ Awardee Address
- ✓ Awardee Parent DUNS #
- ✓ Principal Place Of Performance (POP)
- ✓ CFDA Program Number(s)
- ✓ Project Description
- ✓ Total Federal Funding Amount
- ✓ Obligation/Action Date
- ✓ Report Month
- ✓ In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific SAM record, represented by a DUNS number, belongs) receive (1) 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?
- ✓ Subawardee Data

Tips

Clicking 'Save' or 'Save and Continue,' will save your report in draft (DRT) and allow you to leave and continue your report later.

Click 'Save and Continue' to save information on the current page and go to the next page of the form.

FFATA Reporting – Review Subawardee Data

Firefox | FFATA Sub-award Reporti... | General Services Administration (US) | https://www.frs.gov/index? | ffata | Thursday, March 28, 2013 | 9:02 am | krzyzek@um.edu | Log-in to eSRMS | Logout

FFATA reports

U54NS065768

[BACK TO REPORT LIST](#)

Subawardee Data

Save & Go Back | Cancel | Save | Save & Continue

1. Subawardee Information: * indicates a required field

Subawardee DUNS*: 003985512 [Change DUNS](#) ←

DUNS Number +4:

Subawardee Name*: THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

Subawardee Doing Business As Name:

Subawardee Address*:

Street Address*: 1111 FRANKLIN ST 12TH FL

City*: OAKLAND

State*: California

Country*: United States

Zip+4*: 946075201

Congressional District*: 09

Subawardee Parent DUNS*: 071549000

Amount of Subaward*: 50000.00 ←

Subaward Obligation/Action Date*: 2013-02-08

CFDA Program Number(s): 93.853 Extramural Research Programs in the Neurosciences and Neurological Disorders

Progress

- ✓ FFATA Details
- ✓ Subawardee Data
 - Subawardee Information
 - ✓ Subawardee DUNS
 - ✓ DUNS Number +4
 - ✓ Subawardee Name
 - ✓ Subawardee Doing Business As Name
 - Subawardee Address
 - ✓ Subawardee Address
 - ✓ Subawardee Parent DUNS
 - ✓ Amount of Subaward
 - ✓ Subaward Obligation/Action Date
 - Date
 - ✓ CFDA Program Number(s)
 - ✓ Federal Agency ID
 - ✓ Federal Agency Name
 - ✓ Subawardee Principal Place of Performance
 - Performance
 - ✓ Subaward Number
 - ✓ As provided to you by your subawardee, in your subawardee's business or organization's preceding completed fiscal year, did its business or organization (the legal entity to which the DUNS number it provided belongs) receive (1) 80 percent or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements; and (2) \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?
 - ✓ As provided to you by your subawardee, does the public have access to information about the compensation of the executives in the subawardee's business or organization (the legal entity to which the DUNS number it provided belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?

Tips

Clicking 'Save' or 'Save and Continue,' will save your report in draft (DRT) and allow you to leave

Entering the Subrecipient DUNS will auto-fill some data in record

Verify amount of Subaward and Subaward Obligation/Action Date

FFATA Reporting – A Successful Submission

The screenshot shows a web browser window with the following elements:

- Browser:** Firefox, address bar shows <https://www.fsrs.gov/index?>
- Header:** Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS). Includes logos for FFATA, E-GOV, and USA.gov.
- Navigation:** Home | Profile | Worklist | Create / Review Reports
- Page Title:** FFATA reports
- Page Content:**
 - Report ID: # U54NS065768
 - Left sidebar menu:
 - 1 Instructions
 - 2 Enter Award ID (FAN) - circled in black
 - 3 Grant Award Details
 - 4 Prime Award Details
 - 5 Subawardee Data
 - 6 Review
 - 7 Submit Report
 - Central yellow box: **Report Accepted**. Report has been accepted. Note: Please be aware that all information collected on the FSRS website (www.fsrs.gov), including registration information and report data, will be visible to the public on a public website (www.usaspending.gov).
 - Buttons: Back, Return To List, Save PDF
 - Right sidebar: Report History table showing "Mar 28, 2013 9:08 am Report Submitted" with a "Reopen to Edit Report" button.
- Footer:** For Help: Federal Service Desk | Privacy Policy | Turn Accessibility Mode On | Awardee User Guide | FSRS Awardee User Demonstration | Resources Page | Version 3.4