VCU Office of Sponsored Programs: Process When VCU Serving as Subrecipient (Our sponsor is Pass-through Entity)
Federal Demonstration Partnership
Expanded Clearinghouse (FDP EC)

• VCU is an institutional member of the Federal Demonstration Partnership, an initiative comprised of 10 federal agencies and over 150 institutions working to improve processes relating to research administration.

• The “Expanded Clearinghouse” is a specific FDP project that aims to reduce the need for the “subrecipient commitment forms” that have proliferated following the implementation of Uniform Guidance.
Federal Demonstration Partnership
Expanded Clearinghouse (FDP EC)

• The FDP EC allows for collaborating institutions, of which VCU is one, to provide institutional profile information posted to the following FDP url: https://fdpclearinghouse.org/

• The aim is for important **entity-specific** information to be posted centrally so that a potential Pass-through Entity (PTE) can review and assess the viability and risk of a potential proposed subrecipient without need for extensive additional forms to be completed.
Process when our Sponsor is Pass-through Entity (PTE)

VCU serving in the role of Subrecipient

• When VCU is serving in the role of “Subrecipient”, our sponsor (serving in the role of “Pass-through Entity”) must assess the risk we present as a proposed collaborator.
• VCU provides information including face page, scope of work, budget, budget justification, biosketches, etc. to document our ability to complete the work as proposed. This is “project-specific” documentation.
Process when our Sponsor is Pass-through Entity (PTE)
VCU serving in the role of Subrecipient

• Effective July 5, 2017, some aspects of the process for documenting our role as a Subrecipient in a sponsored project proposal in RAMS-SPOT will stay the same, and some will change.

• Let’s start with what stays the same...
Process when our Sponsor is Pass-through Entity (PTE)

VCU serving in the role of Subrecipient

• **VCU** will provide “subrecipient mini package” at proposal time to our sponsor to include:
  • Signed AOR Authorization
  • Scope of work
  • Line item budget
  • Budget justification
  • CV/biosketches for key personnel

Note: PI/SS upload the subrecipient mini package to the RAMS-SPOT Funding Proposal, Other Submission Details view, Sponsor Submission Package

This is **NOT** a change to current process!
Process when our Sponsor is Pass-through Entity (PTE) 

VCU serving in the role of Subrecipient

• **VCU PI/SS** will evaluate the Federal Demonstration Partnership Expanded Clearinghouse list of participants and discern whether VCU’s proposed sponsor is **on the list**, or is **not on the list**.

• FDP EC List is available at this url:  
  https://fdpclearinghouse.org/

This IS a change to current process!
Process when our Sponsor is Pass-through Entity (PTE)  
VCU serving in the role of Subrecipient

**SUMMARY**

<table>
<thead>
<tr>
<th>PTE/sponsor <strong>not on</strong> FDP EC list</th>
<th>PTE/sponsor <strong>on</strong> FDP EC list</th>
</tr>
</thead>
<tbody>
<tr>
<td>Upload the following VCU documents to RAMS-SPOT at the time of proposal submission:</td>
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</tr>
<tr>
<td>• AOR Authorization (for VCU OSP signature)</td>
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<tr>
<td>• Scope of work</td>
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<tr>
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<td>• Budget justification</td>
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<td>• CV/biosketches for key personnel</td>
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</tr>
<tr>
<td>• Plus, other forms they may request</td>
<td>• Additional forms are unlikely.</td>
</tr>
</tbody>
</table>

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Process when our Sponsor is Pass-through Entity (PTE)

VCU serving in the role of Subrecipient

Additional Resources on OSP website:
http://www.research.vcu.edu/osp/index.htm

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

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

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

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

VCU OSP Process when VCU serving as Subrecipient in a Funding Proposal

VCU serving as Subrecipient
Our sponsor is serving as PTE
(Pass Through Entity)

Provide VCU subrecipient mini package to PTE at proposal time to include:
- Signed VCU AOR Authorization
- VCU scope of work
- VCU line item budget
- VCU budget justification
- VCU Subrecipient CV/biosketches for key personnel

*Note:* Upload the VCU subrecipient mini package to the RAMS-SPOT Funding Proposal, Other Submission Details View, Sponsor Submission Package.

Proposed PTE/sponsor participates in Federal Demonstration Partnership Expanded Clearinghouse (FDP EC) project? List of participants: https://fdpclearinghouse.org/

- No additional forms should be needed.
- “All Occasion Letter to PTE when VCU is Subrecipient” can be provided (available on VCU OSP website, Forms page http://www.research.vcu.edu/forms/index.htm#osp_forms)

Non FDP EC PTE

FDP EC PTE

- Additional forms may be requested by PTE/sponsor and VCU OSP will review and provide AOR signature at proposal time
- Provide “All Occasion Letter to PTE when VCU is Subrecipient” if helpful (available on VCU OSP website, Forms page http://www.research.vcu.edu/forms/index.htm#osp_forms)
VCU serving in the role of Subrecipient
Communicating with the Sponsor/PTE

We have created an “All Occasion Letter to PTE when VCU is Subrecipient”
(available on OSP Website Forms page: http://www.research.vcu.edu/forms/index.htm#osp_forms)

Use this letter to...
• Send the “VCU subrecipient mini-package” to the sponsor, or
• “Push back” when an FPD EC Sponsor requests redundant forms from VCU, or
• Provide a non-FDP EC Sponsor with the link to the VCU profile and inform the sponsor about the FDP Expanded Clearinghouse project.