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

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

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

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

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

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

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

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

• Effective July 5, 2017, some aspects of the process for documenting inclusion of a subrecipient in a VCU sponsored project proposal in RAMS-SPOT will stay the same, and some will change.

• Let’s start with what stays the same...
Process When Proposals Involve a Subrecipient

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

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

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

*See next slide for details

This is NOT a change to current process!
Process When Proposals Involve a Subrecipient

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

• Who is the Authorized Organizational Representative (AOR)?
  ➢ A person with signature authority to legally bind the institution, typically a person in the Office of Sponsored Programs.

• What can serve as Signed AOR Authorization?
  • AOR-signed Sponsor face page, or
  • AOR-signed “Subrecipient Project-Specific Consortium Letter” (available on VCU OSP website, Forms page http://www.research.vcu.edu/forms/index.htm#osp_forms), or
  • AOR-signed Consortium letter (subrecipient may use their own)
Process When Proposals Involve a Subrecipient

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

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

This IS a change to current process!
Process When Proposals Involve a Subrecipient

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

- **VCU PI/Study Staff** will evaluate the Federal Demonstration Partnership Expanded Clearinghouse list of participants and discern whether VCU’s proposed subrecipient is **on the list**, or is **not on the list**.

- FDP EC List is available at this url: [https://fdpclearinghouse.org/](https://fdpclearinghouse.org/)

This IS a change to current process!
## Process When Proposals Involve a Subrecipient

Check FDP: [https://fdpclearinghouse.org/](https://fdpclearinghouse.org/)

<table>
<thead>
<tr>
<th>If VCU PI/SS see that...</th>
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<tbody>
<tr>
<td><strong>Subrecipient not on FDP EC list</strong></td>
<td><strong>Subrecipient on FDP EC list</strong></td>
</tr>
<tr>
<td>Provide the following in addition to the subrecipient mini package items:</td>
<td></td>
</tr>
<tr>
<td>• Completed and signed “VCU Entity Form for non-FDP EC Subrecipients” *</td>
<td>• No additional forms should be requested. (If you ask for additional forms, they will say “NO!”)</td>
</tr>
<tr>
<td>(All forms are available on VCU OSP website, Forms page <a href="http://www.research.vcu.edu/forms/index.htm#osp_forms">http://www.research.vcu.edu/forms/index.htm#osp_forms</a>)</td>
<td></td>
</tr>
<tr>
<td>• Rate agreement, if applicable</td>
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*If subrecipient indicates on the “VCU Entity Form for non-FDP EC Subrecipients” that they will be relying on VCU’s COI policy because they do not have one of their own, then additional forms must be completed. Please refer to the OSP website Navigator, Proposal Tab, “VCU Serving in Role of PTE with Subrecipients” accordion page for details.
### Process When Proposals Involve a Subrecipient
**VCU serving in the role of Pass Through Entity (PTE)**

#### SUMMARY

<table>
<thead>
<tr>
<th>Subrecipient <strong>not on</strong> FDP EC list</th>
<th>Subrecipient <strong>on</strong> FDP EC list</th>
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<tr>
<td>• Completed and signed “VCU Entity form for non-FDP Expanded Clearinghouse Subrecipients” (<a href="http://www.research.vcu.edu/forms/index.htm#osp_forms">available on VCU OSP website, Forms page</a>)</td>
<td>• No additional forms should be requested by VCU at this time.</td>
</tr>
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</tr>
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</table>
Process When Proposals Involve a Subrecipient

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

Additional Resources on OSP website:

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

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

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

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

- 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

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VCU OSP Process for Inclusion of Subrecipient in a Funding Proposal

VCU serving as PTE (Pass Through Entity) and project has proposed subrecipients

All proposed subrecipients provide "subrecipient mini package" at proposal time to include:
- Signed AOR Authorization
- Subrecipient's scope of work
- Subrecipient’s line item budget
- Subrecipient’s budget justification
- Subrecipient CV/biosketches for key personnel

Notas:
VCU’s "All Occasion Letter to Subrecipient" when VCU is PTE can be used to request this information.

Upload the subrecipient mini package to the RAMS-SPOT Primary Budget, External Collaborator view.

Non FDP EC subrecipient

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

FDP EC subrecipient

Include with subrecipient mini package the following additional documents:
- Completed and signed "VCU Entity Form for non-FDP EC Subrecipients" (available on VCU OSP website, Forms page http://www.research.vcu.edu/forms/index.htm#osp_forms)
- Rate agreement, if applicable

No additional forms should be requested

v. 2017-06-23

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Process When Proposals Involve a Subrecipient

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

Additional Resources on OSP website:

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