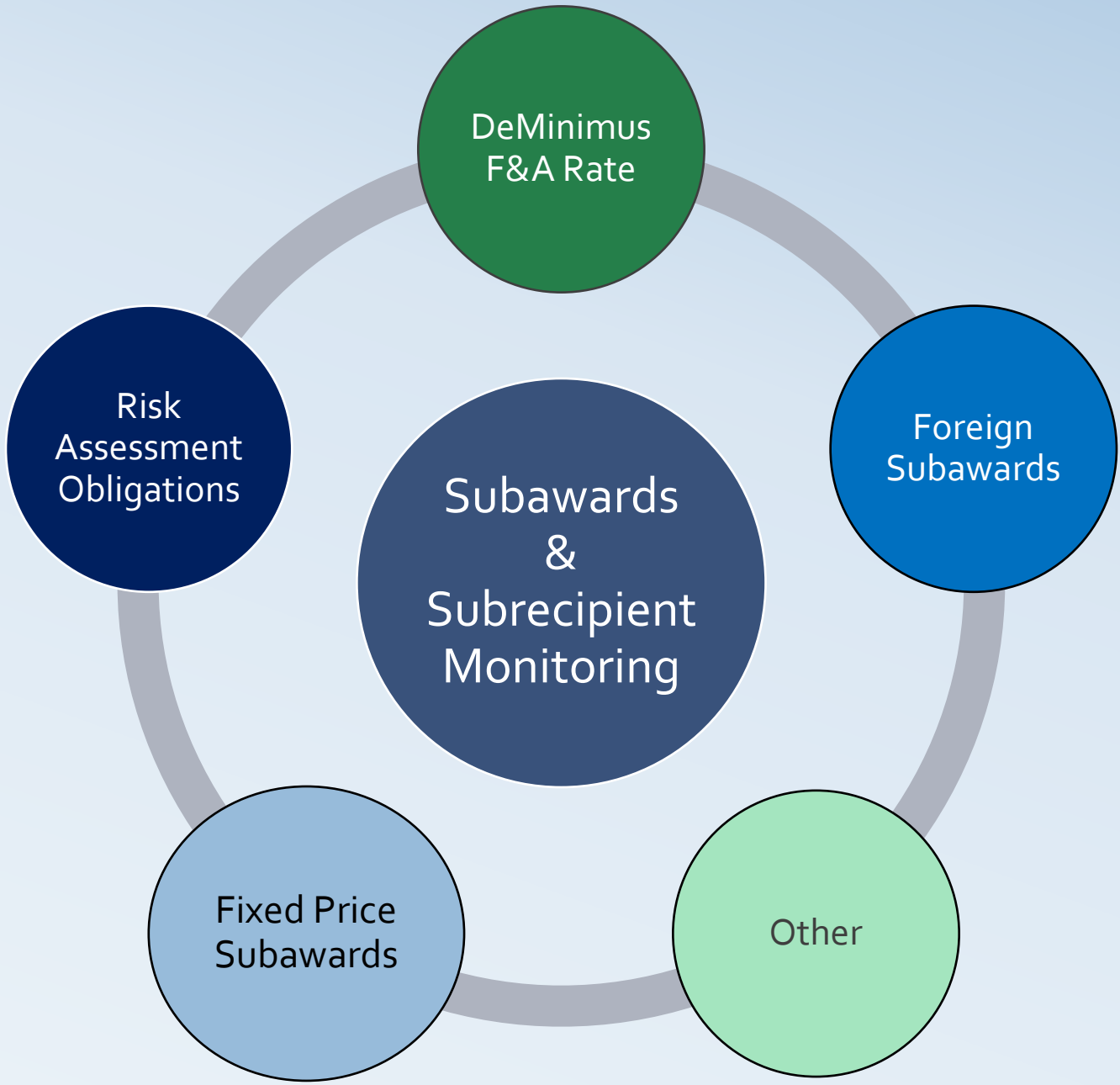


Open Issues with Federal Subawards & Subrecipient Monitoring

Pamela Webb
COGR October 2017





1. Establishing Valid & Acceptable F&A Rates for For-Profit Entities
2. Use of De Minimus Rate for Entities with Expired F&A Rates



DE MINIMUS F&A RATE

1. Timing of Risk Assessments
2. Reliance on Federal Audit Clearinghouse for Audit Findings
3. Can FDP Expanded Clearinghouse be an alternative for FAC?
4. “Safe Harbor” – Need for PTE Audit Review or Follow Up
5. Lack of Direct Link to FAC Audit Package



RISK ASSESSMENT

1. Burden & Lack of Standardization for Prior Approvals
2. Need for Standards to Handle Subawards that the Simplified Acquisition Threshold
3. Need to Reduce Burden of Multiple FP Subawards for the Same Subrecipient for the Same Project
4. Difficulty of Managing Clinical Trial Fixed Price Subwards with Variable Enrollment and Costs
5. Adding Fixed Price Subawards that involve Cost-Sharing



FIXED PRICE SUBAWARDS

1. (See also Fixed Price Subawards, all items)
2. Lack of Clarity about whether SAM Registration is Required, or just a DUNS Number
3. Establishing Standards for Appropriate Foreign Subrecipient Risk Assessment & Monitoring (w/FDP)



FOREIGN SUBAWARDS

1. Federal Agency Acceptance of Negotiated F&A Rates
2. Pass-through Entity Acceptance of Negotiated F&A Rates



OTHER

1. **Finalize the List**
2. **Prioritize**
3. **Which Ones Can COGR (also FDP) Influence?**
4. **What Do We Want to Recommend?**

NEED YOUR INPUT!

