Open Issues with Federal Subawards & Subrecipient Monitoring

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1. Establishing Valid & Acceptable F&A Rates for For-Profit Entities

2. Use of De Minimus Rate for Entities with Expired F&A Rates
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
1. Burden & Lack of Standardization for Prior Approvals

2. Need for Standards to Handle Subawards that Exceed 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
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)
1. Federal Agency Acceptance of Negotiated F&A Rates
2. Pass-through Entity Acceptance of Negotiated F&A Rates
1. Finalize the List
2. Prioritize
3. Which Ones Can COGR (also FDP) Influence?
4. What Do We Want to Recommend?

NEED YOUR INPUT!