

Question	Answer
How great is an organization negatively impacted if they have to withdraw a subaward due to non-compliance?	This depends on whether it is the Federal sponsor terminating the Agreement which will be reported in FAPIIS and could impact the subrecipient's future Federal funding. The impact of your organization terminating, may impact your ability to complete the sponsored work if you cannot find a replacement and depending on the reason for the termination could prevent you from working with the sub in the future.
Is training voluntary or required? Do you do training for faculty and PI's as well as staff?	Uniform Guidance has a training element to its compliance requirements that would be reviewed as part of your annual Single Audit. It does not have a mandated process regarding training, so your organization has flexibility in how you implement it. PI/faculty and departmental trainings are highly recommended.
I recently had an institution refuse to provide/sign a subrecipient commitment form since they are registered as a nonmember in the FDP clearing house. We are not members. How would you handle this? Does it matter if they are a member vs. nonmember?	The FDP Clearinghouse is a repository for entity level data, however it does not preclude the request of commitment or project level data needed at time of proposal. As a non-FDP member you are not required to use the FDP Clearinghouse for entity level data, however it is highly recommended to reduce the administrative burden of all parties.
Now that UG was revised to clarify that subrecipients aren't required to register in SAM.gov but only have a DUNS/UEI, how do you envision this tool will be used in the future?	We are waiting to see what information will be required to obtain a UEI vs full SAM registration and will go from there. There may be some implications in identifying parent companies but the Govt. has now said the UEI's will not roll out until 2022.
If someone looks good on FDP is it necessary to check them on SAM.gov?	FDP will not verify debarment or suspension, though it is highly unlikely that any FDP members would be. However, it is up to your organization if they want to run each subrecipient through SAM.
Is there audit certificate exemption if the audit report is on FAC?	CFR 200.512 requires all PTE's to obtain Single Audits and certification (SF-SAC Form) from the Federal Audit Clearinghouse which should preclude organizations from sending audit certification forms to subrecipients.
Who enters info into FSRs?	It depends on the role at the institution
what do you do when a sub will not provide their financials as part of the initial risk assessment?	Your organization can determine the action you take regarding requiring financial documents. Our organization will not issue a subaward if we do not obtain the financials, while others will just assign a high risk status to those.

Do we need SSN to check PI debarment or the institution EIN is suffice on OIG website?	Typically you can use the name and birthdate of the PI to verify exclusion, but each agency has a different verification process.
Does that point about altering the terms include the free text term box in attachment 2?	Terms and conditions should not be added to Attachment 2 of the FDP template unless they are specific from the sponsor or based on risk assessment of the subrecipient.
Are there any other exceptions to the 30 day requirement to pay an invoice for a CR subaward? For instance, if the invoice has been signed off by the PI, but Accounts Payable has put the invoice on hold until the vendor updates their banking information in a separate system	Uniform Guidance does not have exceptions to the timeframe for paying proper invoices. However, I would recommend documenting any exceptions and the reason for them for audit purposes.
If it is too administratively burdensome to renew all subawards annually, is it ok to have other processes in place to monitor SAM expiration dates, burn rate, etc. as stand-alone processes?	Your organization can determine the best process to manage your subawrad as long as it is within the parameters of Uniform Guidance. It doesn't have to be structured in any other prescribed manner.
I am at a small PUI with a reduced OSP (cradle to grave) and new staff in finance. Who monitors invoicing for subs at your institution?	Invoicing can happen at the department or central office level. It really depends on the structure of your organization.
On the point just made about slow invoicing, can you make them invoicing on a monthly basis?	The FDP template allows for no more often than monthly and no less frequently than quarterly, but if you aren't using the FDP template you can specifically request monthly invoices.
is there a matrix where we can get that info by agency?	The FDP website has the prior approval matrix and allowable cost matrix by Agency.
What do you do when if a sub has not filed their audit within the required timeframe?	The Uniform Guidance has a list of potential corrective actions for non-compliance under section 200.339 Remedies for Non-Compliance.
Do you send a certification form to a clearinghouse member if the data is old?	I would contact the Clearinghouse Contact if the data is old before sending any forms.
Are you doing annual audit certifications for not for profits or just initial certification? Not much will change	CFR 200.512 requires all PTE's to obtain Single Audits and certification (SF-SAC Form) from the Federal Audit Clearinghouse which should preclude organizations from sending audit certification forms to subrecipients.
Do you issue MDL's only for findings on your awards (programs/CFDA's) or on any findings that you think could affect your awards.	Uniform Guidance only requires you issue MDL's for findings directly related to awards from your institution in CFR 200.521.

What is required from our end to get UEI?	UEI's will not go into effect until April 2022 and will automatically be assigned to any active orgs in SAM.gov.
when can we start reporting only 30K for ffata	11/12/2020
when do we need to complete a risk assessment? Should this be done prior to issuing an award?	There is no required point that the risk assessment has to be done, but it should follow your institutional process. I recommend prior to issuance of the subaward so you can contractually mitigate any risks.
If an Institution does not have a Risk Assessment Tool in place, where is a good place to start for developing or implementing one?	The FDP has a sample Risk Assessment Questionnaire for anyone to use.
When to you stop reviewing annual audits for a sub ? Based on sub closed date?	We will review audits for any fiscal year there are expenditures to the subrecipient.
How do you verify parent company relationships? What website or tool do you rely on?	SAM.gov will show parent relationships. Otherwise you will need to request the information from the subrecipient.
Do you consider project specific risk where an entity may be low risk on one issued subaward and high risk on a different subaward?	Dartmouth and Stanford do. We assess both project and entity risk.
Do you do subrecipient monitoring on subs not receiving federal funds?	Dartmouth and Stanford do, we have one policy that applies to all subs regardless of our prime sponsor.
Who is responsible for checking on the subaward company, the PI? GCO?	We have a central office person that conducts an entity level review. It depends on how your organization is set up.
What if the subaward is pre-revenue or a small start-up company? How do you evaluate the risk, and do you issue subaward differently if they don't have an audit or financial statements?	Organizations like those would automatically be assessed at a high risk and mitigations like withholding final payment prior to receipt of deliverable would be included in the agreement.
Do you issue subs on small not for profits that don't have single audits and no other financial statements?	Yes, we just mitigate risk contractually as needed.
If a sub is high risk & we're using FDP template & we want to add terms (e.g., invoice support,	If you're adding terms based on risk assessment, you don't need to remove the moniker as long as you are adding and not altering existing terms.

ledgers, etc. with subaward invoices) should we be removing the FDP moniker?	
Can you provide examples of additional specific terms to mitigate project-based risk?	We would refer to specific conditions CFR 200.208
We review the FAC with each new subaward issued. So if we issue 6 subawards to a particular entity, that means 6 checks to the FAC. Are you saying you do that process once a year and that stands for all issued subs? And is it a proactive review before the subaward or is it done at a set time annually?	You only need to review the Single Audit once per year within six months of the audit being posted to the FAC.
Do you complete regular desk reviews or do you just monitor each invoice?	Dartmouth does both, random desk reviews and reviewing each invoice. Stanford departments will ask for invoice backup to review if there are red flags and the central office will desk review if the departments have issues.
Can you provide your organization's documentation of the subrecipient monitoring plan that is in place?	Dartmouth's and Stanford's policy can be found on our website.
I.E., does every subrecipient agreement have a documented monitoring plan? Or is there a higher-level sub. monitoring plan documented?	It depends what your policy requires. Our policy is at a higher level, and we have individualized plans for subrecipients that require additional monitoring/high level.
What do you do if you do the random invoice audit and you have an entity that does not respond to repeated requests?	After collaboration with our PI we would refer to the regulations and options listed in 200.339 (remedies for noncompliance) for the most suitable
During the postaward stage, what are we need to pay attention on foreign subaward monitoring ?	Invoicing, deliverables, exchange rates, invention reporting, exchange of data in accordance with country requirements like GDPR
Do you have guidelines for what elements are evaluated for "high level" invoice review and what would be checked in a desk review/audit?	A desk review may include documentation of effort, fringe, receipts for travel or supplies, comparison of IDC charged with rate agreements. Dartmouth requires documentation to substantiate each charge on the invoice.
Can entities still require a SAM registration?	Institutional policies can require what suits their needs. The federal regulations no longer require subrecipients to register in SAM, but they do require a UEI once it is implemented.

How do you review if the subrecipient owes funds to the federal government? One of your slides indicated Sam.gov

SAM has a field for delinquent Federal debt. You can also check FAPIIS.