

Subawards

Contents

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- Department subaward process
- Sponsored Program subaward process
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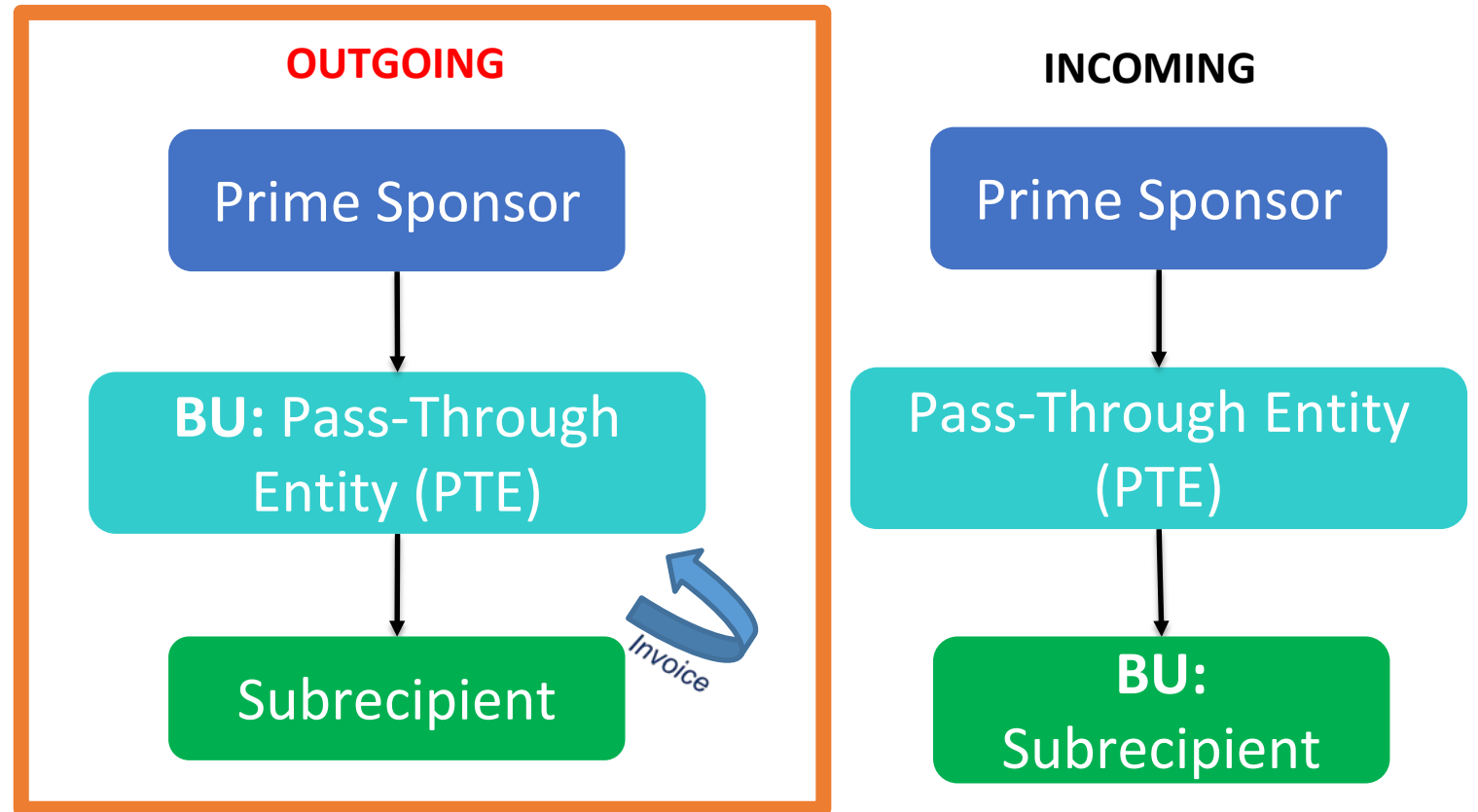
Who is this for?

Department and Grant Administrators who are involved in grants with outgoing subawards who need to better understand the process and key responsibilities.

Subaward: An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity.

Pass-Through Entity (PTE): A non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.

Subrecipient: A non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program.



A **subaward** is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient.

Contractors (Vendor, including individuals or entities that act as a vendor of consultant services). A contract is for the purpose of obtaining goods and services for the pass-through entity (BU)'s own use and creates a procurement relationship with the contractor.



- There are a variety of reasons why the University would enter into a subaward agreement. (E.g., Subrecipient has resources or skills necessary to complete a task that are not readily available at BU).
- Treating entity as a subrecipient or a contractor is determined at Pre-Award stage.

3 person subaward team in SP & **13** people in PAFO covering **103** CRC/MED departments

Received Month (All)
Received Year 2017

Transaction Type	Count
Carryforward	23
Continuation	204
Increment	73
New	230
No Cost Extension	98
Other	69
Select	3
Grand Total	700

Received Month (All)
Received Year 2018

Transaction Type	Count
Carryforward	28
Continuation	267
Increment	72
New	325
No Cost Extension	81
Other	110
Select	27
Grand Total	910

Received Month (All)
Received Year 2019

Transaction Type	Count
Carryforward	41
Continuation	302
Increment	57
New	322
No Cost Extension	109
Other	137
Select	20
Grand Total	988

2019 STATS

- **988** subs, **82** SP sub actions per month

All sub actions triaged first-in, first-out
(based on date of AN)

- PAFO receives over **3,000** subrecipient invoices annually

Step 1: Making initial decisions about subawards for a proposal

Collaborating with Outside Organizations

Many applications submitted to federal agencies rely on collaborations with Investigators from outside organizations; as such, an agreement to collaborate will need to be established at time of submission.



Requesting a Subaward

Once the the Who, Where, What, and How Much have been established, the **submitting Institution** will organize the collection and review of required subaward components.

Project Info



- Funding Announcement
- Project Title
- Sub Award Project Period

Budget



- Direct Costs per Year
- Effort Requirement
- Project Specific Expenses

Documents



- Letter of Intent
- Scope of Work
- Budget & Justification
- Biosketches
- Facilities and Resources
- Letter of Support
- + Any Funding Announcement
- Specific Requirements (e.g. IP Letter)

Application Info



- Performance Site Location
- Key Personnel Information
- Human Subjects (if applicable)
- Vertebrate Animals (if applicable)
- Select Agents (if applicable)

Adherence to Deadlines

Sending and Receiving Subawards adds additional approval cycles to submission timelines: a delay in one institution will delay all institutions

Missed Deadlines at Sub Site

Will Delay Approvals at Prime

Not Enough Lead up Time for Sub Request

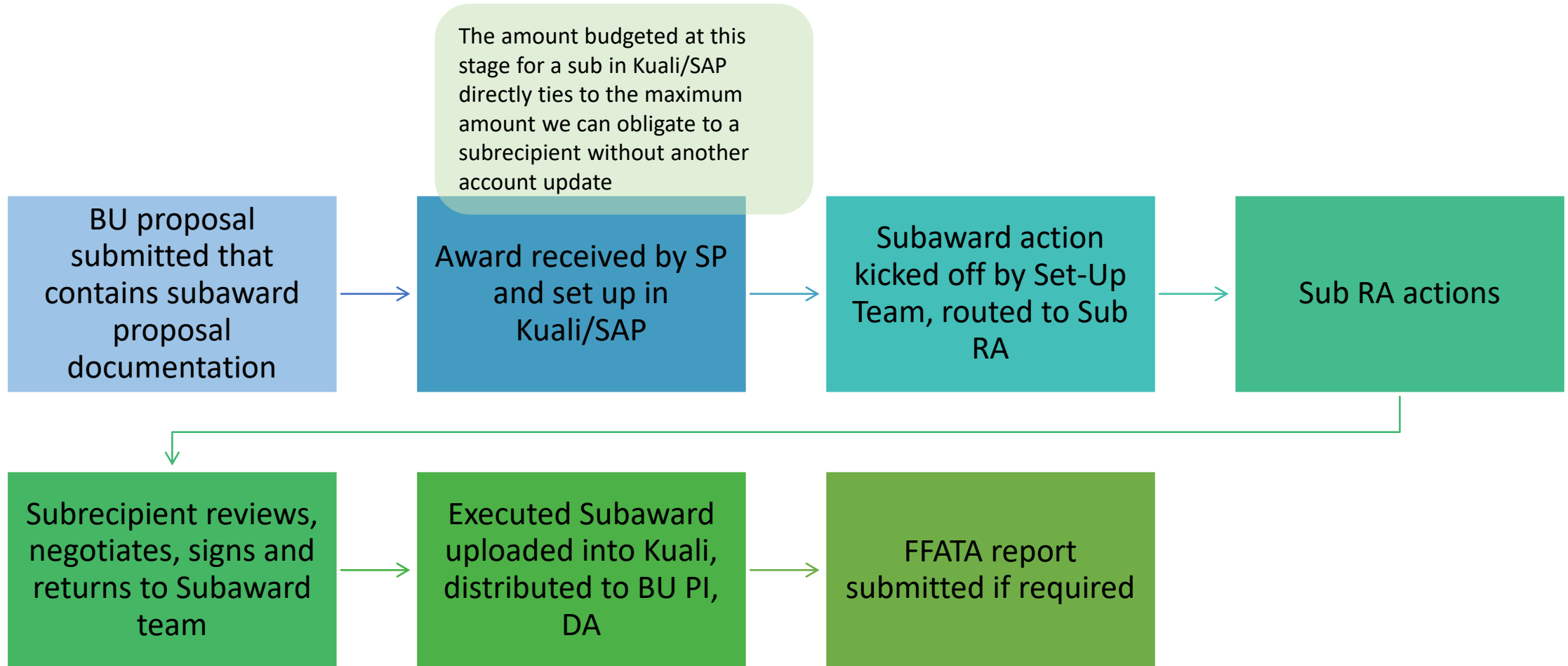
Will Delay Approvals at Sub Site

Hierarchy of Review

Each Sub Site is beholden to their internal institutional review process → appropriate advance notification is crucial for successful collaboration

Step 2: Creating and completing the sub agreement

High-Level Subaward Process Overview



- Locates subaward proposal documents
- Obtains PI concurrence for sub action
- Performs subrecipient risk analysis (for new and some current subrecipients)
- Obtains funds commitment from PAFO
- Creates subaward/ modification
- Sends subaward/ modification to subrecipient

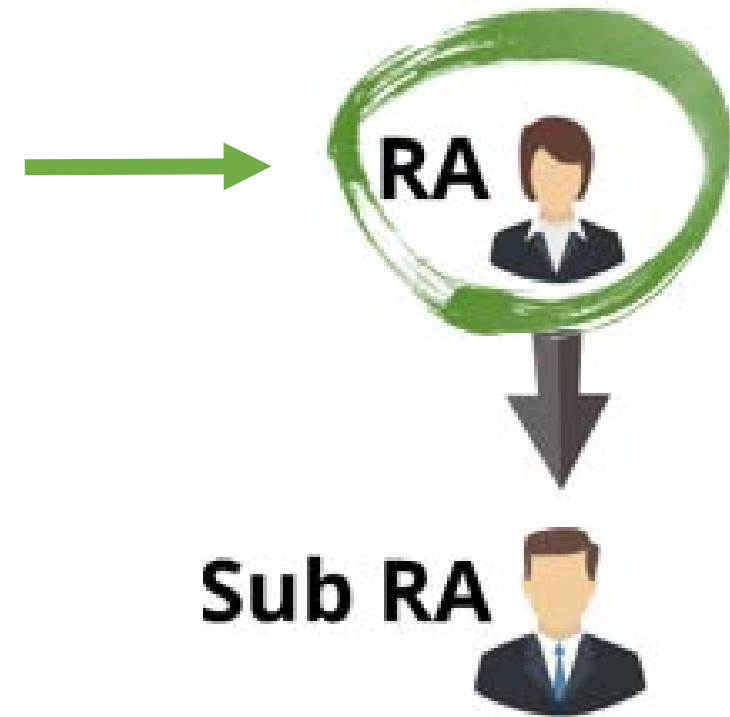


The first point of contact for subaward questions should be your usual pre-award SP RA, who will answer your question or direct you to the correct person.



For questions such as:

- *Has this sub action been kicked off?*
- *Does this subrecipient need carryover approval?*
- *Can you use these updated budgets/documents in my pending sub agreement?*



<http://www.bu.edu/researchsupport/contact/departmental-contacts/>

PI Responsibilities

- Confirms and approves issuance of outgoing subaward

DA Responsibilities

- Facilitates communication with PI and answers administrative questions as needed
- Works with PI to obtain updated subaward documents from subrecipient as needed
- Submits documents to SP for review and approval

SP Responsibilities

- Conducts risk assessment for subrecipients
- Drafts outgoing subaward agreement incorporating required flowdown of terms and conditions
- Obtains PI authorization and institutional approval
- Documents and shares executed subaward with PI, DA, and related parties

Contents of a Subaward Agreement

New Agreements:

- Face Page Identifies Parties, Dates, Dollars, Financial Reporting, Roles
- Attachment 1 Certs and Assurances
- Attachment 2 Terms and Conditions Specific to parent award
- Attachments 3A/3B PTE/Sub Contacts, Entity Identifiers (DUNS)
- Attachment 4 Reporting Requirements
- Attachment 5 SOW/Budget/Budget Justification
- Attachment 6 NOA(s) and any other documentation
- Attachment 7 (rare) DUA (if incorporated at sub's request)

Amendments:

- Face Page Identifies Parties, Dates, Dollars, Term Changes
- Additional Attachments NOA(s), Revised Budgets, SOW, Updated Contacts (all as applicable)

FDP Cost Reimbursement Research Subaward Agreement			
Federal Awarding Agency: <input type="text" value="Select from drop down options"/>			
Pass-Through Entity (PTE):		Subrecipient:	
<input type="text"/>		<input type="text"/>	
PTE PI:	<input type="text"/>	Sub PI:	<input type="text"/>
PTE Federal Award No:	<input type="text"/>	Subaward No:	<input type="text"/>
Project Title: <input type="text"/>			
Subaward Period of Performance (Budget Period):			
Start:	<input type="text" value="?"/>	End:	<input type="text" value="?"/>
Estimated Project Period (if incrementally funded):		Amount Funded This Action (USD): \$ <input type="text"/>	
Start:	<input type="text"/>	End:	<input type="text"/>
		Incrementally Estimated Total (USD): \$ <input type="text"/>	
Terms and Conditions			
<ol style="list-style-type: none"> 1. PTE hereby awards a cost reimbursable subaward, as described above, to Subrecipient. The Statement of Work and budget for this Subaward are as shown in Attachment 5. In its performance of Subaward work, Subrecipient shall be an independent entity and not an employee or agent of PTE. 2. Subrecipient shall submit invoices not more often than monthly and not less frequently than quarterly for allowable costs incurred. Upon the receipt of proper invoices, the PTE agrees to process payments in accordance with this Subaward and 2 CFR 200.305. All invoices shall be submitted using Subrecipient's standard invoice, but at a minimum shall include current and cumulative costs (including cost sharing), Subaward number, and certification, as required in 2 CFR 200.415 (a). Invoices that do not reference PTE Subaward number shall be returned to Subrecipient. Invoices and questions concerning invoice receipt or payments shall be directed to the party's Financial <input type="text"/> Contact, shown in Attachment 3A. 3. A final statement of cumulative costs incurred, including cost sharing, marked "FINAL" must be submitted to PTE's Financial <input type="text"/> Contact, as shown in Attachment 3A, not later than 60 days after the Project Period end date. The final statement of costs shall constitute Subrecipient's final financial report. 4. All payments shall be considered provisional and are subject to adjustment within the total estimated cost in the event such adjustment is necessary as a result of an adverse audit finding against the Subrecipient. 5. Matters concerning the technical performance of this Subaward shall be directed to the appropriate party's Principal Investigator as shown in Attachments 3A and 3B. Technical reports are required as shown in Attachment 4. 			

<http://thefdp.org/default/subaward-forms/>



What does the Sub Team need for every subaward?

- **Statement of Work** → It's up to the PI to determine (and get word to us) if there ever needs to be a change in scope
- **Letter of Intent**
- **Budget** → will need an updated budget if the actual awarded amounts differs more than 25% from the proposal budget, even if the reduction only appears come Yr 02 or 03 or 07
- **Budget Justification** →
- **3B Contact Form** → the Sub RA will obtain this at time of award if it isn't part of Sub Proposal package



Why does it take so long for a subaward to be issued?

- Sub actions don't enter the queue until the BU account is set up
- Sub RA has to obtain documents and attestations from the subrecipient – often requiring a great deal of follow-up
- Subs under uncommon or non-fed prime sponsors require custom agreements
- Last minute edit requests are often more laborious than they sound and may require account updates or greatly altered agreement language



How do I get my subaward processed faster?

- Be on the lookout for a confirmation email from a Sub RA and respond right away
 - We send one for every action
- Forward any updated sub budgets/documents to your SP RA as soon as you get them
- If you've been working with a contact not listed in the sub proposal, send those contact details to your SP RA



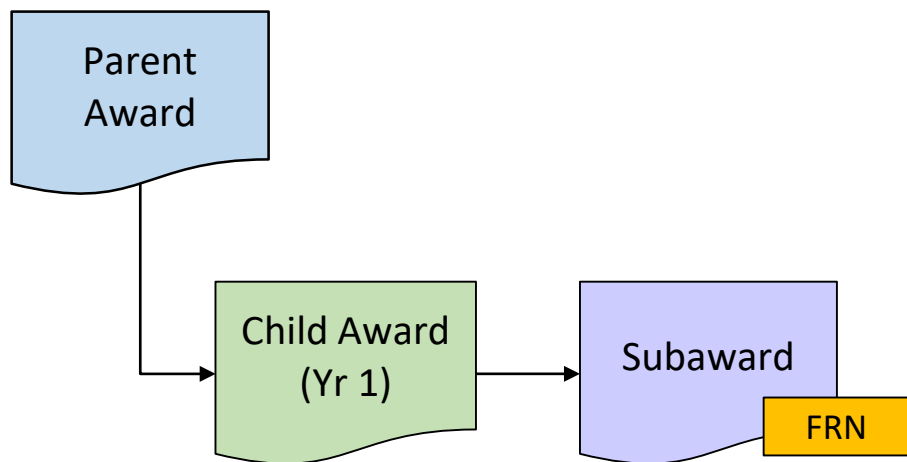
How can I help foreign/small entity subrecipients avoid hold ups?

- If under a federal sponsor, ask sub to register at SAM.gov ASAP
- Make sure SP has the appropriate sub administrative contact person
- Take extra care in reviewing sub SOWs and budgets
- If sub cannot work on a cost-reimbursement basis and will need advance payments, ask your SP RA how to kick off that process ASAP

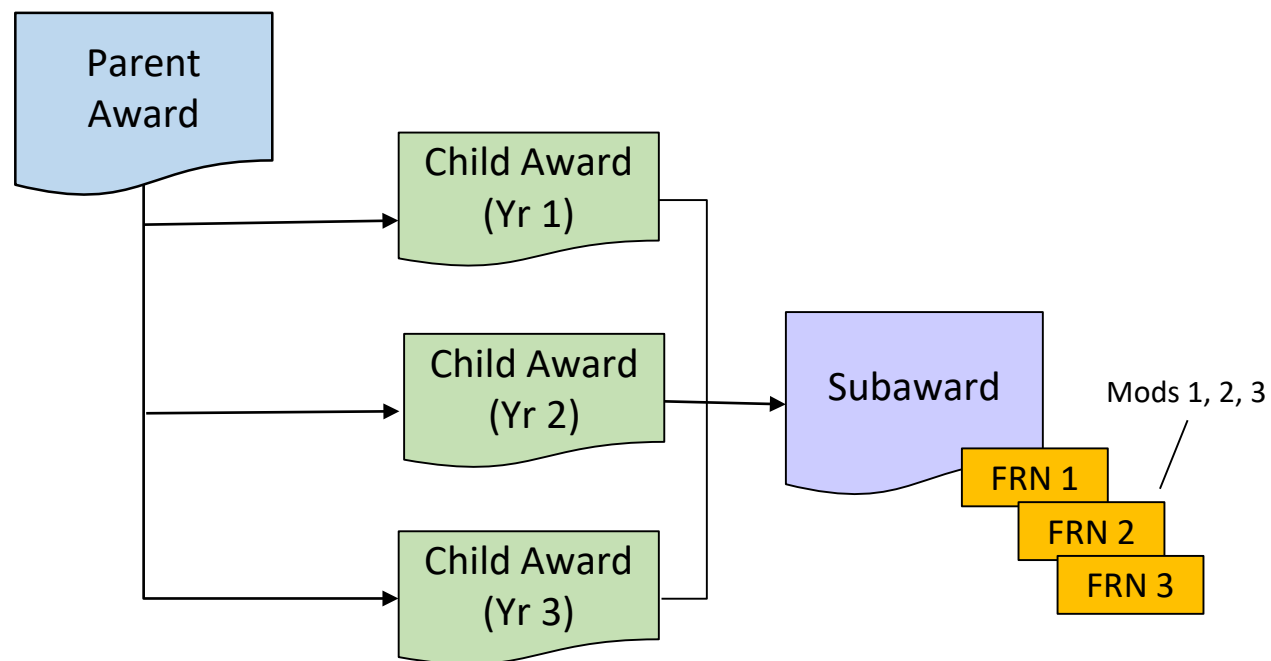


Why does this subaward get a new FRN every year?

One IO for all years of the award; one subaward; one FRN



Different IO for all years of the award; one subaward; different FRNs for each year



IO = Internal Order, also called SP (Sponsored Program #)
FRN = Fund Reservation Number, also called subaward #

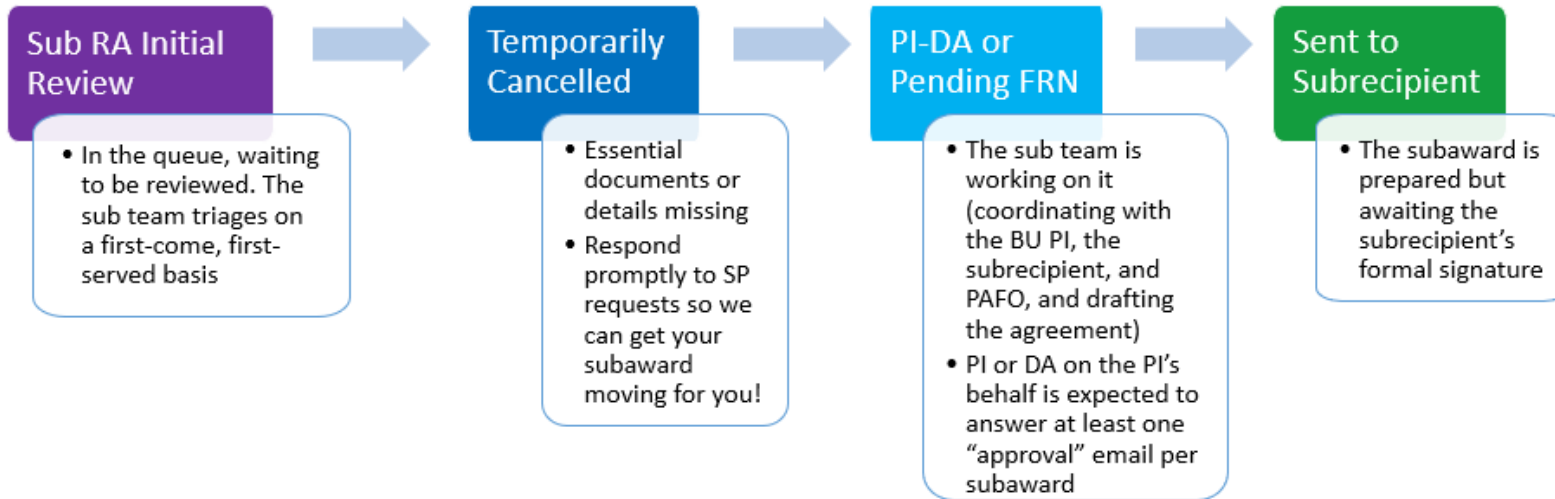
The screenshot shows the BU Research Support website. The top navigation bar includes the BU logo and 'Research Support'. A left sidebar menu lists categories: Project Lifecycle, Compliance, Forms & Policies, Training & How To, Safety, Tools & Services (highlighted), News, Contact, Administration, and Newsletter. The main content area has a breadcrumb trail 'Home > Tools & Services >'. A yellow banner contains a COVID-19 notice: 'COVID-19: View the latest updates for researchers or visit our recovery toolkit.' The main heading is 'Where's My Award and Where's My Outgoing Sub'. Below it is a link: 'On this page: [When will the set-up of my award action, or my outgoing subaward agreement, be completed by Sponsored Program](#)'. Two green buttons are visible: 'CHECK YOUR AWARD SET-UP STATUS' and 'CHECK YOUR OUTGOING SUBAWARD STATUS'.

<https://www.bu.edu/researchsupport/tools-services/wheres-my-award-or-outgoing-sub/>

Subaward Tracker

Where's My Outgoing Sub? Use this page to view the status of your outgoing subaward. You can search by querying the search box located above the list items (you can search by **any** word - PI name, lead unit, subrecipient, etc.) or by using the filters (hover over any of the headers and click the arrow to see filter options).

The current average time to fully execute a subaward action is **60 business days from the date you received your Award Notification** from the award set-up team, assuming the sub team has all required subaward documentation at the time they start their review. The subs are sorted by Date Received. Common subaward statuses are:



Where's My Outgoing Sub? tracker

[+](#) new item or edit this list

Standard Aging Over 50 **Where's my Outgoing Sub?** ...

✓	Lead Unit	Grant PI	Subrecipient	SAP Grant No	Date Received	Status ▼	Transaction Type	KC Sub No	OSP RA
Count= 71									
	2570750000	SARAH M. MAZZILLI	University College London	55206097	8/10/2018	Sent to subrecipient	New	2242	William Segarra
	244240000	LAUREN WISE	Aarhus University	50206889	1/24/2019	Subrecipient Req Revision	New	2392	Laura Kelly
	2570750000	SARAH ANNE MAZZILLI	Dana Farber Cancer Institute	55206097	3/26/2019	Subrecipient Req Revision	New	2435	William Segarra
	2442600000	Robert Horsburgh	P.D. Hinduja National Hospital & Medical Research Center (Hinduja)	50205695	6/3/2019	Sent to subrecipient	New	2482	Suzanne Rocha
	1242040000	EDWARD R DAMIANO	MGH	55207284	6/11/2019	Subrecipient Req Revision	New	2551	Michaela Gillis
	2572010000	RONALD KILLIANY	Massachusetts General Hospital	50207540	9/17/2019	Subrecipient Req Revision	New	2622	Christopher Sylvester
	2442600000	RICHARD LAING	IPA (Kenya)	55206890	10/3/2019	Sent to subrecipient	New	2645	William Segarra
	2444020000	MARGARET COMEAU	Kentucky Cabinet for Health & Family Services	50206850	10/24/2019	Sent to subrecipient	Continuation	2133	Danielle Van Vooren
	2573030000	JEFFREY MARKUNS	University of Health Sciences	55206588	1/6/2020	Sent to subrecipient	Continuation	2314	Nikki De Leon
	2570750000	AVRUM SPIRA	Dana-Farber Cancer Institute	55206170	1/9/2020	Sent to subrecipient	Continuation	2148	Ann Lennon
	2574080000	MICHAEL J CORWIN	Eastern Maine Medical Center	50206637	1/15/2020	Sent to subrecipient	New	2741	Nikki De Leon
	2442410000	GINA MARIE PELOSO	Rector & Visitors of the University of Virginia	50206240	1/15/2020	Sent to subrecipient	No Cost Extension	2167	Christopher Sylvester
	1242120000	Ioannis Paschalidis	Harvard University	50207547	1/22/2020	Sent to subrecipient	New	2748	Rosa Pendenza
	2442440000	Kimberly Nelson	Center for Innovative Public Health Research	50207835	1/30/2020	Sent to subrecipient	New	2755	Danielle Van Vooren
	2442400000	JENNIFER WEUVE	University of California, Davis	50207877	2/4/2020	Subrecipient Req Revision	New	2762	Laura Kelly

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Common Challenges for the Sub Team

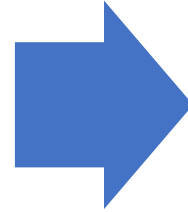


- Obtaining proposal **documents** from the subrecipient
- Obtaining updated **budgets** throughout the life of the award when there are changes
- Hugely **different processes** at similar institutions
- Confusion about the “**nicknames**” for awards/subawards – we reference every award primarily by SAP grant number* since we have large portfolios (*Grant #s start with a 5)

Step 3: Invoicing and monitoring the subrecipient

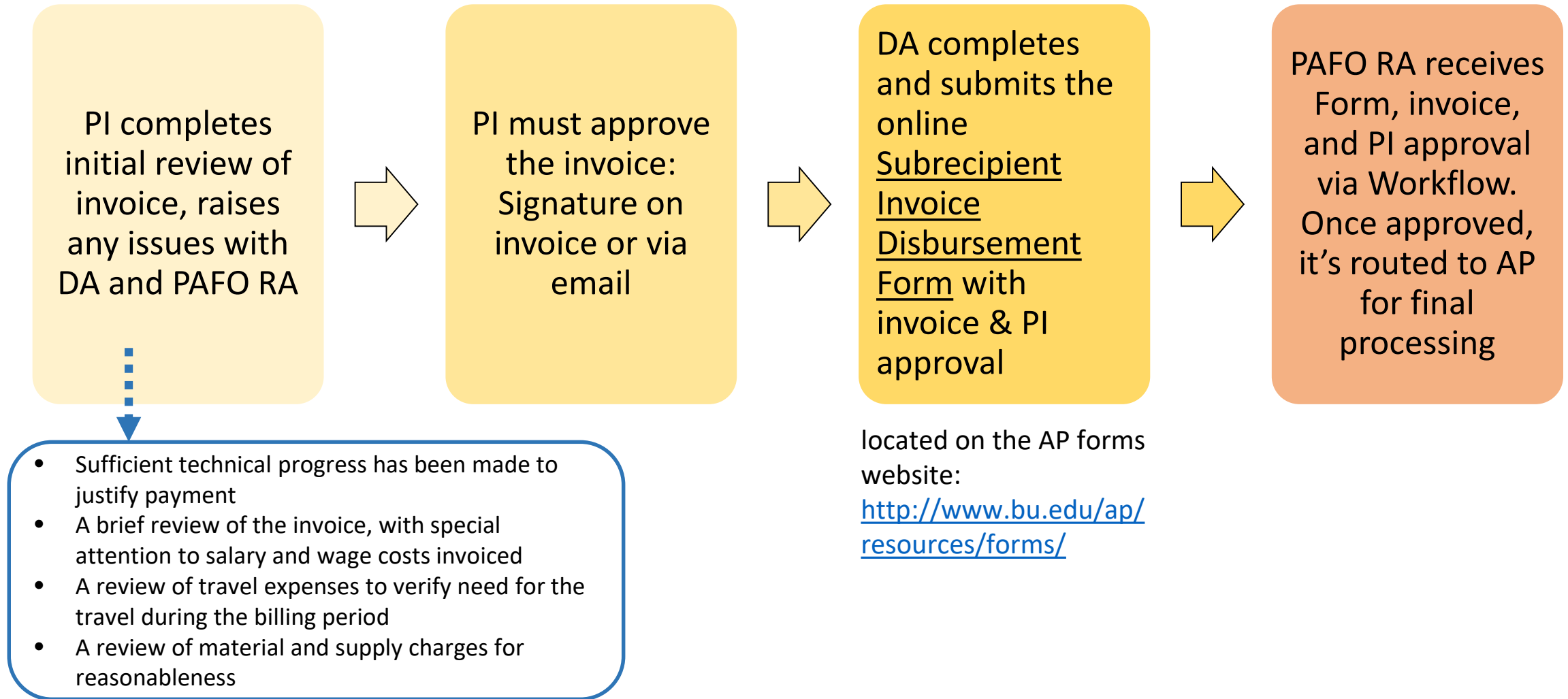
- PAFO receives over 3,000 subrecipient invoices annually

Subrecipient
invoices sent
directly to PAFO
(subinv@bu.edu)

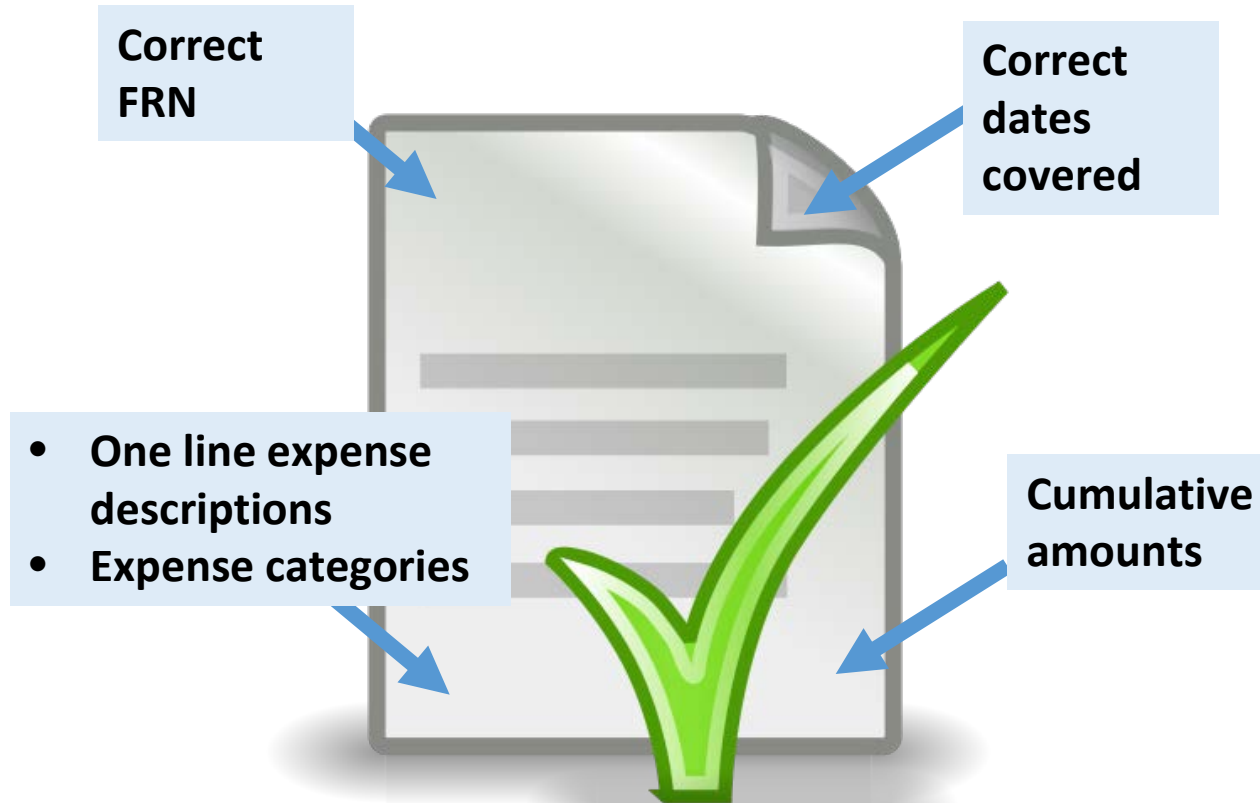


PAFO emails
invoice to PI, DA,
and PAFO RA

If subrecipient sends invoice directly to you, please forward to Craig Gerome (cgerome@bu.edu)
- He will provide to Subinv@bu.edu and inform subrecipient to send invoices to Subinv@bu.edu



Review “four corners of the invoice”



Departments should:

- ensure invoices are sent directly to subinv@bu.edu
- work with subrecipient and PAFO RA to get the final invoice
 - Final subrecipient invoices must be paid and posted to the account in order to be included in the final financial report



PI and DA receive email from Invoices, Subaward to process payment

DA checks for



DATES

Within project period
No overlap with previous
invoice



SUFFICIENT FUNDS

To cover amount of
invoice



CUMULATIVE AMOUNT

Matches total of new
invoice plus previous
amount billed



SIGNED CERTIFICATION

ALL GOOD
contact PI for approval

PROBLEMS
contact PAFO RA

Receive an invoice directly from a subrecipient?
Send it to Craig Gerome (cgerome@bu.edu)

Review your subawards to ensure they are spending accordingly

- PAFO conducts a periodic review (bi-annually) of all active Fund Reservation Numbers:
 - If a FRN has had \$0 expenditures charged against it and has no pending invoice within six (6) months of the execution date.
 - PAFO contacts the PI and DA for additional information as to why spending has not occurred.



Subrecipient Invoice Disbursement Form

This form may take a moment to load...

If the form does not load in Internet Explorer, please try using another browser like Firefox or Chrome.

Disbursement Request Form



Disbursement Request Type *
SUBAWARD

Disposition of Payment *

Account Distribution: For account distribution allocations, click the "Add" button to the right.

GL Account *	Amount *	Cost Object (CC/IO/SP) *	Fund Reservation Number *	Fund Reservation Line Item *
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <input type="button" value="Remove"/>

Total Amount in USD:

PAFO Research Administrator:

Name *	Date *	Phone *	Email Address *
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

*Must be an @bu.edu address

Invoice Number * Invoice Date *

All expenditures must have supporting documentation. (Information provided will be placed in the text field in BW reports) Please include Fund Reservation Number and period covered by invoice. Ex: 450000XXXX SEP-OCT 2017. *

F&A is only charged on the first \$25,000 in subaward expenses (unless F&A is waived)

GL 517510: Used to pay the first \$25,000 in subrecipient invoices. F&A charged.

GL 517520: Used to pay subrecipient invoice expenses in excess of the first \$25,000. F&A excluded

Fund Reservation Number (FRN) is the subaward number (45xxxxxxxx)

Ensure name and email are spelled correctly in order for proper processing through Workflow

Sample Subrecipient Invoice

- About >
- Service Expectations >
- Contact Us >
- FAQs >
- Resources >
 - Forms >
 - Glossary of Terms >
 - Tax Exemption Certificates >
 - Financial Activities and Services Training (FAST) >
 - Research Related Payments >
- Services >

Subrecipient (Subaward) Invoice Disbursement Form

This form may take a moment to load...

If the form does not load in Internet Explorer, please try using another browser like Firefox or Chrome.

Account Distribution: For account distribution allocations, click the "Add" button to the right. Add

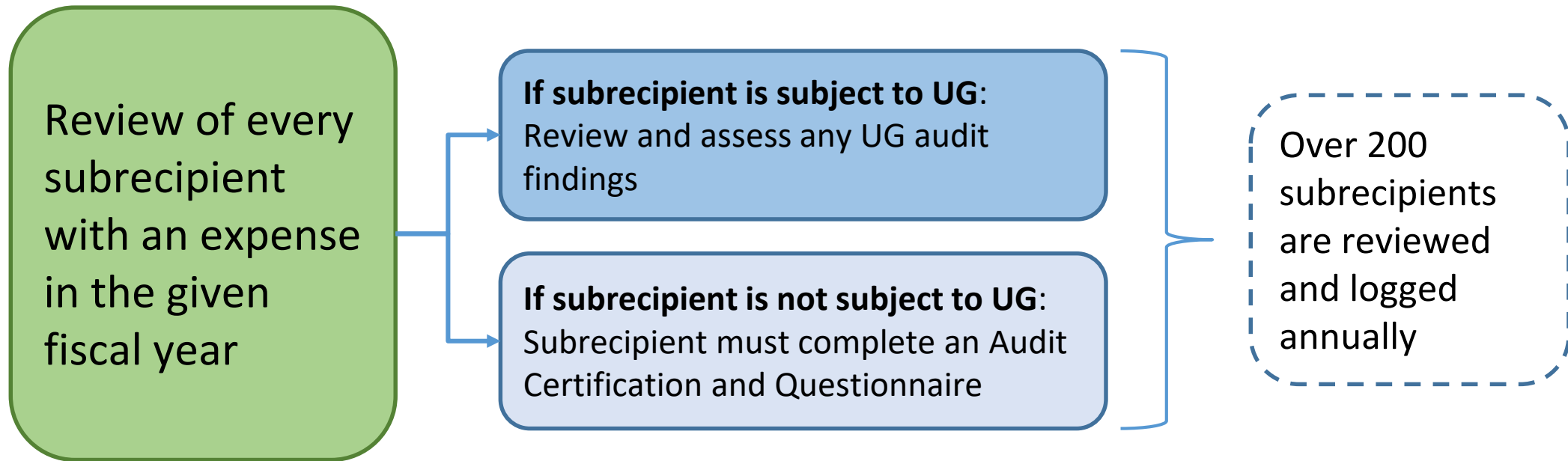
GL Account *	Amount *	Cost Object (CC/IO/SP) *	Fund Reservation Number *	Fund Reservation Line Item *	
<input type="text" value="517510"/>	<input type="text" value="4,384.00"/>	<input type="text" value="9500123456"/>	<input type="text" value="4500001234"/>	<input type="text" value="1"/>	<input type="button" value="Remove"/>
<input type="text" value="517520"/>	<input type="text" value="16,191.50"/>	<input type="text" value="9500123456"/>	<input type="text" value="4500001234"/>	<input type="text" value="2"/>	<input type="button" value="Remove"/>

Total Amount in USD:

invoice 1	\$ 20,616.00
invoice 2	\$ 20,575.50

GL 517510	\$ 25,000.00
GL 517510	\$(20,616.00) invoice 1
GL 517510	\$ 4,384.00 invoice 2
GL 517520	\$ 16,191.50 invoice 2

PAFO conducts an annual subrecipient monitoring review as required by Uniform Guidance



PAFO conducts desk reviews of subrecipient invoices for a variety of reasons:

All **high risk** and **foreign subrecipients** are subject to desk review

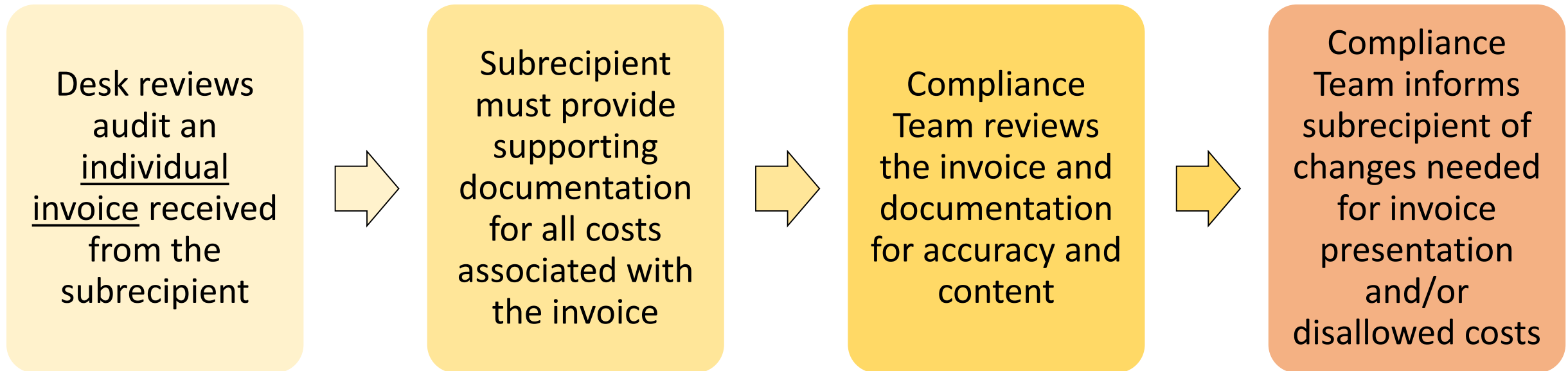
- Based upon Risk Analysis completed by SP. Works with PAFO to mitigate risk.
- E.g. additional subaward terms and/or desk review

As a result of the **annual subrecipient monitoring review**

- E.g. multiple UG findings, issues with responses to Questionnaire

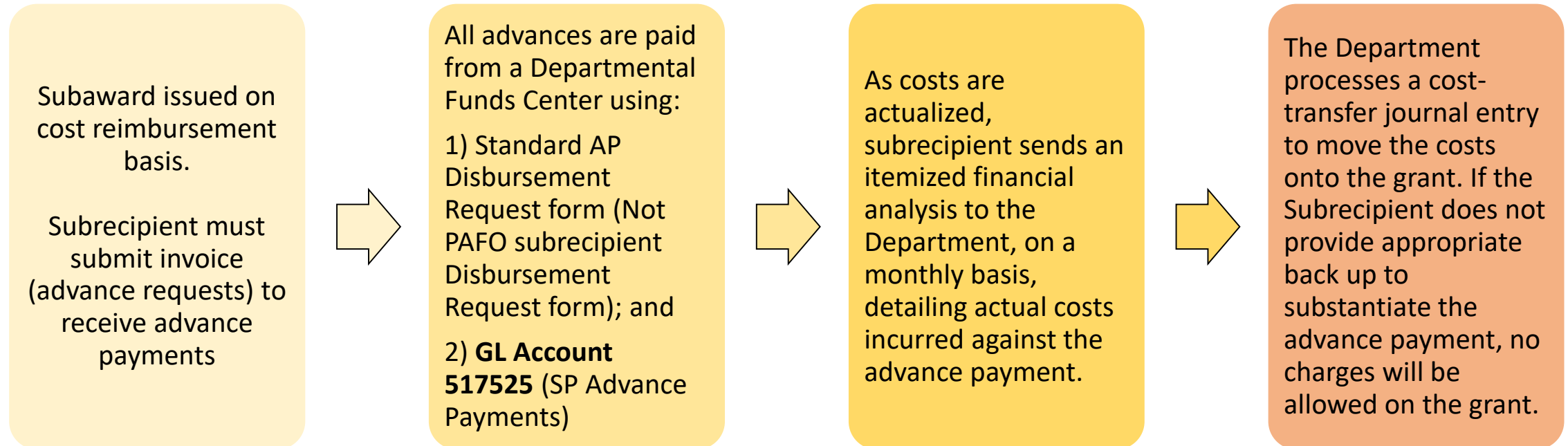
At the **request** of the PI, DA, or PAFO RA

- E.g. certain charge(s) do not appear appropriate, charges not commensurate with science



- DA/PI/PAFO RA on both initial email and conclusion email from Compliance Analyst
- If subrecipient is unresponsive may lead to nonpayment of invoices. Compliance Analyst informs RA/DA/PI

Advances: Most subawards are **cost reimbursable**. If a subrecipient requests advance payments a specific approval process is used. Desk review often conducted.



Subaward Advance Request [Form](#) must be completed and submitted to Sponsored Programs

1. Subrecipient submits request and justification for advance payments to BU PI
 - Request should provide a justification for the advance and detail the method of the advances payments
2. PI and BU Departmental Financial Head must approve advance payment, the payment plan, and the source of the advance funds
3. Department emails this signed form and appropriate subaward documentation to Sponsored Programs RA for review



Note: We strongly recommend that not all funds be advanced: a hold-back of at least 10% is recommended. This final 10% would be paid only on receipt and approval of subrecipient's final report, final invoice and final financial report.

- Reach out to your SP RA with any sub agreement questions
- Reach out to PAFO RA to confirm final balance with subrecipient
- Don't worry – if your set-up budget contained sub funds, the action has been kicked off
- Sub actions go on hold until the sub team has all proper proposal/budget documentation, so send those documents to your SP RA ASAP if they weren't part of the original proposal.
- We need a corresponding budget for **every** sub action that includes not-originally-proposed funding, even if it's just a \$100 supplement.
- Expect your sub to be executed about 60 business days after you get an AN
- Department should ensure invoices are sent directly to subinv@bu.edu