Subaward or Subcontract Initiation and Preparation on a Sponsored Project

This guidance is provided to assist with understanding roles, responsibilities and processes involved in the initiation and issuance of a subaward agreement, as well as the annual maintenance and subrecipient monitoring responsibilities involved as required by Federal regulations 2CFR200.

I.   INITIATING A SUBAWARD
A. Requesting a subaward at the time of proposal:

Each named subrecipient must provide the following documents and information prior to the proposal's submission. These documents are initiated by the subrecipient Principal Investigator (PI) and approved by the subrecipient's Office of Sponsored Programs or Authorized Organization Representative (AOR). The documents are provided to the College pre-award office and PI to incorporate as part of the initial proposal submission.

- **Required Documents:**
  - Signed Letter of Intent to Establish a Consortium or Subrecipient Commitment Form. If the subrecipient is not a member of the Federal Demonstration Partnership, [Federal Demonstration Partnership Expanded Clearinghouse (fdpclearinghouse.org)](http://fdpclearinghouse.org), a Subrecipient Commitment Form is required.
  - Scope of work
  - Budget
  - Budget Justification
  - Bio-sketch of subrecipient PI/Co-I(s)
  - Current and Pending Support for PI and Co-I(s)
  - A copy of the subrecipients Federal Rate Agreement

Once received, Clemson pre-award personnel incorporates the approved subrecipient documents, as part of Clemson's proposal to the sponsor. Each institutions packet is uploaded into InfoEd using the naming convention "*institutions name*_Subaward Submission Package".

B. Requesting/Adding a subaward after an award is made:

In some cases, a PI may find it necessary to add a subrecipient after the proposal is submitted AND awarded by the sponsor. Consistent with the proposal preparation process, principal Investigators (PI's) seeking to add a subrecipient to an existing award will work with their Departmental/College Post-Award contact (CPAC) to request the **required documents** (bulleted list referenced in section A) from the subrecipients. The intended subrecipient principal investigator will work with **their** pre-award sponsored programs office to have the documents authorized and submitted to Clemson University by email to the CPAC, Clemson PI, and Subaward Administrator in Grants and Contracts Administration (GCA).

For the addition of **any** new subaward on a National Science Foundation award, Research.Gov requires that the current and all future period budgets be resubmitted

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along with a new Clemson budget justification (for current and future periods) and scope of work. The PI, working with their CPAC, will provide these documents to GCA whom will complete the request in Research.Gov to obtain sponsor approval.

C. **Departure of a Clemson Co-Investigator that requires a subaward to their new institution:**

There are situations where a Co-investigator may accept a new position at another institution, and a suitable Clemson replacement may not exist or be available, which creates a need for a new subaward at the investigator's new institution. **When the subaward/subcontract budget line has no prior budget, prior approval of the sponsor is generally required**. The Clemson PI, departing Co-Investigator and CPAC post-award administrator will work together to determine the remaining budget, or budget amount to be transferred to the new institution for the departing investigator. The departing PI, in concert with their new institution, assembles all *required documents* (bulleted list referenced in section A). The departing investigator/subrecipient principal investigator will work with his/her pre-award personnel at their new institution to route and submit for AOR (Sponsored Programs Office) authorization. Once authorized, the documents are provided to Clemson University by email to the CPAC, Clemson PI, and Subaward Administrator in GCA.

II. **PREPARATION AND EXECUTION OF A NEW SUBAWARD**
   A. **Preparation of the Subaward**

   The GCA Subaward administrator:
   - Receives a "Subaward" award notification via Subawardsadmin@clemson.edu email account from the GCA Grants Transactional Service Team.
   - Review award notification to verify SUBCON is budgeted. Review documentation in Infoed (i.e., prime award document, proposal, Research Compliance (IACUC, IRB) and Subrecipient Commitment Form package).
     - If Subrecipient Commitment Form package is not in Infoed, email OSP to request package.
     - If subaward was not included in the awarded proposal or identified as being necessary during the course of the project,
       - Notifies the Grants Administrator, within Grants and Contracts Administration, to obtain sponsor approval, if/when required. All documents provided by the subrecipient from the above required documents are submitted to the sponsor as part of the sponsor's prior approval process.
   - Review SCF package and ensure SOW, budget and budget justification is included and verify budget amount and budgeted subcon dollar amount match and authorized by the subrecipient.
   - Email Principal Investigator and cc OSP (preparer) to confirm subrecipient information and budget remains accurate and no changes have been made.
   - Once confirmed by PI, the GCA Subaward Administrator:
     - Ensures subrecipient has provided their UEI- Unique Entity Identifier.
     - Verifies sub-recipients are not debarred or suspended via SAM.GOV.
     - Reviews audit documentation in FAC website to make sure they are current in submitting audit and have no findings.

- o Documents the audit status, Unique Entity Identifier, and Debarred and Suspended verification on Profile spreadsheet.
- o Performs risk assessment and complete risk assessment form, which includes the review of other factors (COI, IRB, IACUC compliances) of the specific project that may impact both the project and institutions risk level; then, assigns a risk level to the project and institution and saves to appropriate subaward folder on H-drive.
  - ▪ If subrecipient is a company or private institution and are not subject to Single Audit requirements, email financial and/or authorized official requesting Financial Questionnaire to be completed and returned with required documentation, review and complete risk assessment. Document on Profile spreadsheet and save on the H drive in the appropriate Profile folder with Financial Questionnaire & documentation.
- o Verifies recipient is an active supplier in Buyways. If not, email sub-recipient administrative contact to verify financial information is accurate, and enter supplier invite request in Buyways. Follow up when subaward package is submitted to subrecipient for review and signature. Confirm if supplier registration is complete when sending fully executed sub-agreement to recipient. If not, send 3rd reminder that they must be registered in Buyways in order to receive payment for subaward invoices.
- Once all required documents are received/verified and steps above have been completed, the Subaward Administrator in GCA:
  - o Prepares subaward/subcontract which includes the subrecipient scope of work, and budget information, the prime award document and any additional terms and conditions contingent on subrecipient recent audit findings, if any.
  - o Identifies any additional terms and conditions that may be needed to be incorporated into the subrecipient agreement based on assessed risk.
  - o Prepares the agreement, using FDP and other templates that helps to standardize the process, and incorporates all attachments and flow-down provisions of the sponsor to the subrecipient.
  - o Forwards the completed agreement to the subrecipient institutions Sponsored Programs Office or AOR for review and signature.
  - o Monitors the timeline and progress of the approval process and follows up as needed (approximately 12-15 working days) to ensure timely execution.
  - o Reviews any changes made to the agreement by the subrecipient and manages any negotiations that may occur between the two institutions.
  - o Routes the partially signed agreement to the Clemson AOR for review and signature.

B. **Subaward Execution, Management and Maintenance**

Once the subaward has been fully executed, there are additional steps that must be performed to remain in compliance with Federal regulations, as well as processes that aid in the management and continuous maintenance necessary for subaward(s) agreements. For example, out-year funding to the subrecipient organization(s), no-cost extensions, adverse audit findings, or performance related matters may require modifications, amendments, or revisions to the existing agreement. In managing these responsibilities, the GCA Subaward Administrator:

- Provides fully executed copy of subaward agreement to the subrecipient institution.

- Uploads the fully executed agreement into InfoEd (by PPN).
- Notifies the PI of the completed and fully executed agreement.
- Sends sub-award agreement to CUSPAA for the Grants Transactional Team. The Grants Transactional Team will:
    - Enters sub-award into Subcontract Panel under prime project in Peoplesoft.
    - Prepares the purchase order and establishes the encumbrance for the subrecipient.
    - Sends sub-agreement to Grants Administrator in GCA for their files and notifies them of the subaward system set up/entry.
    - Uploads executed agreements into Onbase.
- Reviews the Federal prime award for Federal FFATA reporting requirements and reports all federal subawards by:
    - Monitoring all subawards for federal funding over $30,000. to comply with the Federal Funding Accountability and Transparency Act (FFATA) to be reported in the FSRS system.
    - Enters report(s) into FSRS system monthly, as well as all modifications or amendments subject to FFATA via the Federalreporting.gov website.
- Performs subrecipient monitoring responsibilities that includes annual single audit reviews, subrecipient profile updates and continuous institutional risk assessments for each subrecipient and internally tracked as required by 2CFR200.
- Monitors ongoing subawards for needed amendments and perform continued risk assessments.
    - Verifies annual/budget period modifications, amendments, or no-cost extensions (NCE) with the Principal Investigator and CPAC and
    - Prepares updated agreements for routing/execution.
- Prepares termination agreements when informed by the PI or CPAC due to either performance or departure of the subrecipient investigator at the sub-institution.
- Close out purchase orders as needed for ending subawards with remaining balances to release encumbered funds for project close out.

General Subaward Roles and Responsibilities:

Office of Sponsored Programs	Grants & Contracts Administration	Principal Investigator	College Post-Award Contacts
• Sub-award vs. Vendor Determination • Assists with proposal application • Reviews proposal for: • Letter of Intent • Statement and Scope of Work • Budget and Budget Justification • Biosketch or CV for all personnel responsible for the conduct of research (when required) • Current and Pending Support (CP) • Resources and Equipment • Institutional Rate Agreement • Uploads proposal and all relevant documents into InfoEd.	• Perform subrecipient risk assessments (SA) • Negotiate & execute subawards and flow-down requirements to subrecipients (SA) • Assists with establishing the subrecipient in Peoplesoft (SA/GTS) • Set up subrecipient and related purchase order encumbrances; then, notifies GA and CPAC of setup. (SA/GTS) • Approves budget amendments, initiated by CPACs, in Peoplesoft (GA) • Receive invoices from subrecipients, forwards to PI for review and approval (GA) • Review invoices for allowability and compliance with federal regulations and terms and conditions (GA) • Ensures subrecipient invoices are approved by the PI, authorizes payment, and enters vouchers for payment (GA) • Perform subrecipient monitoring activities and annual review of single audit submissions and findings (SA)	• Prepares proposal and ensures subrecipient submits all applicable documents for proposals and new subrecipients added after award is made (i.e., budget, scope of work, biosketch, and CP information). • Monitors technical progress. • Review and approve invoices (billings should be consistent with technical/ progress reports and production of deliverables) • Contacts College Post Award Contact (CPAC) and assist in the resolution of any invoice issues. • Determines frequency and scope of performance monitoring. • Notifies CPAC of any performance issues. o add/reduce funding. o extend performance period. o terminate the subaward early. • Obtains all required performance deliverables.	• Reviews Peoplesoft set up record. • Prepares and initiates internal budgets and budget amendments when adjustments are needed. • Supports PI with assisting in invoice payment and processing questions. • Aids to ensure all invoices are approved by PI and returned timely to GCA for payment. • Assists PI with budgets and other document requests for any new subrecipients that are added or subrecipient changes after the award is made. • Assists PI with any performance issues and may initiate contact with GCA personnel to: o add/reduce funding. o extend performance period. o terminate the subaward early.

Grants and Contracts Administration: (SA) = Subaward Administrator, and

(GA) = Grant Administrator, and

(GTS) = Grant Transactional Services Unit

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