



OFFICE OF THE VICE CHANCELLOR  
FOR RESEARCH

# Research Administrators Monthly Meeting September 2020

## Office of Sponsored Programs

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# New Subaward Templates and Submission Tips

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# Agenda

- Review new subaward forms/templates and explain when to use which template
- Identify resources and tips to help reduce delays during subaward submission and execution



# Learning Objectives

Participants will:

- Understand when to use each subaward template and why it's important to use the right one
- Identify additional tips and resources to make submitting a subaward a smoother process



# New Templates for FY21!

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# Federal Demonstration Partnership (FDP)

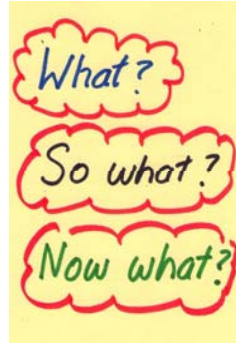
- An association of federal agencies, academic research institutions with administrative, faculty and technical representation, and research policy organizations that work to streamline the administration of federally sponsored research.
- The FDP uniquely offers a forum for individuals from universities and nonprofits to work collaboratively with federal agency officials to improve the national research enterprise.



**FEDERAL DEMONSTRATION PARTNERSHIP**  
Redefining the Government & University Research Partnership

– About the FDP - [www.thefdp.org](http://www.thefdp.org)

# FDP Subaward Templates



## ❖ What are the FDP subaward templates?

- Terms and conditions are well known and accepted by almost all institutions that conduct federally sponsored work.
- Attachment 3A and 3B provides contacts for both parties/FFATA reporting.
- Includes sections on compliance (attachments 1 & 2), reporting (attachment 4), scope of work and budget (attachment 5).

## ❖ When can I use the FDP subaward templates?

- An award is partially or entirely federally funded (even if our incoming award is not directly from a federal agency).
- Subrecipient does **NOT** need to be an FDP member to use this template.

# 2019 FDP Template Updates

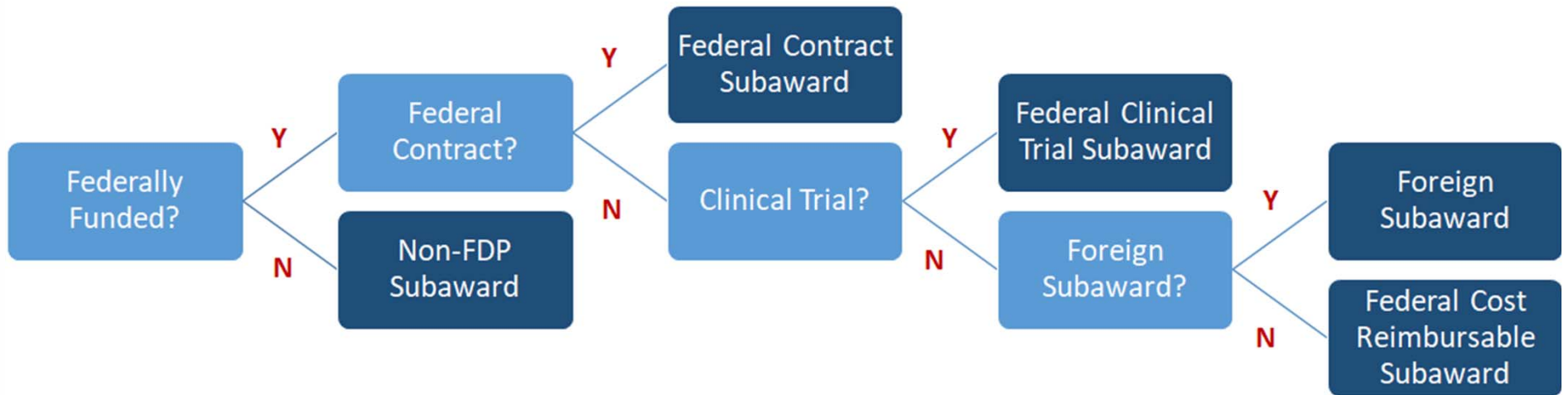
- Templates are updated on an as-needed basis and published by the FDP.
- The last updates were in 2017/2018.
- A document identifying the modification is posted by FDP.
  - 2019 Modifications are summarized here: [http://thefdp.org/default/assets/File/Documents/subaward\\_forms/FDP%202019%20Subaward%20Templates%20Major%20Changes%20FINAL.pdf](http://thefdp.org/default/assets/File/Documents/subaward_forms/FDP%202019%20Subaward%20Templates%20Major%20Changes%20FINAL.pdf)



# Where to find the NEW FDP Templates:

1. *OVCR/OSP website with additional instructions and tips:* <https://research.uic.edu/sponsoredprograms/receiving-an-award/subrecipients/>
2. *Direct link* to the templates: <https://research.uic.edu/sponsoredprograms/submission-links-and-forms/>, then go under Templates/Outgoing Subaward Package
3. *FDP website* with less frequently used templates for federally funded awards: <http://thefdp.org/default/subaward-forms/>

# Which Template Do I Use?



- The dark blue rectangles are the subaward templates that should be used based on the answers to the decision tree above.

# How do I know if the prime award is a contract?

1. Go to FZAGRNT and look at the CFDA Number Field

Grant: E1915 Proposal: 201600661 Grant Text Exists:

Main Grant Agency Location Cost Code Personnel Billing User Defined Data Effort Reporting Pass Through Agency

GRANT MAINTENANCE

Chart of Accounts *	2 ...	<input type="checkbox"/> Pass Through Indicator	
Responsible *	792000 ... Mile Square Health Center	Alternate Description	
Organization		Status Date	11/01/2018
Long Title *	HRSA FY 2016 Service Area Cor	Current Amount	4,116,160.00
Title *	HRSA H80CS00324-17-	Cumulative Amount	
<input type="checkbox"/> Requires Effort Certification		Maximum Amount	11,389,533.03
Agency	@00496468 ... Health Resources and Services Ad	Total Recipient Share	
Principal Investigator ID	673921067 ... Taylor, Henry	Related Grant	E2340 HRSA 6 H80CS00324-14
Project Start Date *	02/01/2016	Grant Type	8 ... Grant
Project End Date	01/31/2019	Category	O ... Letter of Credit Inst Report Req
Proposal	201600661 ...	Sub Category	1200 ... Public Service
Termination Date	10/10/2019	CFDA Number	93.527 ...
Expenditure End Date	07/01/2020	CSFA Number	
Discard Date		Sponsor ID	HEALTHCARECENTERS_16
Status	C ... Continuation		

# How do I know if the prime award is a contract? (cont'd)

- NN.nnn = CFDA (e.g., 93.592)
  - NOT a contract
- NN.000 = Generic placeholder
  - **MAY** be a contract
- Blank = Non-federal
  - Gnnn grant – Should be non-federal
  - Ennn grant – Should be federal
  - Fnnn or Hnnn grant – May be federal
    - If you think the award is federal, but the CFDA is blank, contact your Grant Specialist (OSP Post Award) to confirm.

Sub Category	1200	...	F
CFDA Number	93.527	...	

Sub Category	1100	...	Bar
CFDA Number	64.000	...	
CSFA Number		...	

# What if it **MAY** be a contract?

1. Review the prime award agreement & look for a CFDA number
  - If you find one (e.g. 12.842--NN.nnn), then it is NOT a contract.
2. The document should contain terms & conditions that refer into the Federal Acquisition Regulations (FAR) as opposed to Uniform Guidance (UG) 2 (Grants & Agreements) CFR 200

# Still not sure which one to use?



- Reach out to:
  - Your OSP Negotiator of the Prime Award
  - Your OSP Grant Specialist
  - Your OSP Subaward Negotiator
  - Others in OSP you feel comfortable asking
- Review the [2020 Federal Contracts RAMM Presentation](https://research.uic.edu/sponsoredprograms/education-and-training/) (found <https://research.uic.edu/sponsoredprograms/education-and-training/>), then go to Research Administrator Monthly Meetings [RAMM])



# Template Reminders

- Let us know if something isn't working properly
- Be sure to use the website templates to ensure the most recent version is being used
- Forms were recently updated to include Attachments 3A (institutional info)/3B (subawardee info) in all federal templates – FFATA Reporting.



# Prior to Submitting a Subaward Package

- ✓ Confirm that the subrecipient was included in the original submission to the sponsor.
  - If not, work with the prime sponsor and Sponsored Programs to get the approval before requesting subaward issuance.



- ✓ Working with high risk or unresponsive subawardees? Resolve issues prior to package submission if possible.
- ✓ Ensure the subawardee meets the criteria of a subrecipient (this should be determined at the time of budget development/proposal submission)



# Subrecipient or Contractor?

SUBRECIPIENT/SUBCONTRACTOR	VENDOR/CONSULTANT
carries out a portion of the programmatic effort of the project	provides goods/services within normal business operations
is responsible for programmatic decision making relative for their portion of the scope of work	provides similar goods/services to many different purchasers
must adhere to sponsored compliance requirements (IRB, IACUC, re-budgeting restrictions, publication, and Intellectual Property rights)	is not subject to compliance requirements of the prime sponsor such as reporting and monitoring
uses the sponsored funds to carry out a program of the organization as compared to providing goods or services	provides services as an individual or sole proprietor
identifies a Principal Investigator to manage the project	person conducting the work may or may not be identified
expected to publish and disseminate the project results	no publications are expected
may be providing cost sharing or matching funds	no cost sharing or matching funds involved
there is a potential for patentable or copyrightable technology created through the project	no potential for patentable or copyrightable technology created through project – work for hire
may participate/collaborate in project design/proposal development	does not participate/collaborate in project design/proposal development

<https://uofi.app.box.com/s/fq1klb1pop13hk0xlt01p4xf6unj1zg2>

# FDP Subrecipient vs. Contractor Form

- FDP has published a form that can be used to document this decision at the budget development/proposal stage.
  - [http://thefdp.org/default/assets/File/Documents/subrecipient\\_vs\\_contractor\\_checklist.pdf](http://thefdp.org/default/assets/File/Documents/subrecipient_vs_contractor_checklist.pdf)
- If the subaward scope changes, be sure to re-evaluate this classification.



# Submitting a Subaward Package

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# Subaward Package

- Is the original source funding federal or non-federal? Be sure to use the appropriate package for the type of funding.

## Outgoing Subaward Packages

- **Federal**
  - **Subawards Governed by UG**
    - [Federal Clinical Trial](#)
    - [Federal Cost Reimbursement Subaward](#)
    - [Federal Foreign Cost Reimbursement Subaward](#)
    - [Federal Subaward Amendment](#)
  - **Subaward Contracts Governed by FAR**
    - [Federal Contract Subaward](#)
    - [Federal Contract Subaward Amendment](#)
    - [Federal Contract Attachments](#)
- **Non-Federal**
  - [Non-FDP Subaward template](#)
  - [Subaward amendment template](#)

# Subaward Checklist

**For each submission, the following should be included:**

- Signed departmental cover page
- Appropriate editable subaward package
- Banner screen shots (FZMRFND, FZIGITD)

## **FDP (Federal) Subaward Templates:**

- Are subrecipient Key Personnel named in the NOA (Notice of Award) listed on **Attachment 2**?
- On the **3A attachment**, is the business manager or PI listed as the email contact for invoices?
- Does the **3B attachment** have accurate contact information?
- Does the subrecipient have a D&B Number and an active registration in sam.gov?
- Confirm the reporting details in **Attachment 4** are accurate and meet departmental needs for prime reporting?
- 21 ■ **Attachment 5** – Scope of Work and Budget

# Federal Subawards – Required Information

- Under Uniform Guidance, as a Pass Through Entity (PTE), UIC is required to report data to the subrecipient
  - Subrecipient Name – **Must match the active registration name in sam.gov, which can be verified by the DUNS number**
  - Federal Award Identification Number (FAIN)
  - Federal Award Date
  - Period of performance
  - Amount of federal funds obligated by this action
  - Total amount of federal funds obligated to subrecipient
  - CFDA Number and Name
  - Is this award R & D?
  - Indirect cost rate for **both prime and subaward**

# Non-Federal Subaward Package

Use subcontract package for all non-federal prime funding sources

- Some prime and subrecipient information need to be entered in the contract
- Include a detailed Scope of Work (Exhibit A)
- Include budget details and points of contact (Exhibit B)
  - Ensure F&A rate is correctly calculated

**Please do not send to subrecipient directly!**

# Avoiding Delays

- Gather as much information as early as possible
  - ✓ Setting up departmental timeline
  - ✓ Use templates from our website
  - ✓ Obtain Sponsor approval
  - ✓ Make sure Prime Sponsor Award or anticipation account in place



# Avoiding Delays (cont'd)

- Send agreements for review directly to OSP via OSPWeb
- ✓ Need OSP to review agreement first
- ✓ Attachment 3B – complete to your best ability

# Avoiding Delays (cont'd)

- Accuracy of information on agreements is crucial
  - ✓ No gaps if extending Period of Performance
  - ✓ Ensure Scope of Work, Budget, Budget Justification are included and are correct
  - ✓ Amount is uniform throughout agreement
  - ✓ Do not add carryforward of unexpended funds to amount being awarded in amendment

# Avoiding Delays (cont'd)

- Incorrect or outdated agreement templates or attachments
  - ✓ Signed departmental cover page
  - ✓ Editable agreement
  - ✓ Form 3A – only complete blank sections
  - ✓ Using own template with information from other subaward project
  - ✓ Download form then complete template

# Avoiding Delays (cont'd)

- Mistakes when working with same subrecipient on multiple projects
  - ✓ Make sure correct subaward project is being submitted
    - ✓ Correct amount/budget, PI, Scope of Work

# Avoiding Delays (cont'd)

- Routing revised agreement, supporting documentation or partially executed agreements through OSPWeb
- ✓ Send items directly to negotiator assigned

# Resources

## ❖ OSP Template Links and Guidance -

- <https://research.uic.edu/sponsoredprograms/receiving-an-award/subrecipients/>

## ❖ RAMM Presentations

- <https://research.uic.edu/sponsoredprograms/education-and-training/>
- ∅ Then go to the Heading Research Administrator Monthly Meetings

## ❖ University of Illinois - Subawards

- Section 16-Grants and Research Contracts/Subawards
- <https://www.obfs.uillinois.edu/bfpp/section-16-grants-research-contracts/sponsored-projects-subawards>

# Resources (cont'd)

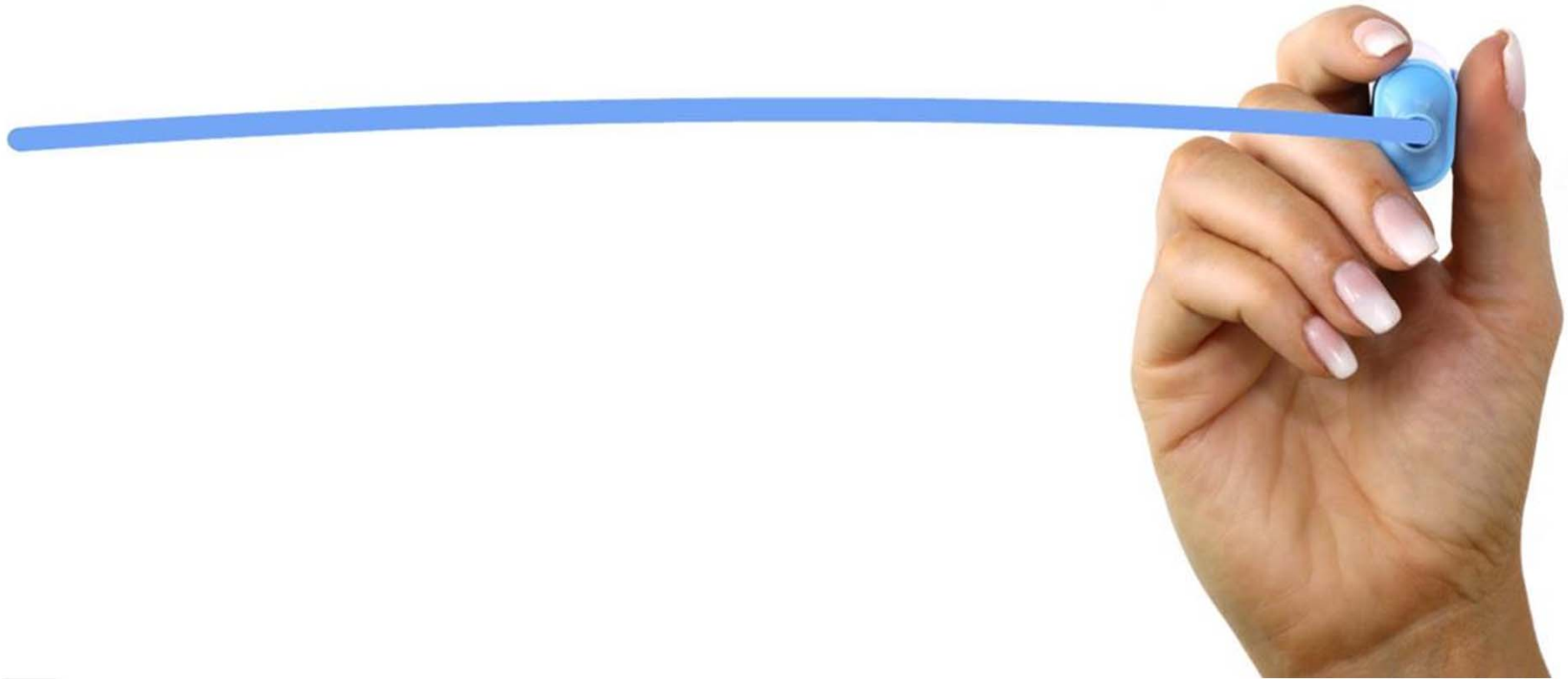
## ❖ Uniform Guidance 2 CFR 200

- Subpart C – Pre-Federal Award Requirements & Contents of Federal Awards (200.207)
- Subpart D – Post Federal Award Requirements (200.330 to 200.332, 200.338)
- <https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=cbe12597ea7cfe86dbedc9fa3647ba04&mc=true&n=pt2.1.200&r=PART&ty=HTML>

## ❖ FDP Website

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

# QUESTIONS







# **Subrecipient Monitoring & Management Refresher**

# Why do we have to monitor subrecipients?

Uniform Guidance (UG) §200.331(d) requires that when the pass-through entity (i.e., UIC) issues a subaward, UIC must monitor the activities of the subrecipient to ensure that:

- ✓ the subaward is used for authorized purposes,
- ✓ in compliance with Federal statutes, regulations, and terms and conditions of the prime and subaward, and
- ✓ performance goals are achieved.



# Monitoring Methods

- **Reporting**

Review financial invoices and performance reports submitted by subrecipient.

- **Site Visits**

Perform site visits at the subrecipient's location to review financial and/or programmatic records.



- **Desk Reviews**

Request, obtain and review supporting documentation from subrecipient for questionable costs.



- **Regular Calls and Communications**

Contact subrecipient regularly and make appropriate inquiries concerning program activities.

# Monitoring Cycle

## Risk Assessment

- Determine subrecipient eligibility
- Determine financial adequacy of the subrecipient
- Verify subrecipient is not debarred or suspended
- Ensure all compliance approvals have been obtained

## Monitoring throughout the Life of Subaward

- Technical reports
- Project deliverables
- Invoices
- Satisfactory progress reports to payments
- On-site visit or desk review

## Monitoring at Closeout

- 60-90 days before the end date of the subaward, determine if the subrecipient needs a no-cost extension
- 30-45 days before the end of the subaward, remind the subrecipient when of final deliverable due dates (invoices, reports, etc.)
- Ensure the final progress report and an invoice labeled "Final" have been received by the due date(s)

# Subaward Invoice Review Process

Subawardee submits invoice to the Business Manager



Business Manager/PI reviews, reconciles, and requests clarification or additional information as needed



Business Manager obtains PI's certification for payment



Business Manager submits invoice to University Payables



Office of Sponsored Programs ensures funds are available and whether the invoice or subawardee are high risk/flagged prior to authorizing payment.

# Ensure Timely Closeout

- Obtain all required reports from subrecipient
  - Project Performance
    - ✓ Technical Reports
    - ✓ Project Deliverables
  - Financial
    - ✓ Final Invoice
    - ✓ Refunds, Rebates, Credits Form (if necessary)
    - ✓ Subcontractor's Release Form
    - ✓ Verify Fulfillment of Cost Sharing Requirements
    - ✓ Disallowances or disputed costs
  - Other Obligations
    - ✓ Patent
    - ✓ Property Reports



# Tools for You!

- **Subrecipient Invoice Checklist** (to be completed with each invoice--financial):  
<https://www.obfs.uillinois.edu/common/pages/DisplayFile.aspx?itemId=96447>
- **Subrecipient Monitoring Checklist** (to be used throughout the award--programmatic):  
<https://www.obfs.uillinois.edu/common/pages/DisplayFile.aspx?itemId=96445>
- **Vendor/Contractor vs. Subrecipient** (to be used to determine which type of contract should be used):  
<https://uofi.app.box.com/s/fq1klb1pop13hk0xlt01p4xf6unj1zg2>

# Example Inquiries Received

- Why did you choose that subrecipient (and is there supporting documentation to support your answer)?
- Why is this a subrecipient rather than a contractor?
- Provide your monitoring plan to the prime awarding agency.
- How did you evaluate this subrecipient's performance?
- Did you communicate all of the required data elements and flow down provisions to the subrecipient?
- Where are the rebudgeting provisions you're requesting of me?



# Avoiding Delays

- To save time in the subaward issuance process, begin gathering as much information as early as possible.
- Do **NOT** send the agreements or amendments to the subrecipient for signature prior to submitting to Sponsored Programs. They need to be reviewed by Sponsored Programs prior to execution by either party.
- Accuracy is vitally important to these legally binding agreements. Any errors in the information provided, especially in the financial sections, will severely delay the processing and execution of the subaward.
- When submitting a new subaward request to Sponsored Programs, ensure that the SOW, budget, and budget justification are included.
- Setting up a timeline for subaward management can help prevent time crises in subaward issuance and potential stoppages in project workflow.
- If a subrecipient is not performing work as expected, inform Sponsored Programs as soon as possible.
- For Public Health Services and Non-PHS Organizations using PHS requirements, [a subrecipient FCOI certification form](#) will need to be completed and submitted to the [Office of Conflict of Interest](#) before work can begin on your subaward.
- Please submit editable forms via [OSPWeb](#) whenever possible.

# Single Audit – Subrecipient Monitoring Criteria

- Determining Subrecipient Eligibility
- SAM registration
- Award identification (13 elements)  
FD
- During award monitoring
- Single Audit monitoring
- For-Profit review
- Pass through entity impact (e.g., risk assessment)

- **Single Audit Federal Compliance Supplement (updated annually)**

- Part 3 – Compliance Requirements (Section 3.1-M and 3.2-M.)
- [https://www.whitehouse.gov/wp-content/uploads/2019/09/2-CFR\\_Part-200\\_Appendix-XI\\_Compliance-Supplement\\_August-2019\\_FINAL\\_v2\\_09.19.19.pdf](https://www.whitehouse.gov/wp-content/uploads/2019/09/2-CFR_Part-200_Appendix-XI_Compliance-Supplement_August-2019_FINAL_v2_09.19.19.pdf)

# What is a subaward?

- A legally binding agreement issued by a pass-through entity (i.e., UIC) to a subrecipient to carry out a substantive portion of work on a sponsored award received by the pass-through entity.
- Does not include payments to a contractor or payments to an individual that is a beneficiary of a sponsored program.
- May be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

# What is a subrecipient?

- An entity that receives a subaward from a pass-through entity to carry out part of a sponsored program; but does not include an individual that is a beneficiary of such program.
- May also be a recipient of other sponsored awards directly from an awarding agency.