LIFECYCLE OF A SUBAWARD:
WHAT YOU NEED TO KNOW
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Session Overview

- Proposal
  - Subaward vs Contract for Professional Services (CPS)
  - What is needed at time of proposal?
- Award
  - What is needed at time of award?
  - Invoice process
- Subaward Closeout
Characteristics of a Subaward

- Carries out effort, as part of a larger effort
- Programmatic decision making relative to their portion of the work
- Must comply with federal, sponsor and other regulations
- Use awarded funds to perform agreed upon Scope of Work
- May (or may not) provide matching funds
- Does not provide generic goods or services
Proposal Development: What you need from a Subrecipient

Always needed

- Scope of Work
- Budget and Budget Justification
- Signed Subrecipient Commitment Form (or commitment letter)

Sometimes needed

- Financial Conflict of Interest Form Packet
- NSF Nondiscrimination Certification Form
- Other documents required by RFP (biosketch, current and pending, etc.)

The required documents should be submitted to SPA with the proposal. They are considered part of a completed proposal, even if the subaward documents will not be sent to the sponsor.
SOMETIMES NEEDED? HOW WILL I KNOW?

- If a document is only needed sometimes, it’s a requirement driven by the sponsor and/or RFP.

- FCOI – Required for all agencies listed on FDP Clearinghouse (more on that in a minute)

- NSF Non-discrimination – If sponsor is National Science Foundation

- Other items as required by the RFP. As an example, if the RFP requires all key personnel to include a biosketch, the subrecipient investigator’s biosketch must be included in the proposal package to the prime sponsor.
## Sponsors Requiring FCOI

### Public Health Service (PHS) Agencies
- Agency for Healthcare Research and Quality (AHRQ)
- Agency for Toxic Substances and Disease Registry (ATSDR)
- Centers for Disease Control (CDC)
- Food and Drug Administration (FDA)
- Health Resources and Services Administration (HRSA)
- Indian Health Service (IHS)
- National Institutes of Health (NIH)
- Office of Global Affairs (OG)
- Office of the Assistant Secretary for Health (OASH)
- Office of the Assistant Secretary for Planning and Evaluation
- Office of the Assistant for Preparedness and Response (ASPR)
- Office of Public Health and Science
- Substance Abuse and Mental Health Services Administration (SAMHSA)

### Non-PHS Agencies
- Alliance for Lupus Research (ALR)
- Alpha-1 Foundation
- American Asthma Foundation
- American Cancer Society (ACS)
- American Heart Association (AHA)
- American Lung Association (ALA)
- Arthritis Foundation (AF)
- CurePSP
- Juvenile Diabetes Research Foundation (JDRF)
- Lupus Foundation of America (LFA)
- Patient-Centered Outcomes Research Institute (PCORI)
- Susan G. Komen for the Cure

*Be sure to check FDP website for the most current listing of agencies.*
Financial Conflict of Interest Form Packet — When do I need it?

• If sponsor is listed as requiring FCOI
  • Check (FDP Clearinghouse) to see if subrecipient has FCOI policy that meets PHS regulations.
    • If subrecipient is listed, nothing else is needed.
    • If subrecipient is not listed, subrecipient must complete PHS Form Packet. Form 1 is always needed.
  • If UMN FCOI policy will be followed, Forms 1 and 2 are needed
    • Forms can be downloaded from SPA’s website
Looking up subrecipient in FDP Clearinghouse

The Federal Demonstration Partnership (FDP) is a cooperative initiative among 10 federal agencies and 155 institutional recipients of federal funds for Phase VI. Our Chair and Vice-Chair are Cynthia Hope from the University of Alabama and Dr. Sandra Schneider from the University of South Florida. The FDP is a program convened by the Government-University-Industry Research Roundtable of the National Academies. Its purpose is to reduce the administrative burdens associated with research grants and contracts. The interaction between FDP’s 450 or so university and federal representatives takes place in FDP’s 3 annual meetings and, more extensively, in the many collaborative working groups and task forces that meet often by conference calls in order to develop specific work products.

The FDP is a unique venue for individuals from universities and agencies to work collaboratively toward shared goals.
FDP FCOI Institutional Clearinghouse

Certification of Institutional Compliance with Public Health Service Financial Conflict of Interest Requirements

This site provides a central location for educational institutions and other entities to document that they are in compliance with the PHS Financial Conflict of Interest (FCOI) rules and regulations. This site is expected to be used by PHS recipients to verify the compliance of their potential subrecipients with these regulations. Institutional authorized representatives may use the link below to add a certification for their institution. The other link is available for public use in determining the compliance status of a specific institution or entity.

List of Agencies using the PHS FCOI Regulations
Enter an institutional verification
List of Compliant Institutions and Entities
Partial name is allowed in the Institution Name field

Click the link for Institutional information
Subrecipient not in FDP Clearinghouse?

Subrecipient must complete Form Packet.

• Form 1: Documentation of PHS Subrecipient Financial Conflict of Interest (FCOI) Policy
• Form 2: Subrecipient Disclosure of Significant Financial Interests
Form 1

Provides documentation that subrecipient has current COI policy in compliance with PHS regulations or will use the University of Minnesota policy.
Form 2 — Only needed if using UMN FCOI policy

If (and only if) the authorized organizational official has checked Box C.2. of Form 1 indicating the University of Minnesota’s conflict of interest policy will be followed, then EACH subrecipient investigator must also complete, sign, and return a Form 2 to the University of Minnesota.
IF FCOI FORM PACKET IS NOT RECEIVED BY DEADLINE:

Subaward is either
- Reclassified as TBN
- Removed from proposal

University of Minnesota cannot submit a proposal without FCOI information in place for all PHS proposals.
A FEW ADDITIONAL PROPOSAL TIDBITS:

• Subaward costs are budgeted as direct cost on UMN’s budget

• Subaward expenses over $25,000 are excluded from UMN MTDC F&A base

• Subrecipient is entitled to their full F&A
  • Federal regulations prohibit Pass-Through Entity (UMN) from capping it
  • If subrecipient does not have a negotiated F&A rate, they may budget 10% MTDC
When will my subaward be issued?

**Risk analysis**
- SPA will complete a Risk Analysis in accordance with Uniform Guidance regulations.
- SPA will check audit, debarment, and other factors.

**FFATA**
- If prime award is subject to FFATA, SPA must report subaward to the Federal Government.
- SPA contacts subrecipient for required data elements.

**Reporting**
- GA will ask PI what reporting requirements are needed for subaward.
- PI will certify receipt of all required reports with each invoice approved for payment.

**Write-Up**
- SPA will write subaward and send it out for review and signature by sub awardee.
- Once returned, SPA will countersign and enter subaward into EFS.
**SUBAWARD INVOICE PAYMENT PROCESS**

Effective with all new and modified subawards issued on or after February 13, 2015

1. **Subrecipient** submits invoice to sub-inv@umn.edu
2. SPA enters invoice into WF Gen
3. System sends emails
   - PI – Action needed by clicking link
   - GA – Action needed by clicking link
   - Department Administrator – Information only. No “active” link in the email, so do not forward to PI for approval.
4. **Approval**
   - GA and PI must both approve invoice by clicking the link in the email.
5. **Payment**
   - Invoice is then routed for payment

WF Gen emails invoice payment confirmation to PI, GA and Department Administrator. All actions are time stamped and available for audit review.
Closeout

- SPA collects a Subaward Release Form from the Subrecipient.
  - SPA GA reviews form to see if any additional reporting to Sponsor and/or Prime Sponsor is needed.

- SPA verifies last payment has been fully processed.

- Subaward encumbrance, if any, is released and PO is terminated in EFS.