

# University of South Alabama Subaward Procedures

## Introduction

External awards made to University of South Alabama to fund sponsored projects may include one or more other institutions that are made responsible for a distinct part of the sponsored project. This relationship is formalized through a subaward agreement executed by both parties which details the scope of work, budget, and partnering language.

### Responsibility

The Office of Sponsored Projects Administration (SPA) is responsible for ensuring subawards funded from externally-funded prime awards made to the University of South Alabama are developed and executed compliantly. SPA works with the Office of Grants and Contracts Accounting to maintain all aspects of financial and non-financial regulation associated with subawards.

#### Procedures

#### **PROPOSAL PROCESSING:**

#### 1. Subrecipient vs. Contractor Determination

• At time of proposal development, PI determines that nature of the relationship with USA and the collaborating entity. *Subrecipient* performs part of the proposed research through intellectual input and authoring/co-authoring papers describing research result. *Contractor* provides a routine service, e.g. analyzing samples.

• Checklist to determine *Subrecipient* or *Contractor* can be found on the SPA website:

http://southalabama.edu/departments/research/spa/project-management/subcontracts.html

- 2. If the relationship is determined to be a Subrecipient, PI provides the following documents at the time of proposal routing
  - Scope of Work (required for expanded review) and detailed Budget
  - Subrecipient Commitment Form (if the subrecipient participates in the FDP Clearinghouse pilot, this form is not necessary. Participating parties can be found on the SPA website.)

#### AFTER AN AWARD IS RECEIVED – SUBAWARD ISSUED:

## 1. PI Initiates Request to Develop Subaward

• PI/Dept. submits a completed Contract Checklist to SPA with Subrecipient Scope of Work and Subrecipient Budget

#### 2. Subaward Preparation

• SPA performs Subrecipient Risk Assessment – any entities which assess beyond low risk

could require additional monitoring actions by investigator and OGCA

- SPA prepares subaward using FDP-model subagreement, incorporating requirements found in CFR 200.331 for federal funds, and when feasible for non-federal funds
- SPA uses Tracking Sheet to document and detail subaward development, negotiation (if necessary), and execution

## 3. Subaward Execution

- SPA emails subaward to subrecipient's administrative contact
- If subrecipient requests changes to subaward, SPA coordinates review of requested change with proper USA unit
- Subrecipient returns partially executed copy to SPA via email
- SPA routes the subaward for signature to the USA signatory
- SPA returns a fully executed copy to subrecipient via email

# SUBAWARD MONITORING BY PI:

# 1. Technical Progress Monitoring

- PI communicates regularly with subrecipient PI to monitor progress on the project
- PI monitors receipt of technical reports for timeliness and content
- PI communicates with SPA/OGCA if changes are needed to statement of work, reporting requirements, budgeting, etc.

# 2. Invoice Approval

- PI ensures all costs are allowable, allocable, and reasonable
- PI ensures all costs were incurred within the period of performance of the subaward, PI confirms expenses are associated with technical progress
- If acceptable, PI approves invoice and a Direct Pay Request is prepared and sent to OGCA

# 3. SUBAWARD MODIFICATION:

- PI/Dept. completes an Agreement Modification form and submits to SPA with all relevant documentation
- SPA prepares amendment
- SPA emails amendment to subrecipient's admin contact with instructions to sign and return via email to SPA
- SPA obtains USA's authorized signature and returns fully executed copy to subrecipient via email and retains copy for subaward file

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# SUBAWARD CLOSEOUT:

# 1. Plan for timely closeout

- Closeout notices are sent by SPA to determine if project will close or will continue through a no-cost extension or further funding
- PI/Dept. checks status with subrecipient 90 days before end date
- PI/Dept. follows up on late or missing reports/deliverables
- PI/Dept. approves final invoice (marked FINAL) and a Direct Pay Request is prepared and sent to OGCA
- PI / Dept. provides subaward close-out documents as requested by SPA
- A copy of the final technical report is sent to SPA

Contact

The Office of Sponsored Projects Administration at the University of South Alabama is located at: www.southalabama.edu/departments/research/spa/index.html