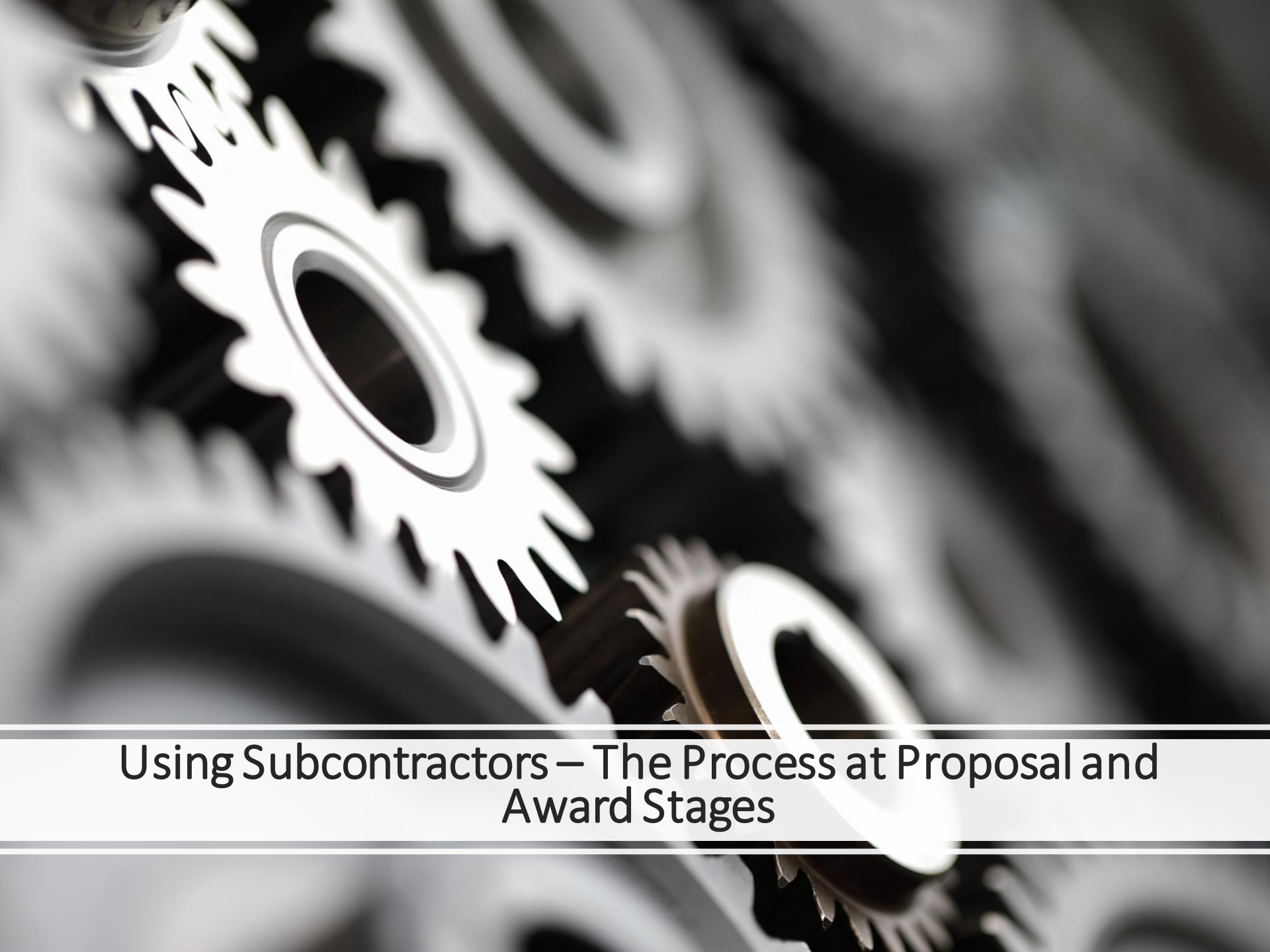




**Research, Grants
and Contracts**



Using Subcontractors – The Process at Proposal and Award Stages

PROPOSAL STAGE

Subrecipient vs. Contractor

Subrecipient is a non-Federal entity that receives a subaward from a pass-thru entity for the purpose of carrying out programmatic activities under a Federal award.

Contract is for the purpose of obtaining goods or services for the non-Federal entity's own use and creates a procurement relationship with the contractor.

PROPOSAL STAGE

Under 2 CFR 200.92, the Uniform Guidance, *Subaward* means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of an award.

PROPOSAL STAGE

Following are characteristics of a subaward. The subrecipient:

- has responsibility for programmatic decision making
- contributes to the scholarly/scientific conduct of the project as described in the statement of work for the prime award
- uses the funding to carry out a program for a public purpose specified in the authorizing statute, as compared to providing goods or services for the benefit of the pass-through entity

PROPOSAL STAGE

Following are characteristics of a subaward. The subrecipient: (continued)

- requires considerable discretionary judgment and the unique expertise of the subrecipient in the performance of the work
- investigator would be considered as a co-author of publications resulting from the work performed under the prime award
- performs work that involves human subjects or animal studies

PROPOSAL STAGE

RGC Protocol when a subcontractor is involved on a proposed research project:

- Facilitate contact with the subaward entity
- Request a subaward package of documents
 - Scope of Work
 - Detailed Budget
 - Budget Justification
 - Subrecipient Form
 - Commitment Letter
 - Cost Share Letter (if applicable)
 - Faculty Supporting Docs as per sponsor requirements (biosketch, etc)

PROPOSAL STAGE

Subaward docs are applied to the NKU proposal file, as needed, and uploaded to the internal GMS proposal file for future reference.

AWARD STAGE

Office of Management and Budget Uniform Guidance §200.514 (formerly Circular A-133)

- Requires NKU to monitor our subrecipients to make sure that they are compliant with Federal requirements.

AWARD STAGE

Subrecipient Monitoring

- Federal Demonstration Partnership (FDP) templates
- Quickly and effectively conveys critical information in standard format for all parties.
- The process for subrecipient monitoring uses the FDP templates.

AWARD STAGE

Subrecipient Contacts

- Additional financial and contact information about the subrecipient.

Attachment 3B
Research Subaward Agreement
Subrecipient Contacts

Subaward Number:

Subrecipient Information for **FFATA reporting**

Entity's UEI/DUNS Name:

EIN No.: Institution Type:

UEI / DUNS: Currently registered in SAM.gov: Yes No

Parent UEI / DUNS: Exempt from reporting executive compensation: Yes No (If no, complete 3B pg2)

Place of Performance Information for FFATA reporting
Physical Address, City, State (if U.S.) and Country:

U.S. Entities only (insert information for Place of Performance):
Congressional District: Zip Code+4: [Zip Code Look-up](#)

Subrecipient Contacts

Central Email:

Website:

Principal Investigator Name:

Email: Telephone Number:

Administrative Contact Name:

Email: Telephone Number:

Financial Contact Name:

Email: Telephone Number:

Invoice Email:

Authorized Official Name:

Email: Telephone Number:

Legal Address:

Administrative Address:

Payment Address:

FDP-3B, 1 JAN 2020

AWARD STAGE

Subrecipient Risk Assessment

Likelihood that the non-federal entity will fail to achieve the grant's intended purpose because of

- Financial instability
- Non-compliance with laws, regulations or policies
- Internal control and management issues

AWARD STAGE

Subrecipient Risk Assessment

- The subrecipient's prior experience with the same or similar subawards.
- The results of previous audits.
- Any changes to the subrecipient's personnel or new substantially changed systems.
- The extent and results of Federal awarding agency monitoring.

AWARD STAGE

Reporting Requirements

- PI's input on the timing of technical reports for the subaward
- Unless there are program guidelines dictating the reporting requirements.

Attachment 4
Reporting and Prior Approval Terms

Subaward Number:

Subrecipient agrees to submit the following reports (PTE contacts are identified in Attachment 3A):

Technical Reports:

- Monthly technical/progress reports will be submitted to the PTE's within days of the end of the month.
- Quarterly technical/progress reports will be submitted within 30 days after the end of each project quarter to the PTE's .
- Annual technical / progress reports will be submitted within days prior to the end of each budget period to the PTE's . Such report shall also include a detailed budget for the next Budget Period, updated other support for key personnel, certification of appropriate education in the conduct of human subject research of any new key personnel, and annual IRB or IACUC approval, if applicable.
- A Final technical/progress report will be submitted to the PTE's within days of the end of the Project Period or after termination of this award, whichever comes first.
- Technical/progress reports on the project as may be required by PTE's in order for the PTE to satisfy its reporting obligations to the Federal Awarding Agency.

Prior Approvals:

Carryover: Carryover instructions and requirements are as stated by the Federal Awarding Agency guidance or as shown below.

Submit carryover requests to the .

Other Reports:

- In accordance with 37 CFR 401.14, Subrecipient agrees to notify both the Federal Awarding Agency via iEdison and PTE's within 60 days after Subrecipient's inventor discloses invention(s) in writing to Subrecipient's personnel responsible for patent matters. The Subrecipient will submit a final invention report using Federal Awarding Agency specific forms to the PTE's within 60 days of the end of the Project Period to be included as part of the PTE's final invention report to the Federal Awarding Agency.
A negative report is required: .
- Property Inventory Report (only when required by Federal Awarding Agency), specific requirements below.

AWARD STAGE

Statement of Work & Budget

- Confirmed with PI

Subaward Number:

Attachment 5
Statement of Work, Cost Sharing, Indirects & Budget

Statement of Work
 Below Attached, pages

If award is FFATA eligible and SOW exceeds 4000 characters, include a Subrecipient Federal Award Project Description

Budget Information

Indirect Information Indirect Cost Rate (IDC) Applied %

Rate Type:

Cost Sharing No

If Yes, Include Amount: \$

Budget Details Below Attached, pages

Budget Totals

Direct Costs	\$ <input type="text" value=""/>
Indirect Costs	\$ <input type="text" value="0.00"/>
Total Costs	\$ <input type="text" value=""/>

All amounts are in United States Dollars

AWARD STAGE

Types of Subawards

- **Cost reimbursement (CR)** agreements are paid as costs are incurred and invoiced, typically monthly or quarterly.
 - Most Sponsored Research Projects
- **Fixed price (FP) agreements** have fixed payments based on a milestone payment schedule or the submission of deliverables.
 - Used by for-profit sponsors and foreign entities

AWARD STAGE

Subrecipient Agreement Packet

- RGC drafts *Subrecipient Agreement*, using FDP template
- Cost Reimbursable **or** Fixed Price Subrecipient Agreement Packet is sent electronically to the subrecipient contact person for signature.
- RGC fully executes the Packet and sends a copy to Comptroller's Office.

AWARD STAGE

Federal Funding Accountability and Transparency Act (FFATA)

- Makes the spending of Federal funds more transparent to the public.
- In compliance with FFATA, NKU registers all first –tier subawards over \$30,000 with the Federal Subaward Reporting System (FSRS).

If you have any questions or need additional information about anything shared within this presentation, please contact the RGC office.

RGC@nku.edu



