



IOWA

2024 SRAI Annual Meeting-Chicago

M106:
Subawards under Federal Grants:
Effective Communication and Essential
Project Components

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When you hear “Subawards” what is your reaction?

LOVE them, love the challenge!



I’m already Exhausted thinking about them...



They are just the worst...



Why do we have these strong feelings?

They take forever to start!

I love a puzzle!

A new requirement?

I don't have all the information I need...

Too much work!

Subawards get my brain flowing!

How many forms do you need?

Too many questions-just let us to the project!

Identifying Our Positions

“We just want to do the work!”

vs.

“Why is it so hard to get the information needed?”

Thoughts?

We do not understand our unique perspectives to achieve our goals.

(Or think we don't!)



- 
- The better we understand the purpose of subawards and what is needed to create an accurate one, the smoother the process for everyone.
 - Let's talk about what Subawards are and how they are created to improve the communication process.

What is a Subaward?

- A legal document to outline roles and responsibilities of each party's contribution to a project.
 - Contains general administrative, compliance, and financial terms.
- Subawards should be determined **at the proposal stage**
 - Impacts project budget
 - Impacts project timeline
 - Correct classification is essential!

Is this really a Subaward?

- “Start From the Back” (Statement of Work)

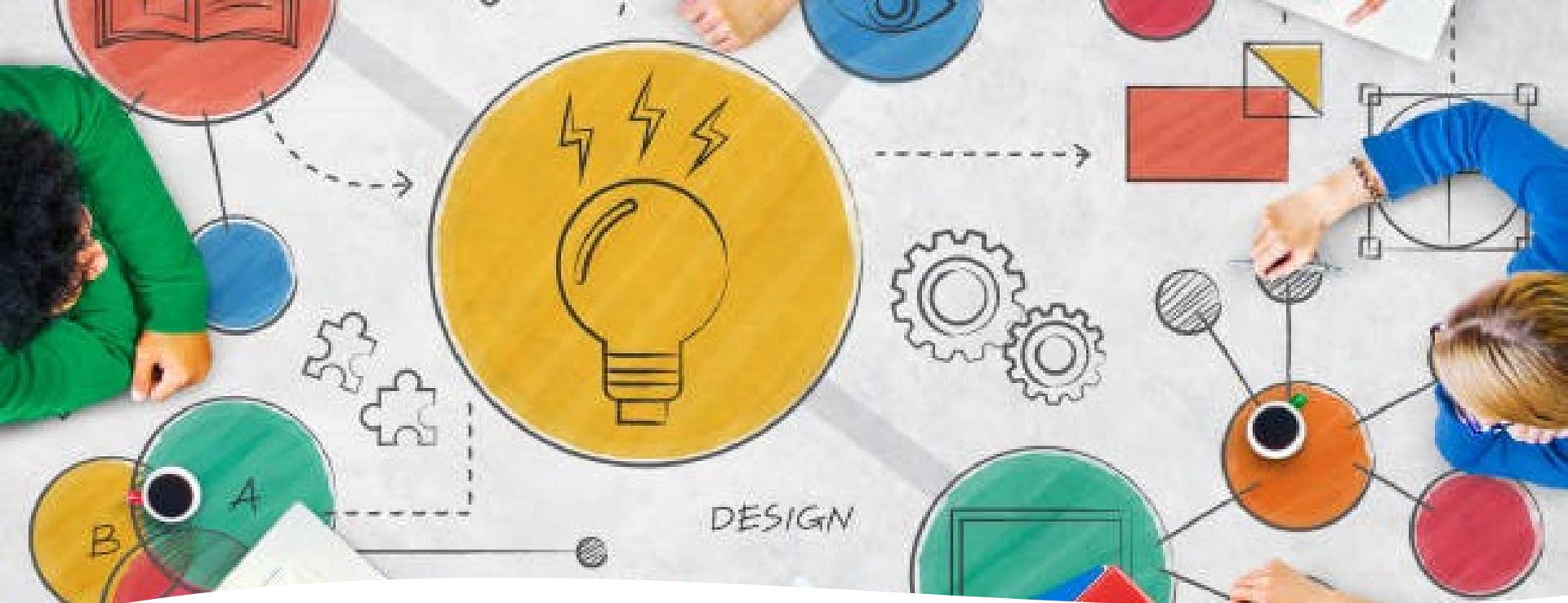
- Key considerations:
 - Human or animal subjects
 - Data collection
 - Writing of a publication
 - Contribution of scientific/scholarly expertise
 - Are students or trainees (Undergraduate, Graduate, Post Docs) participating in the project as part of their thesis or dissertation

Tools:

- ❖ FDP “Subrecipient vs. Contractor Checklist” ([PDF](#))
- ❖ University of Iowa DSP website:
 - ❖ <https://dsp.research.uiowa.edu/subaward-or-fee-service>

Subaward Types

- Cost Reimbursement (most common)
 - Require detailed budgets with intended use of funds by budget category.
- Fixed Price (requires specific sponsor approval)
 - A firm price for delivery of a product or service.
 - Subject to the Simplified Acquisition Threshold limits.
- Capitation (clinical trials)
 - Based on subject/patient enrollment according to terms of the prime award
 - Budget is often fully burdened (inclusive of F&A) and the same for all sites.



Are we ready to work together?

- Central Administration (e.g. Compliance Offices)
 - Sponsored Programs
 - Human Subjects
 - Conflict of Interest

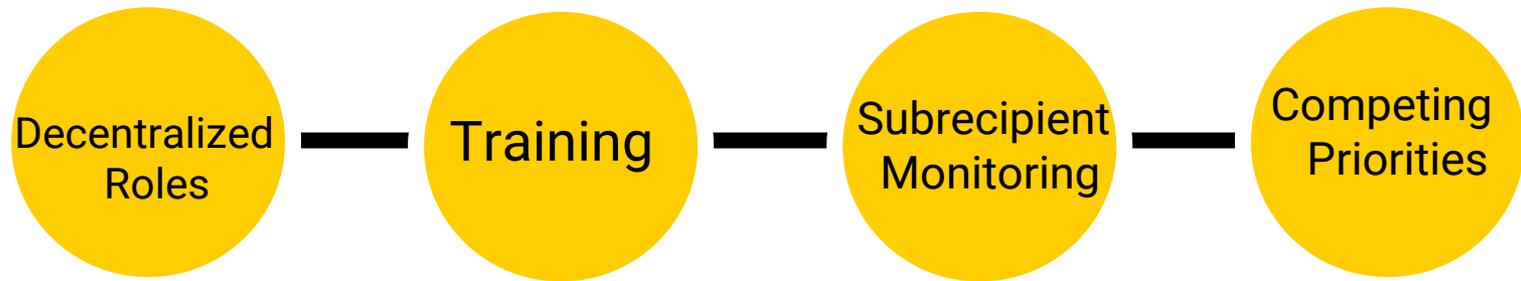
AND

- Departmental Research Administrators
- Principal Investigators

A close-up photograph of a stone staircase, showing the texture and depth of the steps. The steps are made of dark, weathered stone and are arranged in a series of parallel lines that recede into the distance. A bright yellow rectangular box is superimposed over the middle of the image, containing the text "Changing Perspectives" in a bold, black, sans-serif font.

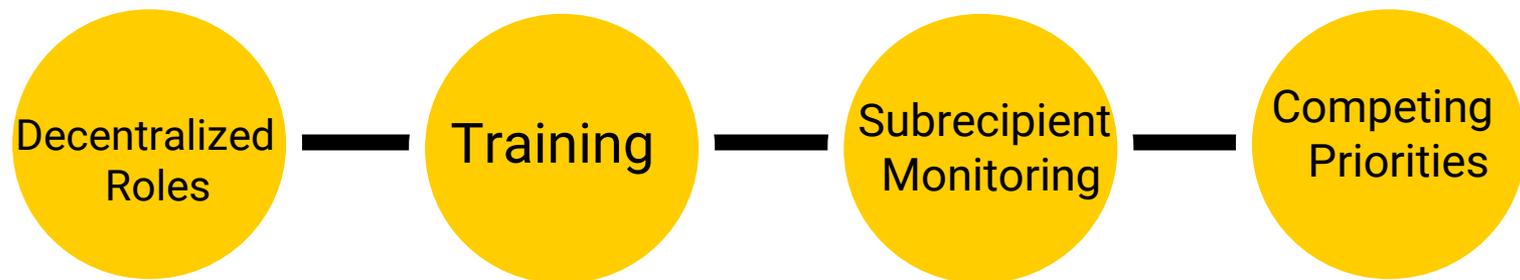
Changing Perspectives

Factors Impacting Subawards



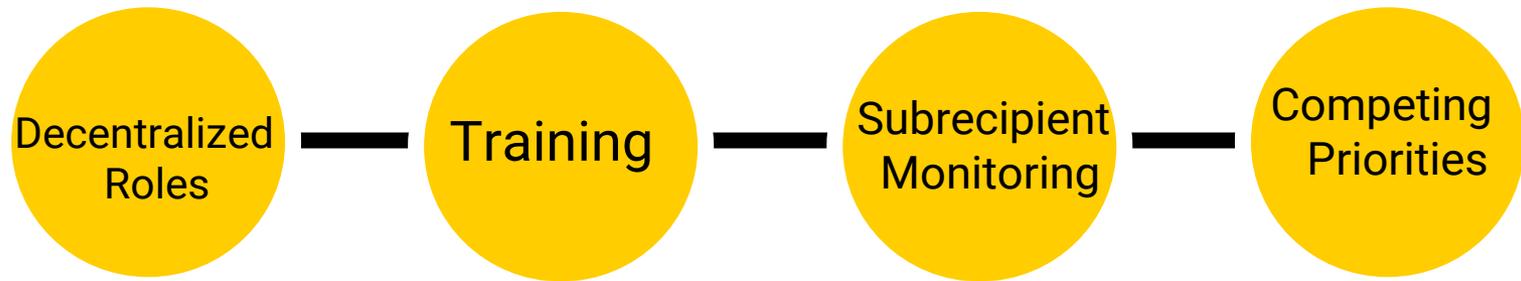
- Separation of duties (Pre-award & Post-award)
- Create many efficiencies but can also amplify poor communication.

Factors Impacting Subawards



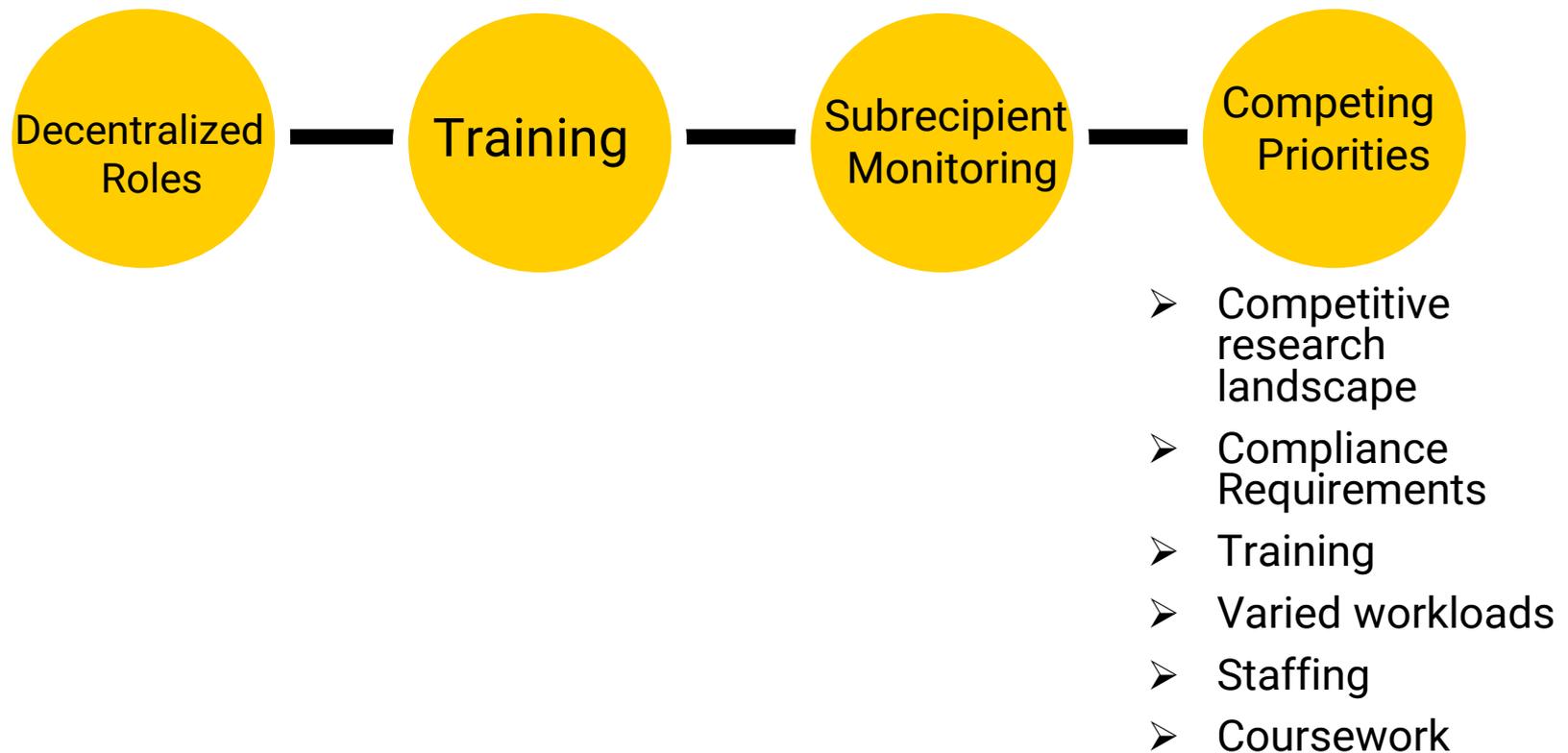
- High rates of retirement
- Rapidly changing and complex compliance environment

Factors Impacting Subawards



- 2 CFR 200 Subpart D
- Annual Audit Reviews
- Subaward Risk Assessments

Factors Impacting Subawards



Collaboration in the Subaward Process



Coordinating the web of Information



- Provide accurate and specific project information.
- Manage Subrecipient Work and receive necessary forms/reports for monitoring.



- Budget amounts, dates, names do not match requests.
- Incomplete project information.
- Ineffective communication between Departments and Central Administration.
- Post award Project changes made AFTER subawards have been fully executed.



- Draft compliant agreements to move project forward.
- Conducts Risk Assessments for Subrecipient.

Perspectives

Principal Investigator

Project Management
"Paperwork"

Department

'Black Hole'

Lack of Updates

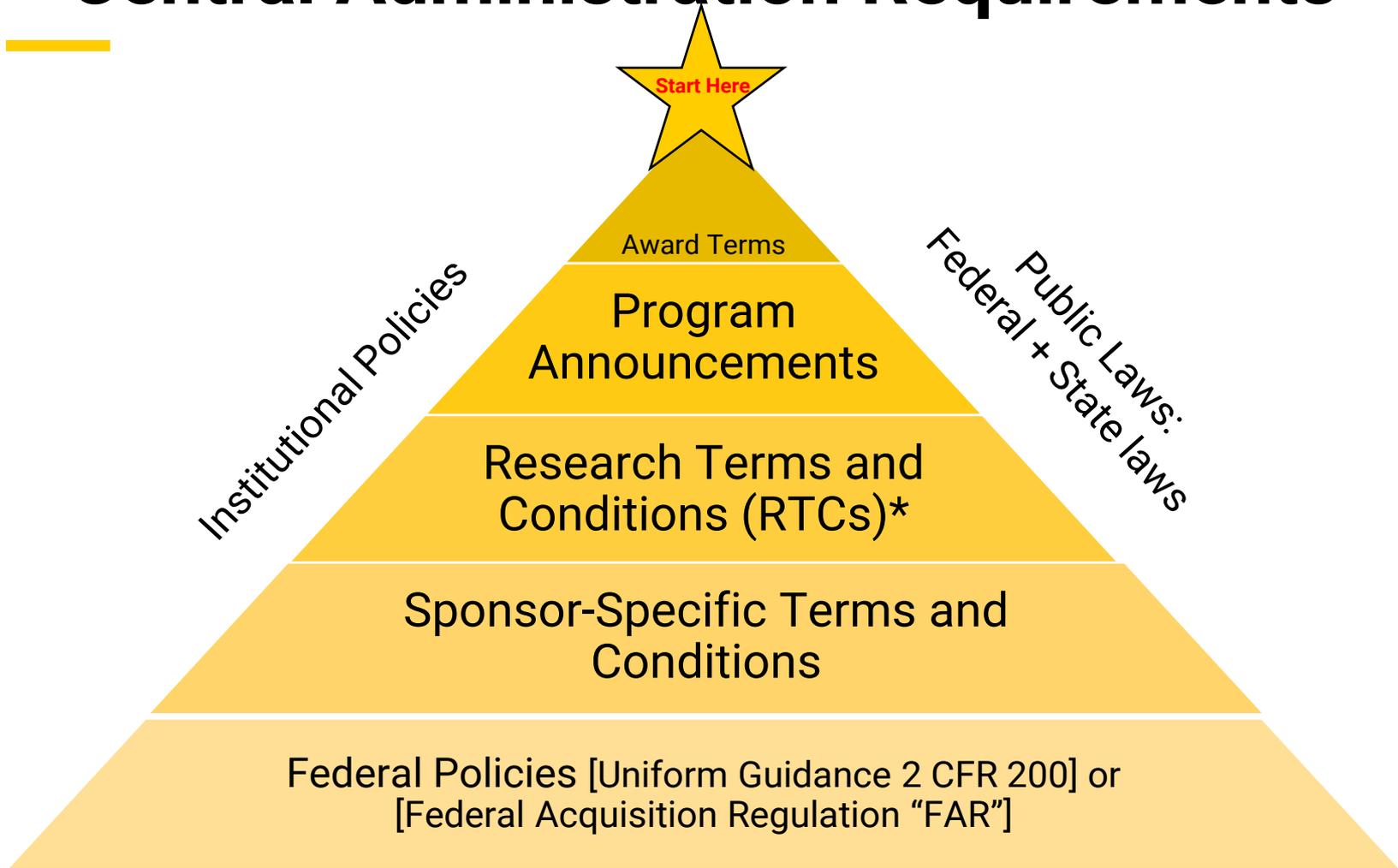
Go-Between

Central Administration

Incomplete Information

Tight Timelines

Central Administration Requirements



*RTCs apply only if the Sponsor has implemented them and the Award is designated as "Research"

External Tools

- How do all the various Central Administration offices connect their information to ensure compliance?
- Use of National Membership Groups and Resources
 - Federal Demonstration Partnership “FDP” (1 example)
 - A leader in facilitating Government and Institution relations by offering options to streamline the administration of federally sponsored research.
 - [FDP Conflict of Interest \(FCOI\) Clearinghouse](#): Central location for educational institutions and other entities to self-certify they comply with US federal funding agency FCOI rules and regulations.
 - [FDP Expanded Clearinghouse](#): Provides online organization profiles in lieu of subrecipient commitment forms to obtain entity-based information needed by pass-through entities for issuing subawards or conducting subrecipient monitoring.
 - The [FDP Subaward and Subcontract templates](#) are widely used and adapted across U.S. institutions and hospitals.

Notice of Award (NIH excerpted below)

- Read the entire Notice of Award “NoA”, it contains important information regarding dates, amounts, carryover, restrictions, and research terms and conditions.
 - For U.S. National Institutes of Health NoAs: many include additional information in SECTION IV of the NoA
 - Review SECTION IV for prior approval requests; restrictions; etc.

SECTION IV – AI SPECIFIC AWARD CONDITIONS

Clinical Trial Indicator: No

This award does not support any NIH-defined Clinical Trials. See the NIH Grants Policy Statement Section 1.2 for NIH definition of Clinical Trial.

FDP Subaward Overview



FDP Subaward Template Location	Information Contained	Source
Face Page	Naming of Parties; Dates; Amounts; Signatures; Payment Terms & Incorporation of T&Cs	Subaward Template / Award / Department
Attachment 1	Certifications and Assurances	Subaward Template / Award
Attachment 2	Data Sharing Management Plan	Department / Award
	Animal Subjects/Human Subjects (Yes/No) Single IRB? Local IRB? IRB application after 1 year? <i>For NIH –is it a Clinical Trial?</i>	Department / Award / Funding Opportunity Type
	Multiple PI Plan (Attached in Attachment 6)	Department / Award
	Box for Additional Terms/Restrictions	Award / Risk Assessment
Attachment 3	Contacts for each Party	Department
Attachment 4	Reporting Requirements-including Carryover	Department / Award
Attachment 5	Statement of Work Budget and Budget Justification	Department
Attachment 6	Award Notice and MPI Plan (as applicable)	Department / Award

Special Considerations

- Clinical Trial Subawards
 - Same Statement of Work or Study Protocol for all sites
 - One Budget template (Capitation) for all sites
 - Multiple Sites
 - Single IRB designated
 - Other Factors?
 - Biospecimens
 - Data Sharing
 - Investigational Drug or Device
 - Industry Partner
- Large Consortium Projects
 - A central network hub for additional studies
- Reach out in advance to ensure all questions are addressed to create templates/processes. The initiation of a template can take time, but its worth it!

An aerial photograph of a university campus. In the center is a large, light-colored building with a prominent dome, surrounded by a green lawn. Several other large, multi-story buildings are scattered around the central area. The campus is interspersed with trees and greenery. In the background, more campus buildings and a residential area are visible under a clear sky.

How do we Improve?

Shared Goal, Similar Challenges

- We have similar challenges for Departments and Central Administration, and they impact Subawards.
 - Decentralized roles
 - Staffing/Training
 - Workloads
- We all want to progress the research mission at our respective entity and see that the project is successful.

Strategies

1. Have a central location to share files/resources.
2. Have a central communication network to share updates on sponsor guidelines and institution policies.
3. Set up a conference call with Department/PI/Central Administration for large projects.
4. Assign subawards for the same project to the same reviewer in Central Administration.
5. Utilize checklists.
6. Online/In-Person Training & Resources: SRAI, colleagues, federal agency trainings, etc.

Sample Email

- **Clinical Trial Subawards** Additional Information is needed from the Department and Principal Investigator (*select from list as needed*)

“Our office is reviewing the outgoing subaward request for your project entitled.... In reviewing the award notice, it mentions the use of a single or central IRB for your project. We will need additional information regarding your project to proceed in completing the subaward, we are also available for a follow up conference call to explain this project in more detail.”

- Is the single/central IRB for this project known? If yes, please provide the name of the central IRB
- Will the subrecipients all utilize this same IRB for the project?
- Do you have that approval in place now or is this expected to be approved within the first year of the project?
- Will any human subjects' data be shared between the parties? If yes, please explain the kind of data that will be shared and to whom
- Do you have a copy of the Study Protocol?

If this is a Multi-site Clinical Trial with Subawards

- Is there a Capitation budget template and universal Statement of Work or Protocol for the enrolling sites?
- Will there be the use of a Drug or Device in your project? If yes, how is that being provided to the patient?
- Is this study required to be registered on clinicaltrials.gov?
- Do you plan to collect subject specimens/samples? If yes, name biorepository.
- Do you need to submit the subject data to an external data repository? If yes, name data repository.

Snapshot of Checklist (Central)

Drafting Subaward Checklist

Draft Agreement

- Use of appropriate template based on Sponsor, project type and Subrecipient
- Dates match award/budget/statement of work/system request
- Sponsor Approval of Subaward/Subrecipient
 - Is it a foreign subrecipient under a federal award? Specific prior approval is required
 - NIH foreign subaward-add Access to Records term
- Review Prime Award for the following to include in Subaward
 - Sponsor Approval of Subrecipient or use of Subawards
 - Single/Central IRB Requirements (as applicable) -**email for further information**
 - IACUC Requirements
 - Data Sharing Management Plan
 - Multiple PI Plan
 - Carryover Policy
 - Export Control terms
 - Sponsor restrictions or special reporting requirements
- Statement of Work is detailed and doesn't refer to items not provided (e.g. human/animal subjects; additional sites; data sharing, etc.) - **email for further information**
- Budget doesn't include items that are unallowable or typically require prior approval. (verify approval; list is not exhaustive)
 - Equipment
 - Foreign Travel
 - Human or Animal Subject costs
 - Additional Subawards
- Final Invoice Due Date/Special Invoicing & Reporting Terms
- Indirect/F&A rate-allowable? Documentation provided as necessary
- Cost Sharing? Voluntary or Required (Add'l terms needed)
- Additional Invoicing Terms based on Risk Assessment?

Human Subjects Data Sharing

Snapshot of Checklist (Dept)

Pre-Award to Award Project Management Checklist (with Subawards)
Departmental Resource

Proposal Submission (Pre-Award Stage)

Completed By:
Completed On:

1. _____ Total Number of Subawards
 2. Any Foreign?: If checked, these need specific Sponsor Approval
 3. Conflict of Interest in Research Form (each site)
 4. Payment Type:
 Cost Reimbursement Capitation (per patient/item) Fixed Price*
Needs SPECIFIC Prior Approval in Main Budget Justification description
 5. Budget
 6. Budget Justification
 7. Indirect Costs/F&A Rate
 Copy of federally negotiated rate agreement?
 De minimis Rate
 Provisional Rate (requires specific prior approval from sponsor and UI for use)
- Is there a cap on indirect costs/F&A from the Sponsor? (location in RFP)

Just-In-Time (Post Submission/Pre-Award Stage)

Completed By:
Completed On:

- Do all Subrecipients have an active Vendor File with Purchasing? Yes No
 If no, begin Vendor File Application process now.
- New or revised routing form submitted to DSP? Yes No N/A

Use the table below to track changes from proposal through award stage of changes to the project and the impact on subawards

Item Changed/Updated	Yes	No	In File	With Sponsor	DSP Notified?	Comments
Subrecipient Institution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Key Personnel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Budget	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Budget Justification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Statement of Work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
COI Form/Plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Data Sharing Management Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Multiple PI Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Award Stage (Preparing Subaward requests)

Completed By:
Completed On:

- Do all Subrecipients have an active Vendor File with Purchasing? Yes No

Shared Responsibility

- ❖ The researcher and the institution are recipients of external funds. This is not our money!
- ❖ The researcher and the institution's name and reputation are at risk for non-compliance.
- ❖ Demonstrating compliance and good stewardship of external funds impacts future funding (in a good way!)

Takeaways



We are all on the same team!!



SHARE information with each other. Give each other grace with timelines.



READ your award and **CONSULT** the sponsor's guidance on many topics to inform your questions.



ASK questions when you aren't certain.

Tools/Resources

- Worksheets/Checklists
 - FDP “Subrecipient vs. Contractor Checklist” ([PDF](#))
 - See Samples
([Pre-Award to Award Project Management Checklist](#);
[Drafting Subaward Checklist](#))
- Ask your colleagues
- Online Training Resources
 - Membership Organizations: SRAI, NCURA, FDP, AUTM, etc.
 - All offer resources covering various topics, we learn from working together!
 - Federal Agencies: NIH, NSF, NASA, etc.
 - Sponsors want your project to succeed in a compliant manner!



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Thank you!
Questions and Comments?

→ **Katherine Gonzales**

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