



SRAI

SOCIETY OF
RESEARCH
ADMINISTRATORS
INTERNATIONAL

TH402:

The Bare Necessities of Subawards

Post-Award Meeting in Action

About the Presenters

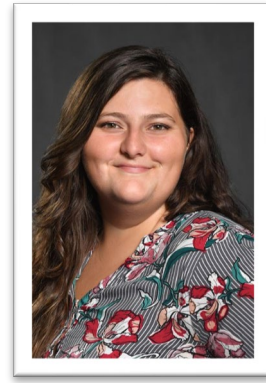


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A Note Before We Begin

- This presentation will focus on the requirements for the most common type of National Institute of Health (NIH) Grant, Research Project Grant (R01).
- We all come from diverse types of institutions with different organizational structures. What works for one institution, may not work for others.
- We love questions! We will stop to answer questions after both the pre- and post-award sections but may need to move on due to time constraints.
- If we can't get to your question due to time constraints, please write it down on the provided index cards.

Agenda

- What is a Subaward?
- Pre-Award Requirements
- Post-Award and Monitoring
 - Closeout
 - Common Mistakes

What is a Subaward Agreement?

A **subaward** is an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract. The term includes consortium agreements. (NIH GPS 1.2)

Pass-Through Entity/Prime Recipient Responsibilities

Prime recipients **are responsible for more than just providing funding to subaward sites.** They also oversee the scientific, programmatic, financial, and administrative aspects of the grant.

As the prime recipient of NIH grant funds, an institution assumes the responsibility for the execution and management of the overall study and its subawards, including:

- Performance
- Funds expenditure
- Reporting
- Any requirements also identified in NIH Guidance or the Notice of Award

What is a Subaward Agreement?

- What constitutes a subaward agreement?
 - A **formal agreement** between two separate legal entities in which a research project is carried out
 - The subrecipient performs a **substantive role in the planned research** and does not merely serve as a conduit of funds to another party
 - There is a **measurable level of effort** from the subrecipient PI along with a breakdown of allowable expenses

Key Elements of a Subaward Agreement

- Subsite Principal Investigator
- Directing/Monitoring Research Procedures
- Reimbursement Procedures
- Policies for items like travel, salary, and benefits
- Terms for Financial Conflict of Interest policy
- Data ownership, sharing, and disposition provisions
- Provisions for NIH data sharing and inventions and patent policy
- Authorship, co-authorship, and publication expectations
- Provisions for property, program income, publications, reporting, and audits
- Public policy requirements and provisions

Subawards in Pre-Award

This process is a **collaboration** between research administrators, principal investigator, and the study team

- Several procedures should be followed before and after establishing contact with potential subsites
 - Subrecipient vs Contractor determination
 - Confirmation that site is not debarred, suspended, or excluded from receiving Federal funds
 - Review of single audit for assessing risk

Subawards in Pre-Award

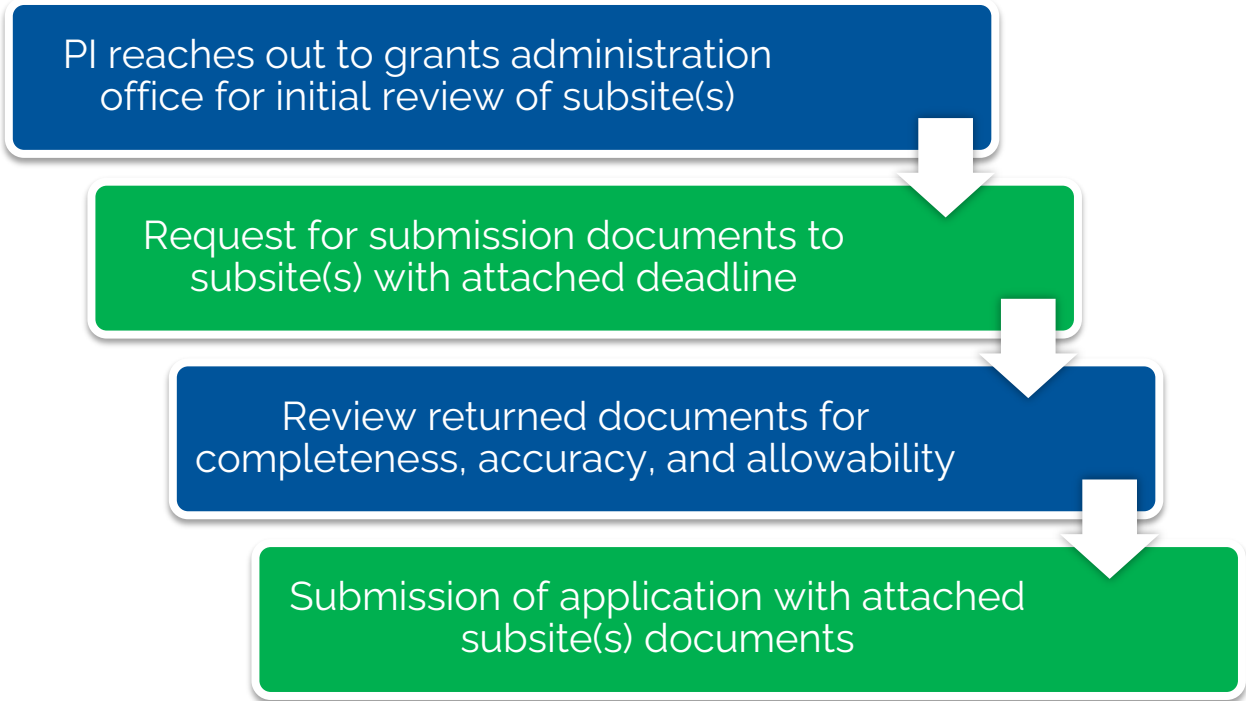
Required documents for submissions (NIH R01):

- Signed Letter/Statement of Intent
- R&R Subaward Budget
- Statement of Work
- Budget Justification
- Biosketches
- Equipment
- Other Support (Current and Pending)
- Facilities and Other Resources
- Financial Conflict of Interest
- Human Subjects/Vertebrate Animals

Required documents will vary between funders and award types

Subawards in Pre-Award

Process Timeline



**Let's Take
A Pause**

**Pre-Award
Questions?**

Subawards in Post-Award

After the Notice of Award is received, the following should be reviewed before sending an agreement:

- Submission budget matches budget awarded by sponsor
- Site's statement of work is still accurate
- Pre-Award risk assessment is still accurate
- Additional terms from sponsor that need to be flowed down to the subsite
- Internal numbers and information match what is being requested for the subaward across all departments

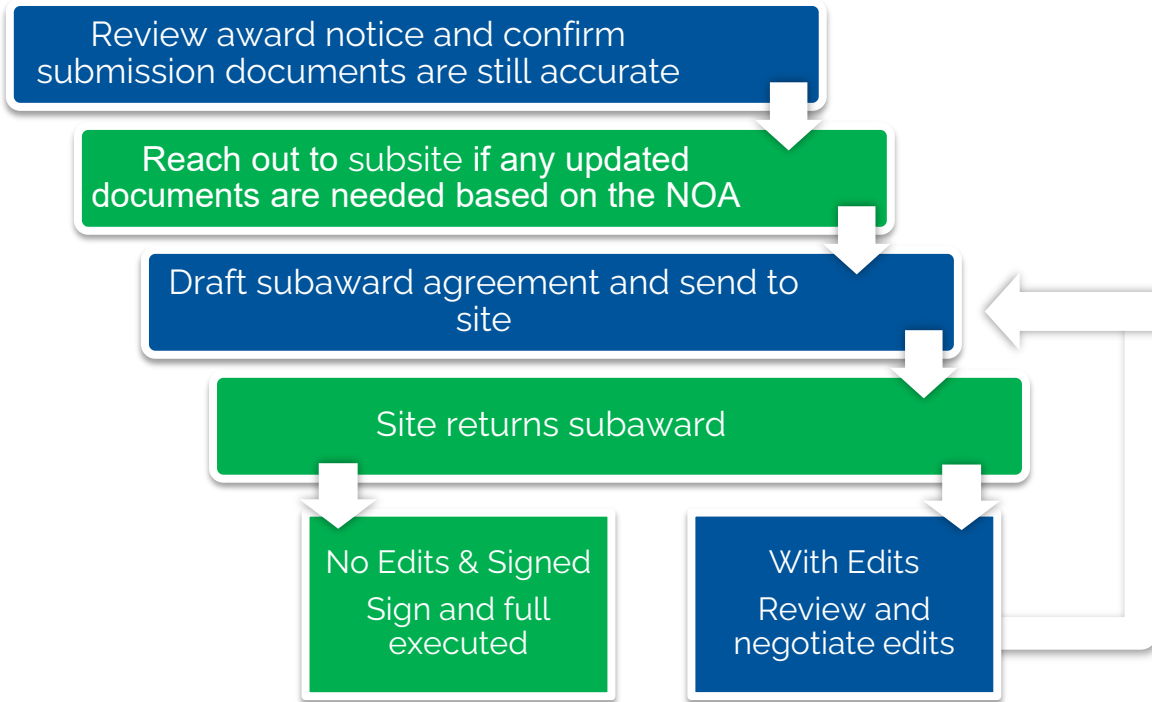
Subawards in Post-Award

Consider these additional factors when drafting a subaward

- Institutional Review Board (IRB)
- Institutional Animal Care and Use Committee (IACUC)
- Data Use Agreement (DUA)
- Material Transfer Agreement (MTA)
- Intellectual Property (IP)

Subawards in Post-Award

Process Timeline



Subawards in Post-Award

Monitoring

Monitoring subawards is
**crucial to maintaining
compliance.**

- Annual/Interim/Final
**Research Performance
Progress Report**
- **Federal Funding
Accountability and
Transparency Act (FFATA)**
 - Reporting subawards in
excess of \$30,000 to sam.gov
- **Invoicing**
 - Quarterly during budget
period
 - Final should be submitted
sixty (60) days after end date

Subawards in Post-Award

Closeout

Items to take into consideration when it's time to close out a subaward agreement:

- Final Invoice
- Final Technical/Performance Report
- Final Invention Statement and Certification
- Financial Property Report/Disposition
- Additional Reports at Request of Pass-Through Entity

Common Mistakes

- Inadequate monitoring of audits, invoices, progress reports, etc.
- Late, incomplete, or inaccurate FFATA reporting in Sam.gov
- Lack of or incomplete documentation (both subsite and PTE)
- Unsupported budget costs

Common Points of Concern

- Consultant vs Vendor vs Subaward Determination
- Subsite Invoicing Issues
- Inaccurate Site Budgets or Reporting Deadlines
- Prior Approval from Sponsor
- Predicting Patient Populations & Budgets for Enrolling Studies
- Managing Sites with Both Fixed Price & Cost Reimbursable Agreements

**Post-Award
Or
Close Out
Questions?**

**Any Other
Questions?**

Helpful Links

- **Subaward Definition** - <https://grants.nih.gov/policy-and-compliance/policy-topics/subawards>
- **NIH Submission Guide** - <https://grants.nih.gov/grants/how-to-apply-application-guide/forms-i/research-forms-i.pdf>
- **NIH Grant Policy Statement** - <https://grants.nih.gov/grants/policy/nihgps/nihgps.pdf>
- **FFATA Reporting** - <https://grants.nih.gov/grants-process/post-award-monitoring-and-reporting/reporting-requirements/federal-funding-accountability-and-transparency-act>
- **RPPR** - <https://grants.nih.gov/grants-process/post-award-monitoring-and-reporting/reporting-requirements/research-performance-progress-report-rppr>