

SUBAWARD PREPARATION ROLES & RESPONSIBILITIES

Principal Investigator (PI)

1. Determines the type and extent of collaboration needed according to project objectives. Identifies the appropriate subrecipient based on:
 - Scientific considerations
 - Performance record and capability
 - Cost and access to resources.
2. Documents subaward plan and rationale for the selection of the subrecipient as part of the proposal.
3. At the proposal stage and in consultation with the Grants Officer (GO), ensures that a 'true' subrecipient relationship exists through completion of the 'Checklist to Determine Subrecipient or Contractor Classification'.
4. In consultation with the subrecipient develops the proposals:
 - Budget – include both Direct and F&A costs. If the collaborating institution does not have a negotiated F&A rate, a 10% de minimis rate should be used instead.
 - Statement of Work
5. In coordination with the GO, the PI or authorized designee (including the GO) submits subaward request with appropriate approval in RFCUNY's Contract Manager system (see item 5 under 'GO'). Includes the following attachments and others as may be required by the system:
 - Scope of Work
 - Budget
 - Subrecipient Commitment Form (<https://www.rfcuny.org/RFWebsite/learning-resources/review-policies-procedures/subrecipient-monitoring-procedure/>)
6. As necessary, works with RFCUNY's Office of Legal Affairs to ensure appropriate subaward terms and conditions are developed.
7. If necessary, obtains sponsor approval of subaward.
8. Additionally after the subaward is executed PIs should:
 - Consistently and adequately communicate with subrecipient PI. Meeting notes and agendas with date and time are evidence showing communication between the PI and subrecipient.
 - Obtain, review and evaluate specified technical reports and other deliverables from the subrecipient in a timely manner. Ensure copies of technical reports and other support documenting technical progress remain available.
 - If necessary, perform periodic site visits to monitor subrecipient's methods and evaluate progress toward scientific objectives. Retain documentation to support these actions.
 - Approve subrecipient invoices for payment. Request additional support or clarification from the subrecipient as needed. PI approval certifies that expenses are appropriate and reasonable in relation to the technical progress and that the cumulative expenses are within total budget.
 - For milestone/deliverables invoices, PI approval certifies that the milestone/deliverable has been completed satisfactorily.
 - Alert RFCUNY's Grants & Contracts department and GO to any issues related to the subaward, including technical performance, regulatory compliance concerns and budget/financial considerations.
 - Ensure final reports/deliverables are received prior to approval of "Final" invoice.

Grants Officer (GO)

1. At the proposal stage and in consultation with the PI, determines whether a subrecipient or contractor relationship exists through completion of the 'Checklist to Determine Subrecipient or Contractor Classification'.
2. If a true subrecipient relationship exists, requests completion and return of the 'Subrecipient Commitment Form' by subawardee.
3. Reviews proposal for conformance to sponsor, RFCUNY, and CUNY guidelines. Notifies PI about any special issues relating to the terms of the subaward.
4. Verifies that Budget includes appropriate classification of Direct and F&A costs. If the collaborating institution does not have a negotiated F&A rate, a 10% de minimis rate should be used instead (see 'Pre-Award Budget Preparation Tips' for further details).
5. In coordination with the PI, the GO as authorized designee may submit subaward request with appropriate approval in the Contract Manager system (see item 5 under 'PI'). Includes the following attachments and others as may be required by the system:
 - Scope of Work
 - Budget
 - Subrecipient Commitment Form
6. Works with PI and Legal Affairs on any modifications to subaward as needed.
7. Provides prompt response to PI in the event performance or programmatic issues arise during the period of performance; works with subrecipient to identify and implement a corrective action plan; notifies G&C and the sponsor as needed.

RFCUNY Office of Legal Affairs

1. Contacts PI if any additional information is necessary to complete the subaward.
2. Prepares the appropriate subaward based on the statement of work, the sponsor's terms and conditions in the prime award.
3. Ensures terms and conditions include dates of service and cumulative costs authorized.
4. Responsible for negotiating, modifying and executing subaward.
5. Notifies PI and GO when a subaward agreement has been executed and provides them with a copy of the agreement.

RFCUNY Grants & Contracts (G&Cs) Department

1. Reviews subaward for conformance to sponsor, RFCUNY, and CUNY guidelines.
2. Provides fiscal approval before contract can be approved for execution by Legal Affairs. Verifies that Budget includes appropriate classification of Direct and F&A costs (see 'Pre-Award Budget Preparation Tips' for further detail).
3. Provides prompt assistance to PI in the event budgetary/financial issues arise during the period of performance; works with PI, GO and subrecipient to resolve outstanding financial matters.
4. Reviews invoices prior to payment to ensure that they are consistent, expenses are in accordance with approved budget, are within the subaward's performance and the project's budget period and the cumulative amount of the invoice does not exceed the total amount of the subaward.
5. Seeks clarification or support from subrecipient for any unusual, miscellaneous, seemingly excessive or other charges invoiced by the subrecipient. Alerts PI and GO regarding any issues.
6. Alerts the Research Foundation's Compliance Manager of any issues related to the subaward, including technical performance, regulatory compliance concerns and budget/financial considerations.
7. Maintains a system to identify current subrecipients in coordination with the Compliance Manager.

RFCUNY Compliance Manager

1. For each subrecipient reviews Single Audit (A-133) reports or other financial documents in accordance with the requirements of the Federal Uniform Guidance.
2. Requests annual certifications from each subrecipient in compliance with Federal Uniform Guidance
3. Follows up on instances of subrecipient noncompliance with annual certification requirements:
 - Follows up with subrecipients regarding appropriate and timely corrective action on findings related to the university's subawards and sponsored project administration
 - Conducts periodic review of invoice support based on risk assessment
4. Alerts the CFO, Deputy CFO, Director of Research Policy and G&Cs of any issues related to the subaward.
5. Maintains a system to identify current subrecipients in coordination with the Grants and Contracts Department.