

<b>University of Kentucky</b> College of Medicine Sponsored Research Administrative Services	Identification M-SRAS 006 Version 2		Contact: SRAS Manager
	Standard Operating Procedure	Date Effective: 11/30/2015 Review Date: 11/30/2016	

## Initiation and Monitoring of Subcontract/Subawards on Sponsored Project Agreements

**Purpose:** The purpose of this standard operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Sponsored Research Administrative Services (SRAS) Grant Proposal Specialist (GPS) and Grant Analyst (GA), with regard to initiation, administrative monitoring, and amending of subcontracts/subawards on sponsored projects agreements. The assumption is the subcontract plans and budget were included in the proposal and subsequent award.

**Introduction:** Grants and contracts for sponsored projects represent a contractual obligation between the grantor and the University for the performance of a specific activity through which the grantor, or sponsor, is entitled to receive some consideration or benefits. The contractual obligation is normally documented by a proposal and award combination, contract, or a written memorandum of agreement. The University assumes full legal responsibility for complying with all requirements imposed by the grantor or sponsor upon acceptance of grants and contracts for sponsored projects, including a requirement for a report of expenditures or a provision for an audit. In turn, the College of Medicine must ensure its faculty is in compliance with all University and sponsor requirements including those as related to the subawarding of funds to a consortium site, or other entity or institution via a subcontract agreement.

**Procedure:** To initiate subcontract requests, facilitate amendment processing, and monitor on-going related administrative functions.

1. As part of the PADR review process (refer to SOP M-SRAS-3), the SRAS GA will identify the inclusion of a budget in the sponsor class(s) for a subcontract.
2. Within five business days of completing a review of the PADR as provided in Item 1., the GA will begin the process to gather the background information needed to initiate a subcontract. This may include accessing the eIAF, the proposal, OSPA’s “Subrecipient Commitment Form,” (see Appendix A) as well as consult with the GPS.
3. The GA will contact the PI and DA to confirm the plans for the subcontract arrangements correspond to those included in the proposal.
4. The GA, with GPS assistance and PI and DA input, will gather all required information to complete the Office of Sponsored Projects Administration’s (OSPA’s) on-line Subagreement Request Form, including required attachments – scope of work, a budget, and a budget justification. (<https://www.research.uky.edu/aspnet/vsprojects/OSPA/SubAgreement/>). While

anyone person can enter the information in this on-line form, only the PI can submit the completed form to OSPA. See Appendix B for further information on this system.

5. If there is a need to obtain information from the subawardee administrative contact, the GA can do so at the PI's request.
6. The GA will enter the details into the on-line request form.
7. The GA will notify the PI that the on-line form is complete.
8. The PI will review the form for accuracy. If edits are needed, he/she will contact the GA for assistance. Once completed and in final form, the PI for the grant will submit the form to OSPA.
9. The PI and the DA will be copied on the email when the subcontract document is emailed to the subawardee. (The SRAS staff is not.)
10. Invoicing processing and payments are handled by the PI's department or by the transactional IBU that provides services to the PI's department.
11. The GA will monitor the grant to ensure the appropriate encumbrances appears on the grant via their monthly account review.
12. Via the discrepancy list, which is part of the SRAS reconciliation process, the GA will monitor the grant budget vs. actual expenses to ensure that there are regular invoices being processed and paid on the grant. The GA will contact the PI and DA if there aren't any appearing.
13. For a multi-year project, if new funds are added to an account via a PADR that includes additional funds for the subcontract, the GA will contact the PI and DA to confirm the continuing plans for subcontract arrangements and facilitate the issuing of an amendment.
  - a. The GA will work with the GPS, if needed, to access budget information for the subawardee for the subsequent funding period.
  - b. The GA will advise the PI and DA of the amount remaining of the current subcontract (by checking the purchasing order/PO in SAP, the University's financial system) and advise if any of those funds can be carried-forwarded into the next year.
  - c. The GA will ask the PI the length of time needed for the amendment and confirm if there will be any changes to the scope of work to be incorporated in the amendment.
  - d. With GA assistance, the PI must determine the budget for the amendment based on the new funds available to be added, and considering if any remaining funds may be carry-forward.
  - e. The GA will work with OSPA, keeping the PI and DA cc:ed on all email communications, the arrangements for issuance of the amendment.
14. Steps 13 a-e will be repeated, as additional amendments are needed.

15. Through the regular grant account review, the GA will monitor the balance remaining in the sponsored class(es) for subcontracts and contact the PI if there appears to be a need to rebudget based on the expenses being incurred.

### **Roles and Responsibilities:**

**Principal Investigator (PI)** is responsible for:

1. Providing information needed to complete the on-line OSPA Subagreement Request Form, if requested by the SRAS.
2. Reviewing the completed on-line OSPA Subagreement Request Form and work with the SRAS to make any edits.
3. Submit the OSPA Subagreement Request Form (this can only be done by the PI).
4. Remaining aware that the invoice processing and billing is to be handled by the PI's department or related transactional IBU.
5. Determining the budget for the amendment based on the new funds available to be added, and considering if any remaining funds may be carry-forward.

**Department Administrator (DA)** is responsible for:

1. Providing information needed to complete the on-line OSPA Subagreement Request Form, if requested by the SRAS.
2. Remaining aware that the invoice processing and billing is to be handled by the PI's department or related transactional IBU.

**Sponsored Research Administrative Services Staff (SRAS)** is responsible for:

1. Identifying as part of the PADR review the inclusion of a budget in the sponsored class(es) for a subcontract. (GA)
2. Locating documents from the associated proposal submission that include planned subcontract details. (GA with GPS consultation)
3. Contacting the PI and DA to confirm the plans for the subcontract arrangements will correspond to those included in the proposal.
4. Gathering information needed to complete the on-line OSPA Subagreement Request Form.
5. Contacting administrative contacts at the subcontract/subaward site(s), if needed, at the PI's request.
6. Entering the details into the on-line OSPA Subagreement Request Form and notifying the PI it is complete. Make any edits as advised by the PI.
7. Monitoring the grant to ensure the appropriate encumbrances appears on the grant via their monthly account review.
8. Monitoring the grant budget vs. actual expenses to ensure that there are regular invoices being processed and paid on the grant and contacting the PI and DA if there aren't any appearing.
9. Contacting the PI and DA to confirm continuing plans for subcontract arrangements when funds are added to a multi-year project and identified as part of the SRAS PADR review process.
10. Advising the PI and DA of the amount remaining of the current subcontract (by checking the purchasing order/PO in SAP, the University's financial system) and advise if any of those funds can be carried-forwarded into the next year.
11. Asking the PI the length of time needed for the amendment and confirm if there will be any changes to the scope of work to be incorporated in the amendment.
12. Working with OSPA, keeping the PI and DA cc:ed on all email communications, the arrangements for the issuance of the amendment.

Abbreviations:

CGO – College Grants Officer

DA – Department Staff/Administrator

eIAF – Electronic Internal Approval Form for grant proposals

F&A – Facilities and Administrative costs

GA – Grant Analyst

IBU – Integrated Business Unit

OSPA – Office of Sponsored Projects Administration

PADR – Project Account Data Record

PI – Principal Investigator

RA – Research Administrator

SRAS – Sponsored Research Administrative Services



# Subrecipient Commitment Form

Office of Sponsored Projects Administration  
109 Kinkead Hall, Lexington KY40506-0057  
Phone: (859) 257-9420 Fax: (859) 323-1060

To be completed by institution issuing the subaward:		
PI Name	PI Department	
Prime Sponsor	Performance Start	Performance End
Proposal Title		

## Institution

To be completed by the subrecipient organization (Sponsored Program/Business Office):			
Institution's Legal Name			
Address		City	State
ZIP + 4			
EIN	DUNS	Congressional District	Institution Type
Registered in SAM? <input type="checkbox"/> Yes <input type="checkbox"/> No		Check if Institution is: <input type="checkbox"/> less than or equal to 5 yrs. old <input type="checkbox"/> HUB-Zone or small disadvantaged business	
Sponsored Program Administrative Name			Title
Sponsored Program Administrative e-mail			Sponsored Program Administrative Phone

## Performance Site Address

Address same as above?  Yes  No *If no, provide performance site address below.*

Address		City	State
ZIP + 4	DUNS	Congressional District	

## Subrecipient PI

Subrecipient PI Name	Department	Phone
E-mail	eRA Commons user name <i>NIH proposals only.</i>	

## Subrecipient Budget Request

Total \$	Direct \$	F&ARate (%)	F&A Amount (\$)	Cost-sharing \$ <i>Must be in budget &amp; budget justification.</i>
Participant Support \$: <input type="checkbox"/> Yes <input type="checkbox"/> No		Program Income: <input type="checkbox"/> Yes <input type="checkbox"/> No	Clinical Trial: <input type="checkbox"/> Yes <input type="checkbox"/> No	

## Compliance Information

Human Subjects: <input type="checkbox"/> Yes <input type="checkbox"/> No	Vertebrate Animals: <input type="checkbox"/> Yes <input type="checkbox"/> No	Export Control: Do you anticipate the use or development of items, software, or technology that would require review under Export Control laws?  <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown at this time
Institutional Assurance No. _____	Animal Welfare Assurance No. _____	
Approval Pending? <input type="checkbox"/> Yes <input type="checkbox"/> No	Approval Pending? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Approval Date <i>if approved</i> _____	Approval Date <i>if approved</i> _____	

## Financial Conflict of Interest (FCOI) Compliance Statement

*Applicable PHS, NIH, NSF, DHHS, or any other program requiring federal financial disclosure (check one).*

- Subrecipient organization certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F, "Responsibility of Applicants Promoting Objectivity in Research."
- Subrecipient does not have a compliant conflict of interest policy but will develop one prior to issuance of a subaward. A model policy is available at the Federal Demonstration Partnership web site.
- Subrecipient does not have a compliant conflict of interest policy and agrees to be bound by the conflict of interest policy of the issuing institution. (University of Kentucky - [Prior OSPA Approval](#))
- Not applicable - Project is not being funded by PHS, NIH, NSF, DHHS, or any other program requiring conflict of interest financial disclosure.

## Responsible Conduct of Research (RCR)

*Only check if appropriate.*

- Not applicable because this proposal is not being funded by NSF or NIFA.
- If NSF, subrecipient institution certifies that it maintains an institutional plan which is compliant with NSF's Responsible Conduct of Research (PCR) requirement.
- If NIFA, subrecipient institution certifies that it will comply with the "Responsible and Ethical Conduct of Research" requirements of the NIFA Agency-Specific Terms and Conditions.

## Checklist of Proposal Documents Required

- |   |   |
|---|---|
| <input type="checkbox"/> Statement of Work                                      | <input type="checkbox"/> IRB and/or IACUC (if applicable) |
| <input type="checkbox"/> Budget and budget justification                        | <input type="checkbox"/> F&A rate agreement or link       |
| <input type="checkbox"/> This form signed by subrecipient's Authorized Official | <input type="checkbox"/> Financial Audit or link          |
|   | <input type="checkbox"/> Other                            |

## Subrecipient Approvals

*With signature that follows, the Authorized Official certifies the information on this form is true and correct. Further, the appropriate programmatic and administrative personnel involved in this application are aware of sponsoring agency policy in regard to subawards and are prepared to establish an inter-institutional agreement consistent with those policies. Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the subrecipient's own risk.*

Authorized Official Name

Signature of Authorized Official

Title

Date Signed

FOR UNIVERSITY OF KENTUCKY USE ONLY - OSPA review completed by:

CGO

Subaward Administrator

Date

Welcome to OSPA's **NEW** On-Line...

### Subagreement Request System

Once you log-on, you will be taken to the electronic version of the Subagreement Request Form. You have the option to complete the form in its entirety and submit. Or, you can save it, review, edit and submit at a later time. This system is designed to allow anyone to enter data, but only the Principal Investigator may submit the request to OSPA. This serves as the PI's "signature" to authorize the subagreement.

Please enter your information

User Name Only  [Help](#)

(e.g. hzhu5)

Password  [Help](#)

[Help](#)

...to start your [online Subagreement Request](#), enter your UK [link blue](#) User ID and Password.

NOTE: Both PIs and departmental administrators can enter and SAVE data, but only the PI can SUBMIT the Subagreement request to OSPA.

...the next screen looks like this...

### Subagreement Request System Search

[Help](#)

UK Grant # / WBS Element

...at this point you can choose to make a New Entry (click the first icon) or search a Grant Account Number (WBS element) for all entries made to date on that account number.

Searching a UK Grant # / WBS element will return a Screen that looks like this...

### Subagreement Request Search

[Help](#)

UK Grant # / WBS Element

	UK Grant # / WBS Element	Year	ID	Subrecipient	Budget Start	Budget End	Amount	Request Date
<a href="#">Select</a>	3048100001	2012	306	Community Coordinated Child Care, Inc. (4C)	07/01/2011	06/30/2012	367078	08/06/2011
<a href="#">Select</a>	3048100001	2012	307	Comprehensive Community Child Care Organization, Inc.	07/01/2011	06/30/2012	194777	08/06/2011
<a href="#">Select</a>	3048100001	2012	308	Audubon Area Community Services	07/01/2011	06/30/2012	228048	08/06/2011
<a href="#">Select</a>	3048100001	2012	309	Child Care Council of Kentucky	07/01/2011	06/30/2012	260451	08/06/2011
<a href="#">Select</a>	3048100001	2012	310	Eastern Kentucky Child Care Coalition	07/02/2011	06/30/2012	346446	08/06/2011
<a href="#">Select</a>	3048100001	2012	311	Licking Valley Community Action Program, Inc.	07/01/2011	06/30/2012	156370	08/06/2011

Click on "select" to see details associated with the subagreement request.

The new online Subagreement Request screen is very similar to the hard-copy version with 4 exceptions as highlighted below...

[Back to Search Screen](#)

[Log Out](#) [Help](#)

### Subagreement Request Input

Please use Tab key or mouse to move your cursor to next field. Fields with \* are required fields.

Fiscal Year

UK Grant # / WBS Element

1. Subawardee Organization

Frequently Chosen Subawardees

If you want to reuse UK Invoice Contact Information from the most recent submission please enter UK Grant # / WBS Element here and click Reuse button.  [Reuse](#) [Help](#)

<p>2. Subawardee Programmatic Contact</p> <p>Name <input type="text"/></p> <p>Address <input type="text"/></p> <p>Address Line 2 <input type="text"/></p> <p>City <input type="text"/></p> <p>State/Province <input type="text"/> (e.g. KY for Kentucky in USA)</p> <p>Zip <input type="text"/> (e.g. 12345 or 123456789 for USA)</p> <p>Country <input type="text"/> (e.g. US A, France, China)</p> <p>Phone <input type="text"/> (e.g. 8592571045)</p> <p>Extension <input type="text"/> (e.g. 62534)</p> <p>Fax <input type="text"/> (e.g. 8592571045)</p> <p>E-mail <input type="text"/></p> <p style="background-color: yellow; font-size: small;">UK Invoice Contact Information</p> <p>Name <input type="text"/></p> <p>Address <input type="text"/></p> <p>Address Line 2 <input type="text"/></p> <p>City <input type="text"/></p> <p>State/Province <input type="text"/> (e.g. KY for Kentucky in USA)</p> <p>Zip <input type="text"/> (e.g. 12345 or 123456789)</p> <p>Country <input type="text" value="USA"/></p> <p>Phone <input type="text"/> (e.g. 8592571045)</p> <p>Extension <input type="text"/> (e.g. 62534)</p> <p>Fax <input type="text"/> (e.g. 8592571045)</p> <p>E-mail <input type="text"/></p> <p style="background-color: yellow; font-size: small;">Cost Share Required? <input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>Does the subawardee's scope of work include Human Subjects? <input type="radio"/> Yes <input checked="" type="radio"/> No *</p> <p>Does the subawardee's scope of work include the use of Animals? <input type="radio"/> Yes <input checked="" type="radio"/> No *</p>	<p>3. Subawardee Administrative Contact</p> <p>Name <input type="text"/></p> <p>Address <input type="text"/></p> <p>Address Line 2 <input type="text"/></p> <p>City <input type="text"/></p> <p>State/Province <input type="text"/> (e.g. KY for Kentucky in USA)</p> <p>Zip <input type="text"/> (e.g. 12345 or 123456789 for USA)</p> <p>Country <input type="text"/> (e.g. USA, France, China)</p> <p>Phone <input type="text"/> (e.g. 8592571045)</p> <p>Extension <input type="text"/> (e.g. 62534)</p> <p>Fax <input type="text"/> (e.g. 8592571045)</p> <p>E-mail <input type="text"/></p> <p style="background-color: yellow; font-size: small;">Is this Subaward a continuation? <input type="radio"/> Yes <input checked="" type="radio"/> No <a href="#">Help</a></p> <p>4. Dates may <u>not</u> exceed current budget dates of UK account.</p> <p>Budget Start Date <input type="text"/> (e.g. 7/11/2011)</p> <p>Budget End Date <input type="text"/> (e.g. 7/10/2013)</p> <p>5. Amount of subaward \$ <input type="text"/> (e.g. 12345)</p> <p style="font-size: small;">Attach a detailed subaward budget and budget justification. To protect confidentiality, only the person who initially saves data or is PI may open attachments.</p> <p>Budget File * <input type="text"/> <a href="#">Browse...</a></p> <p>6. Scope of Work File * <input type="text"/> <a href="#">Browse...</a></p>
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7. Reporting and Monitoring: In the box below, explain how you will supervise or monitor the subawardee's performance and the reports that will be required. \*

[Save Data, Do Not Send To OSPA](#)

Your entry will appear as a TEMP file on your search screen. You can return to complete your entry and submit at a later date.

[Send To OSPA](#) [Help](#)

You will receive a confirmation that your entry has been received. This entry will also appear on your search screen, but you will not be able to make any further changes to it.

All items with a red \* are required elements. Format requirements are provided in blue. You'll find several "Help" links to provide guidance as needed.

You may save your request at any time and return to complete your request. Once the PI has provided a final review, the Subagreement Request can be sent to OSPA. The PI will receive an electronic confirmation with an ID# assigned to the request.

Should you need assistance with the On-Line Subagreement Request form, contact the Subawards/Subcontracts Administrator at [OSPA@uky.edu](mailto:OSPA@uky.edu) or call 859-257-9420.

## Help Screens – On-line Subagreement Request System

### User Name

This is your link blue account user name, also referred to as myUK user ID.

### Password

This is your link blue password. The password you enter here is not readable by anyone else.

### Log In

Once you log-on, you will be taken to an electronic version of the Subagreement Request Form. You have the option to complete the form in its entirety and submit. Or, you can save it, review, edit and submit at later time. This system is designed so that Administrative Personnel can assist with data input, but only the Principal Investigator will be able to submit the request to OSPA. This serves in place of the PI's "Signature" to authorize the Subagreement.

### Log Out

When you click on "Log-Out", you will be sent back to the "Log-In" screen.

Re-enter your User Name and Password to Enter a New Request.

You may exit the On-Line Subagreement Request Input Screen by closing your web browser, but, any data entries you have made will not be saved automatically.

To Save your data, scroll to the bottom of the screen and click on the "Save Data, Do Not Send to OSPA" button.

### Reuse

This feature is designed to populate the UK Invoice Contact Information so you do not have to re-key the data for the UK Account # / WBS Element you enter. You still have the ability to change data in any Invoice Contact Information field.

### Subaward a Continuation?

Some awards and their subawards receive a new Account # / WBS Element each year. If you click "Yes," a window will open asking you to provide the previous year's Account # / WBS Element for the subaward.

If your award retains the same Account # / WBS Element number, then click "No."

Is the award you received the First Year of a New Competing Segment? Click "Yes," then enter the prior competing segment Account # / WBS Element.

This question has been added to assist OSPA in determining which General Ledger code (530200, 530201) should be used to create and/or amend the Purchase Order associated with the subaward.

### Send to OSPA

After you click "Send to OSPA," you will receive a confirmation message that your Sub Agreement Request has been sent to OSPA.

As long as you have entered a correct account number, you will be able to view your entry using "Search all Subagreements," but, you will not be able to make any further changes.

If you cannot retrieve your entry, contact the Subawards Administrator at [OSPA@uky.edu](mailto:OSPA@uky.edu), or by calling 859-257-9420, identifying the date, approximate time of submission, and account number you attempted to use.

### What to do if you've already sent your request, but you know you have errors.

Should you find you have errors in an entry you have sent to OSPA, do not attempt to resubmit. Rather, contact the Subawards Administrator at [OSPA@uky.edu](mailto:OSPA@uky.edu), or by calling 859-257-9420, identifying the date, approximate time of submission, and the account number you used. Provide details about the errors you've made. The Subawards Administrator can help you with the corrections.