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Subawards: Monitoring and Closeouts

Cheryl Sisofo, Subrecipient Specialist

Susan Tompkins, Senior Contract & Grants Specialist

Jill Vamos, Sponsored Research Accountant

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Objectives

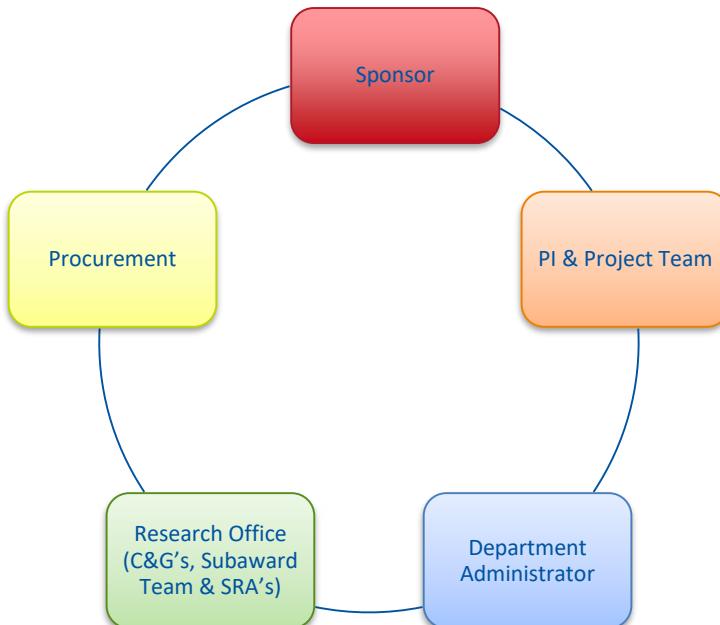
- Roles/Responsibilities: Principal Investigator, Department Administrator & Research Office (Contract & Grants Specialist, Subaward Team & Sponsored Research Accountants)
- Subaward Process/Procedures
- Tips for successful subrecipient monitoring and management

Principal Investigator (PI)

Contract & Grants Specialist (C&G)

Sponsored Research Accountants (SRA)

The PI, Department and Research Office must act as partners to successfully manage a subaward



PARTNERS: Pass Through Entity Responsibilities

- Together, the Principal Investigator, Department Administrator and Research Office:
 - Ensure that federal funds are used for authorized purposes in accordance with laws, regulations and terms & conditions of the prime award & UD Policies
 - Conduct on-going review and oversight of subrecipient progress and compliance
 - Conduct Close-Out in compliance with the terms and conditions of the award

Characteristics of Successful Subaward Monitoring

- Maintain communications between all parties (Subrecipient, PIs, and Administrative Offices)
- Technical Progress on target
- Invoicing timely; expenditures appropriate (including required backup documentation)
- Required prior approvals are obtained
- Annual Risk Assessment of Subrecipients
- Prepare, negotiate and sign subaward & modifications
- Being aware of Sponsor terms & conditions
- Receive, process and approve “proper invoice”
- Finalize Subaward; receipt of final invoice, Attachment 4A and other documentation as required, including Technical Reports

Initiation of Subaward, Department Administrator

- Department Administrator processes requisition for the subaward once the Chart of Accounts (COA) is sent by the Research Office
- There are 2 PeopleSoft account codes used to track Subaward costs
 - 153200- captures costs up to \$25,000.00 and generates Facilities and Administration Costs (F&A)
 - 153300- captures costs over \$25,000.00 and does not generate F&A
- Provide updated Statement of Work (SOW) and Budget/Budget Justification to your Contract & Grants Specialist (C&G), if applicable.

Project Changes that Require Contractual Modifications

- Change in Statement of Work for subrecipient
- Supplemental funding for additional project work
- Continuation for another budget period
- Carry-forward of funds between budget periods
- Change of Principal Investigator (PI)/Key Personnel
- Subrecipient PI move to a new institution
- Changes in funding; budget/increase/decrease
- No-cost extension of Subrecipient's period of performance
- Early termination

Subaward Monitoring: Principal Investigator

➤ Monitoring Subrecipient progress:

- Informal: emails, calls
- Formal technical reports or other deliverables are received on schedule and reflect appropriate progress
- Site visits, especially for “high risk” projects or subrecipient institutions
- Review invoices to confirm spending is in-line with technical progress and appropriate to work being performed

Subaward Monitoring: Department Administrator

- Monitor the spending rate and timeliness of invoices
- Confirm IRB/IACUC approvals are current
- Review Invoices
 - Notify Subaward Team when there is a change in the name of a Purpose Code Administrator/Approver
 - Are costs consistent with budget and subaward terms & conditions?
 - Question costs that are unclear or appear unallowable
 - Verify required cost-sharing is reflected on invoice/reports

Subaward Monitoring: Research Office

- Receives the Subrecipient's invoice in central mailbox; subawards-invoices@udel.edu
- Reviews invoice for accuracy
- Launches Invoice Payment Approval Routing form for "proper invoices"
- Notify the Research Office if there are **ANY** delays with the routing of the form! Uniform Guidance requires "proper invoices" * to be paid within 30 days of receipt. Non-compliance can mean an AUDIT FINDING!
- Tracks Invoice Routing Form and sends follow-up email requests to avoid delays
- Final approval of the Invoice Payment Approval Routing form

Subawards: Closeouts

Closeout

- Principal Investigators, Departments & the Research Office must work together as partners to successfully manage and closeout Subawards along with the Prime Award.
- UD's Final Payment request to the Prime Sponsor is contingent upon the Sub-Recipient's prompt submission of their final invoice and Attachment 4A (closeout checklist)
- Delays of the Subaward closeouts could put UD at risk for losing Prime Sponsor funding.

Departments & Closeout

- **Departments are the first line of defense.**
- **Monitor Subaward activity during the life cycle of the agreement.**
 - All direct costs and MATCH costs must be allowable and in line with their Scope of Work (SOW).
 - Pay attention to any special Subaward requirements: for example, receipts are needed with the invoice.
 - Need to ensure the timeliness of receiving invoices on a regular basis from the Subrecipient.
 - Notify the Research Office if there are any delays or issue with the Subrecipient submitting their invoices.
 - Need to ensure the Subrecipient is reporting their committed Cost Share on the invoices.
 - If MATCH costs are identified as unallowable, UD is responsible for making up the difference of the committed Cost Share of the Subrecipient.

Continuation - Departments & Closeout

- **Sub-Recipient invoices that are not marked as a “Final”**
 - Sponsored Research Accountants will reach out to the Department if the last invoice received was not marked as a final.
 - Departments will need to communicate with the Principal Investigators to determine:
 - ✓ the amount of unobligated funds on the Purchase Order
 - ✓ if the Sub-Recipient has completed their SOW
 - ✓ the final technical report has been submitted
 - UD will request Subrecipient submit revised final invoice and Attachment 4A (Closeout Checklist), must be completed in full, signed and dated.

Continuation - Departments & Closeout

- **Subrecipient's final invoice and completed 4A is received.**
 - Invoice Payment Approval Routing
 - ✓ The process needs to be monitored through its life cycle.
 - Notate on the Automated Closeout Report under the Sub-Contracts section that the Subrecipient's final invoice is being routed for approval.

Sponsored Research Accountant & Closeout

- The Sponsored Research Accountant's ensure the following steps have been fulfilled prior to the closeout of the Prime Award.
 - Subrecipient payments are allocated appropriately under PeopleSoft account codes 153200 & 153300.
 - The grand total of payments between PeopleSoft and the Subrecipient's documents are in agreement.
 - The Final invoice has been submitted by the Subrecipient and payment posted to PeopleSoft.
 - Final Checklist (Attachment 4A) has been completed in full, signed and dated.
 - Sponsored Research Accountant's will notify department contacts of open purchase orders and that the web-form [FIN Purchase Order Amendment](#) needs to be completed for each of the Purchase Orders allowing them to be closed by Procurement Services.

Contact Information

Cheryl Sisofo
Subaward Specialist
csisofo@udel.edu
302-831-3213

Susan Tompkins
Senior Contract & Grants Specialist/Subaward Manager
sdt@udel.edu
302-831-8002

Jill Vamos
Sponsored Research Accountant
jmvamos@udel.edu
302-831-8176

Discussion