

**Process for Initiation and Management of Subawards Issued by UCLA under
Extramurally Funded Grants or Cooperative Agreements Type I
January 2008**

A. PROPOSAL DEVELOPMENT AND SUBMISSION:

RESPONSIBILITY	ACTION
Principal Investigator (PI) and Department	<ul style="list-style-type: none"> • Determines the type of Subaward to be issued; see Definitions Matrix- Attachment A. • Develops proposal for submission to Sponsor in accordance with UCLA proposal submission guidelines and Sponsor guidelines/requirements. • If an organization external to UCLA will conduct some portion of research or work, obtains from proposed Subrecipient(s), the following: <ul style="list-style-type: none"> ▪ Subrecipient's scope of work; ▪ Subrecipient's detailed budget by category, including cost sharing and program income, if applicable; ▪ Budget justification; ▪ CVs of key personnel; ▪ Other Sponsor documents, as required; ▪ Subrecipient's institutional approval of proposal, ▪ If the Subrecipient is not a university, a copy of Subrecipient's Facilities & Administrative (F&A) agreement or documentation of established F&A rates; ▪ Completed Subrecipient Commitment Form- Attachment B. • Notifies OCGA of possible Export Control issues which could arise. • Reviews Fair and Reasonable Cost Analysis. <p>NOTE: Subaward cannot be issued if Subrecipient appears on debarment list.</p>
OCGA Officer/Analyst/DRA	<ul style="list-style-type: none"> • Verifies type of Subaward with Department as needed. • Reviews proposal, including Subaward(s), scope of work, budget and justification for Subaward(s) and Subrecipient Commitment Form- Attachment B. • Documents need for revisions and communicates them to the PI/Department. • Puts note in file regarding Export Control issues if applicable.
PI and Department	Makes corrections and/or revisions and submits final proposal to OCGA Officer/Analyst.
OCGA Officer/Analyst/DRA	Approves proposal and submits to Sponsor.

B. UCLA AWARD REVIEW:

RESPONSIBILITY	ACTION
OCGA Officer/Analyst	Upon receipt of acceptable award, generates Award Synopsis. In the Subawards section, lists the name, amount type of Subaward (Type I, II, III - see Definitions Matrix- Attachment A).
PI and Department	Upon receipt of Transfer of Funds (TOF), appropriates the award, distributes total award amount by Sub account via Transfer of Funds based on approved budget. Funds for Subawards should be allocated to Sub 07.

C. SUBAWARD INITIATION, PREPARATION, AND COMPLIANCE REVIEW:

RESPONSIBILITY	ACTION
PI and Department	<p>For each new (or renewal) Subaward:</p> <ul style="list-style-type: none"> • Completes in entirety the OCGA/Purchasing Subaward Checklist –Attachment C http://www.research.ucla.edu/ocga/Forms/Subaward. • Attaches backup documentation (i.e., scope of work, budget, budget justification, etc) as specified on the Checklist and provides to OCGA/Purchasing Subaward Team via efax (310) 564-7562 or email to ocgasubawards@research.ucla.edu. • Specifies in the BruinBuy requisition the following information: <ul style="list-style-type: none"> ▪ Project title, UCLA Principal Investigator, Subrecipient Principal Investigator, Sponsor, and award number of the UCLA grant; ▪ Period of performance for this Subaward (which may not exceed that of the Sponsor’s award); ▪ Dollar amount of the Subaward. • For awards subject to the UCLA federally approved modified total direct cost (MTDC) rate calculation, allocates funds between object code 7310 (for first \$25,000 of Subaward, which is subject to F&A cost recovery) and 7300 (for dollars in excess of \$25,000 and therefore not subject to F&A cost recovery). For other F&A rate calculations, allocates all funds to 7310. • Adds \$1.00 to the requisition. • Sets the BruinBuy requisition receiving flag to “Y” so that “receiving” must occur prior to each invoice payment. • Enters BruinBuy Requisition # onto the Subaward Checklist. • Submits copy of Subaward Checklist and attachments to Purchasing Subaward Buyer and OCGA Subaward Team via efax box (310) 564-7562 or email to ocgasubawards@research.ucla.edu. •

RESPONSIBILITY	ACTION
Purchasing Subaward Buyer	<ul style="list-style-type: none"> • Reviews the requisition, Subaward Checklist, and attachments to verify: <ul style="list-style-type: none"> ▪ The “Award Synopsis - Type of Award” is either a grant or a cooperative agreement, ▪ The requisition VCK Name/Address agrees with that on the Checklist, ▪ The receiving flag is set to “Y”, ▪ \$1.00 is added to keep the PO open. • If proposed transaction exceeds \$100,000, obtains General Accounting’s written approval. • Drafts the PO as a G-class order, and provides PO number to OCGA Subaward Administrator.

OCGA Subaward Administrator	<ul style="list-style-type: none"> • Drafts the Subaward, including PO number, flow-down of appropriate award terms and conditions from the Sponsor, PI/Department special provisions, institutional standard clauses/compliance requirements, and other clauses as appropriate to the work being performed. • Attaches copy of Sponsor terms and other documents, as appropriate. • As appropriate: <ul style="list-style-type: none"> • Reviews http://exclusions.oig.hhs.gov and http://www.epls.gov/ to determine if Subrecipient is sanctioned. • Incorporates A-133 requirements if applicable. • Checks Harvester website for A-133 compliance. (http://harvester.census.gov/sac/dissemin/accessoptions.html?submit=Retrieve+Records) • Checks to see if A-102 applies; incorporates special terms from OP Guidance Memo 06-05 as required. • Obtains information about Subrecipient as necessary. • If PHS/NIH, DHHS, NSF prime flows down, completes the appropriate conflict of interest requirements. • Includes CFDA number, if applicable. • Checks for export control issues or licenses and OFAC requirements, if applicable.
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D. SUBAWARD NEGOTIATION:

RESPONSIBILITY	ACTION
OCGA Subaward Administrator	As requested, submits the draft Subaward to the PI/Department for review and comment, including scope of work/reporting requirements.
PI and Department	When draft Subaward has been requested, reviews and communicates revisions, if any, to the OCGA Subaward Administrator.

OCGA Subaward Administrator	<ul style="list-style-type: none"> • Revises Subaward as appropriate. • Submits Subaward to the Subrecipient for signature. • Negotiates revisions requested by Subrecipient, communicating with the PI and appropriate University officials, as necessary (e.g., Campus Counsel, Risk Management, etc.). • Forwards revised Subaward to Subrecipient for signature.
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E. EXECUTION OF SUBAWARD:

RESPONSIBILITY	ACTION
OCGA Subaward Administrator	<ul style="list-style-type: none"> • Receives and reviews Subaward signed by Subrecipient. • Receives and reviews outstanding certifications and assurances. • Counter-signs Subaward. • Mails fully executed Subaward to Subrecipient. • Distributes electronic copies of the executed Subaward in its entirety to the PI/Department, EFM, Purchasing, and Equipment Management, as necessary.
Purchasing Subaward Buyer	<ul style="list-style-type: none"> • Posts Subaward PO within five (5) business days following receipt of executed Subaward agreement. • Completes Review & Award Justification form (RAJ) for PO file record.

F. ADMINISTRATIVE MANAGEMENT OF UCLA AWARD AND MONITORING OF SUBAWARD:

RESPONSIBILITY	ACTION
PI with Departmental Assistance	<p>Subaward not contemplated by proposal:</p> <ul style="list-style-type: none"> • If funds are to be allocated to a Subrecipient to conduct some portion of the work that was not previously approved by the Sponsor as a Subaward, notifies and works through the OCGA Officer/Analyst to obtain Sponsor approval, if required. • Completes all PI/Department steps described in Section A (“Proposal Development and Submission”) through Section E (“Compliance Review and Execution of Subaward”). <p>Programmatic monitoring:</p> <ul style="list-style-type: none"> • Obtains from the Subrecipient deliverables including technical progress reports, case reports, data completion forms, equipment/inventory/property reports, invention reports, etc., as specified in the Subaward terms and conditions. • Distributes copies to central units as appropriate. • Notifies OCGA Officer/Analyst or Subaward Administrator in writing of programmatic or technical issues that arise during the period of performance, including lack of progress.

RESPONSIBILITY	ACTION
<p>PI with Departmental Assistance</p>	<p>Fiscal monitoring:</p> <ul style="list-style-type: none"> • Obtains original invoice (based on the sample that is included in Subaward agreement) and financial report from Subrecipient. • Reviews invoice, verifying that: <ul style="list-style-type: none"> • The period of performance specified on the invoice falls within the obligation period specified in the PO, • Charges are in accordance with approved budget and/or deliverable/task schedule as specified in the PO, • Invoice is certified by Subrecipient’s authorized representative, • Work has been performed. • Ensures that expenditures are allowable, allocable, consistently applied, and charged in accordance with the approved budget. • Signs the invoice, certifying items above, have been completed and that the invoice is approved for payment. • Submits signed invoice to Departmental office. • Determines necessity for scheduled programmatic and financial reviews, site visits, and evaluations. Consults with OCGA and/or EFM, as necessary. <p>If an annual financial report is required by sponsor:</p> <ul style="list-style-type: none"> • By date specified in Subaward document, obtains final invoice for the budget period (marked “FINAL INVOICE”), final financial reports, and, if applicable, technical reports from Subrecipient. <p>NOTE: Invoices CANNOT overlap budget years.</p> <ul style="list-style-type: none"> • Reviews and approves final invoice; reconciles the Subrecipient fund allocation. • PI signs FINAL INVOICE for the budget period, indicating that all items are in order and that final payment should be made.

RESPONSIBILITY	ACTION
Department	<ul style="list-style-type: none"> • Notes PO number on invoice and makes a copy for Departmental records. • Submits original invoice bearing Subrecipient’s certification, UCLA PI’s original signature, and PO number to Accounts Payable. • Performs receiving in BruinBuy, being careful to ensure input is on the correct line of the order. For guidance refer to “Receiving” on the BruinBuy website: http://userguide.bruinbuytraining.ucla.edu • For awards using the UCLA federal F&A rate calculation, assures that the first \$25,000 of Subrecipient’s invoiced expenditures are posted to object code 7310 and the remaining charges are posted to object code 7300. For assistance refer to the BruinBuy website: http://userguide.bruinbuytraining.ucla.edu • Notifies EFM in writing of financial issues that arise during the period of performance. • Submits copy of final invoice to EFM, and to Equipment Management if equipment has been purchased.
Accounts Payable	<ul style="list-style-type: none"> • Conducts second level review of invoice by verifying: <ul style="list-style-type: none"> • Period of performance specified on invoice falls within obligation period as specified in the PO, • Invoice contains certification statement signed by Subrecipient’s authorized representative, • Invoice contains signature approval of UCLA PI, • Subrecipient’s invoiced expenditures are posted to the correct object code. • If all criteria are met, “schedules” invoices in BruinBuy and releases payment. In the case of any questions or discrepancies, communicates with Departmental contact for resolution.
Department	<p>If not already done, enters receiving information to BruinBuy once payment notice is received from Accounts Payable.</p>

RESPONSIBILITY	ACTION
<p>OCGA Officer/Analyst and/or Subaward Administrator</p>	<p>Administrative Monitoring:</p> <ul style="list-style-type: none"> • Provides administrative guidance to PI and Department regarding technical/administrative issues including, but not limited to: <ul style="list-style-type: none"> • Human or animal subjects approval, • Stop work on the part of Subrecipient due to UCLA's award termination or non-payment, • Termination of Subaward for cause (non-performance), • Delinquency of reports, • Unsatisfactory deliverables, • Non-compliance with terms and conditions, <p>Regulatory compliance monitoring:</p> <ul style="list-style-type: none"> • Obtains updates to Subrecipient's certifications, representations, and assurances as necessary/required.
<p>EFM</p>	<ul style="list-style-type: none"> • Provides guidance to PI and Department regarding Subaward financial issues including, but not limited to: <ul style="list-style-type: none"> ▪ Subaward rebudgeting, ▪ Unallowable costs included on invoices, ▪ Late submission of invoices including final invoice, etc. <p>Fiscal compliance monitoring:</p> <ul style="list-style-type: none"> • Reports Subrecipient's expenditure information to the Sponsor via financial reports. • As necessary, conducts desk audits of select Departments and Subawards. • Performs review of Subrecipient's records and financial management system as deemed necessary to ensure accuracy and integrity of Subrecipient data. • Reports on deficiencies and makes recommendations or provides training to improve fiscal administration of Subawards.
<p>Equipment Management</p>	<p>Asset monitoring and compliance:</p> <ul style="list-style-type: none"> • Monitors equipment purchased by Subrecipient to which UCLA or Sponsor holds title. • Obtains Subrecipient inventory reports from PI/Department and submits to Sponsor as required. • Oversees return of loaned equipment or facilitates transfer of title and physical equipment to Subrecipient if requested and approved.

G. SUBAWARD MODIFICATIONS/AMENDMENTS:

RESPONSIBILITY	ACTION
PI and Department	<ul style="list-style-type: none"> • Completes OCGA/Purchasing Subaward Checklist for Amendment/Change Order and faxes all applicable back-up documents to efax box 310-564-7562 or email to ocgasubawards@research.ucla.edu. • Works with the OCGA Officer or Analyst to obtain Sponsor approval, if required.
Purchasing Subaward Buyer	<ul style="list-style-type: none"> • For change(s) requiring an executed amendment and/or General Accounting approval, posts change order within five (5) working days after receipt of executed amendment from OCGA Subaward administrator or five (5) working days after receipt of General Accounting approval, whichever is later. • For change(s) not requiring an executed amendment, posts change order within five (5) working days after receipt of OCGA/Purchasing Subaward Checklist or after receipt of General Accounting approval, whichever is later. <p>Note: Encumbrance releases may take more than five (5) working days to post depending on the complexity of the transaction.</p>
OCGA Subaward Administrator	<ul style="list-style-type: none"> • Drafts amendment to the Subaward document. • Reviews A-133 certifications and checks debarment websites as needed.
FOLLOW PROCESS AS SPECIFIED IN SECTIONS D, E, F, and H.	

H. SUBAWARD CLOSE-OUT:

RESPONSIBILITY	ACTION
PI and Department	<ul style="list-style-type: none"> • By date specified in Subaward document, obtains from the Subrecipient (as applicable): <ul style="list-style-type: none"> • Final invoice (marked as such), • Final invention/patent report, • Final financial report, • Final technical report. • Reviews and approves final report(s), reconciles the Subaward fund allocation, and reviews and approves final invoice. • Submits final invoice bearing Subrecipient's certification, UCLA PI's original signature, and PO number to Accounts Payable. • Submits copy of final invoice to Purchasing Subaward Buyer, EFM, and Equipment Management. • Verifies that the final invoice is reflected on the general ledger. • Completes Subaward Final closeout certification (Attachment D) sends to OCGA/ Purchasing Subaward Team via efax box (310) 564-7562 or to ocgasubawards@research.ucla.edu.

Equipment Management	<ul style="list-style-type: none"> • If applicable, working with OCGA Subaward Administrator or Officer/Analyst, submits letter to Subrecipient's property administrator regarding the disposition and return of any equipment purchased under Subaward. • Notifies PI/Department, EFM, and OCGA Subaward Administrator or Officer/Analyst in writing that equipment transactions are complete and closed.
Accounts Payable	Issues final payment to Subrecipient.
EFM	Includes Subrecipient's final financial/expenditure information in UCLA's final financial report and submits to the Sponsor.
Purchasing Subaward Buyer	<ul style="list-style-type: none"> • Closes PO and releases encumbrance, if any, within five (5) business days after receipt of Subaward Close-Out Certificate via efax box 310-564-7562 or email to ocgasubawards@research.ucla.edu.
OCGA Subaward Administrator	Files Subaward closing documentation; obtains Subaward Final Closeout Certification- Attachment D.
EFM	Closes fund.