Subgrant Processing

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Subgrant? Subcontract? Procurement?

**Subgrant** – administered by OCGA

- Formal binding legal agreement between UCLA and a non-UCLA entity to implement a portion of the scope of work under an extramural prime **grant** award
- Subrecipient’s programmatic involvement identified as a separate scope of work, with separate budget and organization approval
- Work is generally performed by the subrecipient’s personnel using their resources, usually at their site
Subgrant? Subcontract? Procurement?

**Subgrant** – administered by OCGA

- The subrecipient takes full responsibility, including intellectual leadership, for the portion of the work statement that they will undertake.

- The award terms and conditions of the prime grant award are “flowed down” to the subrecipient (*e.g.* audit requirements, restrictions on rebudgeting, human and animal subject approval, conflict of interest etc.)
Subgrant? Subcontract? Procurement?

**Subcontract** – administered by Purchasing

- Formal binding legal agreement between UCLA and a non-UCLA entity to procure a specified portion of the scope of work under an extramural prime contract award
- Subcontractor’s programmatic involvement identified as a separate scope of work, with separate budget and organization approval
- Work is generally performed by the subcontractor’s personnel using their resources, usually at their site
Subgrant? Subcontract? Procurement?

**Subcontract** – administered by Purchasing

- The subcontractor takes full responsibility, including intellectual leadership, for the portion of the work statement that they will undertake
- The sponsor terms and conditions of the prime award are “flowed down” to the subcontractor
Subgrant? Subcontract? Procurement?

**Procurement** – administered by Purchasing

- Provides goods and services a project requires within their normal business operations
- Provides similar goods or services to many different purchasers
- Operates in a competitive environment
- Is not subject to terms and conditions/compliance of the sponsoring agency
New/Renewal Subgrant

- Initiated by campus department
- Submit purchase requisition via Bruin Buy
- Send backup documentation to OCGA and Purchasing
  - via joint eFAX (x47562)
  - e-mail to ocgasubawards@research.ucla.edu
  - Includes:
    - subaward checklist
    - signed Subrecipient Commitment Form
    - scope of work
    - budget and justification
    - F&A rate agreement
    - IRB/ARC approval (if applicable) etc...
New/Renewal Subgrant

- Purchasing turns the purchase requisition into a draft purchase order (PO) and transmits it via email to OCGA
- OCGA executes an agreement with the subrecipient
- OCGA verifies that funds are available (award document)
- OCGA notifies Purchasing of receipt of fully executed agreement via email
New/Renewal Subgrant

- Purchasing completes the PO with a signature at the appropriate levels for the payment vehicle
- Purchasing posts the PO to the BruinBuy system
- Purchasing sends a scanned copy of the signed PO back to OCGA for inclusion in the OCGA subgrant file
Amendments/Change Orders:

- Initiated by campus department
- Backup documentation sent to the OCGA and Purchasing
  - via joint eFAX (x47562)
  - e-mail to ocgasubawards@research.ucla.edu
- Includes:
  - subaward checklist
  - scope of work (if changed)
  - budget and justification (if changed)
  - IRB/ARC approval (if changed)
Amendments/Change Orders:

- OCGA validates funds availability (PI Portal)
- OCGA notifies Purchasing of receipt of fully executed amendment via email
- Purchasing completes the change order
- Purchasing posts in BruinBuy
- Purchasing sends a scanned copy of the signed PO back to OCGA for inclusion in the OCGA subgrant file
FFATA

Federal Funding Accountability and Transparency Act
- Signed into law in 2006
- Requires prime recipients of Federal awards to report specific information about subrecipients
- Initiating of reporting requirement pushed back due to ARRA reporting
- Institutions issuing subawards required to report specific data elements to the FFATA Subaward Reporting System (FSRS)
- Information will then be available to the public via a searchable website, www.USASpending.gov
- Applies to prime grants, cooperative agreements, and contracts
FFATA

Grants/Cooperative Agreements
- Prime award issued on/after October 1, 2010 with total funding of $25K or greater
- Report subgrants issued in the amount of $25K or greater
- OCGA handles reporting

Contracts:
- Prime award issued between October 1, 2010 and February 28, 2011 with total funding of $550K or greater; OR
- Prime award issued on/after March 1, 2011 with total funding of $25K or greater
- Report subcontracts and procurements in the amount of $25K or greater
- Purchasing handles reporting

Does not require collection of quarterly data from individual investigators/departments

Data elements vary slightly between grants/cooperative agreements and contracts