Outgoing Subaward Process Timelines

Includes an update on *FDP Subaward Forms* (outgoing & incoming)

Mary Haskins, OCGA Outgoing Subaward Team
**Why:**
- Processing timelines are only as good as the documents submitted to the Subaward Team.
- There are Common Issues, which have increased, that slow down processing timelines.

**How:**
- How long does it take to process an outgoing Subaward/Subaward Amendment?
- It depends!

**Who:**
- Probably not you - but this may be affecting your outgoing Subaward process timelines.
Common Issues that Slow Down Outgoing Subaward Process Timelines

UCLA OCGA Subaward Checklist Form
(i.e. the internal UCLA form to request that a Subaward/Subaward Amendment be issued)

- Not submitted or not submitted to ocgasubawards@research.ucla.edu
- Incomplete, inconsistent (doesn’t match backup docs), or outdated (not “Revised 12/1/2015”)
- Lack of corresponding **Attachments**
  - UCLA Subrecipient vs Contractor Determination Form
  - Subrecipient Commitment Form (or LoI for FDP Pilot Participants) from Authorized Official
    - For Foreign/Nonprofit/For-profit: the additional documents triggered by Commitment Form
  - Subrecipient Scope of Work (SoW) – adequately detailed to clearly define responsibilities and monitor progress
  - Subrecipient Subject Use Approvals
**Checklist:** Not submitted or not submitted to ocgasubawards@research.ucla.edu

**Reminder:** the OCGA Subaward Team does not have access to the BruinBuy system.

### UCLA OCGA SUBAWARD CHECKLIST

(USE FOR ALL NEW OR AMENDED SUBAWARDS ISSUED BY UCLA)

EMAIL THIS COMPLETE FORM WITH ALL REQUIRED BACKUP DOCUMENTATION TO:

ocgasubawards@research.ucla.edu

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<tbody>
<tr>
<td><strong>NEW SUBAWARD</strong></td>
<td><strong>AMENDMENT and/or CHANGE ORDER TO CURRENT SUBAWARD</strong></td>
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<td>(Complete all information, except *section)</td>
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<tr>
<td><strong>UCLA INFORMATION</strong></td>
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<tr>
<td>1. UCLA Requisition or Purchase Order #</td>
<td>Amendment #</td>
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<td>2. UCLA PI</td>
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<td>3. UCLA Department</td>
<td>Dept Contact</td>
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<td>4. UCLA Account &amp; Fund No</td>
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<tr>
<td>5. Award number of the UCLA Grant/Cooperative Agreement</td>
<td>4a. For mailing purposes only: Recharge ID</td>
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<td>6. Name &amp; address of person to whom invoices should be sent:</td>
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<td><strong>SUBAWARD INFORMATION</strong></td>
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<td>7. Subrecipient Name:</td>
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<td>8. Subrecipient Address:</td>
<td>Phone No:</td>
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<td></td>
<td>Email:</td>
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<tr>
<td>9. Name &amp; address of person to whom payment should be sent (Requisition VCK No. should match with</td>
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**Checklist:** Incomplete or outdated – not using “Revised 12/1/2015”

**Reminder:** If you have saved previous versions of Subaward forms on your local computer, please replace them with the versions dated 12/1/2015.

**Conflict of Interest-UCLA Principal Investigator certifies that he/she**

- Does / Does Not have a financial interest of any kind in the proposed Subrecipient. If he/she does, please notify the OCGA Subaward team at ocgasubawards@em.ucla.edu.

I have reviewed the Subrecipient’s budget (attached) and believe that all costs stated therein to be reasonable and appropriate for the work to be performed in Subrecipient’s statement of work (attached). In the event this action represents an increment continuation or a no cost time extension, I certify that the Subrecipient’s performance goals have been achieved and to the best of my knowledge, the costs included are reasonable and appropriate for the work performed.

Signature of Principal Investigator or Authorized Representative ____________________________ Date ____________________________
Checklist: Lack of Attachments

ATTACH THE FOLLOWING DOCUMENTS (if applicable):

- UCLA Award Snapshot
- UCLA Subrecipient vs Contractor Determination
- Subrecipient Commitment Form
- Subrecipient Statement of Work
- Subrecipient Budget and Justification
- PHS FCOI form
- Subrecipient IRB approval (if Human Subjects are used)
- UCLA Fair & Reasonable Cost Analysis Form
- Subrecipient IACUC approval (if animals subjects)
- Subrecipient F&A (indirect cost) rate agreement (if subrecipient is not a universi

LACK OF ATTACHMENTS WILL SLOW DOWN THE PROCESS OF YOUR OUTGOING SUBAWARD

OTHER:

- If subrecipient must provide cost sharing, matching funds, in-kind, provide detail in comments.
- Is program income anticipated? Yes ☐ No ☐
- Special funding requirements provide detail in comments.
- The subaward will flow down any prime sponsor restrictions. If there are additional restrictions should be included, please describe in comments.
So....

If the correct Checklist is submitted, to the correct email address (as noted on Checklist), with the correct Attachments (as noted on Checklist), the processing timeline for your Subaward will be good.

If *everyone on campus* does this, it will be even better.
Federal Demonstration Partnership (FDP) Subaward Forms Update

What:
- A streamlined, standard set of terms and conditions that have been widely accepted, that comply with federal regulations and policies, and that help expedite issuance, review and negotiation of certain subawards between FDP member institutions.

When and Who:
- Federally-funded research where all three parties are FDP members (i.e. 3 = FDP):
  - Prime Sponsor
  - Pass-through Entity (PTE)
  - Subrecipient
FDP Subaward Forms

Effective July 1, 2016, EFM allowed an additional 7 calendar days for the department to submit a closeout packet when a fund includes expenses of FDP partner sub-awardee.

FDP Cost Reimbursement Research Subaward Agreement

Pass-through Entity (PTE): The Regents of the University of California
Subrecipient:

PTE Principal Investigator: Subrecipient Principal Investigator:

Federal Awarding Agency: PTE Federal Award No:

Project Title:

Subaward Period of Performance:
Start: End:

Amount Funded This Action: Subaward No.

Estimated Project Period (if incrementally funded):
Start: End:

Incrementally Estimated Total:

Check all that apply: \[ \square \] Subject to FFATA (Attachment 3B) \[ \square \] Cost Sharing (Attachment 5)

Terms and Conditions

1. PTE hereby awards a cost reimbursable subaward, as described above, to Subrecipient. The statement of work and budget for this Subaward are (check one): \[ \square \] as specified in Subrecipient’s proposal dated \[ \square \] or as shown in Attachment 5. In its performance of Subaward work, Subrecipient shall be an independent entity and not an employee or agent of PTE.

2. PTE shall reimburse Subrecipient not more often than monthly for allowable costs. All Subrecipient’s standard invoice, but at a minimum shall include current and cumulative Subaward number, and certification, as required in 2 CFR 200.415 (a). Invoices that number shall be returned to Subrecipient. Invoices and questions concerning invoices directed to the party’s Financial Contact, as shown in Attachment 3A.

3. A final statement of cumulative costs incurred, including cost sharing, marked “FINAL” must be submitted to PTE’s Financial Contact, as shown in Attachment 3A, NOT LATER THAN 60 days after Subaward end date.
FDP Subaward Forms Update – updated annually around Sept.

Attachment 2
Research Subaward Agreement
Federal Award Terms and Conditions

Sponsor Agency
NIH  NSF  USDA  EPA  NASA  AFOSR  ARO  ONR  AMRMC  AMRAA  Other Agency

Required Data Elements
The data elements required by Uniform Guidance are incorporated as follows:
(Select One)
- Copy of Award Notice
- As Entered

Federal Award Issue Date  FAIN  CFDA No.
CFDA Title

Agency-Specific Certifications/Assurances
By signing this Research Subaward Agreement, Subrecipient makes the certifications and assurances required by Uniform Guidance: 2 CFR 200 et seq.

General Terms and Conditions
1. Conditions on activities and restrictions on expenditure of federal funds in appropriations acts are applicable to this subaward to the extent those restrictions are pertinent. This includes any recent legislation noted on the Federal Awarding Agency’s Award Conditions website.

2. 2 CFR 200 and 45 CFR Part 75.
3. The Grants Policy Statement, including addenda in effect as of the beginning date of the period of performance or as amended found at:

4. Interim Research Terms and Conditions found at:
and Agency Specific Requirements found at: except for the following:
FDP Subaward Forms Update – new Attachment 2 requirements may slow down processing (outgoing and incoming) as we may need to reach out to you/PI:

• Multiple PIs (MPIs): If the Federal Award [NIH Only] includes MPIs, include a copy of the MPI Leadership Plan;

• If under Data Sharing and Public Access Policy, include a copy of approved Data Management/Sharing Plan; and

• Human Subjects Data:
  ▪ **Identify if Human Subjects Data will be exchanged under this Subaward project, and if so:**
    • Which direction, and
    • Set forth the terms of the exchange of human subjects data.
Subawards

• Please share this information with investigators and research administrators in your department/unit.

• In addition, if you have any questions about outgoing Subawards, please contact the OCGA Outgoing Subaward Team:
  • Assistant Director of Outgoing Subawards, Sharon Lam, slam@research.ucla.edu
  • Subaward Officer, Mary Haskins, mhashkins@research.ucla.edu
  • Website: http://www.research.ucla.edu/ocga/sr2/Subawards.htm

• General questions? Thank you!