



NCURATV 2007 Satellite Broadcast Workshop Series
Sub-awards: A Survivor's Guide of Key Concepts and Principles
September 11, 2007
11:30 am – 3:30 pm EST

Moderator

David J. Mayo, Associate Director of Sponsored Research, California Institute of Technology

Panelists

Nancy Daneau, Associate Director of Research Administration Training and Institutional Liaison, Office of the Senior Vice Provost for Research, New York University

Steve Erickson, Director, Office for Research Compliance and Intellectual Property Management, Boston College;

Ruth Farrell, Associate Vice President for Research Administration, University of Vermont

Time EST	Segment Time	Main Topic	Key Issues	Supplemental Information	
10:30	01:00	Test Slate	Test Slate		
11:30	00:05	Welcome	Kathleen Larmett		
11:35	00:10	Introduction	<ul style="list-style-type: none"> • Third party agreements • Federal awards: financial assistance, not procurement • Terminology: subawards vs. subcontract vs. subagreement, etc. • Point-of-view: prime awardee/subawardee 		
11:45	00:20	What are subawards all about?	<ul style="list-style-type: none"> • Collaboration between researchers/institutions • Substantive Programmatic effort not vendor agreement (examples of grey areas in making this distinction) • Agencies encouraging collaborative projects to: stretch funding; reduce transactions; simplify management (for them). 	FDP Statement on Subawards http://thefdp.org/SA_FDPState_Sep2000.pdf Circular A-110, Subpart A.2 (ff) http://www.whitehouse.gov/omb/circulars/a110/a110.html Circular A-133, Subpart B, 210 http://www.whitehouse.gov/omb/circulars/a133/a133.html NSF Strategic Plan http://www.nsf.gov/pubs/2006/nf0648/NSF-06-48_2.pdf	

				NIH Roadmap, Research Terms of the Future http://nihroadmap.nih.gov/researchteams/index.asp	
12:05	00:20	How do subawards happen (pre-award)?	<ul style="list-style-type: none"> • Part of initial proposal • Subaward proposal elements based upon requirements of prime awardee; • Subawardee authorized rep sign-off. • Revised budgets 	Sponsored Research Administration: A Guide to Effective Strategies and Recommended Practices Chapter 3705.4, Subawards http://www.aiseducation.com/lrag_subawards.pdf	
12:25	00:20	How do I know what terms to flow down?	<ul style="list-style-type: none"> • Prime award constructs sub around requirements of prime; • Flow-down terms • Required clauses • Useful clauses • Custom clauses (include PI with SOW, budget, and deliverables) 	Flow-Down Matrix: Cost Principles, Administrative and Audit Requirements http://www.ncura.edu/content/docs/SubawardApplicableRegs.ppt NIH Flow-Down Matrix, Exhibit 2, Public Policy Requirements and Objectives http://grants.nih.gov/grants/policy/nihgps_2003/NIHGPs_Part4.htm#_Toc54600062 Federal Demonstration Partnership Subaward Task Force Web site http://thefdp.org/Subawards.html	
12:45	00:20	What if I have to negotiate my subaward?	<ul style="list-style-type: none"> • Win-win • Preparation • Privity • Business relationship 	Writing and Negotiating Subawards Under Federal Prime Award – NCURA Micrograph http://en.wikipedia.org/wiki/Getting_to_YES	
1:05	00:30				
1:35	00:05	Welcome Back	Kathleen Larmett		
1:40	00:15	What are my responsibilities once a subaward is in place?	<ul style="list-style-type: none"> • As sub, manage like any federal award – according to terms of subaward. • As prime, obligations of 	OMB Circular A-133, Subrecipient Monitoring http://www.whitehouse.gov/omb/fedreg/rev_a133.html#d	

			<p>sponsor, particularly monitoring and oversight.</p> <ul style="list-style-type: none"> • Education of inexperienced subawardees re: their obligations. • Education of prime awardees (e.g., STTR) 	<p>NCURA Neighborhoods: Subrecipient Monitoring http://www.ncura.edu/content/docs/SubrecipientMonitoringIssues.pdf</p> <p>Sponsored Research Administration: A Guide to Effective Strategies and Recommended Practices Chapter 3705.7, Subawards http://www.aiseducation.com/lra_g_subawards.pdf</p>	
1:55	00:15	What are the general federal regulations that apply to subawards?	<ul style="list-style-type: none"> • Cost Principles • Administrative Requirements • Audit requirements • FAR 	<p>OMB Circular A-21, Section 37 http://www.whitehouse.gov/omb/circulars/a021/a21_2004.html#j</p> <p>OMB Circular A-110, Section 5 http://www.whitehouse.gov/omb/circulars/a110/a110.html#5</p> <p>OMB Circular A-110, Section 25 http://www.whitehouse.gov/omb/circulars/a110/a110.html#25</p> <p>OMB Circular A-110, Section 40 http://www.whitehouse.gov/omb/circulars/a110/a110.html#40</p> <p>OMB Circular A-110, Section 51 http://www.whitehouse.gov/omb/circulars/a110/a110.html#51</p> <p>OMB Circular A-133, Section 210 http://www.whitehouse.gov/omb/circulars/a133/a133.html#b</p> <p>Federal Acquisition Regulations http://www.arnet.gov/far/current/html/FARTOCP44.html#wp226845</p>	
2:10	00:10	Are there any helpful tools	<ul style="list-style-type: none"> • FDP Subaward templates • OMB letter 	<p>FDP Subawards Project Site http://www.thefdp.org/Subawar</p>	

		available?	<ul style="list-style-type: none"> Foreign subawards 	ds.html FDP Subaward Templates Site http://www.thefdp.org/Subawards_Forms.html OMB/OSTP letter endorsing FDP templates as appropriate for general use under Assistance Awards http://www.thefdp.org/Model_Agreement.pdf	
2:20	00:20	Is there anything in particular I should watch out for?	<ul style="list-style-type: none"> Cost-Sharing Prime terms incorporated by reference Remember reps and Certs Subawardee has findings relevant to subaward. Certain agencies restrict various aspects of subawards: foreign subawardees (NASA), fee for for-profits (DOD), indirect costs of foreign subs (NSF and NIH) 	OMB Circular A-133, Subpart D http://www.whitehouse.gov/omb/circulars/a133/a133.html#d NASA, 1260.62 Payment to Foreign Government, 1260.65 Exchange of Technical Data and Goods. http://ec.msfc.nasa.gov/hq/granta.html#126050 ONR's Research Grant Terms and Conditions, Article 29 Profit or Fee http://www.onr.navy.mil/02/docs/basicgrant_01.pdf NSF Proposal & Award Policies & Procedures Guide, Part II, Award and Administration Guide, Chapter V, D.1.b. Exceptions to Basic Policy http://nsf.gov/pubs/policydocs/papp/aag_5.jsp#VD1b	
2:40	00:10				
2:50	00:05	Welcome Back	Kathleen Larmett		
2:55	0010	Can my subaward be audited?	<ul style="list-style-type: none"> A-133/agency-specific; reach through in both directions Relationship to written institutional policy Institutions with findings 	OMB Circular A-133, Section 210 http://www.whitehouse.gov/omb/circulars/a133/a133.html#b NIH Audit Reports http://oig.hhs.gov/oas/oas/nih.html	

			(e.g., deficient or no policy) tend to impose tighter controls as part of their “penance”		
3:05	00:10	How do subawards end?	<ul style="list-style-type: none"> • Closeout 	Sponsored Research Administration: A Guide to Effective Strategies and Recommended Practices, Chapter 3705.8 Subawards http://www.aiseducation.com/lrag_subawards.pdf	
3:15	00:10	Summary and Conclusions			
3:25	00:05	Broadcast wrap up	Kathleen Larmett		
3:30	3:30				