



**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

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

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

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

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

			(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"> <li>• Closeout</li> </ul>	Sponsored Research Administration: A Guide to Effective Strategies and Recommended Practices, Chapter 3705.8 Subawards <a href="http://www.aiseducation.com/lrag_subawards.pdf">http://www.aiseducation.com/lrag_subawards.pdf</a>	
3:15	00:10	Summary and Conclusions			
3:25	00:05	Broadcast wrap up	Kathleen Larmett		
3:30	3:30				