Research Administration Practices (RAP) Sessions

Subaward Post-Award Process
Issuance, Monitoring & Closeout

Sharon Ray, Associate Director, Research Administration Services, RAS
Victoria Grafflin, Manager, Research Subawards, RAS
Brendan O’Brine, Subawards Administrator

December 14, 2023
Agenda

RAP Sessions: Targeted skills based educational offerings open to the Research Administration community at MIT. Information gathered and shared with attendees can be taken back to their desks and applied immediately.

• Introduction – Why is this important?
• Trends/Metrics
• Recap of Subawards at Proposal
• Preparations and Basic Considerations
• Requesting Subaward
• After Your Request
• Ongoing Monitoring and Management
  • Invoice Approvals
  • Modifications
  • Close-Out
Introduction

Managing Subawards

General

<table>
<thead>
<tr>
<th>PI/DLCI</th>
<th>Subaward Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintain relationship with subrecipient PI and staff throughout the life of the subaward</td>
<td>Conduct subrecipient initial and annual assessment per federal requirements</td>
</tr>
<tr>
<td>Monitor subaward progress related to meeting project goals</td>
<td>Draft, negotiate and issue subaward agreement and modifications</td>
</tr>
<tr>
<td>Monitor subaward expenses against project budget</td>
<td>Assist with invoice review</td>
</tr>
<tr>
<td>Follow subrecipient monitoring plan as applicable</td>
<td>Assist with close-out process</td>
</tr>
<tr>
<td>Alert Subaward Team of any concerns from a programmatic or financial nature</td>
<td></td>
</tr>
</tbody>
</table>

Invoicing

<table>
<thead>
<tr>
<th>PI/DLCI</th>
<th>Subaward Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confirm subrecipient is meeting project deliverables</td>
<td>After DLCI review and approval, will confirm invoices meet the compliance requirements</td>
</tr>
<tr>
<td>Confirm that the expenses are allowable and appropriate to subaward agreement and budget</td>
<td></td>
</tr>
<tr>
<td>Obtain specific PI approval where management plans are in place</td>
<td>Within correct date ranges</td>
</tr>
<tr>
<td>Track cost share reported on invoices where applicable</td>
<td>Verify availability of funds</td>
</tr>
<tr>
<td>Reject invoices as needed, communicating the issue to</td>
<td>Verification statement</td>
</tr>
<tr>
<td></td>
<td>Authorized signature</td>
</tr>
<tr>
<td></td>
<td>Marked as FINAL where appropriate</td>
</tr>
</tbody>
</table>
What’s the big deal?

• Subawards are highly regulated
• Follow Uniform Guidance
  • Part 200 Subpart D
    • Accurately categorized as a subaward
    • Follow all requirements for pass-through entities 200.332
• Annual Single Audit
  • Assessment
  • Content of agreement documents
  • Invoice compliance
Subaward Stats.

Active and In Process Subawards = 659
## Subaward Volume – FY23 & FY24

### New Subawards & Subaward Modifications

<table>
<thead>
<tr>
<th>Month of Modification</th>
<th>New Subaward FY 2023</th>
<th>New Subaward FY 2024</th>
<th>Modification FY 2023</th>
<th>Modification FY 2024</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>July</td>
<td>18</td>
<td>15</td>
<td>38</td>
<td>24</td>
<td>95</td>
</tr>
<tr>
<td>August</td>
<td>18</td>
<td>18</td>
<td>39</td>
<td>55</td>
<td>130</td>
</tr>
<tr>
<td>September</td>
<td>22</td>
<td>19</td>
<td>25</td>
<td>58</td>
<td>124</td>
</tr>
<tr>
<td>October</td>
<td>23</td>
<td>18</td>
<td>35</td>
<td>57</td>
<td>133</td>
</tr>
<tr>
<td>November</td>
<td>16</td>
<td>26</td>
<td>29</td>
<td>55</td>
<td>126</td>
</tr>
<tr>
<td>December</td>
<td>28</td>
<td>9</td>
<td>64</td>
<td>10</td>
<td>111</td>
</tr>
<tr>
<td>January</td>
<td>18</td>
<td></td>
<td>53</td>
<td></td>
<td>71</td>
</tr>
<tr>
<td>February</td>
<td>17</td>
<td></td>
<td>49</td>
<td></td>
<td>66</td>
</tr>
<tr>
<td>March</td>
<td>9</td>
<td></td>
<td>51</td>
<td></td>
<td>61</td>
</tr>
<tr>
<td>April</td>
<td>19</td>
<td></td>
<td>33</td>
<td></td>
<td>52</td>
</tr>
<tr>
<td>May</td>
<td>22</td>
<td></td>
<td>49</td>
<td></td>
<td>71</td>
</tr>
<tr>
<td>June</td>
<td>20</td>
<td></td>
<td>49</td>
<td></td>
<td>69</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>230</strong></td>
<td><strong>106</strong></td>
<td><strong>514</strong></td>
<td><strong>259</strong></td>
<td><strong>1109</strong></td>
</tr>
</tbody>
</table>
Recap of Subs at Proposal

- Subaward Pre-Award Process Presentation
- Letter of Intent/New Subrecipient Profile Questionnaire
- Confirm Appropriate Indirect Cost Rate
- KC Organization Risk Flag - yellow
- Accurate determination: subrecipient, vendor, independent contractor (consultant)
Determination

Subrecipient is distinguished from both a vendor and an independent contractor/consultant

Subrecipient:

• Performs a substantive portion of the proposed Statement of Work incorporated into the Prime Award;

• Has responsibility for internal programmatic decision-making and design;

• Is responsible for assisting the Prime Recipient in meeting the goals of the project;

• Is responsible for adhering to applicable Federal programmatic compliance requirements;

• Retains intellectual property and copyright to the work produced by the Subrecipient’s personnel; may co-author an article in a professional research journal.

• Note: MIT does not issue Subawards to individual persons; only to a company or organization that is not a sole proprietorship and that has sufficient internal controls and processes to be compliant with flow down terms and conditions.

Vendor:

• Provides the goods and services within normal business operations.

• Provides similar goods or services to many different purchasers.

• Operates in a competitive environment.

• Provides goods and services that are ancillary to the operation of the federal program.

• Is not generally subject to compliance requirements of the federal program.

Independent Contractor (Consultant):

• An individual to perform services working on his/her own behalf rather than for a company
Scope of Work: “Scopes-R-Us will provide access to observing time at its observatory so that MIT can make observations for its research project. Observation time will be invoiced at $250.00 per hour.”

Provide your answer in the poll
How does the subaward get issued?

Before you submit your Requisition in B2P:

• KC notification sent when sub entity added to the award module
• Before the request is submitted
  • Confirm subaward is appropriate mechanism
  • Period of Performance
  • Obligated vs. Anticipated
  • Statement of Work and Budget
  • Protocol Approvals
  • Subaward PI and Administrative Contact
  • Additional Documentation/Information
Realistic Expectations

• Several steps to issue – takes time
• Incomplete documentation will cause delays
• Not-for-Profit entities
  • Infrastructure and experience
• For profit entities –
  • Lengthy negotiations (TLO, OSATT)
  • Different mechanism than a vendor relationship
  • Potential COI mitigation
• International entities –
  • Assessment of infrastructure
  • Ability to accept US flow down
Submitting your Subaward Requisition

Step-by-step instructions for submitting your requisition are found by clicking the icon below on the B2P homepage

This guidance document will be updated as needed – check regularly

Contact B2P@mit.edu for questions regarding errors or issues within B2P
B2P Requisition

General Info

Created By: Theresa Peterson (1-107)
Requested By: Theresa Peterson (1-107) (Change)
Justification: UofWisc-Madison SubAward on MURI CNR project.
Attachments:
- WS00960300-RR_SubawardBudget_B.pdf
- WISOJG.pdf
- Boldiston_Subaward_for_MIT.pdf
- WISC-Phase_1_Period_1.xlsx

Returned to Buyer: Yes
High-Risk: No

Email Address of Requester: theresap@mit.edu

Items included? Yes
Recipient, click if high risk: No

Email Address of Requester: theresap@mit.edu

Period of Performance: 06/01/2023 - 05/31/2026, PI: AJ Boydston, funding at this time is $115,000.

Buyer Contact: IAN ADAMS (IANADAMS@MIT.EDU)

Requisition Type: Standard
Remove Standard T&Cs: No

SAP Requisition: 1040983 0012092322
SAP Error Msg: None
Req Total: $115,000

Requisitioner is the individual attached to subaward in KC and is administrative contact for sub team (only person who can modify)

Attach all required documents

Items are consistent for procurements – not specific to subawards

Subaward checklist will replace adding language in the Notes to Buyer section
Subaward Request Checklist – NEW!

• Ensures necessary information is provided
• Provide info that has changed from LOI or assists with issuance

Subrecipient Request Checklist – New Subaward

Please enter information that has (1) changed from the Sub Letter of Intent, (2) that is new and (3) that may assist in the issuance of the subaward

MIT Information
PI Name
Admin Contact Name
Subaward Project Title

Subrecipient Institution Information
Legal Org Name ___________________________ UEI ____________
Performance Site Address (If different than legal address)______________________________

Sub PI Name ___________________________ Email ___________________________
Administrative Contact ___________________________ Email ___________________________
Contract Negotiation Contact ___________________________ Email ___________________________

Parent Award Number: ___________________________
Total Project Period of Performance (start) (end)
Year 1 Obligation period (start) (end)
Total Anticipated funding for project ___________________________
Funding amount for Year 1 obligation period ___________________________
Cost Share Y/N – Amt total project period ________ Amt Year 1 obligation period ________
Human Subjects Y/N Animal Subjects Y/N (if yes, upload approval document)

Uploaded documents – all FINAL:
Subrecipient Letter of Intent/Commitment
Sub-specific SOW
Sub-specific budget (detailing both current obligation and full performance period)
Sub-specific cost share budget (detailing both current obligation and full performance period)
Protocol approval
Related, ancillary agreements (i.e. NDA, MTA)
Additional documents: (Award letter for internally granted, Email communications)

SPECIAL INSTRUCTIONS: (i.e. Multiple PI award, delayed onset, extraordinary circumstances)
Free form text box
After Your Request ...

- Submitting your requisition in B2P does not automatically create a Subaward record in KC – it is a manual process by Sub Team
  - Assignment to Subaward Administrator
  - Creation of KC Subaward Shell

- Incomplete documentation will cause delays

- Assessment
  - Subrecipient Letter of Commitment/Intent – Questionnaire (*new*)
  - For-profit and International
After Your Request ...

• Drafting – proper flow downs, mitigation terms
  • May require DLCI involvement (Meetings, Management Plans)

• Negotiation
  • May require OSATT/TLO involvement
  • Status – where DLCI can view status

• Execution
  • Requisitioner and PI copied on fully-executed version
Access Issues?

Especially if users are new to MIT or a new role, they should do the following:

• Go to https://rolesapp.mit.edu/rolesclient/rolesui.html (Roles Database) and authenticate via MIT Touchstone

• Assigned authorizations will be listed. Confirm that VIEW SUBCONTRACT KC is listed (and VIEW SUBAWARD ATTACHMENTS KC if they will need to view shared subaward documents).

• If the role does not appear, please request from DLCI Primary Financial Authorizers (RA-HELP if further assistance is needed)

What is the Red Flag?

**Letter of Commitment/Intent:**

**Subrecipient Institution Information**

<table>
<thead>
<tr>
<th>Legal Org Name</th>
<th>Beaver Foundation for Student Wellness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Entity has previously received a subaward from MIT</td>
<td>No</td>
</tr>
<tr>
<td>Sub PI Name</td>
<td>Harvey Wallbanger</td>
</tr>
<tr>
<td>Performance Site Address</td>
<td>1 Beaver Street, Boston, MA 02110</td>
</tr>
<tr>
<td>Project Period</td>
<td>1/1/2024 - 12/31/2024</td>
</tr>
<tr>
<td>Direct Costs</td>
<td>$100,000</td>
</tr>
<tr>
<td>F&amp;A Costs</td>
<td>$25,000</td>
</tr>
<tr>
<td>F&amp;A Rate</td>
<td>25%</td>
</tr>
<tr>
<td>Total Costs</td>
<td>$125,000</td>
</tr>
</tbody>
</table>

**Subrecipient Contacts**

<table>
<thead>
<tr>
<th>Administrative</th>
<th>Susie Q</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authorized Official</td>
<td>Harvey Wallbanger</td>
</tr>
<tr>
<td>Contracting Contact</td>
<td>Susie Q</td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:harvey@bfsw.org">harvey@bfsw.org</a></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:SQ@bfsw.org">SQ@bfsw.org</a></td>
</tr>
<tr>
<td>Phone</td>
<td>617-896-9999</td>
</tr>
<tr>
<td>Phone</td>
<td>617-869-8888</td>
</tr>
</tbody>
</table>
Invoice Review and Approval

Change in approval routing order – December 15th COB

Invoices must be submitted to: Invoices@mit.coupahost.com

DLCI responsibilities
1. Confirm Subrecipient is meeting project deliverables
2. Confirm that the expenses are allowable and appropriate to subaward agreement and budget
3. Obtain specific PI approval where Management Plans are in place
4. Track cost share reported on invoices where applicable
5. Reject invoices as needed, communicating the issue to the Subrecipient for correction and resubmission
6. Contact B2P@mit.edu for questions regarding errors or issues within B2P (i.e. expired cost object, IDC not charging correctly, cannot modify PO – requisitioner needs updating)
7. Alert Subaward Team of any concerns subawards@mit.edu

RAS Sub Team responsibilities
1. Confirm invoices meet the compliance requirements
   • Within correct date ranges
   • Verify availability of funds
   • Verification statement
   • Authorized signature
   • Marked as FINAL where appropriate
2. Reject invoices as needed, communicating the issue to the Subrecipient for correction and resubmission copying DLCI
3. Approve to Accounts Payable for payment (payment status checked through VPF)
Can we pay this? #1


...Can we pay the invoice?
Can we pay this? #2

Pending Subaward recipient sends an invoice for expenses incurred five months before the subaward’s start date, and a letter from MIT’s PI permitting them to start their research five months early.

...Can we pay the invoice?
**Modifications**

*KC Sub record may be accessed for status*

**DLCI responsibilities**
1. Submit B2P Change Order request (Quick Card) to issue a Subaward Modification to:
   - Extend the date
   - Increase funding
   - Issue a budget modification

2. Upload Modification Checklist to ensure documentation is provided as needed:
   - Revised end date, budget and/or SOW
   - Updated compliance approvals

3. Contact B2P@mit.edu for questions regarding errors or issues within B2P

**RAS Sub Team responsibilities**
1. Draft and issue Subaward Modification documents
2. Obtain clarifications from DLCI if applicable
3. Ensure entity assessment is up to date
4. Copy PI and DLCI Admin when sending fully-executed Modification to Subrecipient

---

**Modification Information**
- Is this a No Cost Extension? Y N
- Project Period of Performance (start date) _______ (end date) ____________
- Obligation period (start date) __ (end date) __________________
- Funding amount for obligation period __________________
- Cost Share Amt project period ___________ Amt obligation period ______
- Human Subjects Y N Animal Subjects Y N (if yes, upload approval document)

**Documentation Uploaded** – all FINAL and if applicable:
Is this request complete?

DLCI sends a B2P request to add Y2 funding to a subaward. Total funds have been increased on the PO with no documents or other information. The original signed Subaward agreement only has a Y1 budget and SOW as attachments.

What else does DLCI need to submit?
Close Out

KC Notifications Sent 60 and 30 Days Before Subaward End Date

**DLCl responsibilities**

1. Proactively engage Subrecipient toward award end
   - To collect final deliverables
   - Ensure timely final invoice received (marked as FINAL)

2. Submit [Closeout Request form](#) to Subaward Team
   - Confirm reporting requirements were met
   - Confirm whether balance is to be De-obligated

**RAS Sub Team responsibilities**

1. Confirm receipt of complete and accurate Closeout Request Form
2. Collect final patent report from subrecipient (as required)
3. Soft close B2P PO
4. Change KC Subaward Record Statuses - Ended, Financially Closed, Closed

*With several steps by multiple individuals, being pro-active and starting early is important*
Close Out Request Form

Please complete and submit this form to initiate the subaward closeout process. Contact subawards-closeout@mit.edu with any questions.

Please confirm the following:

- All required deliverables and reports have been received and found to be acceptable by the MIT. Yes ________ No ______
- Final invoice has been received. Yes ________ No ______

<table>
<thead>
<tr>
<th>Subrecipient Name</th>
<th>Requestor Name</th>
<th>MIT PI &amp; DLCI</th>
<th>Subaward # &amp; PO #</th>
<th>Account (WBS) #</th>
</tr>
</thead>
</table>

- \( \text{December} \quad 31 \quad 2023 \)

- YES - Subaward is expected to end by the date noted above.
- YES - De-obligate the remaining balance of \( \text{ (Please type in Dollar Amount) } \).
Questions

Questions can also be sent to subawards@mit.edu
Addendum
Common B2P Subaward Issues

• Please choose AMT-type PO line when creating or revising a Subaward purchase order. QTY will restrict the ability to link and pay multiple invoices on a B2P PO line.

• Please create two separate PO lines for G/L 420600 and G/L 420620; the first line should be for G/L 420600. B2P data entry administrators typically charge first from top-to-bottom.

• Inactive Cost Object error in B2P when the cost object was already extended in KC and SAP?

Solution: the cost object needs to be re-added to each PO line
KC Subaward Module

From KC Home, click **Search for Subawards**
In the Search screen, enter search criteria such as Purchase Order ID or Subaward ID (located on the Subaward agreement as the Subaward Agreement No.), then click Search

Subaward ID = Subaward Agreement number
Example: Agreement no. 5####

*Multi-year agreements may have multiple purchase orders—search with "*" before and after the PO#

Older agreements before 2018 used the PO# as the agreement number and start with 571000####

From search results, click “open”
# Viewing a Subaward

**Subaward Administrator status notes**

![Subaward Administration System Screenshot]

<table>
<thead>
<tr>
<th>Choice</th>
<th>Date Requested</th>
<th>Date Follow-up</th>
<th>Date Received</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>09/20/2020</td>
<td>09/22/2020</td>
<td>09/24/2020</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>09/24/2020</td>
<td>09/30/2020</td>
<td>10/11/2020</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>08/12/2020</td>
<td>08/15/2020</td>
<td>08/18/2020</td>
<td></td>
</tr>
</tbody>
</table>
### Financial tab – View Invoices

**Obligated Amount:** 231,000.00
**Anticipated Amount:** 231,450.00

**Invoice List**

<table>
<thead>
<tr>
<th>Invoice ID</th>
<th>Start Date</th>
<th>End Date</th>
<th>Effective Date</th>
<th>Amount Released</th>
<th>Invoice Status</th>
<th>Attachment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>08/01/2020</td>
<td>08/31/2020</td>
<td>08/01/2020</td>
<td>15,697.94</td>
<td>FINAL</td>
<td><img src="attachment.png" alt="Attachment" /></td>
</tr>
<tr>
<td>2</td>
<td>09/01/2020</td>
<td>09/30/2020</td>
<td>09/01/2020</td>
<td>15,541.00</td>
<td>FINAL</td>
<td><img src="attachment.png" alt="Attachment" /></td>
</tr>
<tr>
<td>3</td>
<td>10/01/2020</td>
<td>10/31/2020</td>
<td>10/01/2020</td>
<td>15,541.00</td>
<td>FINAL</td>
<td><img src="attachment.png" alt="Attachment" /></td>
</tr>
<tr>
<td>4</td>
<td>11/01/2020</td>
<td>11/30/2020</td>
<td>11/01/2020</td>
<td>15,541.00</td>
<td>FINAL</td>
<td><img src="attachment.png" alt="Attachment" /></td>
</tr>
<tr>
<td>5</td>
<td>12/01/2020</td>
<td>12/31/2020</td>
<td>12/01/2020</td>
<td>15,541.00</td>
<td>FINAL</td>
<td><img src="attachment.png" alt="Attachment" /></td>
</tr>
<tr>
<td>6</td>
<td>01/01/2021</td>
<td>01/31/2021</td>
<td>01/01/2021</td>
<td>15,541.00</td>
<td>FINAL</td>
<td><img src="attachment.png" alt="Attachment" /></td>
</tr>
<tr>
<td>7</td>
<td>02/01/2021</td>
<td>02/28/2021</td>
<td>02/01/2021</td>
<td>15,541.00</td>
<td>FINAL</td>
<td><img src="attachment.png" alt="Attachment" /></td>
</tr>
</tbody>
</table>

*Not all invoices are shown for clarity.*
### Comments, Notes & Attachments tab — view

<table>
<thead>
<tr>
<th>ID</th>
<th>Last Updated</th>
<th>Updated By</th>
<th>Attachment Type</th>
<th>Description</th>
<th>File Name</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>02/07/2020</td>
<td>Onyuksel, Alisa Dara</td>
<td>Requisition</td>
<td>Req #435244_Agreement</td>
<td>Requisition #435244_Agreement.pdf</td>
<td>view modify</td>
</tr>
<tr>
<td>3</td>
<td>02/07/2020</td>
<td>Onyuksel, Alisa Dara</td>
<td>IRB Approval</td>
<td>IRB Approval</td>
<td>Providence_IRB_Approval_Letter.pdf</td>
<td>view modify</td>
</tr>
<tr>
<td>4</td>
<td>02/07/2020</td>
<td>Onyuksel, Alisa Dara</td>
<td>Subaward</td>
<td>IRB Approval</td>
<td>Vip/MIT_IRA.pdf</td>
<td>view modify</td>
</tr>
<tr>
<td>5</td>
<td>02/07/2020</td>
<td>Onyuksel, Alisa Dara</td>
<td>Budget</td>
<td>Budget</td>
<td>Handel_Budget.xlsx</td>
<td>view modify</td>
</tr>
<tr>
<td>6</td>
<td>06/03/2020</td>
<td>Onyuksel, Alisa Dara</td>
<td>Agreement</td>
<td>Agreement</td>
<td>MIT-UCB_Subaward_S4998_EXECUTABLE_rev/3ed_PE.pdf</td>
<td>view modify</td>
</tr>
</tbody>
</table>
Comments, Notes, & Attachments tab — Continued

Attachment details include Attachment Type, Description, File Name (with PDF thumbnail), Last updated (and by whom), and an Action button to View the attachment.

Special Note – To view a Subaward or view Subaward Attachments in KC, you will need KC authorizations as granted by the Primary Financial Authorizer for your DLC. More information about KC authorizations may be found here: https://kc.mit.edu/sites/kc/files/uploads/kc-all-roles-db-dlc-authorizations-2017-11-29.pdf
Help and Resources

— Resources —

RAS: Subawards Overview

Subawards in Proposals

— Contact for Help —

RAS Subaward Administrator - Department Assignments
Subaward team email - subawards@mit.edu
Research Administration Help - RA-help@mit.edu
Your DLCI RAS Contract Administrator | COI - coi-help@mit.edu