



# Research Administration Practices (RAP) Sessions

# **Subaward Post-Award Process**Issuance, Monitoring & Closeout

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**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

Home / Grant and Contract Administration / Subawards / Managing Subawards

### ► Sponsored Programs Basics

- Preparing and Submitting a Proposal
- Negotiating and Accepting an Award
- Setting Up An Award
- ► Managing Projects
- Reporting and Closing Out an Award
- Sponsor Information
- Cost Sharing
- ► International Activities
- Subawards

Criteria for Subrecipients Subawards at Proposal Requesting New Subawards

**Managing Subawards** 

**RAS Subaward Team Contacts** 

Under-recovery of F&A Costs
 Audits and Auditors

### **Managing Subawards**

### General

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

### Invoicing

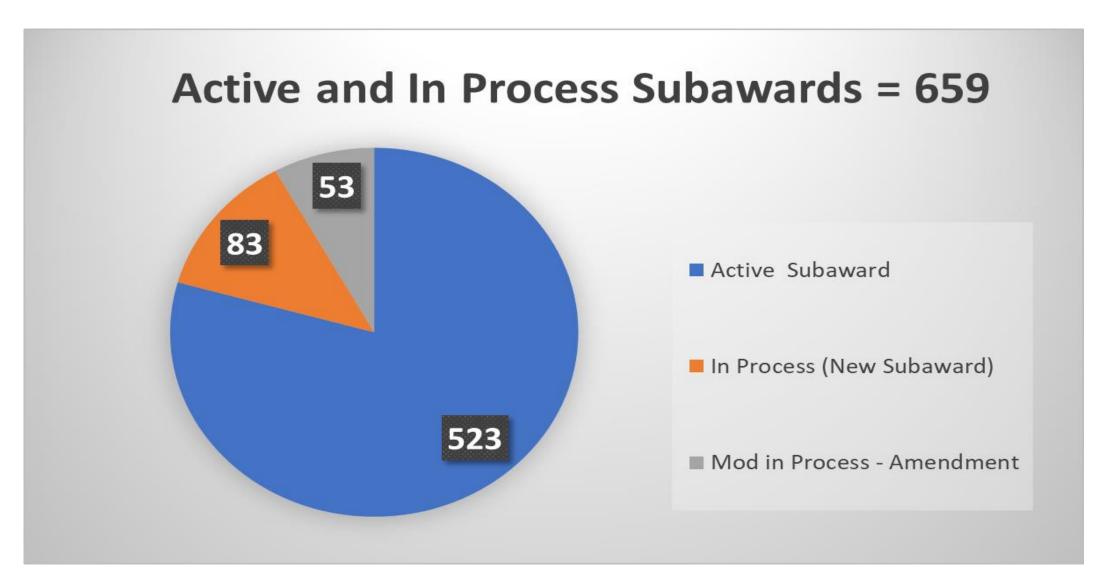
PI/DLCI	Subaward Team
<ul> <li>Confirm subrecipient is meeting project deliverables</li> <li>Confirm that the expenses are allowable and appropriate to subaward agreement and budget</li> <li>Obtain specific PI approval where management plans are in place</li> <li>Track cost share reported on invoices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

# 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.**



# Subaward Volume - FY23 & FY24

<b>New Subawards</b>	& Subaward	Modifications
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	New Sul	<u>baward</u>	<u>Modifi</u>	<u>cation</u>	
Month of					
<b>Modification</b>					
<b>Effective Date</b>	FY 2023	FY 2024	FY 2023	FY 2024	<b>Grand Total</b>
July	18	15	38	24	95
August	18	18	39	55	130
September	22	19	25	58	124
October	23	18	35	57	133
November	16	26	29	55	126
December	28	9	64	10	111
January	18		53		71
February	17		49		66
March	9		51		61
April	19		33		52
May	22		49		71
June	20		49		69
<b>Grand Total</b>	<u>230</u>	<u>106</u>	<u>514</u>	<u>259</u>	<u>1109</u>

# 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 decisionmaking 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

# Is this a subaward?

**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 <u>B2P homepage</u>



This <u>guidance document</u> will be updated as needed – check regularly Contact <u>B2P@mit.edu</u> for questions regarding errors or issues within B2P

# **B2P Requisition**

### General Info

Reg Total 115,000

Requisitioner is the individual attached to Created By Theresa Peterson (1-107) Requested By Theresa Peterson (1-107) (Change) subaward in KC and is administrative contact. Justification UofWisc-Madison SubAward on MURI ONR project. for sub team (only person who can modify) Attachments WS00960300-RR\_SubawardBudget\_B... WISC\_LOI.pdf Boydston\_Subaward\_for\_MIT.pdf Attach all required documents WISC-Phase\_1\_Period\_1.xlsx Attach any documentation (e.g., Selection of Source Form). If you add attachments, please check the box below. :hments included? Yes ibrecipient, click if No high risk Items are consistent for procurements – not Email Address of theresap@mit.edu Requester specific to subawards es a contract need No Irafting or review? ments to Supplier None Subaward checklist will replace adding Notes to Buyer Period of Performance is 06/01/2023 - 05/31/2026, PI language in the Notes to Buyer section AJ Boydston, funding at this time is \$115,000. Buyer Contact IAN ADAMS (IANADAMS@MIT.EDU Requisition Type Standard Remove Standard No. T&Cs SAP Requisition 1040983:0012658232 SAP Error Msg None

# 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 <a href="https://rolesapp.mit.edu/rolesclient/rolesui.html">https://rolesapp.mit.edu/rolesclient/rolesui.html</a> (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)
- A list of all KC roles -> <a href="https://kc.mit.edu/document/kuali-coeus-roles-database-authorizations-kc-quick-reference-nov-2019">https://kc.mit.edu/document/kuali-coeus-roles-database-authorizations-kc-quick-reference-nov-2019</a>

# What is the Red Flag?

### **Letter of Commitment/Intent:**

Subrecipient Institution Information  Legal Org Name Beaver Foundation for Student Wellness  UEI BU2390R					
Entity has previously received a subaward from MIT No					
Sub PI Name Harvey Wallbanger	Email harvey@bfsw.org Phone 617-896-				
Performance Site Address 1 Beaver Street, Boston, MA 02110					
Project Period 1/1/2024 - 12/31/2024					
Direct Costs 100,000 F&A Costs 25,000	F&A Rate 25% Tota	I Costs 125,000			
Subrecipient Contacts					
Administrative Susie Q	Email SQ@bfsw.org	Phone 617-869-8888			
Authorized Official Harvey Wallbanger	Email harvey@bfsw.org				
Contracting Contact Susie Q	Email SQ@bfsw.org	Phone 617-869-8888			

# **Invoice Review and Approval**

### Change in approval routing order – December 15<sup>th</sup> COB

Invoices must be submitted to: <a href="mailto:lnvoices@mit.coupahost.com">lnvoices@mit.coupahost.com</a>

### **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 <u>B2P@mit.edu</u> 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 <a href="mailto:subawards@mit.edu">subawards@mit.edu</a>

### **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

Subaward ended in September 2022. Eight months later Subrecipient sends an invoice dated May 15, 2023 for costs incurred October 2022 – March 2023.

...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?



Photo: Jake Belcher for MIT News Office

# **Modifications**

### KC Sub record may be accessed for status

### **DLCI** responsibilities

1. Submit <u>B2P Change Order</u> request (<u>Quick Card</u>) to issue a Subaward Modification to:

Extend the date
Increase funding
Issue a budget modification

- Upload Modification Checklist to ensure documentation is provided as needed: Revised end date, budget and/or SOW Updated compliance approvals
- 3. Contact <u>B2P@mit.edu</u> for questions regarding errors or issues within B2P

### **RAS Sub Team responsibilities**

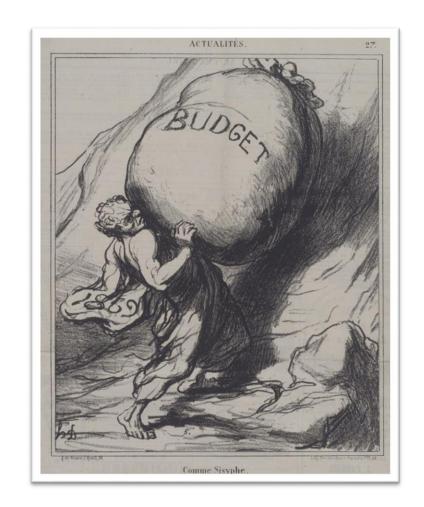
- 1. Draft and issue Subaward Modification documents
- 2. Obtain clarifications from DLCI if applicable
- 3. Ensure entity assessment is up to date
- 4. Copy PI and DLCI Admin when sending fullyexecuted Modification to Subrecipient

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

### **DLCI** responsibilities

- Proactively engage Subrecipient toward award end
   To collect final deliverables
   Ensure timely final invoice received (marked as FINAL)
- 2. Submit <u>Closeout Request form</u> to Subaward Team Confirm reporting requirements were met Confirm whether balance is to be De-obligated

### **RAS Sub Team responsibilities**

- Confirm receipt of complete and accurate Closeout Request Form
- 2. Collect final patent report from subrecipient (as required)
- Soft close B2P PO
- 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 submitthis form to initiate the subaward close out process. Contact subawards-close out@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 had been received Yes	No	<del></del>			
Subrecipient Name					
Requestor Name					
MIT PI & DLCI					
Subaward # & PO #. S PO #	•	Account (WE	3S) #:		
-	December ✓ 31	<b>~</b> 2023 <b>~</b>			
YES - Subaward is expected to end by the date noted above.					
YES - De-obligate the r	emaining balance of		(Please type in Dollar Amou	int).	

# Questions



Questions can also be sent to <a href="mailto:subawards@mit.edu">subawards@mit.edu</a>

# 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?

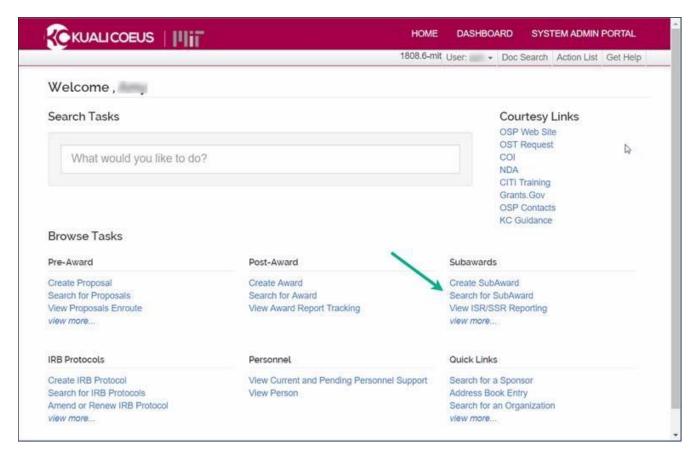
**Solution:** the cost object needs to be re-added to each PO line

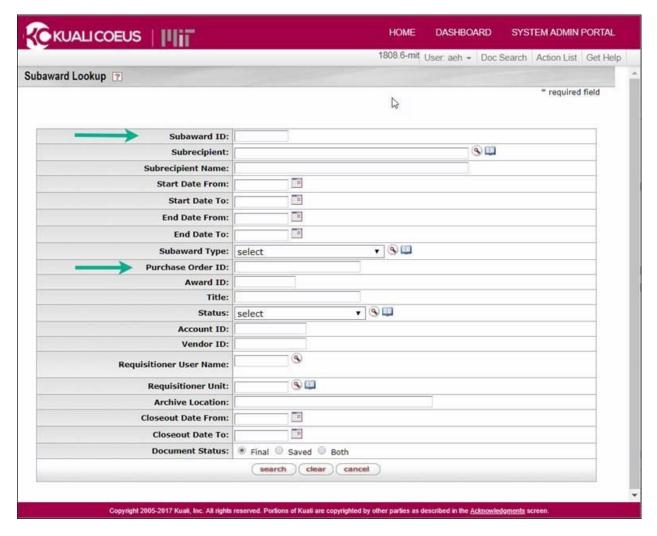
Billing account Subrecipient Agreement -6936091 SUB-AWARD FOR UCF-HU-SPON is inactive Billing account Subrecipient Agreement-not MTDC -6936091 SUB-AWARD FOR UCF-HU-SPON is inactive



# **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. S####

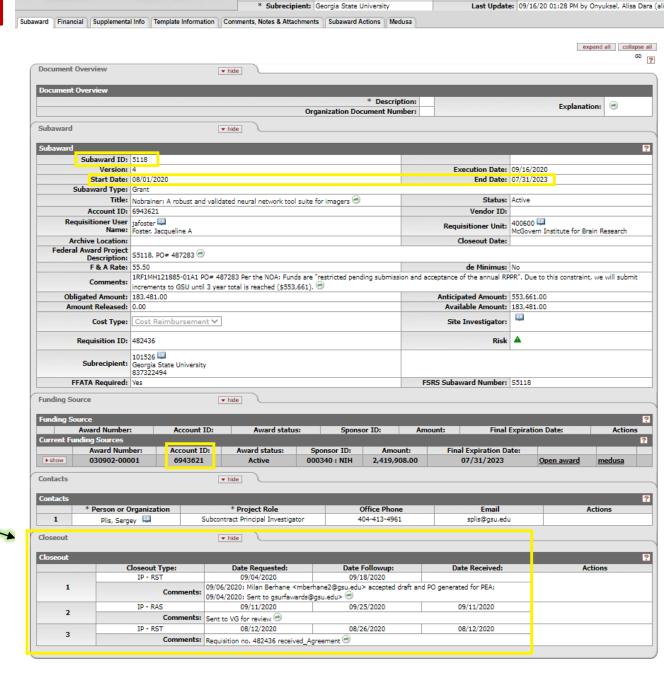
\*Multi-year agreements may have multiple purchase orders—search with "\*" before and after the PO#

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



From search results, click "open"

# Viewing a Subaward Subaward Subaward Subaward Subaward Subaward Financial Supplemental Info Template Information Comments, Notes & Attachments Subaward Actions Medusa



Requisitioner ID: jafoster

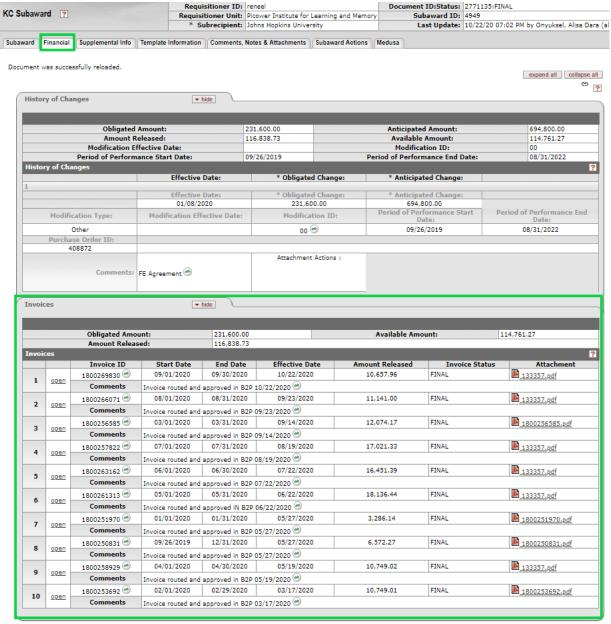
Requisitioner Unit: McGovern Institute for Brain Research

Document ID:Status: 2970270:FINAL

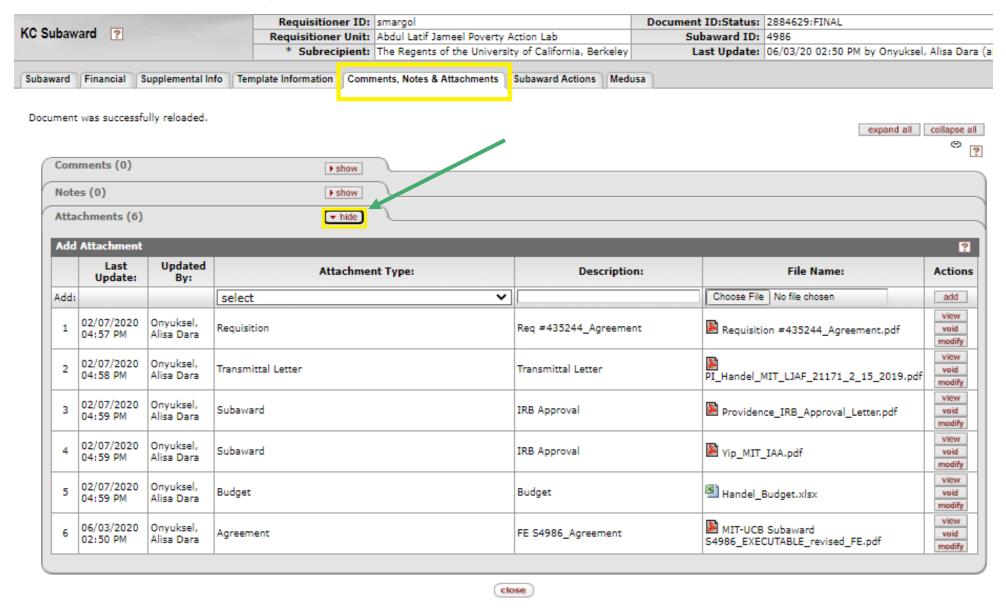
Subaward ID: 5118

Subaward Administrator status notes

# Financial tab – View Invoices

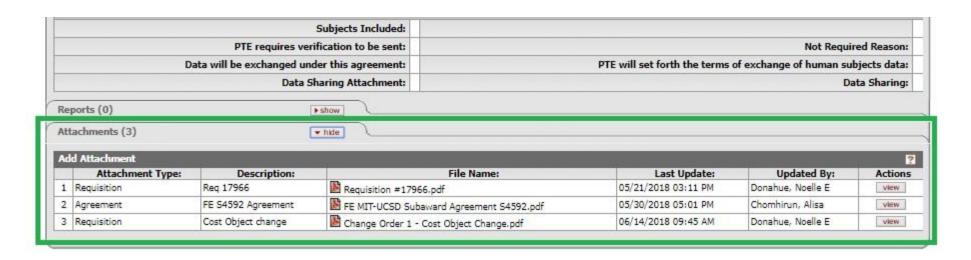


# Comments, Notes & Attachments tab — view



# 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: <a href="https://kc.mit.edu/sites/kc/files/uploads/kc-all-roles-db-dlc-authorizations-2017-11-29.pdf">https://kc.mit.edu/sites/kc/files/uploads/kc-all-roles-db-dlc-authorizations-2017-11-29.pdf</a>

# **Help and Resources**

— Resources —

**RAS: Subawards Overview** 

Subawards in Proposals

### — Contact for Help —

RAS Subaward Administrator - <u>Department Assignments</u>
Subaward team email - <u>subawards@mit.edu</u>
Research Administration Help - <u>RA-help@mit.edu</u>

Your DLCI RAS Contract Administrator | COI - coi-help@mit.edu