

## Federal Subawards: Roles & Responsibilities

*Note: A red check indicates which party has primary responsibility when more than one party is involved.*

CONFIRM THAT THE SUBAWARD IS AUTHORIZED	ORS	RA	PI
Confirm that the subaward is included in the budget awarded by the federal agency.	✓		
Make sure that the proposal budget was fully funded or the subaward amount was adjusted.	✓		
Confirm that ORS has a complete subaward packet on file.	✓		
Confirm that the recipient organization classifies as a subrecipient, not a contractor, in this case.	✓	✓	
Check to make sure that the PI is ready to have the subaward issued.	✓		✓
ASSESS THE RECIPIENT'S READINESS FOR THE SUBAWARD			
Obtain and Review Subrecipient Financial Information			
Obtain the subrecipient's DUNS/UEI number.	✓		
Confirm that the subrecipient is not on the excluded parties list.	✓		
Obtain and review the subrecipient's single audit results.		✓	
If no single audit, request completion of the <b>Subrecipient Survey</b> and review results.		✓	
Confirm that the F&A and FB rates in the subaward budget match the subrecipient's federal F&A and FB rate agreements.		✓	
If no F&A rate agreement, confirm that the F&A rate in the subaward budget equals the "de minimus" rate of 10% MTDC.		✓	
If no FB rate agreement, request a breakout of the fringe benefit rate in the subaward budget.		✓	
Assess the Subrecipient's Compliance with Federal RCR Regulations			
Confirm that the subrecipient has a federally compliant conflict of interest policy.	✓		
Confirm that the subrecipient has a federally compliant research misconduct policy.	✓		
If the funding agency is NSF, confirm that the subrecipient has an Institutional Plan for RCR training.	✓		
If there are human subjects, obtain copy of the IRB approval before issuing the subaward.	✓		
If there are animal subjects, obtain copy of the IACUC approval before issuing the subaward.	✓		
Assign an Overall Risk Level			
Drawing on the information obtained above, complete the risk assessment using the <b>Subrecipient Risk Assessment Matrix</b> and place the subrecipient in an overall risk category.	✓	✓	
Develop a Monitoring Plan			
Develop a monitoring plan based on the subrecipient's overall risk category and the specific conditions that led to the risk classification.	✓	✓	✓

<b>PREPARE, ISSUE, AND REPORT ON THE SUBAWARD</b>	<b>ORS</b>	<b>RA</b>	<b>PI</b>
Use the <a href="#">FDP subaward agreement forms</a> (or language from the forms) whenever possible.	✓		
In the subaward agreement, include the Federal Award Information listed on page 4 above.	✓		
Also include the requirements, provisions, and certifications listed on pages 4 & 5 above.	✓	✓	
As needed, request OGC review and approval for any special terms and provisions not included in the FDP subaward agreement forms or DePaul's subaward template.	✓		
Request RA's comments on the agreement before submitting it to the subrecipient.	✓	✓	
Submit the agreement to the subrecipient's grants office or the identified contact, with scope of work and budget attached.	✓		
As needed, negotiate the agreement, consulting with OGC, RA, and the PI as the situation requires.	✓	✓	✓
Finalize the agreement, securing the appropriate signatures.	✓		
Make copies available to OGC, the PI, and to RA, requesting that the PI initiate a Purchase Order	✓		
Fulfill the FFATA reporting requirement, as applicable.	✓		
<b>CONDUCT ONGOING MONITORING OF THE SUBAWARD</b>			
Note and address any problems associated with invoicing, including late invoices or the need for further cost documentation.		✓	
Review technical reports submitted by the subrecipient.			✓
Review financial reports submitted by the subrecipient.		✓	
Conduct other financial/technical monitoring activities that are part of the monitoring plan developed for the subrecipient.	✓	✓	✓
Review the subrecipient's single audit results annually.		✓	
Review the monitoring plan annually (or semi-annually, as indicated in the plan).	✓	✓	✓
Based on the review, make any adjustments needed in the risk level and the monitoring plan.	✓	✓	✓
Consider taking enforcement action against noncompliant subrecipients.	✓	✓	
<b>CLOSE OUT THE SUBAWARD</b>			
Remind the subrecipient of the approaching end date and of the need to wrap up any remaining work on the project and submit a final invoice.	✓		✓
Review any final technical reports and deliverables.			✓
Confirm that the invoice is marked final.		✓	