Office of Sponsored Projects

Managing Subawards at Yale

Presented by: **Beth Kingsley, Associate Director & Robert Prentiss, Sr. Financial Analyst**

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FUNCTIONAL LEARNING

Learning Objectives

Participants will learn how Yale is addressing the forthcoming NIH regulations on foreign subrecipients

Participants will discover common errors in subrecipient invoices and processing

Participants will review the tools available to Yale DBOs to assist with subaward management and compliance

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Section I

NIH and Foreign Subs

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Subaward Population at Yale

Yale has about 1,000 active subawards to 400 subrecipients in 40 countries.

Prime funding for those subawards comes from 80 sponsors overall, but 70% of all subawards at Yale are funded by the NIH.

There are currently about 100 active NIH-funded subawards to foreign subrecipients.

Data Access - Why?

Per NIH, this does **not** constitute a change in policy

Pandemic highlighted need for additional emphasis on access to subrecipient data when working on a federally funded project

Proposed vs. Final

Initially Proposed:

- Requirement: Copies of all data
- Frequency: Every 3 months
- Effective Date: Oct. 1, 2023
- Specified sharing method

Final Guidance:

- Requirement: Access to copies all data
- Frequency: Annually
- Effective Date: Jan. 1, 2024
- Sharing space not prescriptive

Initial Call to Action

Brand-new Subawards

- Incorporate language that requires the foreign subrecipient to provide access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report, to the primary recipient with a frequency of no less than once per year, in alignment with the timing requirements for Research Performance Progress Report submission. Such access may be entirely electronic.

Current Subawards

- Issue amendments with the same requirement

- Note: NIH is requiring all amendments to be fully executed before **Feb. 29, 2024.**
    - Subawards without executed amendments at that time are subject to termination.

Impact on Yale

Population of active NIH foreign subawards: ~100

OSP Request: Quick turn-around for amendment review and approval

Timeline

Current:
Gathering feedback, implementing process changes, drafting amendments.

December 21, 2023:
All amendments to all applicable subawards sent to subrecipients

February 29, 2024:
Must have fully executed amendment or terminate the subaward.

Ongoing Call to Action

Subrecipient Monitoring

- PI Invoice Approval

- Budget Period Check-in

- Invoice Random Sampling

Human Subjects' data-sharing impact?

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Section II

Common Issues

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Common Subaward Delays

Incomplete required documentation

- SOW
- Budget and justification
  - Note: Must match funded amount
- SIC
- Subrecipient Questionnaire
  - Only new subrecipients to Yale that are not subject to the Single Audit.

Compliances

- PHS-compliant FCOI
- IRB/IACUC confirmation
- Additional audited financial information (if not subject to Single Audit)

Additional Subaward Information

- Clinical Trial elements
- Human subjects' data transfer elements

Common Invoicing Issues

Invoice Components

- Subrecipient submits invoices without a breakdown of costs by category, or without a statement of cumulative expenditures.

- Subrecipient submits invoices that are not signed, or do not indicate who signed, or do not include a certification statement.

Timing

- Subrecipient submits invoices long after the period in which costs were incurred, and not regularly each month.

- An invoice requires revisions before it can be approved, and the reasons for the delayed approval are not indicated in the Workday record.

Refunds

- Yale receives money back from a subrecipient, without a clear indication of which project it is associated with, without a corresponding negative invoice, or without a reason for returning funds well after the period of performance is complete.

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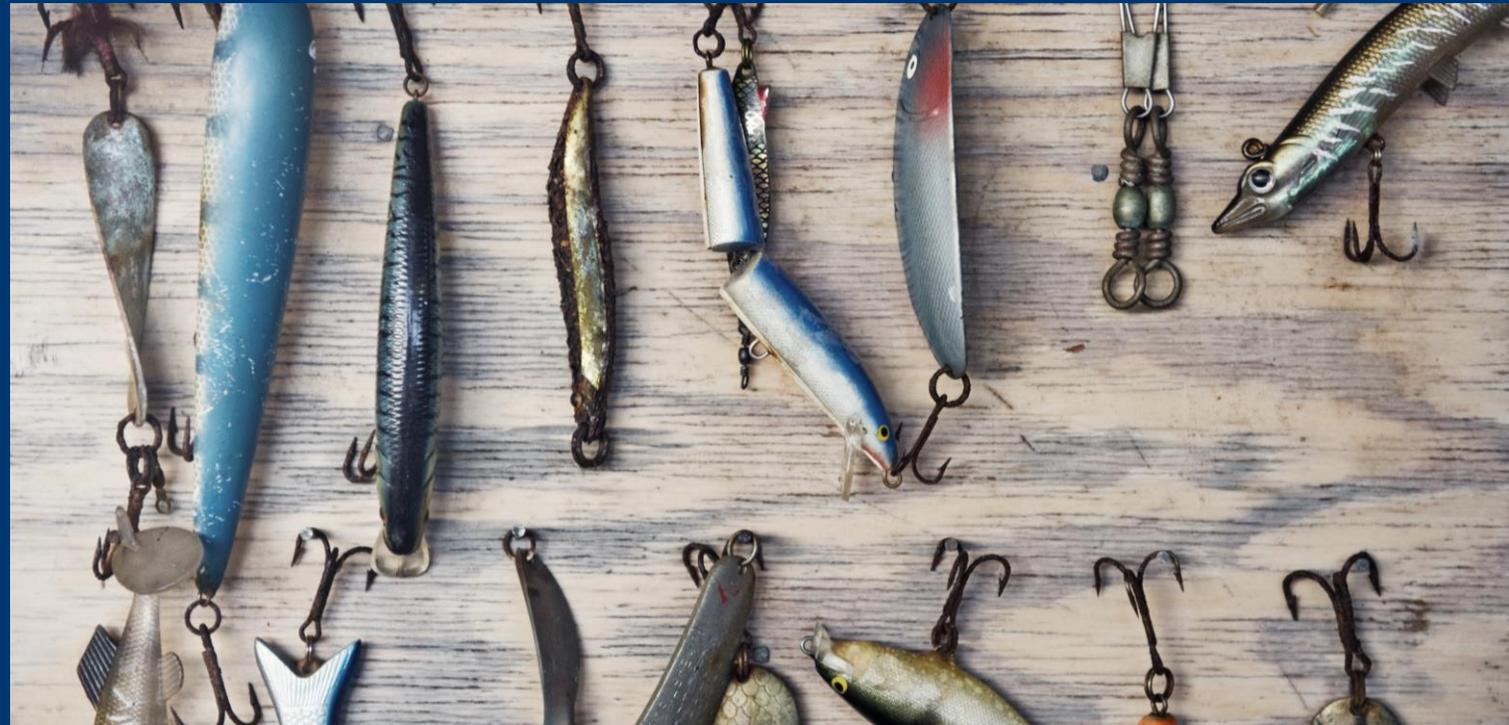
Section III

Tools

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OSP Subawards Website

OSP Subaward Monitoring and Management Webpages

OFFICE OF SPONSORED PROJECTS

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> About/Contacts

News

> Policies and Compliance

> Training

> Funding

> Proposals

> Award Management

> Clinical Trials

> Contracts

> Subaward Monitoring and Management

    Federal Demonstration Partnership Expanded Clearinghouse

    New Subawards

    Subaward Amendments

    Subrecipient Monitoring

    Subaward FAQs: Post Award

    Subaward FAQs: PreAward

> Financial Administration

Effort Reporting

Subaward Monitoring and Management

Subaward Management Team

What We Do, Commitment Statement

The Subaward Management Team provides support to faculty and administrators for the negotiation, execution and monitoring of all outgoing subawards (both federal and non-federal) issued under grants and contracts managed by the Office of Sponsored Projects (OSP).

Under the direction of the Associate Director of Subaward Management, the team's responsibility is to provide outstanding support to faculty and the business offices that support them, as well as protect Yale from financial and compliance risk associated with subawards.

The Subaward Management Team (SMT) is staffed with Subaward Managers who draft and negotiate outgoing subaward agreements and amendments for the University under both federal and non-federal sponsored awards that are managed by OSP. Each agreement and amendment is carefully customized based on the prime award. The team engages with departments and Principal Investigators (PIs) to confirm budgets and verify compliance with invoicing and reporting requirements. Subaward Managers also assist with the negotiation of terms and conditions and work with domestic and foreign subrecipients to facilitate agreements that are compliant with Yale and sponsor policies. Agreements and amendments are closely monitored through the stages of execution and on an annual basis. Additionally, Subaward Managers may set up subaward grant lines and are responsible for setting up supplier contracts in the Workday system. On most subawards, they are the Administrative Contacts who receive a Subrecipient's questions and prior approval requests throughout the life of the agreement.

The SMT's Senior Financial Analyst coordinates monthly FFATA (Federal Funding Accountability and Transparency Act) reporting to the federal government and conducts quarterly desk reviews of randomly selected subawards and their corresponding financial records to ensure accuracy. On an annual basis, the Senior Financial Analyst also assists with monitoring active subrecipients by

SUBAWARD MONITORING AND MANAGEMENT

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Federal Demonstration Partnership Expanded Clearinghouse

New Subawards

Subaward Amendments

Subrecipient Monitoring ⬅

Subaward FAQs: Post Award

Subaward FAQs: PreAward

Use the Subaward Invoice Review Checklist to assist with your review of subaward invoices.

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Subrecipient Monitoring: Invoice Review Checklist

The following checklist is a tool for Departmental Business Offices (DBO) to complete when reviewing and approving subrecipient invoices. If the PI and/or the DBO have a concern about an invoice, contact the appropriate Subaward Manager in the Office of Sponsored Projects and DO NOT APPROVE the invoice until the concern is resolved.

Always refer to the subaward document to ensure invoices reflect the agreement, its scope of work and budget. This checklist is a general checklist and would not address any special terms and conditions of the subaward agreement.

For additional information on processing subaward invoices refer to Procedure 1307 PR.02 Managing Subrecipient Activity Associated with Sponsored Programs.

Verify	Area of Concern	Y/N/NA
Subrecipient Name	Does the subrecipient name match the name in the fully-executed agreement?	
Subrecipient Address	Is there a "remit to" address on the invoice?	
Invoice Date	Is the invoice dated?	
Invoice Number	Did subrecipient put an invoice number on the invoice?	
Subaward Amount	Does the subaward amount on the invoice tie to the total available funding?	
Budget Adherence	Do the expenditures as presented on the invoice conform to the subaward budget? If not, does the PI approve the expenditures on this invoice? Are all costs included on the invoice allowable per sponsor policy?	
Milestones	If payments to be made are based on milestones described in the fully executed subaward agreement, do you have PI approval of the subrecipient's milestones completed?	
Current and Cumulative Expenditures	Does the invoice include both current and cumulative cost columns? Are the expenditures broken out in major categories (e.g., salaries, fringe, supplies, etc.)?	

Invoice Review

When issues are identified and resolved at an early stage, it prevents them becoming serious problems at the end of the award. Resolving subaward issues at the end of an award can interfere with the closeout process of the prime award, as well as introduce audit risks.

Most invoicing issues occur with subrecipients that are not subject to an annual Single Audit, e.g. very small domestic non-profits, for-profit organizations, and foreign subrecipients.

Risk Assessment

- All subrecipients receive an annual risk assessment, and are categorized as either low or high risk.

- Issues may still arise with low risk subrecipients, but the standard terms and review processes are sufficient to mitigate any risk.

- When we have concerns that a subrecipient may have difficulty complying with some of the regulations associated with federal funding, they are categorized as high risk. The method of risk mitigation will depend on the details of the specific subaward.

- Our experiences with the subrecipient during the project's performance are an important element.

Complications

- Carry-forward restrictions

- Supplements

- Advance payments

- Refunds

- Complex projects in IRES & Workday

- International subawards
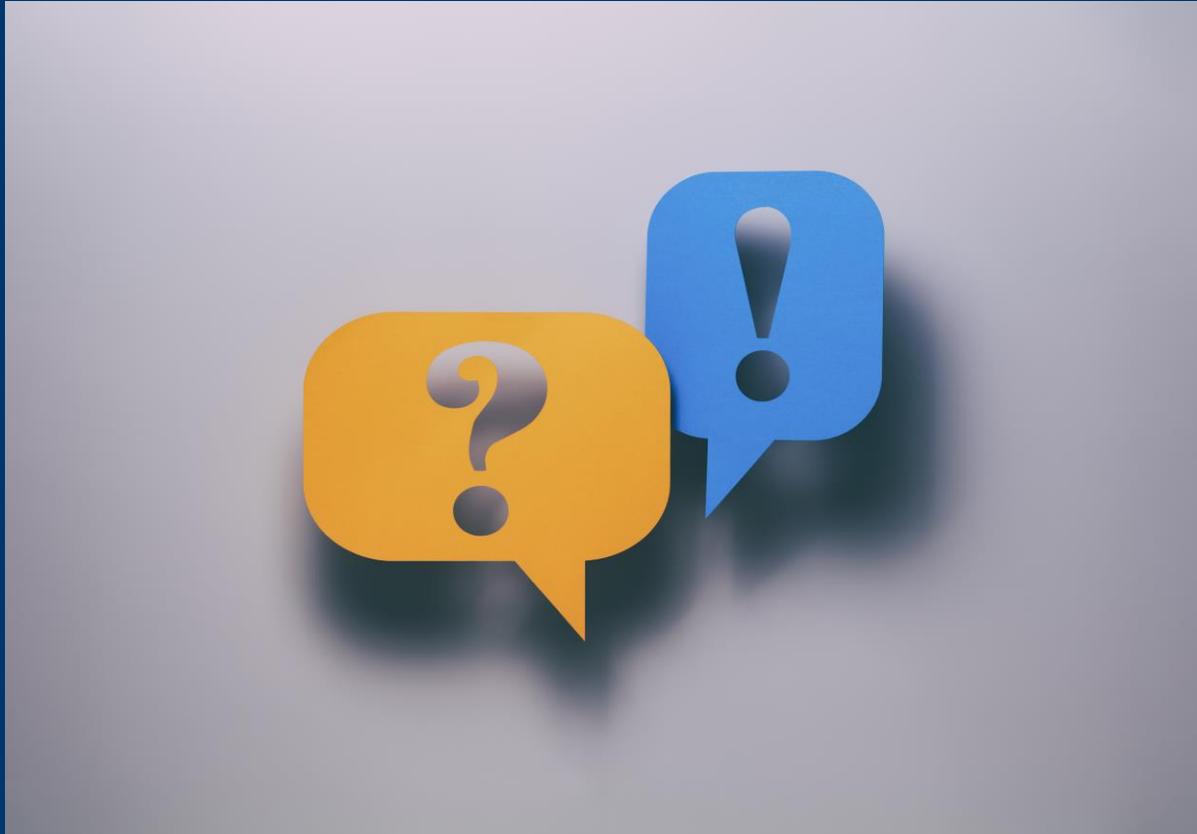
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