

POLICY

Subaward Administration Responsibilities

Topic: Sponsored Awards Admin & Mgmt	Category: Subawards	Policy No: 5.70.01	Effective Date: 12/26/14	Page No: 1 of 2
--	-------------------------------	------------------------------	------------------------------------	---------------------------

Purpose: The Boyce Thompson Institute for Plant Research (BTI) subawards/subcontracts some of its sponsored award funds to other entities who will assist and / or collaborate with the BTI principal investigators (PIs) on sponsored projects.

- Policy:**
- BTI is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsor funds. For subawards under federal prime awards, BTI must comply with OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part §200), specifically sections §200.330 and §200.331, that require prime recipients of federal funds to monitor subawardees and ensure subrecipients meet the audit requirements in Subpart F and use funds in accordance with applicable laws, regulations and terms of the award.
 - It is the policy of BTI that PIs and the Business Office have separate responsibilities for the administration of subcontracts on sponsored awards.
 - Reliance on subawards and subcontracts must be in compliance with BTI's Establishing Subawards or Subcontracts Policy (SAAM 5.70.04) & Subawardees, Contractors, Consultants Policy (5.70.05).
 - The terms and conditions of a sponsored award received by BTI in support of a project must be incorporated into the subawards/subcontracts.
 - The only legal relationship established on BTI subawards/subcontracts is between the prime recipient (BTI) and the subrecipient.
 - BTI will strive to maintain this relationship and not to create a relationship of privity between the agency sponsor and subrecipient.
 - All project administrative matters of the subaward/subcontract must go through BTI's Business Office.
 - BTI subrecipients must comply with BTI's Subrecipient Responsibilities Policy (SAAM 5.70.03).

Responsibilities – Principal Investigators:

Pre-Award

- Provision of notification to the Business Office when a subcontract or amendment needs to be written.
- Preparation of an adequate statement of work concise as to what, when, and how the prime recipient (BTI) expects the subrecipient to accomplish the tasks, as well as a complete budget for the subrecipient.

POLICY

Subaward Administration Responsibilities

Topic: Sponsored Awards Admin & Mgmt	Category: Subawards	Policy No: 5.70.01	Effective Date: 12/26/14	Page No: 2 of 2
--	-------------------------------	------------------------------	------------------------------------	---------------------------

Post-Award

3. Review and approval of invoices for payment.
4. Maintain effective communication with key personnel listed in subcontract.
5. Ensure that all reporting obligations are met.
6. Provide verification that the subcontract scope of work has been completed.

Responsibilities – Business Office:

Pre-Award

7. Determine when BTI should issue a subaward versus a contract. (See BTI policy 5.70.05: Subawardees, Contractors, Consultants.)
8. Assess the risk factor of all proposed subrecipients and approve all final subrecipients. (See BTI policy 5.70.061: Subrecipient Profile Questionnaire.)
9. Issue and administer subawards/subcontracts in compliance with BTI Policies and Procedures, the applicable sponsor regulations, and the terms and conditions of the prime award, with the ultimate goal of ensuring that the subaward/subcontract activities satisfy BTI, sponsor and government requirements and protect the interests of our sponsors and BTI.
10. Set up subaward/subcontract file and enter into subcontract database.
11. Encumber subcontract/subaward costs in the BTI sponsored award accounting system and verify budget dollars.
 - Notify the PI if any adjustments are necessary.

Post-Award

12. Review subrecipient invoices prior to sending to the PI for the following:
 - Invoices are tied to general encumbrance.
 - Categories of expense are appropriate and coincide with budget categories.
 - Equipment purchased only if allowed on subcontract.
 - Verify correct indirect cost rate used.
 - Invoice was entered into the subcontract database.
13. Ensure all subrecipient invoices are paid within 30 days of being received by BTI's Finance department.
14. Facilitate closing of subcontract ensuring that all closeout information is received in a timely manner.
 - Final invoice received from subcontractor.
 - Reporting of any purchased equipment.