SUBAWARD GUIDANCE

**What is a Subaward?**

A subaward is an award provided by a passthrough entity (such as Emory University) to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity.

Sponsored programs may include partnerships with other organizations whereby a portion of the project is conducted by investigators or collaborators at those sites. In these cases, sub agreements are issued to other entities under a sponsored agreement/prime award made to Emory University.

Entities with whom Emory partners through a sub agreement are also referred to as subrecipients.

**Subaward Process**

1. **Make initial decisions about subawards for a proposal**
   * Review the information provided by the PI and Department in the Subaward Request
   * Complete a compliance review of the subrecipient in order to determine the subawardee’s A-133 status
   * Complete a risk assessment of the subrecipient risk utilizing the current forms and processes
2. **Prepare a Subaward Document**

All Sponsored Awards, whether grants, contracts or cooperative agreements, which are received by Emory and which involve participation by a third party in support of the award, must have a subaward document prepared to formalize the contractual relationship between Emory and the third party.

With the assistance of the Principal Investigator (PI)/Project Director (PD) and the College, Schools, Department, or Research Unit, OSP is responsible for all formal negotiations with the subaward recipient during the development or performance of the subaward. All such subawards and any changes or modifications thereto must be requested through the Office of Sponsored Programs (OSP).

Prepare the appropriate sub agreement based on the sub agreement entity, statement of work and the sponsor’s terms and conditions in the prime award.

1. **Obtain a PO and negotiate payment terms and conditions**

When Emory’s PI/PD requests that a subaward be issued through the Compass Subaward Request Page, they authorize OSP to request a Purchase Order from Procurement for the total amount of the subaward and to negotiate the terms of the subaward document.

The PI is encumbering the funds for the subaward by making the online request. If a department administrator or other individual makes the request through the system, they should ensure the approval of the is on file in the department.

When the department administrator or PI/PD completes the online request and provides necessary information on the subcontractor, they are also providing the Office of Sponsored Programs the authorization to executive a purchase order on behalf of the department.

1. **Send Sub Award to subrecipient**

Send a draft version of the sub agreement/sub award, referencing the PO, to the subrecipient.

1. **Execute the Subaward**

* Negotiate Subaward terms as necessary with the subrecipient
* Receive partially-executed copy back from subrecipient
* Sign and return fully executed copy to subrecipient
* Upload fully executed copy of subaward in Emory Express

1. **Report Subaward FFATA data as necessary**

As the subaward moves through the drafting and signature process, dates will be entered in the appropriate fields. OSP will also use this section to track information about the subaward recipient itself, as well as for Emory’s compliance with the Federal Financial Accountabilityand Transparency Act (FFATA) requirements

1. **Subaward Amendments**

**Continuation**:

These are requests for additional time and money to be awarded to the subrecipient who has an existing subaward. Amendments to sub agreements must be in sync with the prime award made to Emory. PI’s and their department support staff should request continuations as soon as possible after receipt of the continuation NOA.

**Supplemental**:

These are requests to add funds to an existing subaward within the time period currently in progress. The request must include a detailed budget and a revised Statement of Work if the PI wishes to add additional funds and deliverables.

**No-cost extension**:

These are requests to extend the period of performance, but without additional funds. No-cost extensions can only be made if the prime award is extended.

**Carryover**: Carryover requests can only be made if the prime award allows for them or if the agency has approved a carryover request for Emory which includes the subaward. The request must include a detailed budget and revised Statement of Work if the PI wishes to add additional funds and deliverables.

**Renewal**:

A renewal is very similar to the new subaward request process. A new subaward document, unrelated to the prior award, will be issued by OSP. A detailed budget and statement of work must accompany the request. Typically, such requests are in the funded proposal. If the request was not made in the original proposal, depending upon the agency, formal approval to enter into a sub agreement may need to be sought.

**Other-Amendment**: Any requested change to an existing agreement which does not fall into one of the categories referenced above. Amendments may include actions made to reduce time, decrease funding, notify the Subrecipient of an Emory or sponsor administrative change, orto signal approval for a request from the Subrecipient. An explanation of the request may be uploaded into the attachments section of the request system.

1. **Close the Subaward**