

Office of Sponsored Programs (OSP) Roundtable

Subawards on Sponsored Projects

Research&Innovation



Subawards on Sponsored Projects

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AGENDA

- Key Definitions
- Incoming vs Outgoing subawards
- Subaward Lifecycle
 - - Proposal
 - - Subaward
 - - New NIH Requirements
 - - Modifications
 - - Close out
- Subrecipient Monitoring
- Subawards in RASS

Key Definitions

Subaward: A formal legal agreement between Cornell University and another legal entity to perform a defined, and intellectually significant portion of the sponsored project's activity in exchange for sponsored funds.

- Work to be performed is defined in a Statement of Work (SOW).
- Funds to be used are outlined in a detailed budget and justification.
- Also referred to as subagreement or subcontract.

NOTE: Sending non-sponsored funds (ex. Cornell funds, gift funds) to another entity is not a subaward and is not processed by OSP. PI/units wishing to send non-sponsored funding to an outside entity will need to work with Cornell Counsel, counsel@cornell.edu.

Incoming vs. Outgoing Subawards

Prime Sponsor

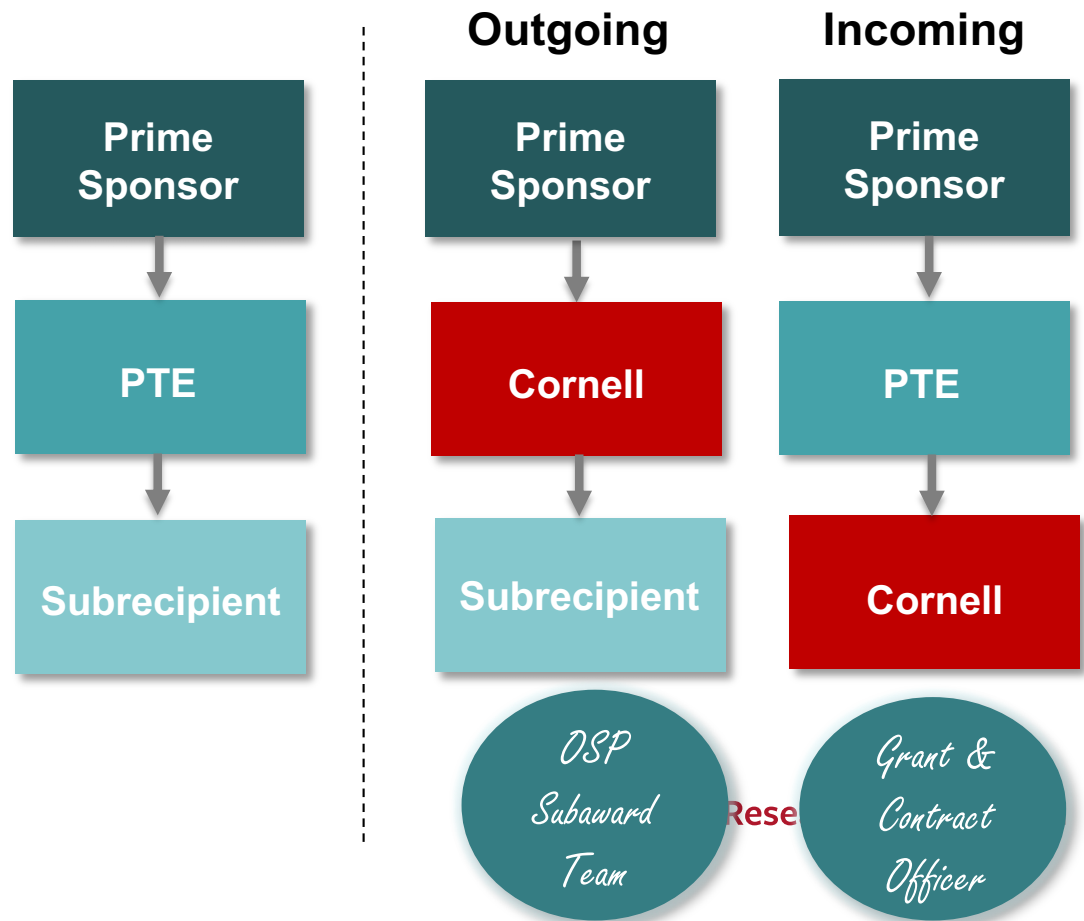
The entity from where the funding originates

Pass-Through Entity (PTE)

Receives the prime award and issues the subaward

Subrecipient

The recipient of the subaward



Subrecipient vs. Contractor

Subrecipient

- A subaward is issued to a subrecipient for the purpose of carrying out an intellectually significant portion of a sponsored project.

Contractor/Vendor

- A contract is issued to a contractor for the purpose of obtaining goods and/or services.

NOTE: For procurement agreements, PI/units will need to work with Procurement and Payment Services, procurement@cornell.edu.

Uniform Guidance 2 CFR 200.331 – Subrecipient and Contractor Determinations

Subrecipient	Contractor
Cornell is engaging another entity to carry out a portion of the award.	Cornell is procuring a service that will support the project.
Work to be performed will be self-directed with minimal direction from Cornell.	Cornell will provide a high level of direction regarding the work being performed.
Has programmatic decision-making responsibilities.	Does not have programmatic decision-making responsibilities.
May determine who is eligible to receive federal assistance.	Provides the specified goods and services within their normal business operations.
Performance will be measured in relation to whether objectives of the prime sponsor/award have been met.	Provides the specified goods and services to many different purchasers.
Will use the funds to carry out a program for a public purpose specified in the prime award.	Engaged to provide goods and services that are ancillary to the operations of the prime award.
Responsible for adherence to the prime award requirements.	Normally operates in a competitive environment.

Uniform Guidance 2 CFR 200.331 – Subrecipient and Contractor Determinations, Con't.

Additional Guidance and Link to the Checklist

<https://researchservices.cornell.edu/resources/proposing-subaward>

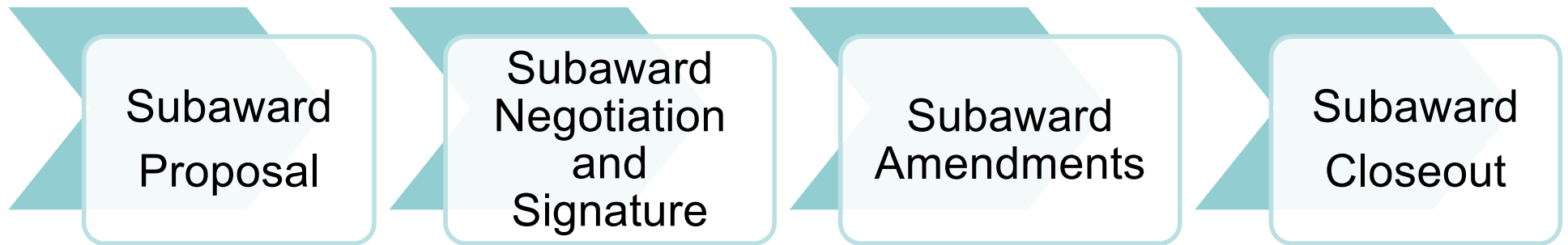
Subrecipient vs Contractor Checklist

Cornell applies the Uniform Guidance ([2 CFR 200](#)) definitions of subrecipient and contractor (see [2 CFR 200.1](#)) and the subrecipient and contractor determination guidance ([2 CFR 200.331](#)) to all sponsored awards.

Instructions: Check all boxes that best describe the relationship with the third-party entity. The column with the greatest number of checked boxes indicates the likely classification of subrecipient or contractor. Consistent with [2 CFR 200.331\(c\)](#), judgement should be exercised when making the determination of subrecipient vs. contractor. The nature of the collaboration is more important than the form of the agreement. At Cornell, this determination is made in collaboration with the PI, the Office of Sponsored Programs, and Sponsored Financial Services.

Characteristics	<input type="checkbox"/> Entity will perform a substantive portion of the programmatic work. (i.e. They are directly engaged in carrying out specific aims of the prime award). <input type="checkbox"/> Has programmatic involvement in the project identified by a separate statement/scope of work, a separate budget and separate organizational approval. <input type="checkbox"/> Entity has responsibility for programmatic decision making. <input type="checkbox"/> Entity's personnel may be included as a PI/PD, Co-PI or Key Person on Cornell's prime project. <input type="checkbox"/> Entity's performance is measured against whether or not the project objectives are met. <input type="checkbox"/> Entity's work could potentially result in patentable and/or copyrightable technology and/or intellectual property (IP). <input type="checkbox"/> Entity is expected to author or co-author publications on the results of the program/project work. <input type="checkbox"/> Entity's work includes vertebrate animal and/or human subjects and/or stem cell work and is responsible to adhere to applicable program compliances. <input type="checkbox"/> Entity is providing cost share or matching funds. <input type="checkbox"/> Entity is required to adhere to the applicable program requirements and terms and conditions of the prime award. (ex. Entity is required to have an active and enforced Conflict of Interest policy that meets prime sponsor requirements; carry forward of unspent funds may need prime sponsor prior approval; entity is subject to audit and record retention requirements of the prime award; entity is required to comply with IRB, IACUC and IBC requirements.) <input type="checkbox"/> Entity will use the funds to carry out a program for a public purpose, as opposed to providing goods and/or services for the benefit of Cornell.	<input type="checkbox"/> Entity provides the goods and/or services within normal business operations. <input type="checkbox"/> Entity provides similar goods and/or services to many different purchasers/entities. <input type="checkbox"/> Entity normally operates in a competitive environment. <input type="checkbox"/> Entity is providing goods and/or services that are primarily for the benefit of Cornell that support the program/work and has not significantly participated in the design of the program/work. <input type="checkbox"/> Entity is not directly responsible to the prime sponsor for the research or for determining research results. <input type="checkbox"/> Entity does not expect to author or co-author publications on the results of the program/project work.
Determination	<input type="checkbox"/> SUBRECIPIENT An entity that carries out a defined portion of a sponsored program's scope of work. Managed by the Office of Sponsored Programs.	<input type="checkbox"/> CONTRACTOR (Vendor) An entity from whom Cornell purchases property, equipment, or services needed to carry out a sponsored program. Managed by Procurement and Payment Services .

Subaward Lifecycle



Subaward Proposal

PI - Identifies subrecipient(s)

- Considers their qualifications, past experience, type of institution, and whether they are prepared to perform the work.

Research Administrator (RA) or Pre-award Specialist – Gathers the required proposal documents from each subrecipient and uploads them to RASS to be submitted with the Cornell proposal.

- Letter of Intent (LOI) for FDP Partner entities or a Subcontractor Commitment Form (SCF) for non-FDP entities. The LOI or SCF are to be signed by the authorized official at the subrecipient entity;
- Detailed Statement of Work (SOW);
- Detailed budget, budget justification, and a copy of the subrecipient's Negotiated Indirect Cost Rate Agreement;
- Other Documents that may be required by the sponsor:
 - Biosketches, Collaborators and Other Affiliations, Current and Pending, Equipment, Facilities and Other Resources, etc.

Additional Resources

<https://researchservices.cornell.edu/resources/proposing-subaward>

FDP Expanded Clearinghouse

<https://fdpclearinghouse.org/>

The Federal Demonstration Partnership (FDP) Expanded Clearinghouse is a publicly available website that provides online organizational profiles containing entity-based information needed from pass-through entities when they are issuing subawards or monitoring their subrecipient entities. Participating Organizations (listed under “Participating Organizations”) have agreed to review each other's published profiles in lieu of sending/receiving individual subrecipient commitment forms containing the information posted on their profile.

The goal of the FDP Expanded Clearinghouse is to significantly reduce administrative burden.

FDP Clearinghouse Participating Organizations

<https://fdpclearinghouse.org/organizations>

OR



Subrecipient Letter of Intent or Commitment Form

Clear Form

PASS-THROUGH ENTITY (PTE) INSTITUTION INFORMATION					
PTE PI					
PTE Institution					
Prime Sponsor					
Project Title					
SUBRECIPIENT INSTITUTION INFORMATION					
Institution					
FDP Expanded Clearinghouse Profile url					
PI Name	eRA Commons				
PI Phone	PI E-Mail				
Project Period					
Performance Site Address	Performance Site Congressional District #				
Direct Costs	F&A Costs			Total Costs	
SUBRECIPIENT CONTACTS					
Administrative					E-Mail
					Phone
Authorized Official					E-Mail
					Phone
	YES/NO	APPROVAL DATE OR PENDING		YES/NO	APPROVAL DATE OR PENDING
Human Subjects	No		Recombinant DNA	No	
Vertebrate Animals	No		Program Income	No	
Human Embryonic Stem Cells	No		Cost Sharing	No	
Select Agents	No				

In signing below and offering to participate in this research program, the Subrecipient Institution certifies that neither they nor their principals are presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from receiving funds from any federal department or agency and are not delinquent on any federal debt; they are in compliance with the Drug Free Workplace Act of 1988; they are in compliance with U.S. Code, section 1352, restrictions on the use of federal funds for the purpose of lobbying; they have filed annually with the Office of Scientific Integrity a PHS form 6349 governing Misconduct in Science; they have filed with DHHS compliance offices certification forms governing Civil Rights (441), Handicapped Individuals (641), Sex Discrimination (639-A), and Age Discrimination (680); they are in compliance with PHS policy governing Program Income; they have established policies in compliance with 45 CFR Part 46, Subpart A (protection of human subjects); the Animal Welfare Act (PL-89-544 as amended) and the Health Research Exchange Act of 1985 (Public Law 99-158); and that they are in compliance with NIH guidelines regarding human pluripotent stem cell research, transplantation of fetal tissue, recombinant DNA and human gene transfer research, and inclusion of women, children & minorities in research.

This proposal has been reviewed and approved by the appropriate official(s) of Subrecipient and certified to its accuracy and completeness. The appropriate programmatic and administrative personnel of subrecipient involved in this application are aware of the prime awarding agency's policies, agree to accept the obligation to comply with award terms, conditions, and certifications, and is prepared to establish the necessary inter-institutional agreement consistent with that policy. Any terms or rates included in the proposal described herein are not binding upon the Pass-Through Entity. All terms and conditions between the parties will be outlined in a separate formal Agreement.

SUBRECIPIENT INSTITUTIONAL OFFICIAL:

Name and Title	Signature/Date

<https://fdpclearinghouse.org/resources>



Office of Sponsored Programs

SUBCONTRACTOR COMMITMENT FORM

This form is intended to be completed & signed by an organization participating on a Cornell project as a subcontractor

Subcontractor Legal Name: _____

Subcontractor PI Name: _____

Address: _____ City: _____ State: _____

Address where research will be performed: _____ City: _____ State: _____

Proposal Title: _____

Period of Performance: _____ Total Amount Requested: _____

Cornell's PI Name: _____

Prime Sponsor: _____

SECTION A - Proposal Documents

- The following documents are included in our proposal submission and covered by the certifications below (check as applicable):
- SUBCONTRACTOR COMMITMENT FORM (required for all PHS proposals)
 - STATEMENT OF WORK (required for all proposals)
 - BUDGET AND BUDGET JUSTIFICATION (required for all proposals)
 - Certificate of Insurance (may be required at time of issuance of subaward)
 - Small/Small Disadvantaged Business Subcontracting Plan, in agency-required format
 - Biosketches of all Key Personnel, in agency-required format
 - Other: _____

SECTION B - Certifications

- Facilities and Administrative Rates** included in this proposal have been calculated based on:

Our federally-negotiated F&A rates for this type of work, or a reduced F&A rate that we hereby agree to accept. (If this box is checked, please attach a copy of your F&A rate agreement or provide a URL link to the agreement.)

Other rates (please specify the basis on which the rate has been calculated in Section D Comments below)
- Fringe Benefit Rates** included in this proposal have been calculated based on:

Rates consistent with or lower than current/applicable federally-negotiated rates (If this box is checked, please attach a copy of your FR rate agreement or provide a URL link to the agreement.)

Other rates (please specify the basis on which the rate has been calculated in Section D Comments below).
- Small Business Concern** Yes No

Subcontractor represents that it is a small business concern as defined in 13 CFR 124.1002.

If "Yes": Subcontractor represents that it is a:

 - Small disadvantaged business as certified by the Small Business Administration
 - Women-owned small business concern
 - Veteran-owned small business concern
 - Service-disabled veteran-owned small business concern
 - HUBZone small business concern
- Cost Sharing** Yes No Amount: _____

Cost sharing amounts and justification should be included in the subcontractor's budget
- Human Subjects** Yes No Approval Date: _____

If "Yes": Copies of the IRB approval must be provided before any subaward will be issued. Please forward these documents to Cornell's PI and Cornell's Office of Sponsored Programs Subcontract Team at [cu_subawds@cornell.edu](mailto:subawds@cornell.edu) as soon as they become available.
- Animal Subjects** Yes No Approval Date: _____

If "Yes": A copy of the IACUC approval must be provided before any subaward will be issued. Please forward this document to Cornell's PI and Cornell's Office of Sponsored Programs as soon as it becomes available.

<https://researchservices.cornell.edu/forms/subcontractor-commitment-form>;

New NIH Requirements

Policy Guidance for Foreign Subawards – Effective September 12, 2025

NIH defines a foreign component as the performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended.

- NIH has established a new award structure that will prohibit foreign subawards from being nested under the parent grant.
- ***Foreign Subrecipients will be funded directly from the NIH effective 2026 for Notice of Funding Opportunities (NOFO's) that support the new NIH PF5/UF5 Activity Code.***
See PA-26-002: NIH Collaborative International Research Project (Parent PF5 Clinical Trial Optional.
- NIH will issue a PF5 or UF5 award to the domestic organization and a separate RF2 or UL2 award to the foreign organization.

SEE NIH Notice Numbers: NOT-OD-25-104, NOT OD-25-155, and NOT -0d-25-130

<https://www.grants.nih.gov/grants/guide/notice-files/NOT-OD-25-104.html>

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-155.html>

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-130.html>

New NIH de minimis limitation to 10%

Policy Guidance for de minimis IDC rate

NIH is limiting the de minimis IDC rate to 10% of Modified Total Direct Costs (MTDC) and is not adopting the 15% de minimis rate outlined in the Uniform Guidance.

Modified total direct costs. *Consists of all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.*

SEE NIH Notice Numbers: NOT-OD-26-072

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-072.html>

NIH Data Access Requirements

Policy Guidance for Subaward/Consortium Written Agreements – Effective January 1, 2024

- NIH expects recipients to ask potential subrecipients, at the application/proposal stage, to submit language in their letters of support indicating their awareness of the requirements of the data access policy and the subrecipient's willingness to abide by all requirements should an award be issued.
- All subawards on NIH awards must include a written agreement signed by both Cornell and the subrecipient that addresses the negotiated arrangements for meeting the scientific, administrative, financial, and reporting requirements of the project, including those necessary to ensure compliance with all Federal regulations.
- ***If a subrecipient is unwilling to accept the NIH requirements as outlined in Section 15.2.1 Written Agreement, then a subaward cannot be issued to that subrecipient.***

SEE NIH Grants Policy Statement 15.2.1 Written Agreement:

https://grants.nih.gov/grants/policy/nihgps/HTML5/section_15/15.2_administrative_and_other_requirements.htm?Highlight=consortium%20written%20agreements

Subaward Agreement

Requesting a Subaward

- OSP Grant & Contract Officer (GCO) processes the prime award in RASS.
- Department/Unit receives a distribution email. This is the trigger for the unit that the subaward(s) can be requested.
- Department/Unit Research Administrator (RA) initiates the “Subaward Request” in the RASS Portal. <https://rass.cornell.edu>

The screenshot shows the Cornell University Novelution Research Management System (RASS) interface. The top navigation bar includes 'Profile & Settings', 'IRB Module', and 'Grants & Contracts'. The 'Grants & Contracts' menu is open, displaying a list of options: 'Create Sponsored Project Proposal', 'Search Sponsored Projects', 'Explore Ithaca Awards', 'Create Non-Financial Agreement', 'Search Non-Financial Agreements', 'Ad hoc reports', 'Create Subaward', 'Search Subawards', and 'Current & Pending Management'. The 'Search Subawards' option is highlighted with a green circle, and a green arrow points to it. Another green arrow points to the 'Grants & Contracts' menu item. The main content area shows 'All My Tasks' and a 'Filter Search by Task De' section with a 'Type:' dropdown menu set to 'Filter by Task Type'. At the bottom, there are tabs for 'My Assigned Tasks' and 'Following'.

NOTE: The prime award must be fully executed and distributed – but the Control Account does not need to be set up – to initiate a new subaward request.


Subaward Agreement

Requesting a Subaward (Continued)

- Search by entering the prime award OSP # or the subaward OSP # (if known)

^ Go to Subaward

OSP # or Title



- If searching using the prime award OSP #, choose the appropriate subaward from the dropdown menu.

^ Go to Subaward

OSP # or Title

150019

150019-23766 O... / Ateios Systems

150019-23866 S... Energy

150019-23882 Natrion Inc.

150019-23930 LIBAMA Power Corporation


150019-23966 Cellec Technologies Inc.

150019-24024 American Power Company, Inc.

^ Filter Subawards

Prime OSP #

Latest Status



Subaward Agreement

Unit Research Administrator Completes:

Subaward Details Panel

- Enter the Proposed Budget Period(s).
- Enter the Invoicing Contact and Frequency. The invoicing contact is the person at Cornell that will receive the invoices from the Subrecipient.
- If the Prime Award is Federal, enter the FFATA Description. This is a brief summary of only the subrecipient's work.

Deliverables Panel

- Enter the reports and/or deliverables required of the subrecipient and the frequency/dates due from the subrecipient.

Update any missing information not entered at Subaward Proposal Stage:

Key Personnel – Be sure the information includes an email address and phone number for each.

Budget Panel

- Upload the final version of the budget and budget justification. Revisions may have occurred post proposal submission.
- Add the budget periods and amounts.
- Complete the F&A/Indirect Costs information and upload a copy of the subrecipient's NICRA.
- Complete the Cost Sharing question.

Compliance Panel – Complete all questions. **NOTE: Do not check a compliance that is associated only with the Cornell work.** (Ex. Human Subject work will be completed by Cornell but not by the subrecipient. The human subject question will be “No”.)

Detailed Guidance:

<https://guide.rass.cornell.edu/sponsored-projects/initiate-a-subaward/>

Subaward Agreement - OSP Review & Processing

OSP Subaward Team

- Reviews all requests for completeness and consistency with the prime award.
- Reviews requests for consistency with federal, sponsor, and Cornell policy.
 - Risk Assessment is completed including an audit review.
 - Debarment, suspension, and excluded party checks are completed.
 - Indirect Costs are reviewed for accuracy and compliance with the subrecipient's current Federally Negotiated Indirect Cost Rate Agreement (NICRA).
- Drafts the subaward agreement and sends it to the subrecipient for review.
- Negotiates the subaward agreement terms with the subrecipient.
- Distributes the fully negotiated and executed subaward on the subaward record in RASS.

Subaward Agreement - Indirect Costs

Uniform Guidance 2 CFR 200.332(a)(4)

Subrecipients have three options for indirect Costs:

- 1) Use the Subrecipient's Federally Negotiated Rate
- 2) Negotiate a rate between Cornell and the Subrecipient
- 3) Use the de minimis rate of 15% of Modified Total Direct Costs (MTDC) for subrecipient proposals submitted on/after 10/1/2024 and for older awards that have been amended using the new UG approved rate.
 - *The de minimis rate remains 10% for proposals submitted before 10/1/2024 that have not been amended to approve the 15% rate.*

Uniform Guidance Definition of MTDC – 2 CFR 200.68

MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$50,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs and with the approval of the cognizant agency for indirect costs.

NOTE:

- **For federal prime awards and many non-federal prime awards, the IDC Rate cannot change in the out years of a subaward.**
- **The rate(s) that can be used by the subrecipient are the approved rates when the award is fully executed and that becomes the rate(s) for the life of the agreement.**
- **A change in the IDC Rate in the out years of a subaward requires prime sponsor prior approval.**

Subaward Agreement – The Document

Subagreement

- Consists of 4 or more parts:
 - Subaward terms
 - Subrecipient's Statement of Work
 - Subrecipient's Budget and Justification
 - The Cornell Prime Award
- } These documents are attached and labeled as Exhibits or Attachments and given an identifier (ex: Exhibit A, Exhibit B, Attachment 5, etc.).
- Subaward Terms:
 - The award terms and conditions from the prime award are “flowed down” to the subrecipient, who must also agree to comply with them.
 - Additional terms that Cornell imposes on the subrecipient.

NOTE: No part of the Cornell proposal is included in the subagreement.

Subaward Agreement – The Statement of Work (SOW)

A comprehensive SOW should identify:

- Who – the subrecipient institution, the subrecipient PI and any project staffing;
- What – project and subaward objectives and a detailed description of the research to be conducted;
- When – the period of performance and timing/frequency of meetings and reports;
- Where – location(s) where the research will be conducted;
- How – specific deliverables and milestones defined with a high level of detail.

A comprehensive SOW performs the following functions:

- Allows OSP to perform the required subrecipient risk assessment and determine the subaward terms;
- Clarifies the determination of subrecipient vs contractor relationship;
- Supports more effective subrecipient monitoring;
- Allows Cornell University to identify and correct performance deficiencies.

NOTE:

A subrecipient's SOW *must not* point to the task number(s) or specific aim(s) of the Cornell project's description, specific aims, or summary.

The Cornell project description/specific Aims/summary, etc. are NOT included in the subaward.

Subaward Agreement - Negotiation

Common areas where negotiation is required:

- Insurance – Subrecipient may be unable or unwilling to provide insurance as outlined in the subaward.
- Intellectual Property – Subrecipient unable or unwilling to provide Cornell or prime sponsor with IP rights as outlined in the subaward
- Compliances – Human Subjects work requires an approved IRB Protocol; Vertebrate Animal work requires an approved IACUC Protocol and related agreements, etc.
- Conflict of Interest – Subrecipient does not have a compliant COI Policy and is required to follow Cornell's.
- Indemnification – Subrecipient may be unable or unwilling to agree to indemnify Cornell.
- Financial Statements/Audits – Subrecipient is not willing to provide financial statements to Cornell as required to complete the risk assessment and subrecipient monitoring tasks.
- Indirect Costs – Subrecipient without a NICRA is using a rate greater than the federal de minimis rate in their budget.
- Indirect Cost Rate Agreement – Subrecipient is unwilling to provide a copy of their NICRA, claiming it is proprietary information.

Working with Weill Cornell Medicine (WCM)

WCM is technically not a Subrecipient to Cornell

- WCM is a Cornell entity. However, their current financial and sponsored projects systems differ from Cornell Ithaca's systems, and therefore **WCM is treated as a subrecipient in RASS**. A subaward record must be added to the prime award record for WCM collaborations. However, IDC is not calculated on the first \$50K of the WCM "subaward".
- Compliances – The WCM compliance office is separate from Cornell Ithaca's compliance office. WCM needs to provide copies of approved protocol documentation when WCM is using human subjects, vertebrate animals, etc.
- The Agreement – The agreement between WCM and Cornell Ithaca is a Memorandum of Understanding (MOU) as opposed to a full subaward agreement. The SOW, budget, budget justification, and Cornell prime award are still included in the MOU as attachments.
- Invoicing – WCM submits invoices to Cornell Ithaca to be reviewed by the PI/Unit RA for completeness, allowability, and allocability. The unit submits them for payment in the same way external subrecipient invoices are reviewed and submitted for payment.

Amendments

The terms “amendment” and “modification” are often used interchangeably.

When does a subaward need to be amended?

- Provide additional funding;
- Provide additional funding and time;
- Issue a no-cost extension;
- Approve a budget revision;
- Approve a change in project activities that will affect the scope of work;
- Approve a change in Subrecipient’s key personnel;
- Compliances changes;
- Other changes

Department/Unit Research Administrator must “Request Modification” within the subaward record in RASS.

NOTE:

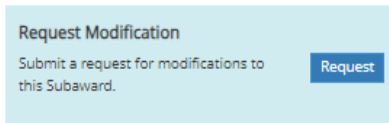
Many subaward amendments require prime sponsor prior approval. The prime award terms and/or prime sponsor policies will generally dictate if/when subaward amendments require prior approval.

Your Prime Award GCO can assist you with interpreting the prime award prior approval requirements.

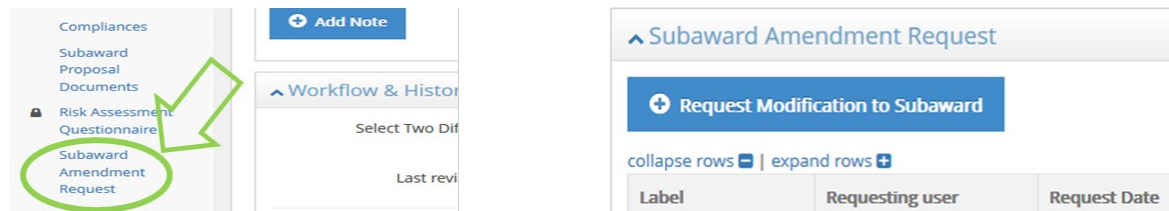
Amendments

Requesting an Amendment

- Navigate to the subaward record in the RASS Portal.
 - Provide modification to the subaward by using the “Request Modification” button at the top of the record.



- Or select “Subaward Amendment Request” from the Panel Shortcuts, then “Request Modification to Subaward”



NOTE:

The prime award amendment (when applicable) must be fully executed and distributed before the subaward amendment can be requested by the Unit RA. Amendments to a prime award do not automatically flow down to the subaward(s).

Closeout

- The Unit RA is responsible for collecting all final reports (technical, financial, IP, equipment, etc.) from the subrecipient. The dates the final reports were received must be entered into RASS in the “Deliverables” section by the Unit RA.
- A copy of the final IP Report and/or Property Report (if required) must be uploaded to RASS.
- A final invoice marked “Final” must be received. Once all final reports are received and the RA has entered the dates and report uploads (if applicable) into RASS, the final invoice can be processed. SFS will enter the date the final invoice is received into RASS.
- Email cu_subawards@cornell.edu after all dates are entered into RASS. The Subaward Team will close the Subaward in RASS.
- **Note:** *We do not process amendments to deobligate funds at the end of a subaward.* If funds remain in a subaccount after a subaward is closed, SFS will move the funds back to the control account. SFS handles the accounting side of awards/subawards.

Subrecipient Monitoring

2 CFR 200.332 – Requirements for pass-through entities

In a subaward, Cornell is acting as the federal government and/or sponsor. As such, the processes and controls must be carefully scrutinized on an ongoing basis

OSP

- Risk Assessment
- Sub profiles
- Rate Agreements
- Insurance Certs
- Audit/financial statement review

SFS

- Audit/financial statement review
- Aids with risk assessment

PI/Unit

- Monitors technical and financial progress prior to approving payment
- Collects and reviews the reports from the subrecipient and enters the dates received in the RASS.

NOTE:

<https://researchservices.cornell.edu/resources/subrecipient-monitoring-financial-and-technical>

PI/Unit Responsibilities

- Monitor performance
 - Are all reports and invoices being submitted? Are they acceptable?
 - Are there any concerns about performance?
 - For subrecipients/subawards designated as elevated risk, it is important that the additional monitoring requirements be completed.
- Review reports
 - Is performance as expected?
 - Is progress being made?
- Review invoices
 - Are the costs commensurate with progress?
 - Are the costs consistent with the terms of the subaward?
- Engage the OSP Subaward Team any time there are concerns.

Subrecipient non-performance impacts the entire project!

Discuss any performance concerns with the subrecipient and/or the OSP Subaward Team.

Subaward Concepts and Points to Remember

- Subawards are not automatically sent out when the prime award is distributed in RASS. The Unit Research Administrator must initiate the subaward(s) on the subaward record(s) in RASS.
- Amendments to the prime award do not automatically flow down to the subaward(s) (ex. Funding increase, No Cost Extension, early termination, etc.). The Unit Research Administrator must request an amendment on the subaward record(s) in RASS to modify the subaward(s).
- Nearly all Cornell subawards are cost reimbursement agreements - funds are not sent from Cornell to a subrecipient upon execution of a subagreement. The subrecipient incurs allowable project expenses and invoices Cornell for reimbursement of those expense.
 - Exception: When advance payment terms have been negotiated with the Subrecipient and are included in the subagreement. The Subrecipient invoices Cornell for the agreed upon advance.
- Subrecipient invoice review and payment reminders:
 - PIs and units are responsible for invoice review, and invoices should never be approved without discussion with OSP if deliverables are lacking.
 - Subaward invoices should be paid within 30 days, and any delays (e.g. awaiting a deliverable) should be documented on the payment form.
 - If you haven't gotten an invoice from a subrecipient for a while, this should be noted as part of your monitoring. Is work underway? Are there invoicing problems? Are they getting lost at Cornell?

Who do I call for help?

RASS Help

<https://guide.rass.cornell.edu/>

rass@research.cornell.edu

RASS office hours on Tuesday and Thursday from 1pm – 2pm. [Join via Zoom](#)

Outgoing subawards

OSP Subaward Team – cu_subawards@cornell.edu

Prime Award Grant and Contract Officer

- Incoming subawards (awards to Cornell)
- Outgoing subaward proposals (pre-award stage)
- When prime sponsor prior approval is required for an action on an existing subaward

When in doubt, email both the Subaward Team (cu_subawards@cornell.edu) and the GCO for assistance

Additional Resources

Subawards in a Proposal:

<https://researchservices.cornell.edu/proposal/subcontracts>

Proposing a Subaward:

<https://researchservices.cornell.edu/resources/proposing-subaward>

Initiate a Subaward in RASS:

<https://guide.rass.cornell.edu/sponsored-projects/initiate-a-subaward/>

Issuing the Subaward Agreement:

<https://researchservices.cornell.edu/resources/issuing-subaward-agreement>

Subaward Roles & Responsibilities:

<https://researchservices.cornell.edu/resources/subawards-roles-and-responsibilities>

Subrecipient Monitoring:

<https://researchservices.cornell.edu/resources/subrecipient-monitoring-financial-and-technical>

Collaborating with Weill Cornell Medicine:

<https://researchservices.cornell.edu/process/collaborating-weill-cornell-medicine>

Questions?

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