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OSP Subaward Request Process

Overview

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. (In this document, the term "subaward" shall be used to mean either a subgrant or subcontract.) All such subawards and any changes or modifications thereto must be requested through the Office of Sponsored Programs, utilizing OSP's online Subaward Request page (which is part of the Compass Financial Management System).

With the assistance of the Principal Investigator/Project Director 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. When Emory's PI/PD requests that a subaward be issued through the Compass Subaward Request Page, he/she authorizes OSP to request a Purchase Order from the Office of Financial Operations (Procurement and Payment Services) 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 PI is on file in the department.

The Subaward Request page is divided into two main entry tabs. The first tab requests general data about the award under which the subaward will be issued, as well as information on the subaward recipient. The second tab requests information about the subaward itself (whether it is a new award or a modification to an existing award) and provides a place to upload relevant documents. Requests for federal contracts will require additional information, as described below. Requests for continuations will also require additional information, as described below.

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 (OSP) the authorization to execute a purchase order on behalf of the department.

To utilize the system to initiate and complete a request, follow the steps below.

Initiate A Request

- 1) Log into the Compass Financial System
- 2) Navigate to the Subcontract Entry option of the Subrecipient section

GRANTS > SUBRECIPIENTS > SUBCONTRACT ENTRY

3) Select Add a New Value and click Add



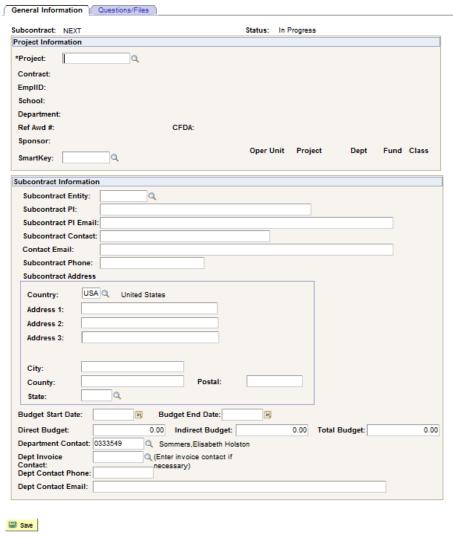
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4) You will then be taken to the General Information tab of the request system:

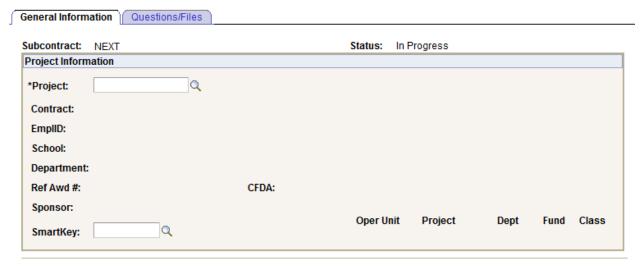


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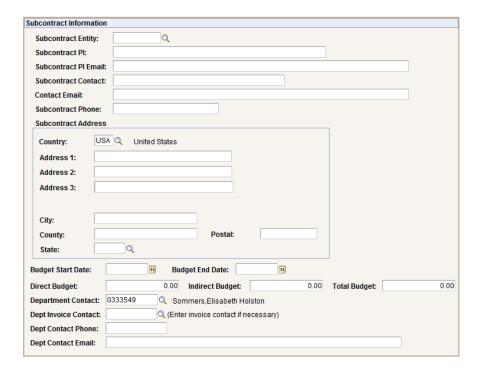
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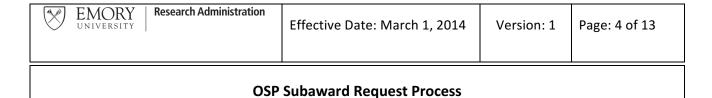
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5) To start the request, in the Project Information section you must first identify the Compass project under which the subaward will be issued and paid. (Click the magnifying glass iconto search for the appropriate project.) Please note that you must have a fully-active project request a subaward. You may not request a subaward under a PAN.



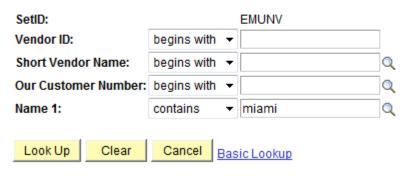
- 6) The remaining data in the Project Information Section, except the SmartKey, will pre-populate based on the project selected.
- 7) Select the correct SmartKey. (Only SmartKeys associated with that project will appear for selection. In most cases, therefore, only a single SmartKey is available for selection.)
- 8) Enter the Requested Information in the Subcontract Information section of the tab.



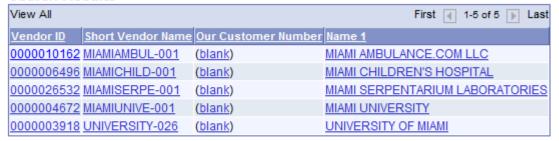


- 9) Most fields in the Subcontract Information section are self-explanatory. However, see below for these important notes on information entry in this section:
 - a. The Subcontract Entity (subrecipient organization) must be selected from the system. You cannot manually enter the Subcontract Entity. Click on the magnifying glass to search for the appropriate entity. **Search Tip:** Use the "Name 1" field to search for the subrecipient indicating that "Name 1" contains and enter a portion of the name (e.g., to find the University of Miami, enter "Miami"):

Look Up Subcontract Entity



Search Results



- b. If a subrecipient does not already exist in the table, select "New Subrecipient" as the subrecipient from the list. In the Attachments section of the request form (described in Item 12e below), please include a file with the full legal name of the subrecipient, along with the full administrative contact information and address. OSP will then work with the appropriate individuals to add the subrecipient to the system and change the subrecipient in the request system once the entity is added.
- c. Please be sure to complete all contact information fields, including subrecipientaddress. "Subcontract Contact" should be the subrecipient's business contact with whom OSP will negotiate the subaward agreement.



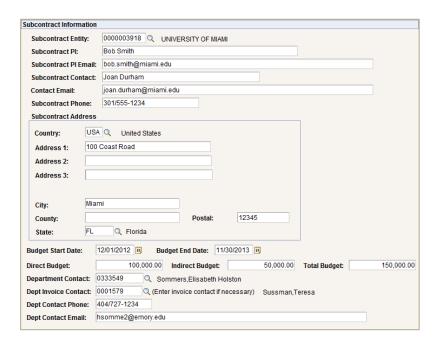
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- d. The system will pre-populate "Department Contact" with the individual who created the request. If the individual who will "receive" invoices in Emory Express is a different person, please indicate that person under "Dept Invoice Contact."
- 10) Once all information has been completed, click "Save." (All mandatory fields on this page must be completed or the system will not allow you to save the request.)
 - a. Once you have saved the request, the request will be assigned a Subcontract Number by the system. At this point, you may leave the request unfinished and return to finalize it at a later date.



b. To return to the record, you may use the Subcontract number to return directly backto the request if you leave and return to complete it.

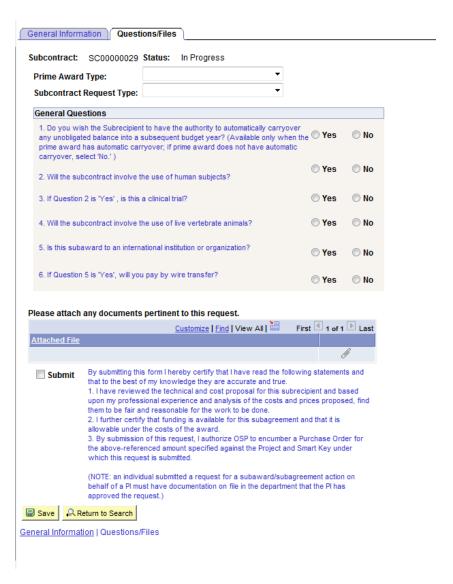


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11) Complete the information and answer the questions on the Questions/Files tab.

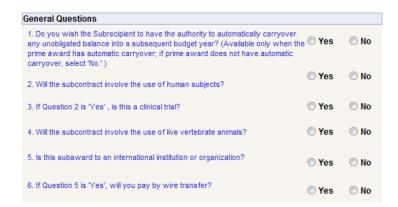


- 12) Most fields on the Question/Files tab are self-explanatory. However, see below forthese important notes on information entry in this section:
 - a. The information required and the questions asked on this tab may change based on the specifics of each individual request, as described below. Please provide all information requested on the page.
 - b. Take care in specifying the Prime Award Type. When Federal Contract is selected, additional guestions will appear, as described in Appendix 1 below.
 - c. Take care in specifying the Subcontract Request Types (defined in Appendix 2 below). When "Continuation," "Supplement," or "Other-Amendment" are selected, additional questions will appear, as described in Appendix 3 below.
 - d. All requests must include answers to the following General Questions, as appropriate:

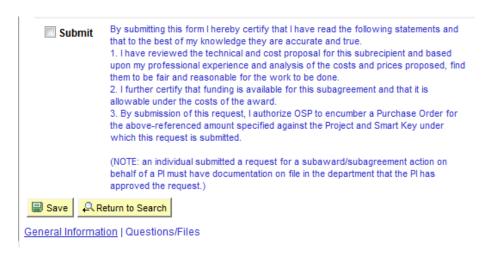
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- e. The required attachments will also vary by Subcontract Request Type. Multiple files may be attached.
 - i. New, Renewal, and Supplement requests must be accompanied by a Statement of Work and a Detailed Budget.
 - ii. All other requests, with the exception of No-cost Extension, must be accompanied by a detailed budget. A Statement of Work should be attached if the activity covered by the request differs in any way from the existing SOW from the original agreement. A detailed budget should accompany an NCE request if a specific amount of funds are approved for use during the extension period.
 - iii. Please also use the Attachments section to attach a file containing any special instructions or other information that would be useful to, or known by, OSP during the subaward creation and negotiation process.
- 13) When the request is complete, carefully review the certification statement to which you are agreeing by submission of the request. To finalize and submit, click the Submit check box and then click Save.



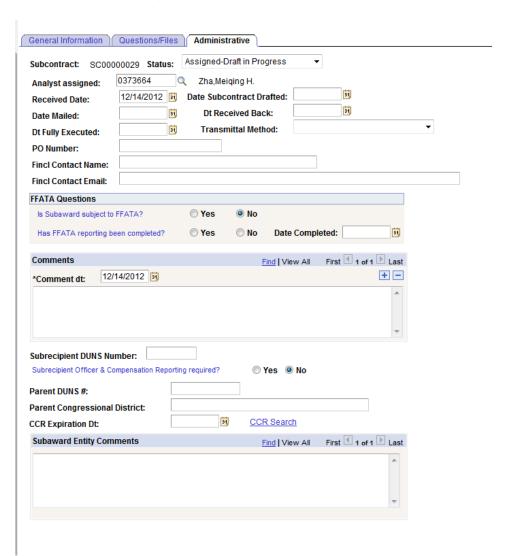
14) Remember that by submitting the request, you are authorizing OSP to establish a Purchase Order and encumber the funds on your Compass project.

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- 15) Upon submission, you will receive an e-mail from the system confirming submission and reiterating your Subcontract Number.
- 16) After submission, OSP will create the subaward following the processes described in Appendix 4. You may track the status and progress of the subaward request by navigating to the Subcontract Administration tab. You will also see who has been assigned to handle the subaward. Campus users will have view-only access to this tab.



17) OSP will also record comments during the drafting and negotiation period that are relevant to the process.

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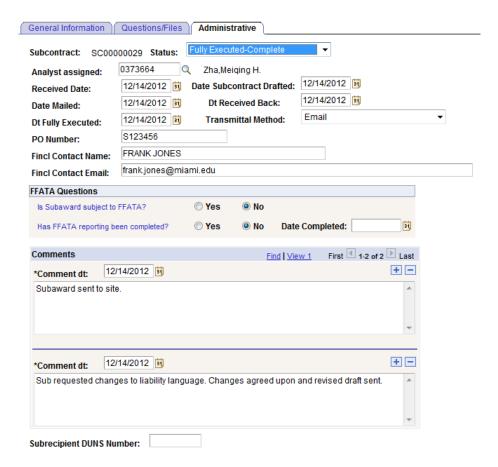
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18) As the subaward moves through the drafting and signature process, dates will be entered in the appropriate fields. OSP will also use this section to track information about the subaward recipient itself, as well as for Emory's compliance with the Federal Financial Accountability and Transparency Act (FFATA) requirements. Once all steps have been completed, the Status will be set to "Fully Executed - Complete."



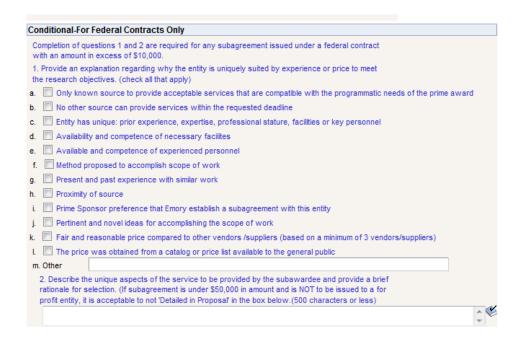
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APPENDIX 1 - Conditional Questions for subawards under Federal Contracts

All requests must include answers to Questions 1 and 2 below. The first is a series of statements which pertain to the rationale and price. The second question requests that the PI describe the unique aspect of the service to be provided by the subawardee and the rationale for the selection of that entity. If the subagreement is to be issued to a for-profit entity and is under \$50,000 it is acceptable to note: "detailed in proposal" in the text box. For question 1, please check all that apply.



APPENDIX 2 - Subcontract Request Type Definitions

New: a first time request for OSP to create a subaward, obtain a purchase order, encumber funds from the award to be set aside to pay invoices from subrecipient, and execute the subagreement. 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 subagreement may need to be sought.

Continuation: These are requests for additional time and money to be awarded to the subrecipient who has an existing subaward. Amendments to subagreements must be in sync with the prime award made to Emory. Pl'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 revised Statement of Work if the PI wishes to add additional funds and deliverables.



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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 subagreement 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, or to signal approval for a request from the Subrecipient. An explanation of the request may be uploaded into the attachments section of the request system.

APPENDIX 3 - Conditional questions for Continuations, Supplements, and Other-Amendment

To ensure that appropriate subrecipient monitoring has occurred, prior to issuing additional time and funding the PI must answer the following four questions. If the PI can not answer the questions with a "yes," he/she must provide additional justification as to why the subaward should continue. OSP staff will contact the PI to discuss the advisability of the continuance of the subaward in these cases.



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APPENDIX 4 - OSP General Processes for Establishment of Subawards

- 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 then current forms and processes;
- Prepare the appropriate subagreement based on the subagreement entity, statement of work and the sponsor's terms and conditions in the prime award;
- Contact department/PI if any additional information is necessary to complete the subcontract or if specific questions remain;
- Complete a purchase order requisition for the subcontract in the purchasing system on behalf of the department/PI. POs are sent to OSP staff once the PO has been created.
- Reference PO on subagreement and send subagreement out subaward draft (unsigned) to subrecipient;
- Negotiated subaward terms as necessary with 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 and notifyappropriate individuals via the Emory Express system;
- Report subaward FFATA data as necessary.

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