Salt Lake Community College
Office of Sponsored Projects   PO:4.0
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Processing and Accepting Awards as a Subrecipient

Review Dates: _____ _____ _____ _____ _____ _____

Revision Dates: _____ _____ _____ _____ _____ _____

Obsolete Date: _____   Made Obsolete By (initials): _____

Approved By: _____ _____
                          OSP Director/Designee   **Date**

PURPOSE, SCOPE, AND PRINCIPLE:

This Standard Operating Procedure (SOP) outlines the steps involved in processing and accepting subawards when Salt Lake Community College (SLCC) is the subrecipient of funds from an awardee referenced within this SOP as the Pass through Entity (PTE). It includes descriptions of typical subaward documents and the internal review, approval and execution process. It applies to all subawards processed through the Office of Sponsored Projects (OSP) regardless of the name of the instrument used to execute it (subaward, subcontract, contract, etc.) See Attachment A for additional information regarding the characteristics of a subaward.

Although subaward documents may be received and reviewed by various departments, subawards made to SLCC must be routed through OSP. Procedural references to other departments in this SOP are general and in no way circumvent written policies and procedures applicable to their functions and processes.

RESPONSIBILITIES

A. OSP Personnel
   1. Facilitate subaward review and approval process
   2. Negotiate changes with PTE
   3. Maintain OSP project file in accordance with GP:7

B. PI
   1. Review subaward documents and provide feedback
   2. Facilitate RM review process as needed.

C. RM/Legal Counsel
   1. Review, recommend changes and approve subaward agreement
   2. Return signed routing sheet to Contact on routing sheet

D. BOF
   1. Review subaward budget and provide feedback to OSP

DOCUMENTS/RESOURCES NEEDED:
OSP Contract Routing Sheet (shared drive/SOP DOCUMENTS/Forms/Active)
Contract Routing Procedure (http://www.slcc.edu/eeo/services/contract-review.aspx)
Project Lifecycle Form (shared drive/SOP DOCUMENTS/Forms/Active)

DEFINITIONS:
- **Catalog of Federal Domestic Assistance (CFDA):** Catalog system for federal programs attributable to specific federal agencies and/or award programs. Additional information found at https://www.cfda.gov/
- **Federal Funding Accountability and Transparency Act (FFATA)**: Public law that outlines requirements to collect and publish recipient and subrecipient information for federal awards of $25,000 or more (Public Law 109-282). This information must be made available to the public via a single, searchable website. Additional information can be found at https://www.fsrs.gov/
- **Single Audit**: Also known as an A-133 Audit, it is a rigorous audit and examination of entities that expend certain amounts of federal award funds in a year
- **Subaward**: An agreement issued under an assistance mechanism by another organization (PTE, Prime Recipient or Awardee) to perform the scope of work on a grant awarded to them
- **Uniform Guidance**: Formal published instructions and information issued by the Office of Management and Budget to federal agencies. The most recent guidance, Title 2 → Subtitle A → Chapter II → Part 200 – Uniform Administrative Requirements, Cost Principles, and audit requirements for federal awards went into effect 12/26/14. This guidance includes federal grant award regulations and those that flow down to recipients and subrecipients.

PROCEDURE:

A. Save and Review Subaward Documents
   1. Save documents received from PTE in OSP project file per SOP GP:7
       NOTE: Subawards can vary in length and content. See Attachment B for general list and description of subaward documents.
   2. Review for errors, omissions or changes needed. Common errors to look for when reviewing the subaward documents include:
       1) Incorrect project name and misspellings
       2) Subaward amount differs from budget
       3) Attachment references incorrect/misnamed
       4) Period of performance dates are inconsistent with Prime Award or are illogical
       5) Contact information missing or incorrect
       6) Conflicting terms and conditions
       7) Budget doesn't add up
       b. Send to BOF and PI for feedback
       c. Complete/update subaward documents designated by PTE for completion by SLCC
           1) See Attachment C for general document types and instructions
   3. Negotiate changes as needed with PTE
       a. Repeat steps A.1-2 until documents ready for SLCC approval process
   4. Create or update "Project Lifecycle Form" and save in applicable location per SOP GP:7

B. Facilitate SLCC Approval
   1. Determine if subaward requires RM review and approval
       a. Refer to current college policy and procedures for guidance
           NOTE: Most subawards require RM approval. Example of documents that may not require approval is a recurring subaward with no changes in terms and conditions
   2. If subaward requires RM review and approval perform the following:
       a. OSP routes through RM unless PI requests to do so

       1) If OSP routes the subaward:
         a) Prepare an "OSP Contract Routing Sheet" and submit with subaward to RM
         b) Follow up with RM and respond to questions and requests for changes
         c) Negotiate changes with PTE as needed and reroute through RM for review
         d) Sign "OSP Contract Routing Sheet" returned with RM and Legal signatures
         e) Proceed to step B.2.b
       2) If PI routes the subaward
         a) Work with PI to identify current RM process and routing sheets to submit for approval
         b) Follow up with PI on status
         c) Work with PI to negotiate changes with PTE as needed and finalize with RM
         d) Request PI to send copy of completed routing sheet with approved subaward to OSP
    b. Save electronic copy of approved subaward and routing sheet in OSP project file per GP:7
    c. Forward subaward agreement and signed routing sheet to OSP Director/Designee (and others if indicated) for signature
  3. If a subaward **does not** require RM review
    a. Forward subaward agreement to OSP Director/Designee (and others if indicated) for signature

C. Execute Subaward with PTE
  1. Save signed subaward as "SLCC signed *Abbreviated Project Title Subaward*" to project file and send to PTE for countersignature (If the contract is unchanged and came signed by the grantor countersignature and return document not needed – skip step C.2 and name according to Step C. 3).
    a. Preferred method for delivery is electronic unless PTE request physical copy(ies)
    b. When mailing send by registered mail. File proof of mailing in Project File
  2. Follow-up with PTE as necessary until agreement signed and returned
  3. Save electronic copy of complete, countersigned subaward agreement
    a. Name the electronic version as follows: "EXE *Abbreviated Project Title Subaward*"
      a) Example: "EXE NISGTC Subaward"
    b. File subaward and routing sheet copy in physical OSP project file
    c. Send copy of executed subaward and signed routing sheet to PI and RM
    d. Update "Project Lifecycle Form" as needed

REFERENCES:
ECFR — Code of Federal Regulations Title 2, Subtitle A, Chapter II, Part 200 Uniform Administrative Requirements, Cost, Principles and Audit Requirements for Federal Awards. (2014, December 19). Retrieved June 22, 2015, from http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

Attachment A

Five Characteristics Indicative of a Subaward from the Uniform Guidance
2 CFR 200.330 - Subrecipient and contractor determinations

1. The subrecipient determines who is eligible to receive what Federal financial assistance.
2. The subrecipient has its performance measured against whether the objectives of the Federal program are met.
3. The subrecipient has responsibility for programmatic decision making.
4. The subrecipient has responsibility for adherence to applicable Federal program compliance requirements.
5. The subrecipient uses the Federal funds to carry out a program of the organization as compared to providing goods or services for a program of the pass-through entity.

Attachment B
General List and Description of Subaward Documents

Subawards can include the following types of documents and information:

1. Subaward instrument with approval signature lines and award information including:
    a. Funding description – project name, sponsor and CFDA (if federal award)
    b. Award amount
    c. Period of performance
    d. Extension options
    e. Signature line
    f. Attachments and description
    g. Flow through requirements or other special terms and conditions
2. Terms and Conditions
3. Budget
4. Scope of Work / Statement of Work (SOW)
5. Copies of federal award documents (Only optional if flow down requirements are adequately included in subaward instrument and/or terms and conditions)

Attachment C
Example of Subaward Documents to Complete

Below are example of subaward documents or information that may need completion before the award can be reviewed for approval and execution. They are meant as guidance and should not be considered inclusive (subaward structures can vary). Column 1 is the document or information needed. The contact is guidance on where this information or form should be sent to for completion.

Information or Document	Contact	Comments
FFATA Form	OSP	Collect SLCC data
A-133 Certification	BOF	SLCC certification that Single Audit is complete
Signatory Official	OSP	The name and title provided in conjunction with the subaward signature approval line(s)
Contact Information	OSP	Administrative – Grant Officer Financial – BOF designee Programmatic – PI
W-9	OSP	http://www.slcc.edu/osp/internal-resources.aspx
Budget/Justification	PI	Additional information or detail may be needed as part of the subaward.
SOW	PI	Additional information or detail may be needed as part of the subaward.
Single Audit	OSP	While not as common, this may be required as part of the subaward documents. The most current copy can be located on the Share Drive/12. Audits & Site Visits/SLCC Single Audits