Salt Lake Community College
Office of Sponsored Projects
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Issuing Subawards

Review Dates: _____ _____ _____ _____ _____ _____

Revision Dates: _____ _____ _____ _____ _____ _____

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

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

PURPOSE, SCOPE, AND PRINCIPLE:
This procedure outlines the process Office of Sponsored Projects (OSP) follows to issue subawards including the approvals needed, request process, subrecipient requirements, description of subaward documents and execution of them. The subaward process is a collaborative one that includes OSP, the Principal Investigator (PI), subrecipient(s), and other business areas of the college. Many of the roles and responsibilities involved can be interchangeable between OSP and the PI and these areas are noted as such with the inclusion of (OSP/PI). Subawards must be allowed by the Sponsor awarding the funds to Salt Lake Community College (SLCC) and will not be issued before the prime award is fully executed.

RESPONSIBILITIES:
A. OSP
   1. Work with PI to ensure subaward is allowed, prepared and executed correctly
   2. Update OSP Project Files per SOP GP:7

B. Business Office (BOF)
   1. Review subaward budgets

C. PI
   1. Ultimately responsible to ensure subawards are allowed, prepared and signed
   2. Work with OSP to complete the subaward process

D. Risk Management (RM)
   1. Review subaward contract

DOCUMENTS/RESOURCES NEEDED:
Federal Demonstration Partnership (http://sites.nationalacademies.org/pga/fdp/index.htm)
FFATA Data Request Form (shared drive/SOP DOCUMENTS/Forms/Active)
OSP Contract Routing Sheet Form F:8 (shared drive/SOP DOCUMENTS/Forms/Active)
RM Contract Routing Procedure (http://www.slcc.edu/eeo/services/contract-review.aspx)
System for Award Management (SAM) (www.sam.gov)
SLCC Terms and Conditions (http://www.slcc.edu/eeo/forms.aspx)

DEFINITIONS:
- **Contact Person**: Person entered as contact in a contract routing document and responsible for the contract routing process.
- **Data Universal Numbering System (DUNS)**: A unique numeric identifier assigned to a business by the federal government.
- **Debarments and Suspensions**: Actions preventing companies and individuals from receiving federal funding. These "exclusion records" are listed at www.sam.gov
- **Exclusion Record**: Identifies parties excluded from receiving federal contracts, certain subcontracts, and certain types of federal financial and non-financial assistance and benefits. Also known as debarments and suspensions.
- **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 (currently http://www.USASpending.gov). Additional information can be found at https://www.fsrs.gov/. See ATTACHMENT A for more information.
- **FFATA Subaward Reporting System (FSRS)**: Reporting tool for Federal prime recipient (i.e. prime contractors and prime grant awardees) used to capture and report subaward and executive compensation data regarding their first-tier subawards to meet the FFATA reporting requirements. See ATTACHMENT A for information.
- **First-tier Subrecipient**: Organization that receives a subaward of $25,000 or more from a federal award granted to a Prime Recipient (i.e. SLCC).
- **The North American Industry Classification System (NAICS)**: Classifies business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. economy.
- **Prime Recipient**: The direct (prime) awardee.
- **Sponsor**: Primary source of funding. In the subaward process the determination of whether the sponsor is a federal agency is important in relation to additional steps and considerations in making subawards
- **Subaward**: An agreement issued under an assistance mechanism by SLCC to another organization to perform the scope of work (SOW) on a grant awarded to SLCC (prime contractor). Subawards are established for the period authorized in the prime award notice, typically in one-year increments, with the terms and conditions passed on from the prime award.
- **Subaward Agreement**: Inclusive 'package' of documents approved and included as part of the subaward executed between subrecipient and SLCC.
- **System for Award Management (SAM)**: Web-based, government-wide application that collects, validates, stores, and disseminates business information about the federal government's trading partners in support of the contract awards, grants, and electronic payment processes.
- **The Federal Demonstration Partnership (FDP)**: Association of federal agencies, academic research institutions with administrative, faculty and technical representation, and research policy organizations that work to streamline the administration of federally sponsored research. This is a reference site located at http://sites.nationalacademies.org/pga/fdp/index.htm.

PROCEDURE:

NOTE: Steps listed below are performed by OSP personnel unless stated otherwise.

A. Determine Sponsor approval requirements for issuing subaward are met and documented
   1. If yes skip to Step B
   2. If no, obtain Sponsor approval by performing the following steps before moving to Step B:
      a. Notify OSP Director of proposed subaward and that approval will be needed in executing subaward
      b. Determine if Sponsor is a federal agency
         1) If no skip to Step A.3
         2) If yes, verify Duns number is active for subrecipient
            a) Go to the SAM website (www.sam.gov)
            b) Locate subrecipient record using search records function

        (1) If subrecipient cannot be located on SAM
           1. STOP, subaward cannot be issued until organization record can be located
           2. Work with subrecipient to resolve
  c. Verify subrecipient and its PI are free from debarment or suspension actions using www.sam.gov
    1) Exclusion record for subrecipient or PI would be indicated with a "Y" in "Active Exclusion" field
    2) If PI name does not return results an Exclusion Record for that search does not exist
      a) Search help can be found in SAM Help Topics
    3) If exclusion record exists determine if it prevents issuing subaward
    4) If exclusion record prevents issuing subaward, STOP and notify PI and OSP Director that exclusion record exists and subaward process cannot continue

3. Determine Sponsor request and approval process requirements
  a. Work with PI to review solicitation, award documents or contact Sponsor for process requirements
4. Work with PI to prepare subaward approval request
  a. General requirements of request includes:
    1) Written approval request to Sponsor indicating reason a portion of the SOW will be allocated to subrecipient
    2) Subrecipient's name, address, DUNS number and budget
    3) Award modification request (as needed) with the changes to SLCC's award and budget as result of this subaward approval request (See PO:2 for submitting modifications for prime award)
    4) Signatory authority approval
      a) Depending on the method of submission this could be in many forms including signature on a request letter, email approval, or other signed form or document
5. Submit request to Sponsor for approval
  a. Usually electronic but other delivery options could be utilized if required
6. Save request in the applicable location of the electronic OSP project file (See GP:7)
7. Negotiate subaward process with Sponsor until written approval is received
  a. Respond to questions and requests for additional information or changes as needed
  b. Review changes and requests with PI and others as needed
  c. Save revised request submissions as new documents and named as such in the electronic OSP project file (See GP:7.0)
8. Upon receipt of Sponsor approval perform the following:
  a. Send copy of approval to PI
  b. File approval and final version of modification request in the OSP project file (see GP:7 for process)
    1) Electronic copy
      a) Save electronic copy within a Subaward folder named for subrecipient (abbreviated to less than 15 letters preferred)
    2) Physical copy
      a) If a physical copy of all final documents does not exist make a copy
      b) Place physical copy in applicable OSP project file

B. Draft subaward instrument and attachments to execute subaward with subrecipient (OSP/PI)

NOTE: Although Step B could be in process while waiting for Sponsor approval, Step A must be complete before Step C.

1. General requirements include: (see The Federal Demonstration Partnership for additional resources and information regarding subawards and documents)
  a. Subaward contractual document
  b. SLCC terms and conditions
  c. Flow-down requirements
  d. SOW and Budget - utilize Sponsor forms when required
  e. Copy of SLCC award documents
    1) Portions deemed irrelevant to subaward issuance may be omitted but the end result of documents included should be comprehensive in nature
  f. "FFATA Data Request Form"

C. Send subaward to RM for approval if required (See RM Routing Procedure)
   1. If subaward does not need RM review skip to step D
   2. If subaward needs RM review, work with PI to determine who the Contact Person will be
      a. If OSP is routing the subaward perform the following (Preferred Method):
         1) Complete "OSP Contract Routing Sheet" and enter name as Contact Person
         2) Submit completed "OSP Contract Routing Sheet" with subaward documents to RM for review and approval (usually in email)
      b. If PI is routing the subaward refer them to RM's contract routing procedure and current version of their contract routing sheet then instruct them to enter their name as the Contact Person
   3. The Contact Person listed on the routing sheet performs the following until RM approves subaward
      a. Negotiate changes to subaward requested during RM review
      b. Send revised/renegotiated subaward document to RM for additional review as needed
      c. Repeat Step C.3 a-b until final approval from RM with signed routing sheet
   4. Contact Person informs PI/OSP subaward approval received
   5. Contact Person signs bottom of routing sheet

D. Verify award is fully executed and documented
   1. If award is not executed STOP as subaward cannot be processed any further until this is complete
   2. Communicate status as needed to PI and subrecipient

E. Save and disperse signed subaward agreement (order may vary)
   1. Send subaward agreement to subrecipient for approval signatures (OSP/PI)
      a. Negotiate change requests during this stage with subrecipient, PI/OSP, RM and BOF as applicable
   2. Forward signed routing sheet and signed subaward agreement to OSP Director for countersignature
   3. Contact person distributes copy of executed subaward agreement to subrecipient
   4. Contact person sends copy of executed subaward and signed routing sheet to PI/OSP and RM
   5. Save copy of executed subaward in electronic and physical OSP project file (see GP:7)
      a. Ensure all subaward documents and attachments are included
      b. Name electronic file with EXE at the beginning of file name to indicate fully-executed document
      c. Save electronic copy of signed contract routing sheet (see PR 5.0)

F. Report subawards of $25,000 or more issued under federal agencies in compliance with FFATA
   1. Data can be found on FFATA Data Request Form in Step B.1.f and completed by subrecipient in Step E
   2. See ATTACHMENT A for additional guidance and information

G. Work with BOF to update Banner budget as needed (OSP/PI)

REFERENCES:
Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS). Retrieved June 9 2015, from www.fsrs.gov

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

Zients, J. (2010, August 27). OMB Guidance and Subaward and Executive Compensation Reporting Memo. Retrieved June 22, 2015, from https://www.fsrs.gov/documents/OMB_Guidance_on_FFATA_Subaward_and_Executive_Compensation_Reporting_08272010.pdf

ATTACHMENT A
FFATA/FSRS REPORTING

REPORTING TIMELINE FOR PRIME GRANT RECIPIENTS

Prime Grant Recipients awarded a new federal grant greater than or equal to $25,000 are subject to FFATA/FSRS subaward reporting requirements as outlined in the Office of Management and Budgets guidance issued August 27, 2010. The prime recipient is required to file a FFATA subaward report by the end of the month following the month in which the prime recipient awards any subaward greater than or equal to $25,000 (FSRS.gov).

SUBRECIPIENT DATA REQUIREMENTS

The data listed below is required from subrecipients for all grants and contracts that meet the FFATA requirements (OMB Guidance on FFATA Subaward and Executive Compensation Reporting)

1. Name of entity receiving award
2. Amount of award
3. Funding sponsor
4. NAICS code for contracts / CFDA program number for grants
5. Program source
6. Award title descriptive of the purpose of the funding action f. Location of the entity (including congressional district)
7. Place of performance (including congressional district)
8. CCR Registration
9. Unique identifier of the entity and its parent (DUNS); and
10. Total compensation and names of top five executives (same threshold for prime recipients) if…
    a. More than 80% of annual gross revenues from the Federal government, and those revenues are greater than $25M annually and
    b. Compensation information is not already available through reporting to the SEC. Classified information is EXEMPT from the prime and sub-award reporting requirement as are contracts with individuals.

Note: Subrecipients are not required to report FFATA if they reported less than $300,000.00 in gross income in the previous tax year. In addition, exemptions to the FFATA reporting requirements may occur and it is up to each subrecipient and OSP to understand the sponsor's requirements.

The subaward information entered in FSRS will then be displayed on www.USASpending.gov associated with the prime award furthering Federal spending transparency.

FSRS PROCEDURES AND INFORMATION FOR PRIME RECIPIENTS
- FSRS Reporting System: www/fsrs.gov
- Awardee User Guide: https://www.fsrs.gov/documents/FSRS_Awardee_User_Guide.pdf
- FSRS Grant Batch Upload User Guide: https://www.fsrs.gov/documents/grants_batch_upload_ref.pdf