

UCF Subawards Office Publishes in National Research Administrator Magazine

The UCF Research Subaward Office recently had an article published in the March/April 2023 issue of National Council of University Research Administrators magazine titled *Subawards: Demanding and Rewarding*.

The article, authored by Tameria Mace, Elena Andreeva, and Ritu Bhatia, details methods for overcoming many of the demands surrounding subaward administration as well highlights some of the rewards.

The National Council of University Research Administrators was founded in 1959 and has 7,500 members from over 1,100 colleges, universities, teaching hospitals, and research institutes in 40 countries.

Congratulations Tameria, Elena, and Ritu on this fantastic article and for representing UCF Research on the national and global stage!

Tameria is the Associate Director of Sponsored Programs, Elena is a subaward specialist III with Sponsored Programs, and Ritu is a subaward specialist I with Sponsored Programs.

Here is their article:

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SUBAWARDS:

A Challenge and An Opportunity



ALSO IN THIS ISSUE

- 🔗 Building a Culture of Research Security
- 🔗 Pending Federal Cybersecurity Standards
- 🔗 Strategies for Promoting a Culture of Professional Integrity

SUBAWARDS: Demanding & Rewarding

By Tameria Mace, Elena Andreeva, and Ritu Bhatia

Navigating subawards efficiently and effectively can be a daunting task for research administrators. The last decade of federal regulations including its oversight and restrictions, has made issuing subawards disproportionately burdensome for the Pass-Through Entities (PTE). Balancing the demands associated with compliance and regulation of subawards, while fostering collaboration to ensure successful research outcomes, can be very challenging for research administrators. Let us explore some methods that will assist in overcoming some of the administrative demands surrounding subaward administration.

Proper Classification

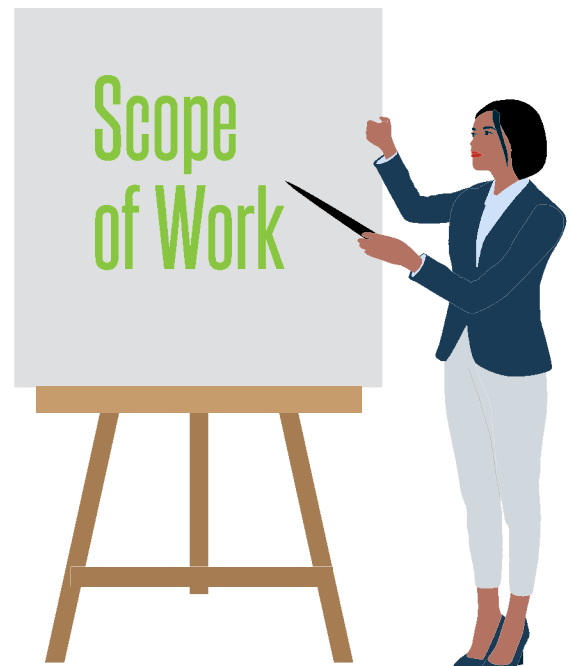
Terms such as vendor, subrecipient, contractor, and consultant can be used interchangeably by Principal Investigators (PIs). Prior to entering a collaboration with external parties for goods, services, or substantive work under a federal award, determinations must be made regarding the nature of the entities' relationships with the PTE. This determination is required by Uniform Guidance as defined in 2 CFR §200.330. Research Administrators can struggle with making this determination as the relationships are not always clear. There are several online tools and checklist that help classify your collaborator(s) properly. One such tool is the Federal Demonstration Partnership (FDP) Subrecipient vs Contractor Checklist. It is the substance of the relationship between the PTE and third-party, and not the label or form of agreement, that should be given the greatest consideration for this classification.

Once it is established that the external party is indeed considered a subrecipient, it is not enough to just to make a determination of the relationship, the entity must also understand the demands of that classification. Enforcing what it means to be subrecipient at the start of a proposal is invaluable and can reduce some of challenges of engaging in subawards. There is significant financial, regulatory, and compliance, commitment required by subrecipients. A heavy administrative burden exists on providing documentation, assurances, and evaluating the entities financial and technical viability to meet obligations. We cannot express how often a third party has been deemed a subrecipient but expects to operate as vendor or consultant after the Prime has been awarded. A subrecipient should be made aware early on of any required actions to facilitate the ease of receiving an award such as maintaining an active System for Award Management (SAM) registration or obtaining a Unique Entity Identifier (UEI).

Subrecipients that are not prepared or familiar with the onset of requirements associated with their classification can result in major delays in issuing the subaward and ability to make appropriate progress on the project. Making the proper determination and ensuring that the subrecipient understands the requirements that are associated with being a subrecipient can mitigate issues during the award lifecycle.

Clear Roles and Responsibilities

Having clearly defined roles and responsibilities for your subrecipient helps negate some of the burdens in administering subawards. This can be facilitated by having a robust subrecipient Scope of Work (SOW). The SOW is the specific programmatic work to be performed by the subrecipient. The SOW should provide sufficient detail of the technical and programmatic work to be conducted by the subrecipient, define the deliverables and milestones, and outline the time frame in which they are to be delivered. The Subrecipient's SOW is performed by its personnel, using its own facilities and resources. The SOW should be unique to the subrecipient's responsibilities and contain only the programmatic work that the subrecipient is tasked with completing. It should be accurate and concise as to what, when, and if appropriate, how the subrecipient will accomplish the work to be performed and should not



be confused with the specific aims of a project. Inadequate role definition are consequences of lack of clarity in objectives and key accountabilities, and unclear timelines. An ambiguous SOW invites discord, confusion, and decreased productivity. Establishing clearly defined performance standards and expectations in the SOW can result in fewer conflicts between collaborators. Clear roles and responsibilities aids subrecipients in understanding their importance to projects goals and promotes working effectively towards them.

Arduous Regulations and Restrictive Terms and Conditions

Sponsoring agencies are increasingly adding formidable terms and conditions and requirements to research agreements related to cybersecurity protections, foreign influence, and Exchange of Controlled Unclassified Information (CUI) or Controlled Technical Information (CTI) (Office of the Federal Register, 2016). A PTE's prime award terms and conditions (T&C) are usually negotiated or accepted without considerable thought given to how these T&C and flow downs may impact subrecipients. Terms and Conditions from the prime award are typically imposed on the subrecipient to the same degree that they are imposed on the PTE. These increasing demands create barriers for collaborating as some subrecipients do not have the framework or capacity to accept these regulations. Research Administrators have the insurmountable struggle to develop and implement best practices to ensure subrecipients comply with these emerging regulations and terms while maintaining the ability to broaden research impacts through collaboration. Trends show that regulations and compliance around research will continue to increase as technology advances. Research Administrators have to be agile to meet those demands. There is a heightened awareness and interest in understanding the downstream impacts of these regulations when including subrecipients in research projects.

Subrecipient Monitoring

Challenges with subawards do not end after the agreement has been executed. Once a subrecipient agreement has been fully executed by both parties, the management and monitoring of the subaward's performance begins. 2 CFR 200.332(d) requires PTE to monitor the activities of its subrecipients as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. What does the mechanics of subrecipient monitoring look like to research administrators? Some key performance indicators that should be reviewed include:

- Is subrecipient's work progressing according to schedule?
- Are deliverables, progress, and technical reports, satisfactory and being provided in a timely manner?
- Are compliance requirements current (IACUC, IRB, COI)?
- Do invoices reflect allowable, allocable, and reasonable costs?
- Are funds being spent according to the budget and project timelines?
- Is committed cost share being invoiced accordingly?

Reviewing the subrecipient invoices, cost share, reports, spend rates and compliance requires cross functional collaboration and heavy documentation. Those collaborators include the Principal Investigator (PI), departmental, post-award, and financial players of the organization. Having strong internal controls, streamlined processes can assist with subrecipient monitoring; however, it does not negate the time consuming and often cumbersome

review of a subrecipients performance indicators. Understanding that the PTE is responsible for monitoring the subrecipient throughout the subaward lifecycle is essential in preparing to meet and mitigate the monitoring challenge.

Rewards

Although navigating subawards is complex and challenging, engaging in these partnerships enhance the quality of research. Increasing interdisciplinary partnerships, technology, and globalization is fostering broadened research initiatives (Bansal et al., 2019). Subrecipient collaboration provides opportunities to expand research expertise and increase productivity and efficiency to meet these needs. Subrecipient relationships foster development of innovative solutions and makes additional resources available to organizations. Navigating the complexities and demands of subaward administration is not easy and will increase your capacity to problem solve. Being reminded that these collaborations can lead to social and economic rewards that benefit everyone makes the challenge well worth the effort. ■

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