This session will *not* be recorded, but this PowerPoint can found <a href="https://medschool.ucla.edu/research/research-infrastructure/administrative-support/department-of-medicine-office-of-research/fund-management-training">https://medschool.ucla.edu/research/research-infrastructure/administrative-support/department-of-medicine-office-of-research/fund-management-training</a>

# Subawards Proposal Preparation

UCLA DEPARTMENT OF MEDICINE OFFICE OF RESEARCH ADMINISTRATION ZOOM TRAINING

### Subawards: Terms & Definitions

### What is a Subaward?

- An agreement that transfers a portion of the research or substantive effort of the prime award to another institution or organization. Subs are written under the authority of a prime award and are consistent with the terms and conditions of the prime award.
- A formal binding legal agreement between the University of California, Los Angeles ("UCLA") and a non-UCLA entity in which:
  - A defined portion of the UCLA work statement's intellectually significant activity is assigned to another entity ("the subrecipient") to fulfill;
  - Work is generally performed by the subrecipient's personnel using their resources, usually at their site;
  - The subrecipient takes full responsibility, including intellectual leadership, for the portion of UCLA's work statement that they will undertake;
  - Many of the award terms and conditions UCLA has accepted from our funding agency are "flowed down" to the subrecipient, who must also agree to comply with them (e.g. audit requirements, restrictions on rebudgeting, human and animal subjects approvals, conflict of interest, clean air and water, etc.).
  - Has its performance measured against whether the objectives of the project are met

### Common Terms

- Prime
  - Usually refers to the Sponsoring Agency of the contract, grant or cooperative agreement awarded to Institution. i.e. original source of funding
- Subawarder (aka "parent")
  - The Institution that receives the award directly from the Prime Sponsoring Agency and flows down the terms and conditions down to a "child" Institution. It oversees the overall project while apportioning a part of the research/effort and associated funding to the "child" Institution.
  - Also referred to as:
    - Pass-Through Entity (PTE)
    - Recipient
    - Prime Recipient
    - Prime Awardee
    - Prime Grantee

### Common Terms

- Subrecipient/Subawardee (aka "child")
  - The legal entity to whom a subgrant or subcontract is made and who is accountable for the use of funds provided. A subrecipient has its own PI who will carry out a substantive, scholarly portion of the scope of work described in the proposal.
  - Also referred to as:
    - Subgrantee
    - Consortia
- Third-Party Entity (TPE) (not specific to subawards)
  - Entity that enters into an agreement with the PTE to carry out work/service in the sponsored activity under the PTE's prime award
  - Types of 3<sup>rd</sup> party entities: **subawards**, *vendor/contractor*, *consultant*
- Multi-Campus Award (MCA)
  - Subaward between 2 UC campuses
  - Sometimes referred to Multi-Campus Agreements

### Common Terms

- "Incoming" Subaward = award coming <u>into</u> UCLA
  - i.e. funding coming into UCLA *from a PTE*/subawarder; this makes *UCLA the subawardee*
- "Outgoing" Subaward = award being sent <u>out of</u> UCLA
  - i.e. funding coming *from a Prime Sponsor* to UCLA; *UCLA is the PTE/subawarder*
- BruinBuy (BB)
  - BB Legacy BruinBuy purchasing portal/web-based system used prior to December 31, 2023
  - BruinBuy Plus (BB+) Current BruinBuy portal/web-based system used today
- Offices Involved in Subawards:
  - OCGA Office of Contract & Grant Administration
  - TDG Technology Development Group
  - UCLA Procurement Solutions Group (PSG), aka Campus Purchasing

### Prime/Sponsoring Agency



### PTE/Subawarder/Parent\*

Sends an outgoing subaward



### Subrecipient/Subawardee/Child\*

Receives an incoming subaward

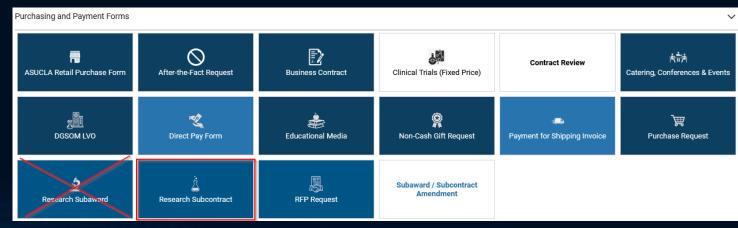
\*UCLA can be either parent or child, depending on the flow of funding.

## Subawards: Types

### Different Types of Subawards

#### 1) Subcontract

- When Parent receives a CONTRACT, and then transfers a portion of the research or substantive effort of that contract to another institution.
- Issuing Office: UCLA Purchasing Office
- BruinBuy Order Class: S (legacy BruinBuy PO # only)
- Modified Total Direct Cost (MTDC) F&A Base Object Codes:
  - 7310 (<u><</u>\$25K)
  - 7300 (>\$25K, excluded from overhead)



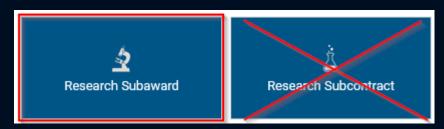
### Different Types of Subawards

### 2) Subgrant

- When Parent receives a GRANT or COOPERATIVE AGREEMENT, and then transfers a portion of the research or substantive effort of that grant or cooperative agreement to another institution.
  - At UCLA, it is often referred to as a "subaward."
- Issuing Office: OCGA (most instances)
  - TDG only if Prime is for-profit
- BruinBuy Order Class: G (legacy BruinBuy PO # only)



- 7310 (<u><</u>\$25K)
- 7300 (>\$25K, excluded from overhead)



### NON-Subawards 3<sup>rd</sup> Party Agreements

- Other types of 3<sup>rd</sup> party agreements that you may see under a prime award that are NOT types of subawards:
  - Vendor
  - Contractor
  - Consultant
- A contract is for the purpose of obtaining goods and services for UCLA's own use and creates a procurement relationship between UCLA and the third-party entity. Reference Class # 20 for more information.

### <u>Difference between Subaward & Contractor</u>

#### **SUBRECIPIENT**

- Intellectually significant portion of overall programmatic effort
- Sub PI responsible for making programmatic decisions
- Work could result in development of intellectual property
- Expected to author publications on results of work
- Will need animal/human subject approval
- Provides cost sharing or matching
- Will use funds to carry out program for public purpose

#### **CONTRACTOR (VENDOR)**

- Provides goods/services within normal business operations
- Provides similar goods/services to many different purchasers
- Performs series of repetitive tests or activities require little or no discretionary judgment
- Normally operates in a competitive environment
- Provides goods/services that are ancillary to the operation of the program

Sub vs. Vendor Matrix

### Third-Party Entity (TPE) Summary

- It is of vital importance to properly characterize the TPE at the time of proposal submission
  - i.e. Subaward, Vendor, Contractor, Consultant
- Things to consider when determining type of TPE
  - Type of Sponsor Award i.e. contract, grant, cooperative agreement
  - TPE Scope of Work i.e. intellectually/scientifically significant vs. regular business goods/service
- Impacts
  - Facilities & Administrative (F&A) costs, aka indirect costs
  - Terms & conditions flowed down
  - Set up & management of TPE agreement
    - Which central office Department Research Administrator works with

### Third-Party Entity (TPE) Summary

• Have PI use <u>Subrecipient vs. Contractor Determination Tool</u> to assist

Incoming to UCLA OCGA	Grant/Cooperative (Assistance)		Contract (Acquisition)	
3 <sup>rd</sup> Party SoW	Programmatic for the Project: Intellectually significant programmatic effort, including intellectual decision- making, in a portion of UCLA's proposed project work	Goods/services for UCLA: goods or services are used by UCLA in order for UCLA to accomplish of its project	Programmatic for the Project: For a very specific scholarly or programmatic task under a portion of UCLA's proposed contracted work	Goods/services for UCLA: goods or services are used by UCLA in order for UCLA to accomplish of its project
Outgoing	Subaward to Subrecipient	Contract to Contractor Vendor*	Subcontract to Subcontractor	Contract to Contractor Vendor*
Outgoing Handled by	Outgoing Subaward Team (OST)**	Purchasing	Purchasing	Purchasing

<sup>\*</sup> Also consulting, professional services, other agreements are processed by Purchasing.

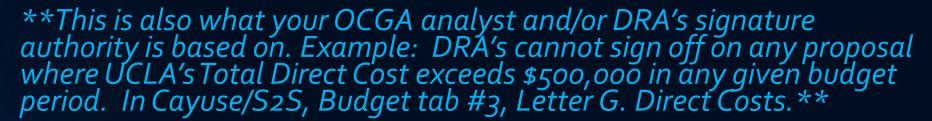
<sup>\*\*</sup>UC Multi-Campus Award (MCA): at proposal stage treated similar to a third party agreement (except UCLA F&A); however, technically not a "third party" since all UC campuses part of the same legal system (UC Participating Campus/Site).

# Knowledge Check #1

### Subawards: In/Direct Cost Calculations

### Total Direct Cost vs. DC Limitation/Ceiling

- UCLA's Total Direct Cost =
  - UCLA's Direct Cost, plus (+)
  - Subaward's Direct Cost, plus (+)
  - Subaward's F&A



- Direct Cost Ceiling/Limitation = (excludes Sub's F&A)
  - UCLA's Direct Cost, plus (+)
  - Subaward's Direct Cost
  - NIH Notice NOT-OD-04-040: This is to encourage collaborations outside of the PI's own institution, and not penalize a PI by counting the subaward's F&A towards the ceiling.



### **Direct Cost Definitions**

UCLA's Total Direct Cost =
 UCLA's DC + Sub's DC + Sub's F&A

NIH Direct Cost Limitation/Ceiling =
 UCLA's DC + Sub's DC

# Indirect Cost Calculations for Modified Total Direct Cost (MTDC)

- Only the first \$25,000 of each subaward scope of work for the entire project period is subject to indirect cost. In other words, any amount above the first \$25K is excluded, regardless of which year it occurs.
- <u>Exception</u> Other UCs: Entire amount (not just the first \$25K) of sister UC campus subawards are excluded from indirect cost calculations.
  - This is because the Federal government sees all The Regents of the University of California as a single entity. To provide UCLA IDC on another UC's cost is seen as double charging the government.
- Helpful Tool: <u>Budget Template</u>\* to help calculate MTDC \*must be logged into UCLA Health Box first before accessing

## Cayuse Example/Visual: MTDC Budget Formula/Calculations: TDC + (IDC Base x IDC Rate) = TC

Total Direct Costs (TDC) G. in Cayuse

\$573,751 TDC

SubTC - 1st \$25K of each Sub

- \$168,714 Sub > \$25K (\$218,714-\$50K)

- Sum of All Exclusions

- \$10,000 Equipment

= MTDC Indirect Cost (IDC) Base

\$395,037 IDC Base

x IDC Rate Note: sample using old F&A rate.

x 56.0% IDC Rate

= Indirect Cost (IDC)

\$221,221 IDC

+ Total Direct Cost

+ \$573,751 TDC

**Total Cost** 

\$794,972 TC

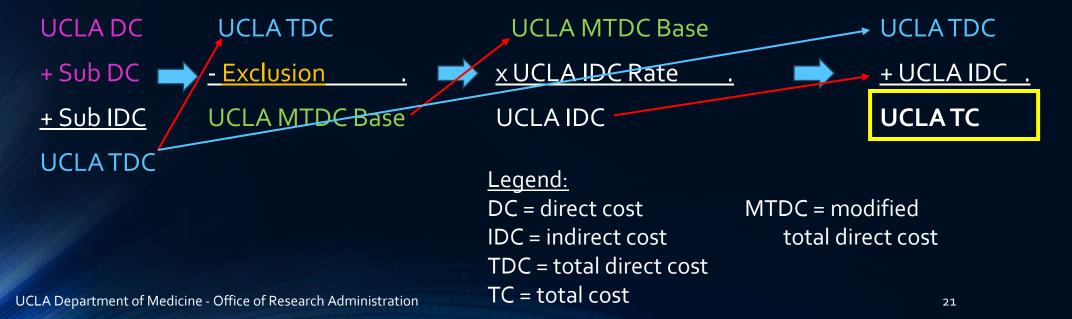
Limitation = \$573,751 - \$73,900 (combined subs IDC) = **\$499,851** 

Visual Aid for this Example

DC Ceiling/

### Summary of Indirect Calculations

- Know the difference between UCLA's TDC and DC Ceiling/Limitation
- For MTDC, only the 1st \$25K of each sub's scope of work is charged UCLA IDC, regardless of year the \$25K threshold is hit
  - Any amount above the 1st \$25K is EXCLUDED from UCLA IDC
  - A sister UC Campus TOTAL cost/full amount is EXCLUDED from UCLA IDC
- IDC Calculation Formulas



## Knowledge Check #2

### Subaward F&A Exercise

SUBAWARD SCENARIO CALCULATION EXCEL TEMPLATE

### Scenario #1

- UCLA PI wants \$100,000 to use towards his own lab for 1 year.
- Subaward Direct Cost is \$50,000/yr and F&A is \$32,000/yr.
  - 1. What is UCLA's Total Direct Cost?
  - 2. Assuming the \$100,000 for the UCLA PI is for salary & supplies only,
    - 2a) What is UCLA's **MTDC base**?
    - 2b) What is UCLA MTDC base if the Sub is to another UC?
    - 2c) What is UCLA's **Indirect Costs** if the Sub is non-UC?
    - 2d) What is UCLA's **Indirect Costs** if the Sub is to another UC?
    - 2e) What is UCLA's **Total Cost** if the Sub is non-UC?
    - 2f) What is UCLA's **Total Cost** if the Sub is to another UC?
  - 3. What amount is counted towards the NIH's Direct Cost Ceiling?
  - 4. What amount is counted towards an SO's signature authority?

### Scenario #2

- UCLA PI wants \$100,000/yr to use towards his own lab for 3 years.
- Subaward Direct Cost is \$10,000/yr and F&A is \$5,000/yr.
  - 1. What is UCLA's Total Direct Cost?
  - 2. Assuming the \$100,000 for the UCLA PI is for salary & supplies only,
    - 2a) What is UCLA's **MTDC base**?
    - 2b) What is UCLA MTDC base if the Sub is to another UC?
    - 2c) What is UCLA's **Indirect Costs** if the Sub is non-UC?
    - 2d) What is UCLA's **Indirect Costs** if the Sub is to another UC?
    - 2e) What is UCLA's **Total Cost** if the Sub is non-UC?
    - 2f) What is UCLA's **Total Cost** if the Sub is to another UC?
  - 3. What amount is counted towards the NIH's Direct Cost Ceiling?
  - 4. What amount is counted towards an SO's signature authority?

### Subawards: Proposal Preparation

UCLA AS THE PTE/PRIME GRANT RECIPIENT/SUBAWARDER ISSUING SUBAWARD TO AN OUTSIDE INSTITUTION/OTHER UC

Scenario #1 – Outgoing Subaward
NIH (Sponsoring Agency)



UCLA (as Subawarder/Parent)



Stanford (as Subawardee/Child)

### Steps - Outgoing Subaward

- 1) Confirm relationship/scope is indicative of a <u>subaward vs. contractor</u>. If confirmed this will be a subaward follow below steps:
- 2) Obtain the name/email of the Subrecipient's Admin Contact
- 3) Provide Subrecipeint with necessary information:
  - Sponsor Guidelines/Funding Opportunity Announcement (FOA)/Notice of Funding Opportunity (NOFO)
  - Final Title
  - Project Period
  - <u>List of all information/documents</u> UCLA PI will need from Sub to submit to Prime Sponsor
  - Sub's budget guidelines often (not always!) max \$ direct costs (DC) as set aside by the UCLA PI
  - Sub's deadline to return all requested documents
- 4) Collect a "mini proposal" from the Subrecipient
- 5) Review all Sub's forms to ensure they comply with Sponsor guidelines
- 6) Incorporate the Sub's paperwork into UCLA PI's overall proposal

### Documentation Required

- Subrecipient vs. Contractor Determination Checklist
  - Used to determine if Entity is truly a subrecipient or contractor
  - Recommend PI to complete. Technically no longer required, but good to have.
- Subaward/Subrecipient Forms Checklist
  - Email checklist to subrecipient to ensure correct versions of <u>all</u> required forms are obtained.
  - Suggest obtaining all non-signature forms in Word, rather than PDF whenever possible to enable flexibility in formatting/copying & pasting.
    - Exception is the budget which may come in Excel or <u>SF424 Budget PDF</u>
  - <u>Subrecipient Letter of Intent Form</u> or <u>MCA Commitment Form</u> (if to another UC)
  - All forms must be completed/received PRIOR to proposal submission.
  - Give the subrecipeint a realistic "hard" deadline. Remember you have to incorporate all the sub's budgets/forms into your PI's proposal AND submit within DOM DRA's 3 day/OCGA's 5 day deadline!

### Subawards in <a>S2S/Cayuse</a></a>

- Do NOT forget to incorporate the following information from the subawards into your proposal:
  - Subaward's Performance Sites.
  - Subaward's Facilities and Other Resources information.
  - Subaward's Equipment.
  - Full Professional Profiles & Biosketches for all subaward Key Personnel.
  - Under Research Plan section:
    - Consortium/Contractual Arrangements.
    - Letter of Support from subaward PI.
  - See <u>S2S Subaward Review</u> for requirements for various sections.

### Subawards in <a>S2S/Cayuse</a></a>

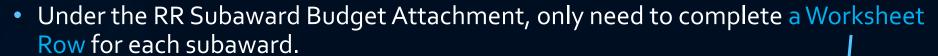
- For Both Detailed (RR Budget) and Modular Budgets:
  - Subaward budget mechanism always follows the parent proposal
    - i.e. If UCLA will submit detailed budget, subaward budget must also be detailed. If UCLA will submit modular, subaward is also modular.
    - Regardless, you should request the <u>SF424 RR Subaward Budget Attachment</u>\* (detailed budget) from the subawardee. \*<u>NIH SF424 Forms website under R&R Budget 5yr</u>
  - Always allow S2S to auto-calculate UCLA F&A (Section H).
  - Only overwrite the auto-calculated figures if you are 100% sure you are correct.

#### HINT: S2S/Cayuse is almost always right!

- Exception: Subawards to other UCs are entirely exempt from UCLA F&A calculations.
  - In this case, be sure to zero out the \$25k "Allocated to IDC Base" under RR Subaward Budget Attachment, as this is auto-filled by Cayuse.

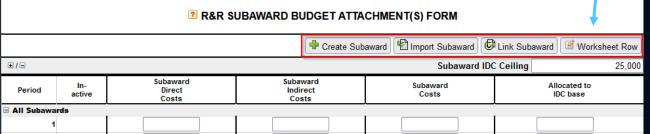
### Subawards in S2S/Cayuse

### Modular Budgets



- Manually enter the subaward's direct cost and F&A amounts provided to you by the subawardee in their SF424 RR Subaward Budget Attachment.
- Do <u>NOT</u> mark the checkbox next to the RR Subaward Budget Attachment, as the Worksheet Row data should NOT be submitted to the agency.

Under the PHS 398 Modular Budget, include the Consortium Justification. See
 S2S Subaward Review for items required to be included in the Consortium
 Justification.



RR Budget

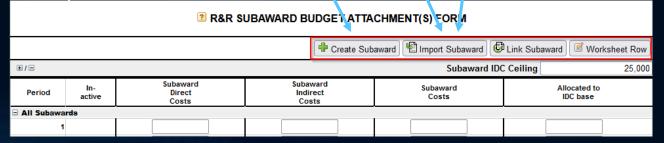
PHS Human Subjects and Clini

RR Subaward Budget Attachm

PHS 398 Modular Budget

### Subawards in <a>S2S/Cayuse</a></a>

- Detailed Budgets
  - Make sure the RR Subaward Budget Attachment box is checked so the subaward's detailed budget is included with the proposal to the sponsor.
  - 3 ways to enter a detailed subaward into Cayuse:
    - Import an SF424 RR Subaward Budget Attachment Form (Grants.gov Adobe PDF) provided by the subawardee.
    - 2. Import the subawardee's Cayuse/S2S subaward proposal (applicable if the subawardee uses Cayuse).
    - 3. UCLA Fund Manager manually enters data into Cayuse using the budget information provided by the subawardee.
      - Last Resort!



RR Budget

PHS Human Subjects and Clini-

PHS 398 Modular Budget

RR Subaward Budget Attachme

## Subawards: Proposal Preparation

UCLA AS THE SUBAWARDEE/SUBRECIPIENT/CHILD

# Scenario #2 – Incoming Subaward NIH (Sponsoring Agency)



Stanford (as PTE/Subawarder/Parent)



UCLA (as Subawardee/Child)

### What about when UCLA is the subawardee?

- Work closely with your contact at the Subawarder Institution. They
  may have their own set of requirements.
- Find out the Subawarder's proposal deadline, it will inevitably be prior to the Prime Sponsor deadline.
- Best Practice: Obtain and read through the Prime Sponsor's guidelines/FOA/NOFO.
- For NIH grants, more than likely, you will be required to complete the Grants.gov SF424 RR Subaward Budget Attachment Form.
  - Download directly from the Grants.gov RFA/PA packet.
  - Available on the DOM ORA Website, under <u>Pre-Award Forms Subaward SF424</u>
     <u>Adobe Budget</u>. (must be logged into UCLA Health Box & download before use) or <u>NIH SF424 Forms website under R&R Budget 5yr</u>

### What about when UCLA is the subawardee?

- Create a mini-proposal, which usually includes at least the following documents:
  - Subawarder's subrecipient commitment form/Face Page/Letter of Intent.
    - Requires OCGA's signature (Contract Officer)
  - Performance Site location information.
  - Biosketches & Key Person Profiles for all UCLA Key Personnel.
  - Resources & Equipment files for UCLA PI.
  - UCLA Statement of Work.
  - Letter of Support from UCLA PI.
  - Budget (for NIH, usually the <u>SF424 Subaward Budget Attachment Form</u>\*) along with the Budget Justification. \* or <u>NIH SF424 Forms website under R&R Budget 5yr</u>
  - Once proposal is reviewed & Subrecipient Commitment Form is signed by OCGA, send the mini proposal directly to your contact at the subawarder institution. They will then incorporate your documents into their proposal, and will submit the proposal to the Prime Sponsor.

# Links from Today's Class

- OCGA
  - Outgoing Subaward Home Page
  - Outgoing Subaward Required Forms
  - Outgoing Subaward FAOs
  - OCGA Monthly Training Outgoing Subaward Basics
- DOM Fund Manager Manual Chapters
  - Subaward Forms Checklist
  - Cayuse (S2S) NIH Subaward Review Checklist
  - S2S Subaward Attachment Requirements
  - Subaward SF424 Adobe Forms Budget

# Survey Link <a href="http://goo.gl/forms/C3gdjsL5y1">http://goo.gl/forms/C3gdjsL5y1</a>

We appreciate if you would take a few moments to complete a short 7 question anonymous survey to help us improve your training experience. Thank you!