

This session will *not* be recorded, but this PowerPoint can found

<https://medschool.ucla.edu/research/research-infrastructure/administrative-support/department-of-medicine-office-of-research/fund-management-training>

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 3rd 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 into UCLA**
 - i.e. funding coming into UCLA ***from a PTE/subawarder***; this makes ***UCLA the subawardee***
- “Outgoing” Subaward = award being **sent out of 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 (\leq \$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)
- Modified Total Direct Cost (MTDC) F&A Base Object Codes:
 - 7310 (\leq \$25K)
 - 7300 ($>$ \$25K, excluded from overhead)

NON-Subawards 3rd Party Agreements

- Other types of 3rd 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 # 19 for more information.

Difference between Subaward & Contractor

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

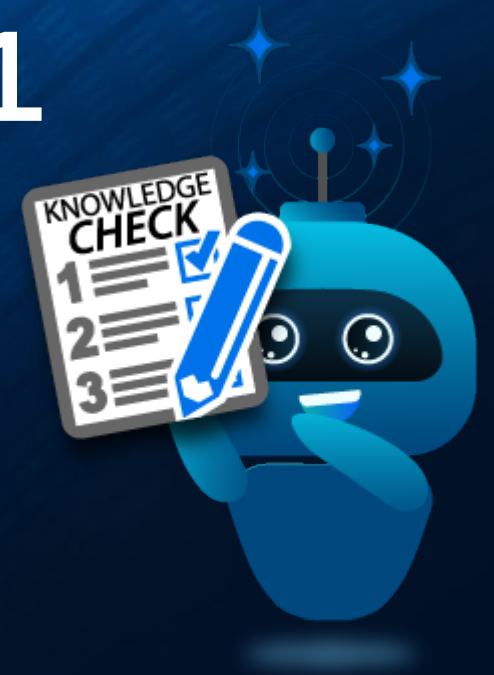
- Have PI use [Subrecipient vs. Contractor Determination Tool](#) to assist

<i>Incoming to UCLA OCGA</i>	Grant/Cooperative (Assistance)		Contract (Acquisition)	
<i>3rd Party SoW</i>	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
<i>Outgoing</i>	Subaward to Subrecipient	Contract to Contractor Vendor*	Subcontract to Subcontractor	Contract to Contractor Vendor*
<i>Outgoing Handled by</i>	Outgoing Subaward Team (OST)**	Purchasing	Purchasing	Purchasing

* Also consulting, professional services, other agreements are processed by Purchasing.

**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

This is also what your OCGA analyst and/or DRA's signature authority is based on. Example: DRA's cannot sign off on any proposal where UCLA's Total Direct Cost exceeds \$500,000 in any given budget period. In Cayuse/S2S, Budget tab #3, Letter G. Direct Costs.

- 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.

Reference
Class #16!

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.
- Exception – 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: Budget Template* to help calculate MTDC **must be logged into UCLA Health Box first before accessing*

Cayuse Example/Visual: MTDC Budget Formula/ Calculations: $TDC + (IDC \text{ Base} \times IDC \text{ Rate}) = TC$

Total Direct Costs (TDC) <small>G. in Cayuse</small>	\$573,751	TDC
Sub TC – 1 st \$25K of each Sub	- \$168,714	Sub > \$25K (\$218,714-\$50K)
<u>- Sum of All Exclusions</u>	<u>- \$10,000</u>	<u>Equipment</u>
= MTDC Indirect Cost (IDC) Base	\$395,037	IDC Base
<u>x IDC Rate</u> <small>Note: sample using old F&A rate.</small>	<u>x 56.0%</u>	<u>IDC Rate</u>
= Indirect Cost (IDC)	\$221,221	IDC
<u>+ Total Direct Cost</u>	<u>+ \$573,751</u>	<u>TDC</u>
Total Cost	\$794,972	TC

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

Visual Aid
for this
Example

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

$$\begin{array}{ccccc}
 \text{UCLA DC} & & \text{UCLA TDC} & & \text{UCLA MTDC Base} & & \text{UCLA TDC} \\
 + \text{Sub DC} & \rightarrow & - \text{Exclusion} & \rightarrow & \times \text{UCLA IDC Rate} & \rightarrow & + \text{UCLA IDC} \\
 + \text{Sub IDC} & & \text{UCLA MTDC Base} & & \text{UCLA IDC} & & \text{UCLA TC}
 \end{array}$$

Legend:

DC = direct cost

IDC = indirect cost

TDC = total direct cost

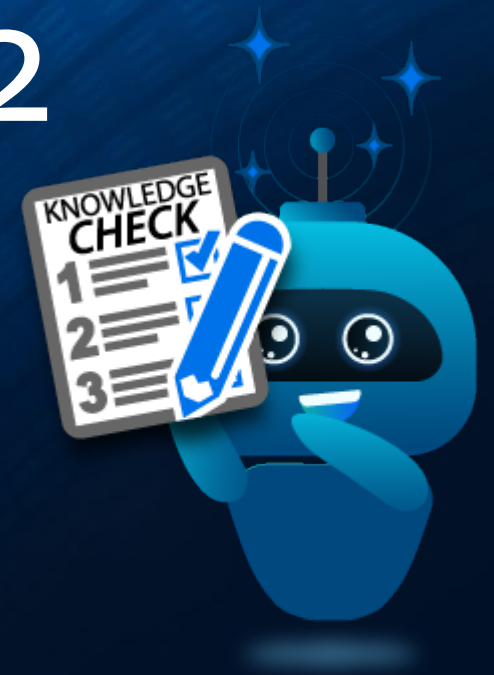
TC = total cost

MTDC = modified
total direct cost

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 subaward vs. contractor. If confirmed this will be a subaward follow below steps:
- 2) Obtain the name/email of the Subrecipient's Admin Contact
- 3) Provide Subrecipient with necessary information:
 - Sponsor Guidelines/Funding Opportunity Announcement (FOA)/Notice of Funding Opportunity (NOFO)
 - Final Title
 - Project Period
 - List of all information/documents 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
 - Requires PI responses and signature
- Subaward/Subrecipient Forms Checklist
 - Email checklist to subrecipient to ensure correct versions of all 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 SF424 PDF
 - Subrecipient Letter of Intent Form or MCA Commitment Form (if to another UC)
 - All forms must be completed/received **PRIOR** to proposal submission.
 - Give the subrecipient 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 S2S/Cayuse

- 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 S2S Subaward Review for requirements for various sections.

Subawards in S2S/Cayuse

- 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 SF424 RR Subaward Budget Attachment* (detailed budget) from the subawardee. *NIH SF424 Forms website under R&R Budget – 5yr
 - 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**

- Under the RR Subaward Budget Attachment, only need to complete a **Worksheet Row** for each subaward.
 - 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 NOT 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
1
2
3
4
☒ PHS Human Subjects and Clinical
1
☒ PHS 398 Modular Budget
1
☐ RR Subaward Budget Attachment
1

R&R SUBAWARD BUDGET ATTACHMENT(S) FORM

Subaward IDC Ceiling: 25,000

Period	In-active	Subaward Direct Costs	Subaward Indirect Costs	Subaward Costs	Allocated to IDC base
1					

Subawards in S2S/Cayuse

- 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:
 1. 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
1
2
3
4
☒ PHS Human Subjects and Clinical Investigations
1
☐ PHS 398 Modular Budget
1
☒ RR Subaward Budget Attachment
1

R&R SUBAWARD BUDGET ATTACHMENT(S) FORM

Subaward IDC Ceiling: 25,000

Period	In-active	Subaward Direct Costs	Subaward Indirect Costs	Subaward Costs	Allocated to IDC base
All Subawards					
1					

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 [Pre-Award Forms – Subaward SF424 Adobe Budget](#). (must be logged into UCLA Health Box & download before use) or [NIH SF424 Forms website under R&R Budget – 5yr](#)

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 SF424 Subaward Budget Attachment Form*) along with the Budget Justification. * or NIH SF424 Forms website under R&R Budget – 5yr
 - 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 FAQs](#)
 - [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

<http://goo.gl/forms/C3gdjsL5y1>

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!