



Office of Research

SUBJECT: Standard Operating Procedure for Subawards Topic – Subaward Requirements at Proposal Stage	Effective date: 00/00/0000	Policy Number:
	Supersedes:	Page of 1 2
	Responsible Authorities: Associate Vice President of Research Director of Sponsored Programs	

Purpose: The purpose of this policy is to provide guidance on establishing the minimum requirements for the use of subawards at proposal the stage.

Policy: The Office of Research (OR) requires subrecipient documentation be obtained by the investigator and provided to the OR along with the prime proposal in order to comply with agency and institutional guidelines.

Definitions (adapted from 2CRF200):

Subaward - *Subaward* means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a sponsored project received by the pass-through entity.

Subrecipient - *Subrecipient* means an entity that receives a subaward from a pass-through entity to carry out part of a sponsored program.

Pass-through entity - *Pass-through entity (PTE)* means an entity that provides a subaward to a subrecipient to carry out part of the sponsored program.

Background: UCF is responsible for complying with sponsoring agency regulations regarding subrecipients included in the prime proposal.

Procedures:

1. PI will inform the Unit Research Administrator of the intention to include a subrecipient as early as possible.
2. Unit Research Administrator will complete the [Subawards Predetermination Form](#) that will determine if the third party is a subrecipient, consultant or vendor; upload form in HRS.
3. Unit Research Administrator will confirm that the subrecipient is a member of the Federal Demonstration Partnership (FDP) and include documentation in HRS.
4. Unit Research Administrator will obtain a Letter of Commitment or [Subrecipient Letter of Intent \(Sub LOI\) Form](#) from the subrecipient institution (Sub PI, Sub PI designee, or Sub PI Institutional Official.)
5. A completed copy of the Letter of Commitment or Sub LOI with supporting documents must be included with the proposal to be routed through the HRS process not less than five days before the sponsoring agency deadline ([5-day rule policy](#)). This fillable form must be signed by the subrecipient institutional official (electronic signature allowed).
6. Supporting documents for the Sub LOI will include:

- a detailed statement of work to be completed by the subrecipient
 - the subrecipient budget and budget justification, including indirect costs, as approved by PI.
 - any additional information required by the sponsoring agency per agency guidelines
 - Subrecipient Commitment Form completed by the subrecipient (FDP Expanded Clearinghouse members may omit this form; preferred at proposal, required at Award set up)
 - Audit Certification and Financial Status Questionnaire completed by the subrecipient (Only applicable to organizations not subject to the Single Audit Act)
7. In accordance with 2CFR200.330, a predetermination of role as either a subrecipient or contractor (vendor/consultant) is required at the time of proposal. This determination is made based upon the scope of work, rather than preference of PI or subrecipient. The PI or PI delegate will complete the [UCF Subaward Predetermination Form](#), or statement of rationale for subaward, and forward as a supporting document for review by the UCF Pre-Award manager for determination. In the event of a difference of opinion regarding the predetermination of role as either a subrecipient or contractor, additional guidance will be sought from UCF Research Compliance Director.
8. Additional information will be gathered at the time of award or “Just-In-Time” notification, if needed.

Process metrics:

RELATED LINKS AND INFORMATION

Attachments:

- UCF Sub LOI
- UCF Subaward Predetermination Form
- UCF Subrecipient Commitment Form
- UCF Audit Certification and Financial Status Questionnaire
- UCF Outgoing Subaward processing Checklist

POLICY APPROVAL

Initiating Authority

Signature: _____
Dorothy Yates, Associate Vice President for Research

Date: _____