



Office of the
Vice President for Research

Research Administration Practices (RAP) Sessions

Subaward Post-Award Process Issuance, Monitoring & Closeout

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December 14, 2023

Agenda

RAP Sessions: Targeted skills based educational offerings open to the Research Administration community at MIT. Information gathered and shared with attendees can be taken back to their desks and applied immediately.

- Introduction – Why is this important?
- Trends/Metrics
- Recap of Subawards at Proposal
- Preparations and Basic Considerations
- Requesting Subaward
- After Your Request
- Ongoing Monitoring and Management
 - Invoice Approvals
 - Modifications
 - Close-Out

Introduction

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Managing Subawards

General

PI/DLCI	Subaward Team
• Maintain relationship with subrecipient PI and staff throughout the life of the subaward • Monitor subaward progress related to meeting project goals • Monitor subaward expenses against project budget • Follow subrecipient monitoring plan as applicable • Alert Subaward Team of any concerns from a programmatic or financial nature	• Conduct subrecipient initial and annual assessment per federal requirements • Draft, negotiate and issue subaward agreement and modifications • Assist with invoice review • Assist with close-out process

Invoicing

PI/DLCI	Subaward Team
• Confirm subrecipient is meeting project deliverables • Confirm that the expenses are allowable and appropriate to subaward agreement and budget • Obtain specific PI approval where management plans are in place • Track cost share reported on invoices where applicable • Reject invoices as needed, communicating the issue to	• After DLCI review and approval, will confirm invoices meet the compliance requirements ◦ Within correct date ranges ◦ Verify availability of funds ◦ Verification statement ◦ Authorized signature ◦ Marked as FINAL where appropriate

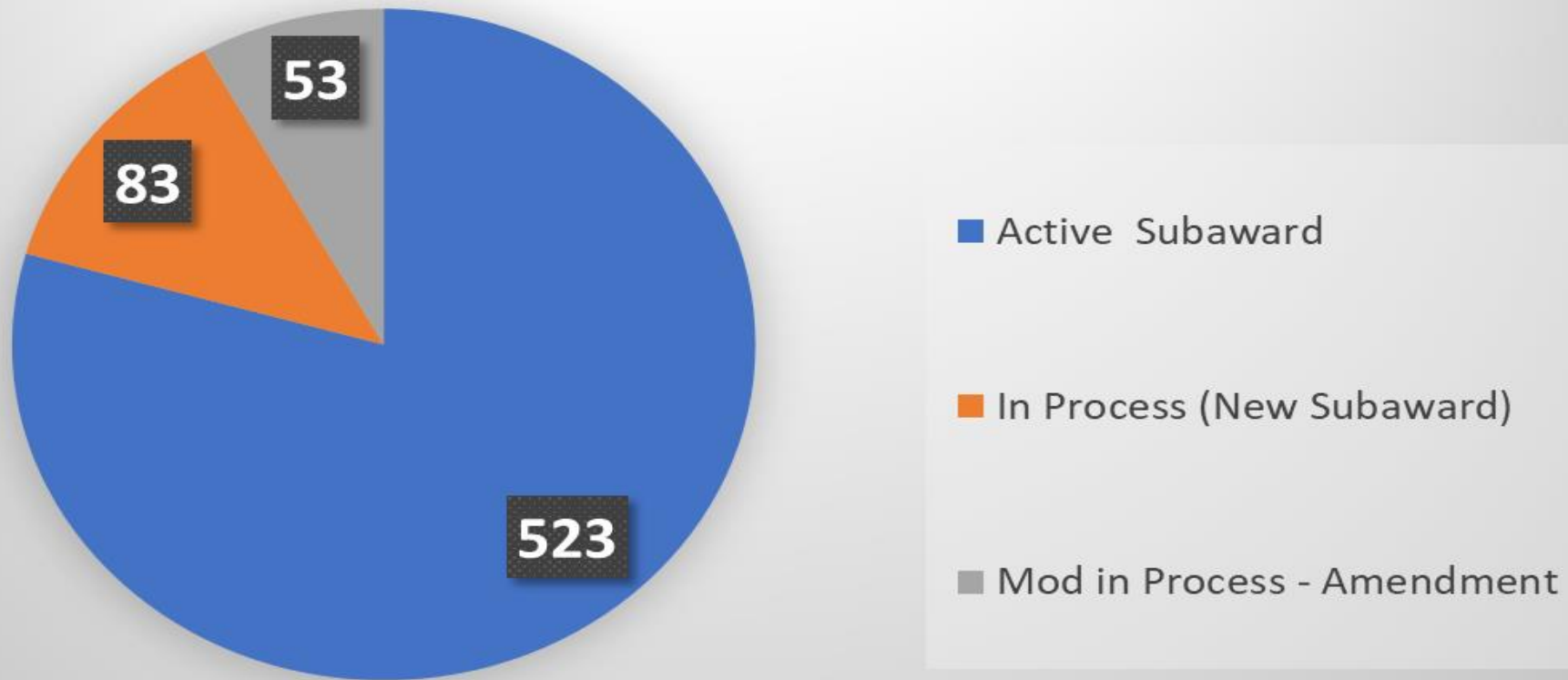
What's the big deal?

- Subawards are highly regulated
- Follow Uniform Guidance
 - Part 200 Subpart D
 - Accurately categorized as a subaward
 - Follow all requirements for pass-through entities 200.332
- Annual Single Audit
 - Assessment
 - Content of agreement documents
 - Invoice compliance



Subaward Stats.

Active and In Process Subawards = 659

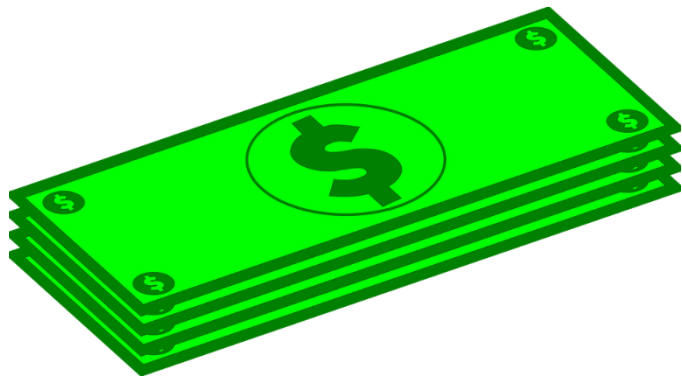


Subaward Volume – FY23 & FY24

New Subawards & Subaward Modifications					
<u>Month of Modification Effective Date</u>	<u>New Subaward</u>		<u>Modification</u>		<u>Grand Total</u>
	<u>FY 2023</u>	<u>FY 2024</u>	<u>FY 2023</u>	<u>FY 2024</u>	
July	18	15	38	24	95
August	18	18	39	55	130
September	22	19	25	58	124
October	23	18	35	57	133
November	16	26	29	55	126
December	28	9	64	10	111
January	18		53		71
February	17		49		66
March	9		51		61
April	19		33		52
May	22		49		71
June	20		49		69
<u>Grand Total</u>	<u>230</u>	<u>106</u>	<u>514</u>	<u>259</u>	<u>1109</u>

Recap of Subs at Proposal

- [Subaward Pre-Award Process Presentation](#)
- [Letter of Intent/New Subrecipient Profile Questionnaire](#)
- Confirm Appropriate Indirect Cost Rate
- KC Organization Risk Flag - **yellow**
- Accurate determination: subrecipient, vendor, independent contractor (consultant)



Determination

Subrecipient is distinguished from both a **vendor** and an **independent contractor/ consultant**

Subrecipient:

- Performs a substantive portion of the proposed Statement of Work incorporated into the Prime Award;
- Has responsibility for internal programmatic decision-making and design;
- Is responsible for assisting the Prime Recipient in meeting the goals of the project;
- ***Is responsible for adhering to applicable Federal programmatic compliance requirements;***
- Retains intellectual property and copyright to the work produced by the **Subrecipient's** personnel; may co-author an article in a professional research journal.
- **Note:** *MIT does not issue Subawards to individual persons; only to a company or organization that is not a sole proprietorship and that has sufficient internal controls and processes to be compliant with flow down terms and conditions.*

Vendor:

- Provides the goods and services within normal business operations.
- Provides similar goods or services to many different purchasers.
- Operates in a competitive environment.
- Provides goods and services that are ancillary to the operation of the federal program.
- ***Is not generally subject to compliance requirements of the federal program.***

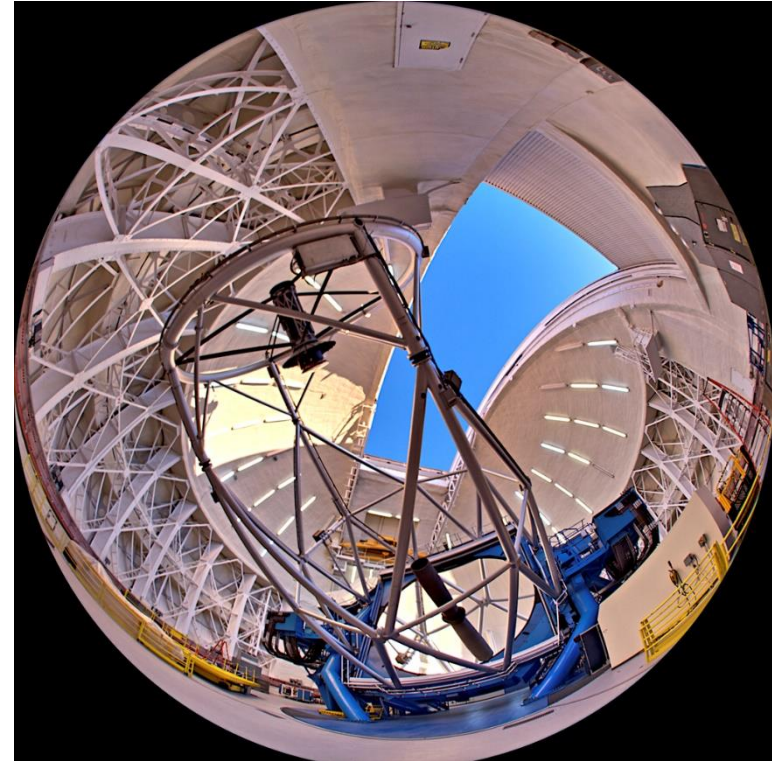
Independent Contractor (Consultant):

- An individual to perform services working on his/her own behalf rather than for a company

Is this a subaward?

Scope of Work: “*Scopes-R-Us* will provide access to observing time at its observatory so that MIT can make observations for its research project. Observation time will be invoiced at \$250.00 per hour.”

Provide your answer in the poll



How does the subaward get issued?

Before you submit your Requisition in B2P:

- KC notification sent when sub entity added to the award module
- Before the request is submitted
 - Confirm subaward is appropriate mechanism
 - Period of Performance
 - Obligated vs. Anticipated
 - Statement of Work and Budget
 - Protocol Approvals
 - Subaward PI and Administrative Contact
 - Additional Documentation/Information



Realistic Expectations

- Several steps to issue – takes time
- Incomplete documentation will cause delays
- Not-for-Profit entities
 - Infrastructure and experience
- For profit entities –
 - Lengthy negotiations (TLO, OSATT)
 - Different mechanism than a vendor relationship
 - Potential COI mitigation
- International entities –
 - Assessment of infrastructure
 - Ability to accept US flow down



Submitting your Subaward Requisition

Step-by-step instructions for submitting your requisition are found by clicking the icon below on the [B2P homepage](#)



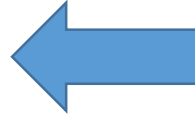
Create or Change
Subaward
Requisition

This [guidance document](#) will be updated as needed – check regularly
Contact B2P@mit.edu for questions regarding errors or issues within B2P

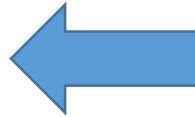
B2P Requisition

General Info

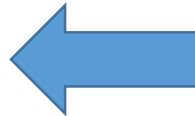
Created By	Theresa Peterson (1-107)
Requested By	Theresa Peterson (1-107) (Change)
Justification	UofWisc-Madison SubAward on MURI ONR project.
Attachments	WS00960300-RR_SubawardBudget_B... WISC_LOI.pdf Boydston_Subaward_for_MIT.pdf WISC-Phase_1_Period_1.xlsx Attach any documentation (e.g., Selection of Source Form). If you add attachments, please check the box below.
Attachments included?	Yes
Subrecipient, click if high risk	No
Email Address of Requester	theresap@mit.edu
Does a contract need drafting or review?	No
Comments to Supplier	None
Notes to Buyer	Period of Performance is 06/01/2023 - 05/31/2026, PI AJ Boydston, funding at this time is \$115,000.
Buyer Contact	IAN ADAMS (IANADAMS@MIT.EDU)
Requisition Type	Standard
Remove Standard T&Cs	No
SAP Requisition	1040983:0012658232
SAP Error Msg	None
Req Total	115,000



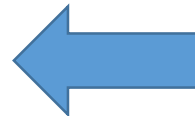
Requisitioner is the individual attached to subaward in KC and is administrative contact for sub team (*only person who can modify*)



Attach all required documents



Items are consistent for procurements – not specific to subawards



Subaward checklist will replace adding language in the Notes to Buyer section

Subaward Request Checklist – NEW!

- Ensures necessary information is provided
- Provide info that has changed from LOI or assists with issuance

Subrecipient Request Checklist – New Subaward

Please enter information that has (1) changed from the Sub Letter of Intent, (2) that is new and (3) that may assist in the issuance of the subaward

MIT Information

PI Name _____
Admin Contact Name _____
Subaward Project Title _____

Subrecipient Institution Information

Legal Org Name _____ UEI _____
Performance Site Address (If different than legal address) _____

Sub PI Name _____ Email _____
Administrative Contact _____ Email _____
Contract Negotiation Contact _____ Email _____

Parent Award Number: _____

Total Project Period of Performance (start) (end) _____

Year 1 Obligation period (start) (end) _____

Total Anticipated funding for project _____

Funding amount for Year 1 obligation period _____

Cost Share Y/N – Amt total project period _____ Amt Year 1 obligation period _____

Human Subjects Y/N Animal Subjects Y/N (if yes, upload approval document)

Uploaded documents – all FINAL:

Subrecipient Letter of Intent/Commitment

Sub-specific SOW

Sub-specific budget (detailing both current obligation and full performance period)

Sub-specific cost share budget (detailing both current obligation and full performance period)

Protocol approval

Related, ancillary agreements (i.e. NDA, MTA)

Additional documents: *(Award letter for internally granted, Email communications)*

SPECIAL INSTRUCTIONS: *(i.e. Multiple PI award, delayed onset, extraordinary circumstances)*

Free form text box

After Your Request ...

- Submitting your requisition in B2P does not automatically create a Subaward record in KC – it is a manual process by Sub Team
 - Assignment to Subaward Administrator
 - Creation of KC Subaward Shell
- Incomplete documentation will cause delays
- Assessment
 - Subrecipient Letter of Commitment/Intent – Questionnaire (*new*)
 - For-profit and International



After Your Request ...

- Drafting – proper flow downs, mitigation terms
 - May require DLCI involvement (Meetings, Management Plans)
- Negotiation
 - May require OSATT/TLO involvement
 - Status – where DLCI can view status
- Execution
 - Requisitioner and PI copied on fully-executed version



Access Issues?

Especially if users are new to MIT or a new role, they should do the following:

- Go to <https://rolesapp.mit.edu/rolesclient/rolesui.html> (Roles Database) and authenticate via MIT Touchstone
- Assigned authorizations will be listed. Confirm that **VIEW SUBCONTRACT KC** is listed (and **VIEW SUBAWARD ATTACHMENTS KC** if they will need to view shared subaward documents).
- If the role does not appear, please request from DLCI Primary Financial Authorizers ([RA-HELP](#) if further assistance is needed)
- A list of all KC roles -> <https://kc.mit.edu/document/kuali-coeus-roles-database-authorizations-kc-quick-reference-nov-2019>

What is the Red Flag?

Letter of Commitment/Intent:

Subrecipient Institution Information

Legal Org Name	Beaver Foundation for Student Wellness	UEI	BU239oR
Entity has previously received a subaward from MIT	No	v	
Sub PI Name	Harvey Wallbanger	Email	harvey@bfsw.org
Phone	617-896-9999		
Performance Site Address	1 Beaver Street, Boston, MA 02110		
Project Period	1/1/2024 - 12/31/2024		
Direct Costs	100,000	F&A Costs	25,000
F&A Rate	25%	Total Costs	125,000

Subrecipient Contacts

Administrative	Susie Q	Email	SQ@bfsw.org	Phone	617-869-8888
Authorized Official	Harvey Wallbanger	Email	harvey@bfsw.org		
Contracting Contact	Susie Q	Email	SQ@bfsw.org	Phone	617-869-8888

Invoice Review and Approval

Change in approval routing order – December 15th COB

Invoices must be submitted to: Invoices@mit.coupahost.com

DLCI responsibilities

1. Confirm Subrecipient is meeting project deliverables
2. Confirm that the expenses are allowable and appropriate to subaward agreement and budget
3. Obtain specific PI approval where Management Plans are in place
4. Track cost share reported on invoices where applicable
5. Reject invoices as needed, communicating the issue to the Subrecipient for correction and resubmission
6. Contact B2P@mit.edu for questions regarding errors or issues within B2P (*i.e. expired cost object, IDC not charging correctly, cannot modify PO – requisitioner needs updating*)
7. Alert Subaward Team of any concerns
subawards@mit.edu

RAS Sub Team responsibilities

1. Confirm invoices meet the compliance requirements
 - Within correct date ranges
 - Verify availability of funds
 - Verification statement
 - Authorized signature
 - Marked as FINAL where appropriate
2. Reject invoices as needed, communicating the issue to the Subrecipient for correction and resubmission copying DLCI
3. Approve to Accounts Payable for payment (*payment status checked through VPF*)

Can we pay this? #1

Subaward ended in September 2022. Eight months later Subrecipient sends an invoice dated May 15, 2023 for costs incurred October 2022 – March 2023.

...Can we pay the invoice?



Can we pay this? #2

Pending Subaward recipient sends an invoice for expenses incurred five months before the subaward's start date, and a letter from MIT's PI permitting them to start their research five months early.

...Can we pay the invoice?



Photo: Jake Belcher for MIT News Office

Modifications

KC Sub record may be accessed for status

DLCI responsibilities

1. Submit [B2P Change Order](#) request ([Quick Card](#)) to issue a Subaward Modification to:
 - Extend the date
 - Increase funding
 - Issue a budget modification
2. Upload **Modification Checklist** to ensure documentation is provided as needed:
 - Revised end date, budget and/or SOW
 - Updated compliance approvals
3. Contact B2P@mit.edu for questions regarding errors or issues within B2P

RAS Sub Team responsibilities

1. Draft and issue Subaward Modification documents
2. Obtain clarifications from DLCI if applicable
3. Ensure entity assessment is up to date
4. Copy PI and DLCI Admin when sending fully-executed Modification to Subrecipient

Modification Information

Is this a No Cost Extension? Y N

Project Period of Performance (start date) _____ (end date) _____

Obligation period (start date)____ (end date) _____

Funding amount for obligation period _____

Cost Share Amt project period _____ Amt obligation period _____

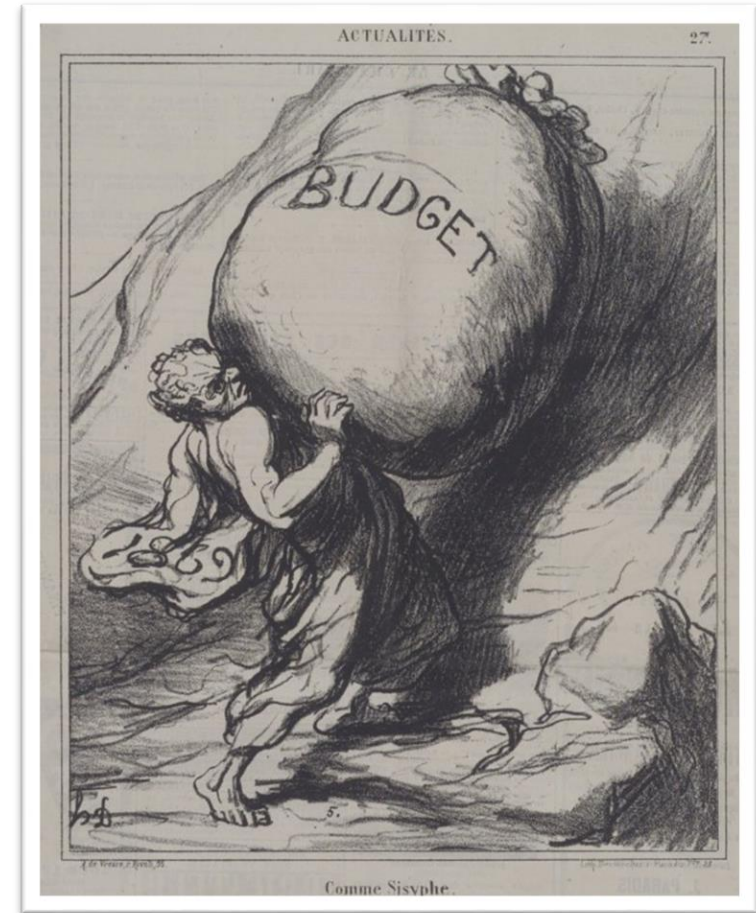
Human Subjects Y N Animal Subjects Y N (if yes, upload approval document)

Documentation Uploaded – all FINAL and if applicable:

Is this request complete?

DLCI sends a B2P request to add Y2 funding to a subaward. Total funds have been increased on the PO with no documents or other information. The original signed Subaward agreement only has a Y1 budget and SOW as attachments.

What else does DLCI need to submit?





Close Out

KC Notifications Sent 60 and 30 Days Before Subaward End Date

DLCI responsibilities

1. Proactively engage Subrecipient toward award end
To collect final deliverables
Ensure timely final invoice received (marked as FINAL)
2. Submit [Closeout Request form](#) to Subaward Team
Confirm reporting requirements were met
Confirm whether balance is to be De-obligated

RAS Sub Team responsibilities

1. Confirm receipt of complete and accurate Closeout Request Form
2. Collect final patent report from subrecipient (as required)
3. Soft close B2P PO
4. Change KC Subaward Record Statuses - Ended, Financially Closed, Closed

With several steps by multiple individuals, being pro-active and starting early is important

Close Out Request Form

Please complete and submit this form to initiate the subaward closeout process. Contact subawards-closeout@mit.edu with any questions.

Please Confirm the following:

- All required deliverables and reports have been received and found to be acceptable by the MIT Yes _____ No _____
- Final Invoice had been received Yes _____ No _____

Subrecipient Name

Requestor Name

MIT PI & DLCI

Subaward # & PO #.

S _____

PO #

December

▼ 31

▼ 2023

▼

Account (WBS) #:

☐ YES - Subaward is expected to end by the date noted above.

☐ YES - De-obligate the remaining balance of (Please type in Dollar Amount).

Questions



Questions can also be sent to
subawards@mit.edu

Addendum

Common B2P Subaward Issues

- Please choose AMT-type PO line when creating or revising a Subaward purchase order. QTY will restrict the ability to link and pay multiple invoices on a B2P PO line.
- Please create two separate PO lines for G/L 420600 and G/L 420620; the first line should be for G/L 420600. B2P data entry administrators typically charge first from top-to-bottom.
- Inactive Cost Object error in B2P when the cost object was already extended in KC and SAP?

Solution: the cost object needs to be re-added to each PO line

Billing account Subrecipient Agreement -6936091 SUB-AWARD FOR UCF-HU-SPON is inactive
Billing account Subrecipient Agreement-not MTDC -6936091 SUB-AWARD FOR UCF-HU-SPON is inactive

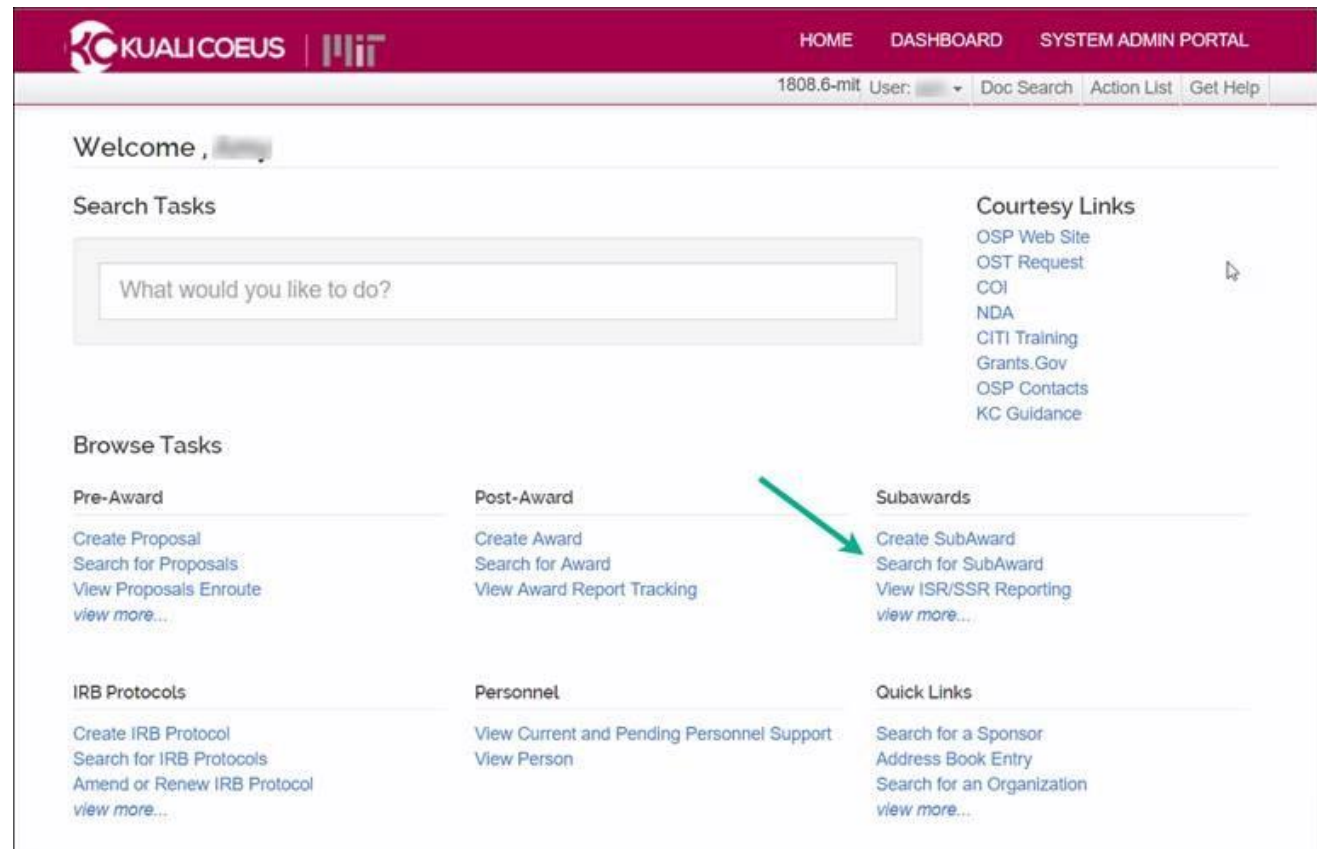
Choose an Account

Choose Chart Of Accounts MIT COA

* - GL	Subrecipient Agreement (420600)	x v
* - CostObj	6936091 SUB-AWARD FOR UCF (6936091 (Hu, Juejun))	x v
* - FundCtr	6936091	q
* - Sponsor	6936091 SUB-AWARD FOR UCF (6936091 (Hu, Juejun))	

KC Subaward Module

From KC Home, click **Search for Subawards**



KUALI COEUS | MIT

HOME DASHBOARD SYSTEM ADMIN PORTAL

1808.6-mit User: aeh Doc Search Action List Get Help

Subaward Lookup ? * required field

Subaward ID:

Subrecipient:

Subrecipient Name:

Start Date From:

Start Date To:

End Date From:

End Date To:

Subaward Type: select

Purchase Order ID:

Award ID:

Title:

Status: select

Account ID:

Vendor ID:

Requisitioner User Name:

Requisitioner Unit:

Archive Location:

Closeout Date From:

Closeout Date To:

Document Status: ☒ Final ☐ Saved ☐ Both

search clear cancel

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In the Search screen, enter search criteria such as Purchase Order ID or Subaward ID (located on the Subaward agreement as the Subaward Agreement No.), then click *Search*

Subaward ID = Subaward Agreement number
Example: Agreement no. S####

Multi-year agreements may have multiple purchase orders—search with “” before and after the PO#

Older agreements before 2018 used the PO# as the agreement number and start with 571000####

One item retrieved.

Actions	Requisitioner	Subaward ID	Subrecipient	Subrecipient Name	Start Date	End Date	Subaward Type	Purchase Order ID	Title	Subaward Status	Account ID	Vendor ID	Requisitioner Unit	Archive Location	Closeout Date	Document Status
open medusa	Jones, Gretchen L.	4552	000023	Massachusetts General Hospital	01/01/2018	12/31/2018	Grant	205917	Phillips-MIT Alliance	Active	6932607		Comp Sci & Artificial Intel Lab HQ			Final

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From search results, click “open”

Viewing a Subaward

KC Subaward

Requisitioner ID:	jafoster	Document ID/Status:	2970270:FINAL
Requisitioner Unit:	McGovern Institute for Brain Research	Subaward ID:	5118
* Subrecipient:	Georgia State University	Last Update:	09/16/20 01:28 PM by Onyuksel, Alisa Dara (ali

Subaward Financial Supplemental Info Template Information Comments, Notes & Attachments Subaward Actions Medusa

[expand all](#) [collapse all](#)

Document Overview

[hide](#)

* Description:		Explanation:	
Organization Document Number:			

Subaward

[hide](#)

Subaward ID: 5118			
Version:	4	Execution Date:	09/16/2020
Start Date:	08/01/2020	End Date:	07/31/2023
Subaward Type:	Grant		
Title:	Nobrainier: A robust and validated neural network tool suite for imagers		
Account ID:	6943621	Status:	Active
Requisitioner User Name:	jafoster	Vendor ID:	
	Foster, Jacqueline A	Requisitioner Unit:	400600
			McGovern Institute for Brain Research
Archive Location:		Closeout Date:	
Federal Award Project Description:	S5118, PO# 487283		
F & A Rate:	55.50	de Minimus:	No
Comments:	1RF1MH121885-01A1 PO# 487283 Per the NOA: Funds are "restricted pending submission and acceptance of the annual RPPR". Due to this constraint, we will submit increments to GSU until 3 year total is reached (\$553,661).		
Obligated Amount:	183,481.00	Anticipated Amount:	553,661.00
Amount Released:	0.00	Available Amount:	183,481.00
Cost Type:	Cost Reimbursement	Site Investigator:	
Requisition ID:	482436	Risk:	
Subrecipient:	101526		
	Georgia State University		
	837322494		
FFATA Required:	Yes	FSRS Subaward Number:	55118

Funding Source

[hide](#)

Award Number:	Account ID:	Award status:	Sponsor ID:	Amount:	Final Expiration Date:	Actions
Current Funding Sources						
show	030902-00001	Active	000340 : NIH	2,419,908.00	07/31/2023	Open award medusa

Contacts

[hide](#)

	* Person or Organization	* Project Role	Office Phone	Email	Actions
1	Plis, Sergey	Subcontract Principal Investigator	404-413-4961	splis@gsu.edu	

Closeout

[hide](#)

	Closeout Type:	Date Requested:	Date Followup:	Date Received:	Actions
1	IP - RST	09/04/2020	09/18/2020		
	Comments:	09/06/2020: Milan Berhane <mberhane2@gsu.edu> accepted draft and PO generated for PEA; 09/04/2020: Sent to gsurfawards@gsu.edu			
2	IP - RAS	09/11/2020	09/25/2020	09/11/2020	
	Comments:	Sent to VG for review			
3	IP - RST	08/12/2020	08/26/2020	08/12/2020	
	Comments:	Requisition no. 482436 received Agreement			

Subaward
Administrator
status notes

Financial tab – View Invoices

KC Subaward	Requisitioner ID: reneel	Document ID: 2771135:FINAL
	Requisitioner Unit: Picower Institute for Learning and Memory	Subaward ID: 4949
	* Subrecipient: Johns Hopkins University	Last Update: 10/22/20 07:02 PM by Onyuksel, Alisa Dara (a)

Subaward	Financial	Supplemental Info	Template Information	Comments, Notes & Attachments	Subaward Actions	Medusa
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Document was successfully reloaded.

[expand all](#) [collapse all](#)

History of Changes

Obligated Amount:	231,600.00	Anticipated Amount:	694,800.00
Amount Released:	116,838.73	Available Amount:	114,761.27
Modification Effective Date:		Modification ID:	00
Period of Performance Start Date:	09/26/2019	Period of Performance End Date:	08/31/2022

History of Changes

	Effective Date:	* Obligated Change:	* Anticipated Change:	
1	Effective Date:	* Obligated Change:	* Anticipated Change:	
	01/08/2020	231,600.00	694,800.00	
Modification Type:	Modification Effective Date:	Modification ID:	Period of Performance Start Date:	Period of Performance End Date:
Other		00	09/26/2019	08/31/2022
Purchase Order ID:				
408872				
Comments:	FE Agreement	Attachment Actions :		

Invoices

Obligated Amount:	231,600.00	Available Amount:	114,761.27
Amount Released:	116,838.73		

Invoices

	Invoice ID	Start Date	End Date	Effective Date	Amount Released	Invoice Status	Attachment
1	open 1800269830	09/01/2020	09/30/2020	10/22/2020	10,657.96	FINAL	133357.pdf
	Comments	Invoice routed and approved in B2P 10/22/2020					
2	open 1800266071	08/01/2020	08/31/2020	09/23/2020	11,141.00	FINAL	133357.pdf
	Comments	Invoice routed and approved in B2P 09/23/2020					
3	open 1800256585	03/01/2020	03/31/2020	09/14/2020	12,074.17	FINAL	1800256585.pdf
	Comments	Invoice routed and approved in B2P 09/14/2020					
4	open 1800257822	07/01/2020	07/31/2020	08/19/2020	17,021.33	FINAL	133357.pdf
	Comments	Invoice routed and approved in B2P 08/19/2020					
5	open 1800263162	06/01/2020	06/30/2020	07/22/2020	16,451.39	FINAL	133357.pdf
	Comments	Invoice routed and approved in B2P 07/22/2020					
6	open 1800261313	05/01/2020	05/31/2020	06/22/2020	18,136.44	FINAL	133357.pdf
	Comments	Invoice routed and approved in B2P 06/22/2020					
7	open 1800251970	01/01/2020	01/31/2020	05/27/2020	3,286.14	FINAL	1800251970.pdf
	Comments	Invoice routed and approved in B2P 05/27/2020					
8	open 1800250831	09/26/2019	12/31/2020	05/27/2020	6,572.27	FINAL	1800250831.pdf
	Comments	Invoice routed and approved in B2P 05/27/2020					
9	open 1800258929	04/01/2020	04/30/2020	05/19/2020	10,749.02	FINAL	133357.pdf
	Comments	Invoice routed and approved in B2P 05/19/2020					
10	open 1800253692	02/01/2020	02/29/2020	03/17/2020	10,749.01	FINAL	1800253692.pdf
	Comments	Invoice routed and approved in B2P 03/17/2020					

[add invoice](#) [close](#)

Comments, Notes & Attachments tab — view

KC Subaward 	Requisitioner ID:	smargol	Document ID/Status:	2884629:FINAL
	Requisitioner Unit:	Abdul Latif Jameel Poverty Action Lab	Subaward ID:	4986
	* Subrecipient:	The Regents of the University of California, Berkeley	Last Update:	06/03/20 02:50 PM by Onyuksel, Alisa Dara (a

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5	02/07/2020 04:59 PM	Onyuksel, Alisa Dara	Budget	Budget	 Handel_Budget.xlsx	view void modify
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