

QuickCard: Outgoing Subaward/Subcontract Process Overview

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Background and Purpose

The primary recipient (“Pass Through Entity” or “PTE”) of externally funded awards in support of research or other sponsored activities is responsible for the proper stewardship of such funds, including: the overall performance of the project; the appropriate expenditure of funds by all parties; applicable reporting requirements; and all other obligations of the PTE as outlined in the award notice and related funding agency guidelines.

This QuickCard sets outlines the process for outgoing subawards and/or amendments to existing subawards and their related administrative, compliance and risk-assessment requirements.

Process Overview of Outgoing Subaward or Amendment

1. The NU-RES Grant Officer (GO) reviews the award obligation package. Once the GO finalizes their review and the award is fully-executed, the award obligation package is sent to the subawards team via email to nures_contracts@northeastern.edu. The award obligation package includes the fully executed Notice of Award, final budget, and “backup” including the up-to-date proposal documents (JIT information, Scope of Work and Budget Detail and justification for subrecipient) and any applicable compliance review/approval documentation received during award review.

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2. The subaward team will:
 - a. Create eCLAWS record for the requested subaward action, using either the new award issuance or existing award modification wizard and adding all documentation received
 - i. Be sure to include the subaward number in the eCLAWS explanations field
 - b. Review the documentation to confirm that the subaward issuance/amendment is expressly awarded/approved in the prime award and all required backup documentation (e.g. proposal, prior approval request, etc.) is added to eCLAWS record
 - i. If the subaward action is not expressly awarded/approved in the prime award backup documentation provided, the subaward team will reach out to the GO/CO to confirm that the subaward action (issuance or modification) is documented as approved
 1. If prior approval is needed, GO will seek necessary approval and alert subaward team once received; the subaward team takes no action on the subaward until such approval is received
 - c. Send PI/Department Administrator applicable online intake form to complete via eCLAWS info request; review and add completed intake form response to eCLAWS file cabinet once received
 - i. Online intake forms request information from the NU PI that is necessary for subaward issuance/modification, including whether the requested subaward action was approved in the original proposal or post-award and, for modifications, whether the subrecipient has performed satisfactorily to date
 1. New subaward intake form: <https://forms.office.com/r/keWKrOnFzv>
 2. Subaward modification intake form: <https://forms.office.com/r/Av9V92wMw0>
 - d. Complete Outgoing Subaward Checklist/Contract Review Record (CRR) to ensure all information necessary to process the subaward request is available and accurate; add completed checklist/CRR to eCLAWS file cabinet
 - i. If any items or information is missing after subaward team has reviewed all eCLAWS documents as well as the related ePAWS and/or Coeus records, subaward team will consult the GO/CO/PI/Department Admin for missing information as applicable and proceed with processing once received
 - e. Conduct Risk Assessment Questionnaire (RAQ) of subrecipient¹ and review subrecipient audits² for risks requiring escalation or mitigation;

¹ [FDP Website: Subrecipient Monitoring and Other Assessment Tools page](#)

² [Federal Audit Clearinghouse website](#)

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- i. Subrecipients that are not in FDP clearinghouse must complete the NU Subrecipient Questionnaire to facilitate financial risk assessment
 - ii. Add Checklist, PI Intake Form, RAQ and NU Subrecipient Questionnaire to eCLAWS record as backup in the file cabinet
 - iii. Any subawards designated as “high risk” must be escalated to Subawards Manager and Sr. Assoc. Director of Contracts prior to proceeding
 - f. Draft subaward agreement/modification and send to subrecipient with all relevant stakeholders (PI/Dept/etc.) included
 - i. Ensure that draft agreement/modification reflects all reporting, financial documentation and other applicable requirements/risk mitigations as identified in PI intake forms and risk assessment process
 - g. Negotiate subaward document(s) with subrecipient as needed until ready for final execution; route/email final document(s) as necessary for final internal/external reviews and signatures
 - h. Distribute final copies of fully executed agreements to all relevant stakeholders and save to eCLAWS file cabinet
 - i. Email fully executed subaward and related risk assessment documents to Subaward Invoice Administrator for final processing/setup
 - j. Subaward Invoice Administrator adds final subaward contract and risk assessment documents to COEUS, completes FFATA reporting (as applicable), and ensures subrecipient is registered with NU payment/invoicing system(s)
-

Risk Assessment and Compliance Reviews

Subrecipient Risk Assessment

Consistent with the subrecipient monitoring requirements of the Uniform Guidance, subrecipients under federally-funded awards are reviewed and assessed for risk using the latest adopted versions of the [FDP Risk Assessment and Continuing Assessment questionnaires](#)

1. Subrecipients are assessed at initial subaward issuances using the FDP Risk Assessment Questionnaire (RAQ) form
2. Subrecipients whose awards are being modified are assessed using the FDP Continuing Assessment Tool (CAT)

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For both RAQ and CAT assessments, the NU subawards team member conducting the risk assessment utilizes the award backup documentation, subrecipient letter of intent (LOI) and subrecipient questionnaire (where applicable) to determine whether a subaward action is low, medium or high risk in accordance with the RAQ/CAT calculations and NU standards.

PIs and College administrators are also asked to confirm whether the subrecipient's technical and financial performance is satisfactory to date with each modification.

Once risk level is determined, subaward administrator adds documentation to the eCLAWS record and ensures that the award/modification contains terms and/or requirements appropriate to the identified level of risk.

Regulatory Compliance Reviews

Once the subaward record is created in eCLAWS, the NU-RES subaward team will review the request to ensure regulatory compliance approvals are in place, and/or appropriate language added to the subaward agreement to address any such concerns.

If necessary approval(s) are not yet available at the time a subaward or modification is issued, the subaward or modification can be initiated with a restriction placed on any activities affected by the outstanding approval(s) unless/until approval(s) are received if the NU PI:

- (1) requests that a restricted subaward be issued and
- (2) confirms that the subrecipient SOW and budget includes tasks or effort that the subrecipient can complete until approval is in place

1. **Human Subjects Research:** If the NU or subrecipient SOW includes human subjects research (HSR), the subaward team will confirm with NU Principal Investigator (PI) whether subrecipient is conducting human subjects research.

- a. If yes, when the subaward team sends the unexecuted subaward to the subrecipient, the subaward team will request from the subrecipient a copy of the subrecipient's IRB approval.
- b. Upon receipt of the subrecipient's IRB approval, the subaward team member will upload the subrecipient's IRB approval to eCLAWS prior to uploading partially executed subaward and routing for NU signature.

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2. **Data Exchange:** The subaward team member will confirm with NU PI whether data of any kind will be exchanged between NU and the subrecipient, and if so, whether the exchange is one-way or mutual, and the type of data being exchanged (e.g. anonymized, de-identified, PII, PHI etc.).
 - a. If data is being exchanged between the parties, the subaward team member will add the appropriate Data Use Agreement (DUA) template as Attachment 7 of the subaward.
 3. **Vertebrate Animals:** If the subrecipient will be conducting work with vertebrate animals, when the subaward team sends the unexecuted subaward to the subrecipient, the subaward team will request from the subrecipient a copy of the subrecipient's IACUC approval.
 - a. Upon receipt of the subrecipient's IACUC approval, the subaward team member will upload the subrecipient's IACUC approval to eCLAWS prior to uploading partially executed subaward and routing for NU signature.
 4. **Exchange of Biological or Chemical Materials:** If the NU or subrecipient SOW includes an exchange of biological or chemical materials between the parties, the subaward team will ensure that the subaward agreement and record includes appropriate documentation to cover the exchange. The subaward team will initiate an eCLAWS information request consult to the OARS team to confirm that any necessary institutional approvals are in place prior to issuing an award allowing the transfer to take place.
 - a. If **biological materials** are being exchanged, the subaward team member will check the AUTM website to confirm whether the subrecipient is a signatory to the AUTM UBMTA Master Agreement.
 - i. If so, the subaward team member will add the [UBMTA Implementing Letter](#) as an attachment to the subaward.
 - ii. If the subrecipient is not a signatory to the AUTM UBMTA Master Agreement, the subaward team member will add the AUTM UBMTA Master Agreement and Implementing Letter as an attachment to the subaward.
 - b. If **chemical materials** are being exchanged, the subaward team will add the [NU-approved chemical material transfer agreement template](#) as an attachment to the subaward.
 - c. In limited circumstances, an MTA may not be necessary to cover the exchange; in such instances, OGC-approved language may be used in place of an MTA
-

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Drafting the Subaward/Amendment

1. The subaward team member will identify the appropriate subaward template based on the prime award funding agency.

Type of Prime Award	Template To Be Used
Federal Grant/Cooperative Agreement	<ul style="list-style-type: none"> FDP³ (cost reimbursable is most common or fixed price). If subrecipient is foreign entity, there is a specific FDP template for foreign subrecipients
Federal Contract	FDP subcontract template
Foundation Award	NU-RES long form template
Industry Award	NU-RES long form template

2. The subaward team member will review the prime award for terms and attachments that should be flowed down to the subrecipient, paying close attention to the following:
 - a. Any additional/modified terms necessary for risk mitigation (medium/high risk subrecipients only)
 - b. Financial and technical reports necessary for NU to satisfy prime award requirements
 - c. Cost documentation requirements (for cost reimbursable subawards only)
 - d. Audit requirements
 - e. Representations and certifications
3. Please use the following naming convention:
eCLAWS record number_ 'NU Sub'_Subrecipient _ subaward number_NU PI_Fund Number_'New' or "Amd #X'Draft and upload subaward using the appropriate template (FDP, nonfederal long-form nonfederal, foreign subaward), including detailed budget, SOW and prime award to eCLAWS record and route for any applicable internal/secondary reviews.
 - a. Please use the following naming convention: eCLAWS record number_ 'NU Sub'_Subrecipient _ subaward number_NU PI_GR#
4. For awards with restricted carryforward, NU issues a bilateral modification to authorize the next increment of funding. The modification must include the new grant tag created by Research Finance for the upcoming increment, which can be located in Workday. Ensure that all dates align with the current funding period. The bilateral amendment must contain the following term: "Subaward number is hereby revised to GRXXXX. Invoices for expenses incurred during the period of xx/xx/xxxx-xx/xx/xxxx are required to reference this new subaward number." Ensure that "Not Automatic" is selected for the Carryover section. Once the amendment is fully executed by all parties, notify the Research Finance Administrator that this amendment pertains to a new period with restricted carryforward so that the Research Finance Administrator can create a new Purchase Order for this period.

³ See Appendix A for quick FDP template guidance. Further guidance can be found on FDP website.

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5. Send subaward to subrecipient, , copying college administrator and NU PI, and upload email with subaward attached to eCLAWS, Change sub-status in eCLAWS to: Pending action from other party; continue to update to reflect current status until record is complete
 6. Subrecipient may choose to negotiate terms and conditions; upload pertinent emails and negotiated versions to eCLAWS.
 7. Once subrecipient returns partially executed subaward, review to ensure they include completed contacts pages.
 8. Upload partially executed subaward that is ready for NU-RES signature to eCLAWS and route to NU signatory via eCLAWS 'additional action' request function.
 9. NU-RES signatory will review, sign, and add the fully executed agreement to the eCLAWS additional action request response
 10. Subaward team will return fully executed subaward to subrecipient, cc-ing all relevant stakeholders (PI/Dept/Subrecipient) and Subaward Invoice Administrator
-

Post Execution Operations

Once the subaward document is fully executed, the subaward team member will:

1. Review Checklist, specifically Post Issuance section
 2. **Encumber Funding** - Create a Requisition via WorkDay to create a Purchase Order to pay incoming invoices for subaward. If amendment, increase/decrease PO via WorkDay.
 3. Create **Coeus Record** in Subawards Module
 4. Complete **FFATA reporting** (<https://www.sam.gov/>) within 30 days of fully executed subaward and if the cumulative amount awarded to subrecipient is over \$30,000.
-

Ongoing Administration Resources/Activities:

Monitoring

- Subcontract and Grant Expirations are tracked using [Tableau report – 'Subcontracts Expiring Soon'](#)

Invoicing

- Invoices: See "Northeastern Issued Outgoing Subcontracts - Invoice Processing Instructions" (IN PROCESS_ UPDATES UNDERWAY)

Subaward Change Initiators

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- Subaward modifications- NU-RES initiated (Subaward team will be notified by GO/CO when amendment processed for NU award that includes subawards)
- Programmatic Changes – college initiated via eCLAWS
- Budget Changes - college initiated via eCLAWS
- No-Cost Extensions – NU-RES initiated

Close-out Activities

- Coordinate with Research Finance to confirm final invoice is processed before prime award closes
- Close/liquidate PO encumbrances after Research Finance confirms that final subrecipient invoice(s) are paid
- POs can be adjusted or liquidated by completing the online PO Change Order in WorkDay.

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Appendix A

Quick FDP Template Guidance

- Select the appropriate Federal Awarding Agency from the dropdown on the top of the page and click the “Run Template” button located at the top right, this will populate many of the fields and dropdowns to that Agency’s standards.
- Complete the template’s remaining fields.
- Subaward No: is the grant tag found in WorkDay (GRXXXX) Each subaward has it’s own grant tag.
- Subawards are issued in yearly increments, the Subaward Period of Performance and Amount Funded This Action reflects only one year’s POP and funding. Estimated Project Period and Incrementally Estimated Total reflect the total length and funding for the subaward if funded for all applicable years.
- Attachment 2:
 - If the total amount funded under the subaward is over \$30,000 then it is subject to FFATA
 - If Human Subject Data is to be exchanged then select “Applicable” from the dropdown. This will prompt you to select how data is being transferred and to insert Attachment 7 (Human Subjects Data Transfer and Use Terms) into the subaward.
- Check NOA for any carryover terms and as applicable insert them into the Additional Terms section.
- Attachment 3: Complete Attachment 3a with NU’s information. Subrecipient shall complete Attachment 3b.
- Attachment 4: List all appropriate technical and financial reports according to the following:
 - Ensure that all prime award reporting requirements applicable to the subrecipient are selected and/or written into the text box, noting both cadence (monthly/final/etc.) and formatting (sponsor template/requirement to participate in meetings and/or calls/written status reports) requirements are listed
 - Ensure that any additional or variant reports requested by the NU PI and/or department are reflected in the subaward’s reporting requirements

Notes on Default Selections:

- Default selection for low risk subawards with no required reports specified in the prime award document is:
 - “Technical/progress reports on the project as may be required by PTE’s to satisfy its reporting obligations to the Federal Awarding Agency.”
- Default selections for medium and high-risk subawards with no required reports specified in the prime award document are:
 - Monthly technical/progress reports will be submitted to the PTE’s [select] within days of the end of the month.

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- Annual technical / progress reports will be submitted within [select] days prior to the end of each budget period to the PTE's [select]. Such reports shall also include a detailed budget for the next Budget Period, updated other support for key personnel, certification of appropriate education in the conduct of human subject research of any new key personnel, and annual IRB or IACUC approval, if applicable.
- A Final technical/progress report will be submitted to the PTE's [select] within [select] days of the end of the Project Period or after termination of this award, whichever comes first.
- Attachment 5: Include the SOW, Indirect rate of subrecipient, cost sharing, budget details, and direct, indirect and total costs. Insert budget as additional page if required and specify number of pages in Attachment 5.
- Attachment 6: as applicable insert the NOA.
- (As applicable) Attachment 7: Include if human subject data is to be exchanged under the agreement as per Attachment 2.

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Appendix B

Outgoing Subaward Checklist

Outgoing Subaward Checklist	NU Tracking #
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Subrecipient:

Sponsoring Agency:

Sponsor Award Number:

Yes	No	N/A	New Outgoing Subaward - Prior to Issuance
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Prime Sponsor Award – fully executed? If yes, is the award package complete and available?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Budget Detail – awarded amount = proposed amount? If not, request to dept for revised budget
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Complete / final SOW
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are Human Subjects involved at sub? If Yes, ensure IRB Approval is uploaded to eCLAWS record. <input type="checkbox"/> Ensure if IRB approval was not received in prior years, ask sub for IRB approval and upload to eCLAWS record for current amendment/agreement. <input type="checkbox"/> If DOD is the sponsor, confirm if HRPO approval is required for NU/Subrecipient HSR
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Will there be an exchange of identifiable human subjects data ? <ul style="list-style-type: none"> <input type="checkbox"/> If yes, confirm with NU-RES Contracts Team that a DUA is in place. <input type="checkbox"/> If no separate DUA, add Att. 7. <input type="checkbox"/> Upload a copy of the informed consent form to eCLAWS, make sure it states that PII will be shared with 3rd parties for research purposes. <ul style="list-style-type: none"> <input type="checkbox"/> If there is an IAA in place, the sub's research team and NU's are considered one unit, so this step is unnecessary in those cases. Upload a copy of the IAA to the eCLAWS record. <input type="checkbox"/> If de-id'd, make sure 4 standard statements included in DUA. <input type="checkbox"/> If PHI, email Bruce Waterbury and PI so they can set up a data protection plan. <input type="checkbox"/> IF MPI PLAN, must choose "PII" and add text from SLT doc. <input type="checkbox"/> IF NU PROVIDES DATA, MUST INCLUDE LANGUAGE FROM OGC IN SLT DOC.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Will there be an exchange of materials? <ul style="list-style-type: none"> <input type="checkbox"/> If so, ask dept admin to request an MTA in eCLAWS. <input type="checkbox"/> Add MTA-specific language to Att. 2 or similar.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are Animals involved at sub? If Yes, ensure IACUC Approval is uploaded to eCLAWS record. <input type="checkbox"/> Ensure if IACUC approval was not received in prior years, ask sub for IRB approval and upload to eCLAWS record for current amendment/agreement.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final budget and budget justification routed to NU-RES for review?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subrecipient Entity New entity? <input type="checkbox"/> Yes, if yes, ask for w9 when issuing and send LeAnh a request to add vendor (provide name of institution and administrative contact information) <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subrecipient PI identified
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Risk Assessment Questionnaire completed, Subrecipient Questionnaire completed if new subrecipient not in FDP CH/ does not have single audit <ul style="list-style-type: none"> <input type="checkbox"/> MAKE SURE TO MARK FY OF SINGLE AUDIT THAT YOU CHECKED ON RAQ.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	High Risk Entity? (automatically yes if foreign) If yes, include special invoice terms
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Entity? If yes: <ul style="list-style-type: none"> <input type="checkbox"/> Ask for International Supplier Form to be completed by sub <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> IF NIH-FUNDED, ADD FOREIGN SUB TERMS TO ATT. 2!
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Will Sub rely on NU COI policy?

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			If so, check with RC to be sure all relevant personnel have completed training/forms.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is Prime Award a federal contract ?
Outgoing Amendment – Prior to Issuance			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If renewal, is Prime fully executed ?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check initial Sub and any previous Amds: Need IRB, IACUC continuing approval?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IF NIH-FUNDED AND SUB IS FOREIGN, ADD TERMS TO AGREEMENT!!
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Change in SOW?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAT: Make sure to mark FY of the Single Audit that you checked!
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Budget detail - does awarded amount match requested amount?
Outgoing Subaward or Amendment Post Issuance			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Create/edit PO
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Create/Edit Coeus Record
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FFATA Report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Save subaward and related docs in Q Drive
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Let NU RES know to close out record

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Appendix – C – Language to add for Special Circumstance

If High Risk subrecipient entity, add the following:

Each invoice must be accompanied by a brief technical report, and: (i) be sequentially numbered; (ii) indicate the date(s) of performance by the Subrecipient; (iii) itemize costs in detail, in accordance with the Subaward budget; (iv) include both current costs and cumulative costs; (v) include the Subrecipient certification, with authorized official's signature, that costs are appropriate and accurate and that payment has not yet been received; and (vi) be supported by a general ledger report originating directly from the Subrecipient's financial record keeping system. PTE may request supporting documentation in certain categories prior to or subsequent to approving the invoice. Supporting documentation includes, but is not limited to, travel receipts, purchase orders, invoices for services or supplies, or time records, Property Inventory Report; frequency, type, and submission instructions listed here and only to be used when required by PTE Federal Award.

For use with subawards that share any identifiable data

Add the following to Attachment 7:

"As further contemplated in Attachment 7, prior to disclosure of any PII Data, the Provider shall inform Recipient of any restrictions imposed on the PII Data by any Informed Consent."

Add the following to Attachment 7 when NU is sharing PII:

Privacy & Security. If and only to the extent that Recipient receives or is provided access to Personal Information under this Agreement, Recipient shall adhere to the requirements set forth in the Northeastern Data Processing Addendum: Controller ("DPAC") located at <https://generalcounsel.northeastern.edu/contracts-transactions/data-processing-addendum/> that is in effect on the date of this Agreement. Prior versions shall be available at the link provided. Recipient shall use reasonable and appropriate physical, technical and administrative measures to safeguard Confidential Information against any misuse or accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access. Such measures shall include, at a minimum, those set forth in Annex II of the Northeastern DPAC in effect on the date of this Agreement.

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For use with DOD funded subawards where HRPO approval is required for Human Subjects Research:

"Research under this subaward involving the use of human subjects, to include research involving the use of human biospecimens and/or human subjects data is not permitted until the ARL Human Research Protection Official (HRPO) provides authorization that the human subjects research may commence. Subrecipient shall provide its IRB protocol approval to PTE. Upon submission to PTE, PTE shall submit the relevant IRB approval and materials to HRPO for approval. Once HRPO approval has been received, PTE will issue a modification to this agreement which lifts this restriction."

For use with subawards that need an MTA attached

Add to Attachment 2; Additional Terms: "The Parties agree that the exchange of biological and/or chemical materials will be governed by the terms and conditions of the UBMTA attached hereto and incorporated herein as Attachment XYZ (insert correct #)."

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Appendix D

Subrecipient Profile Questionnaire

SECTION A. Subrecipient Information (Proposal Specific)

Legal Name of Institution/Organization (“Subrecipient”):

Address:

City:

State:

Zip Code:

EIN:

UEI:

Registered in SAM? ☐ YES ☐ NO

Date of SAM expiration:

Is Subrecipient delinquent on Federal debt? ☐ YES ☐ NO

Date of Subrecipient incorporation: _____

Subrecipient Principal Investigator

Name:

Title:

Address:

City:

State:

Zip Code:

Phone:

Email:

Administrative Contact

Name:

Title:

Address:

City:

State:

Zip Code:

Phone:

Email:

Proposal Title:

Period of Performance:

Subrecipient Agreement Amount (Total Award):

Subrecipient Cost-Share Amount (if applicable):

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Section B. Project Information

Export Control

Will any equipment, technology or information be provided to the subrecipient entity by PTE? (If Yes, provide more information in the Comments section). ☐ YES ☐ NO

Will any equipment, technology or information, subject to export controls, be provided to the PTE by the subrecipient? (If Yes, provide more information in the Comments section). ☐ YES ☐ NO

Will any equipment, technology or information be provided to foreign national or shipped/delivered to a location outside the U.S.? (If Yes, provide more information on what will be provided in the Comments section.) ☐ YES ☐ NO

Will any funds be given or provided to an entity in Cuba, Iran, North Korea, Sudan or Syria? (If Yes, provide more information on the entity and its location in the Comments section). ☐ YES ☐ NO

Project Compliance: For each item below, indicate if it is involved in this project & enter protocol numbers associated with IRB and/or IACUC in the associated text boxes to the right of the compliance item. If the protocol is pending, or if there are multiple protocols associated with the award, please indicate them in the Comments section.

Human Subjects: ☐ YES If Yes, IRB protocol #: ☐ NO

Laboratory Animals: ☐ YES If Yes, IACUC protocol #: ☐ NO

Subrecipient is a:

☐ Institution of Higher Ed ☐ Foreign Entity ☐ Government Entity ☐ For-Profit Entity ☐ Non-Profit Entity

Subrecipient is exempt from reporting executive compensation. ☐ Yes ☐ No

Reporting is required if all of the following are true:

- a. The total Federal funding under this subaward will be \$25,000 or more
- b. In the preceding fiscal year, the organization received one of the following:
 - i. 80 percent or more of annual gross revenues from Federal awards
 - ii. \$25,000,000 or more in annual gross revenues from Federal awards
- c. The public does not have access to information about the compensation of senior executives

If No, list names & total compensation of the five most highly compensated officers of the entity in the Attachment 3B-2.

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SECTION C. Certifications

Facilities and Administration (F&A) Rates were calculated based on:

- ☐ Federally negotiated F&A rate for this type of work, or an accepted reduced F&A rate. Rate agreement attached.
- ☐ de minimis rate of 10% of modified total direct costs (MTDC) in accordance with 2 CFR 200.414(f), if applicable.
- ☐ We, the subrecipient certify that the indirect cost rate for this subaward was prepared in accordance with FAR 31.203, Contract Cost Principles and Procedures
- ☐ The sponsor mandates the use of an indirect cost rate for this award that is lower than our federally negotiated rate

Fringe Benefit Rates were calculated based on:

- ☐ Rates consistent with or lower than the subrecipient federally-negotiated rates. **Please attach Rate agreement.**
- ☐ Other rates (specify the basis on which the rate has been calculated in the Comments section).

Subrecipient Classification: (check all applicable)

- ☐ Large Business
- ☐ Small Business
- ☐ Volunteer Organization
- ☐ Historically Black College/ University
- ☐ Minority Owned
- ☐ Small disadvantaged business as certified by the Small Business Administration
- ☐ Women-owned
- ☐ Veteran-owned
- ☐ Service-disabled veteran-owned

Does your organization have experience working under Federal Assistance Awards, Cooperative Agreements or Contracts? ☐ YES ☐ NO

If Yes, number of years:

Does your organization have an accounting system that provides for:

Proper segregation of direct costs from indirect costs?

☐ YES ☐ NO

Identification and accumulation of direct costs by contract?

☐ YES ☐ NO

Accumulation of costs under general ledger control?

☐ YES ☐ NO

A timekeeping system that identifies employees' labor by intermediate or final cost objectives?

☐ YES ☐ NO

Exclusions from costs charged to government contracts amounts which are unallowable under FAR, Contract Cost Principles and Procedures, or other contract provisions?

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☐ YES ☐ NO

Does your organization have formal, written policies that address:

Pay rates/benefits?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Time and Effort reporting?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Leave?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Discrimination?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Property/Inventory?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Purchasing?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Travel?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
General Liability Insurance?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Record Retention?	<input type="checkbox"/> YES	<input type="checkbox"/> NO

Conflict of Interest Policy

Subrecipient organization has a conflict of interest policy? ☐ YES ☐ NO

☐ Subrecipient organization certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research” and has registered as an organization with a PHS-compliant FCOI policy with the FDP Clearinghouse

☐ Subrecipient organization certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research.” Subrecipient also certifies that, to the best of Institution’s knowledge, (1) all financial disclosures have been made related to the activities that may be funded by or through a resulting agreement, and required by its conflict of interest policy; and, (2) all identified conflicts of interest have or will have been satisfactorily managed, reduced or eliminated in accordance with Subrecipient’s conflict of interest policy prior to the expenditures of any funds under any resultant agreement

☐ Subrecipient organization does **not** have an active and/or enforced conflict of interest policy and agrees to comply with Northeastern University’s policy and procedures.

Debarment and Suspension

Is the PI or any other employee, contractor or representative participating in this project debarred, suspended or otherwise excluded from or ineligible for participation in federal assistance programs or activities? If Yes, explain in the Comments section. ☐ YES ☐ NO

The Subrecipient organization certifies: (answer all questions below)

Is presently debarred, suspended, proposed for debarment, or declared ineligible for award of federal contracts? ☐ YES ☐ NO

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Has been indicted for, or otherwise criminally or civilly charged by a government entity within three (3) years prior to the date hereof, been convicted of or had a civil judgment rendered against them for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) contract or subcontract violation of Federal or State antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property? ☐ YES ☐ NO

SECTION D. Audit Status

Subrecipient received an annual audit of financial statements?

☐ YES ☐ NO

Most recent fiscal year completed:

Audit findings were reported? If Yes, explain in Comments section. ☐ YES ☐ NO

Subrecipient was determined to be a High-Risk auditee? If Yes, explain in Comments section.

☐ YES ☐ NO

If organization does not obtain an annual audit, subrecipient is required to provide a copy of most recent audited financial statements, an independent auditor's management letter, balance report, income statements, P&L or 990 (if non-profit).

Section E. Comments:

SECTION F. Approval of Subrecipient

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I am an authorized business official of this Organization, and by signing below certify that all of the foregoing responses on this profile are complete, true and accurate. **Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the Subrecipient's own risk.**

Signature of Subrecipient Authorized Official

Date

Name and Title of Authorized Official