




Sponsored Subcontract Training

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I want to add
someone to my
proposal/project.
Now what?

ARE THEY A SUBCONTRACT? A CONSULTANT? A VENDOR? AN
EMPLOYEE?

Subcontractor is responsible for a significant role in the project and engages in a reciprocal relationship with USF

Performs a substantive portion of the proposed scope of work

Contributes in a broader purpose to the scope of work rather than providing a service

Has responsibility for programmatic decision-making and design

Is responsible for adhering to programmatic compliance requirements including IRB approval

Is responsible for meeting the goals of the project that are assigned to them

Subcontractor PI is considered key personnel (typically coPI) of the project and may co-author a manuscript

Consultant may be an individual or a commercial entity who provides guidance, technical expertise, or a service to the project

Non-USF employee with expertise required for the project but who is free from control and supervision in completing their work

Work being performed is done on a routine basis to other entities and does not include determining research objectives

Fee is based on an hourly/daily rate provided in a proposal and does not include F&A

Not subject to compliance requirements of the prime contract

Does not use USF resources to complete work

Deliverables do not typically contain copyrightable results and are not substantive in nature

Vendor is paid via a purchase order for goods and services

Is not responsible for research results

Typically a one-time procurement

Provides similar goods and services to other customers on a route basis

Competes with other providers for the services being provided

Does not retain any intellectual property or copyrights to the deliverables

Vendors do not have any publication or authorship credit

Terms and conditions and compliance do not flow down to vendors

Employee: A worker must meet conditions to be hired

The individual's work is controlled and supervised by someone at USF

The work is performed within the usual course of USF business as part of the worker's assigned duties

The individual may receive training from USF to complete the assigned work

Subcontract Requirements

Subrecipient required documentation

➤ Proposal stage

- Letter of Commitment
- Resume/CV/Biosketch for key personnel
- Scope of Work
- Annual and Cumulative Budget and Budget Narrative
- Indirect Cost Rate Agreement
- Other documents as specified in the proposal announcement

➤ Funding stage

- Subrecipient Compliance Form (online)
- Updated Scope of Work
- Updated Budgets and Narrative
- Any audit-related documentation requested by USF
- Any IRB approvals related to the project
- Financial conflict of interest forms A/B for any PHS funding

Requirements for consultants, vendors and employees

Required documentation

Consultant

At proposal, a signed letter from consultant providing details relevant to the consulting activities and their hourly/daily rate and number of hours/days needed

If available, a link to their relevant rates

At funding, payment set up information will be requested

Financial conflict of interest forms A/B for any qualified funding

Vendor

At proposal, a signed letter or formal quote detailing the activities, services or items being provided and their associated costs

At funding, vendor set up information will be requested

Employee

At proposal and funding, the effort requested at the proposal and distributed at funding should be equal to the amount of work devoted to the project.

At proposal and funding, an updated financial conflict of interest (interest inventory) must be on file for any PHS funding.

Subrecipient Monitoring



Responsibilities by role per CCHIP009

Principal Investigator

Develop budget limit for sub

Monitor technical progress of a sub's performance of obligations as defined in their subcontract

Review sub's invoices for allowability and compliance with policy, regulations and terms and conditions

Resolve financial questions related to invoices including disallowing questionable costs, which are not adequately supported

Review and approve sub's invoices, verifying that billings are consistent with technical/progress reports and production of deliverables as well costs being appropriate and allowable

Submit invoices for payment in a timely manner

Responsibilities by role per CCHIP009

Department Administrator

Responsible for ensuring and collecting items on the subrecipient checklist

Assist PI in developing the budget and chartfield string for subagreement(s)

Assist subrecipient in completion of compliance documentation at both proposal and award stage

Assist with the submission of invoices for payment in a timely manner and retain copies for departmental records. If sub is not on the FDP list, request detailed backup for all invoices.

Monitor expenditures for appropriateness and advise PI of any concerns in relation to cost allowability and compliance with federal/state regulations or award terms and conditions

Responsibilities by role per CCHIP009

Sponsored Research-Pre-award

Initiate pre-award subrecipient reviews including reviewing proposal to ensure that funds are segregated.

Perform subrecipient risk assessment for all subrecipients, as deemed necessary.

Negotiate and execute subcontracts including language requiring adherence to federal regulations and other sponsor requirements as applicable

Provide special terms and conditions to manage risk

Provide monitoring and guidance in interpreting applicable regulations and subcontract terms and conditions, and in executing these procedures

Responsibilities by role per CCHIP009

Sponsored Research-Post-award

Release the subcontract budget in FAST

Verify that subcontract chartfield is recorded correctly in FAST

Advise PI and department administrators on the proper accounting of subcontracts

Provide guidance in accordance **USF Policy No. 0-302** and interpret subrecipient award terms and conditions in executing these procedures

Distribute annual single audit certification request forms and review submitted documentation to assess risk

Report costs accurately to sponsoring agencies on financial reports and invoices

Questions?

Contact CFS PreAward:

- Via Teams
- CFSPreAward@usf.edu
- 813-974-4670

Resources

[USF Policy 0-302 Administration of Sponsored Research Subagreements](#)

[USF CCHIP 009 Subrecipient Monitoring of Sponsored Awards](#)

[Federal Demonstration Partnership \(FDP\) Clearinghouse Participants](#)

[Public Health Service \(PHS\) entities](#)

[Form A and B for financial conflict of interest \(FCOI\)](#)