Subagreement Updates

Kim Austin, Contracting Team Manager
Brie Teer, Contracting Team Manager
Liz Powell, Assistant Director of Contracting

08/11/2022
Agenda

• Changes to Subagreement Contracting Teams
• Updates to Subagreement Process
• Letter of Intent
• Tips to Expedite Process
Updates to Contracting Teams and Process
Non-Industry Contracting Teams

Kim Austin
Contracting Team Manager (Non-Industry)

Matthew Bucklin
Contracting Officer

Jacob Drouillard
Contracting Officer

Troy Ellis
Contracting Officer

Elise Richards
Contracting Officer

Brie Teer
Contracting Team Manager

Christina Crawford
Contracting Officer

Kyle Helmick
Contracting Officer

Amy Mabry
Contracting Officer

Karissa McKendall
Contracting Officer

Earleen Sharrock
Contracting Officer

Jessica Shenefield
Contracting Coordinator

OSPSubs@unc.edu
Changes to Streamline Process

- Developed Subrecipient Database
- Elimination of Subrecipient Commitment Form
- Improved Submonitoring Checklist
- Rerouted SIPs straight to contracting team
- Updated SIP (covered in detail in separate session)
  - Updated data form in SIP
- Update Letter of Intent (LOI)

*Reminder*: RAMTracker Transparency
New Subagreement Webpage

Provides helpful resources, tools and information. 

https://research.unc.edu/sponsored-programs/subagreements/

Proposal
- Proposal Checklist
- Subrecipient Outgoing Letter of Intent

Award Management
- Award Management Checklist
- Subrecipient Personnel Change – Conflict of Interest
- Amendment Guidance for Department
- Closeout Checklist

Other
- Matrix of Required Documentation
- Subagreement Initiation Portal (SIP)
- Subaward vs. Vendor vs. Independent Contractor Guidance
New Subagreement Webpage

Details the process steps and tips on working with outgoing subagreements.
https://research.unc.edu/sponsored-programs/subagreements/

- **Proposal Stage**
  - Letter of Intent
  - Scope of Work
  - Budget & Justification

- **Award Stage**
  - Submit SIP
  - Revised SOW*
  - Revised Budget*

- **Risk Assessment**
  - Post-Audit Team Review
  - Contracting Team Review

- **Draft & Execute**
  - Draft
  - Negotiate
  - Both Parties Execute

- **Ongoing Actions**
  - Annual Audit Review
  - Desk Review
  - Monitoring
Updates to Letter of Intent
Letter Of Intent (LOI)

- Updated LOI form on website
  - Includes updated detailed instructions
- Changes
  - Conflict of Interest
  - Modified Budget Questions
  - Department of Homeland Security Questions
- Importance of Correct Information
  - We no longer require the Subrecipient Commitment Form and rely on LOI
Administrative Section

- Administrative Contact information is used to draft subagreement and for communication with subrecipient
- UEI/DUNS/EIN (coming soon) are used to ensure the agreement is issued to the correct legal entity

<table>
<thead>
<tr>
<th>Subrecipient Administrative Contact:</th>
<th>Sponsor Administrative Contact:</th>
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<tbody>
<tr>
<td>Legal Name: (Enter Subrecipient's Name)</td>
<td>Legal Name: University of North Carolina at Chapel Hill</td>
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<tr>
<td>UEI/DUNS: (Required)</td>
<td>UEI/DUNS: D3LHU66KBLDS/608195277</td>
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<tr>
<td>Lead PI: (Enter Subrecipient's PI)</td>
<td>Lead PI: (UNC's PI)</td>
</tr>
<tr>
<td>Name/Title: (Enter Subrecipient Administrative Contact)</td>
<td>Name/Title: David Paul/Assistant Vice Chancellor</td>
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<tr>
<td>Address: (Subrecipient's State/Province, Country, Zip)</td>
<td>Address: 104 Airport Drive, Suite 2200-1350</td>
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<tr>
<td>Address: (Enter Subrecipient State/Province, Country)</td>
<td>Address: Chapel Hill, NC</td>
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<tr>
<td>Zip Code: (zip code +4, US Only)</td>
<td>Zip Code: 27599-5023</td>
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<tr>
<td>Phone: (Enter Subrecipient Phone)</td>
<td>Phone: 919-966-3411</td>
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<tr>
<td>Email: (Enter Subrecipient Main Email)</td>
<td>Email: <a href="mailto:SponsoredPrograms@unc.edu">SponsoredPrograms@unc.edu</a></td>
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Project Information

- Project information used for Subrecipient Monitoring
- A certification is required for Department of Homeland Security awards

**Project Information**

- **Subrecipient Project Title:** (Enter Project Title)
- **Subagreement Project Dates:** (Start Date) (End Date)
- **Prime Awarding Sponsor:** (Enter Prime Sponsor Name)
- **RFA/RFP:** (Enter related solicitation RFA/RFP)
- **UNC-CH Proposal Number:** (Enter UNC IPF Number)
- **Is the Prime Awarding Sponsor the US Department of Homeland Security?**
  - Yes
  - No

The Subrecipient, hereby certifies that, to the best of its knowledge, it:

- Has been a prime recipient of DHS funding and has submitted an evaluation tool within the last two (2) years.
- Subrecipient has not been a prime recipient of financial assistance from DHS in the past two (2) years.
- Subrecipient has not submitted an evaluation tool within the last two (2) years for another reason.
Financial Information

- The Applicable F&A Rate should match the F&A rate listed in budget documents
- If the Sponsor restricts the F&A, please choose Sponsor Rate

Financial Information

Choose appropriate option below:

- Federal Negotiated Rate
- Sponsor Rate
- Other

Applicable F&A Rate: [ ]

Total Estimated Subagreement Amount: [ ]
Compliance Information

- Human and animal subjects' information should match information provided on Research Subjects and Data Form
- We include data transfer terms in the subagreement when possible

Compliance Information

Human Subjects:  
- Yes
- No

Animal Subjects:  
- Yes
- No

Active SAM.gov member?  
- Yes
- No

Is your institution a participant of Federal Demonstration Partnership (FDP) Clearing House?  
- Yes
- No
Conflict of Interest

- If Subrecipient is not in FDP, there are additional COI questions

Please select the type of Conflict of Interest (COI) that best describes your institutional practices:

Subrecipient Institution hereby 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,” or the NSF Award and Administration Procedure Guide, Chapter IV. Subrecipient also certifies that, to the best of the 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;
2. All identified Conflict of Interest have been or will have been satisfactorily managed, reduced, or eliminated in accordance with Subrecipient’s Conflict of Interest policy prior to expenditure of any funds under an resulting agreement;
3. Any Financial Conflicts of Interest (FCOI) will be reported to UNC-CH before funding begins and throughout the term of the project.

Subrecipient does not have an active and/or enforced Conflict of Interest policy which meets the PHS or NSF standards and hereby agrees to abide by the UNC-CH Individual Conflicts of Interest policy. The UNC-CH published policy is located at https://policies.unc.edu/TDClient/2833/Portal/KB/ArticleDet?id=132238.

This project is funded by a Sponsor which has its own Conflict of Interest (COI) or financial disclosure requirements that differ from PHS and NSF. Subrecipient Institution hereby certifies it will comply with the Sponsor’s standards for Conflict of Interest or financial disclosure:

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;
2. All identified Conflict of Interest have been or will have been satisfactorily managed, reduced, or eliminated in accordance with Subrecipient’s Conflict of Interest policy prior to expenditure of any funds under an resulting agreement;
3. Any Financial Conflicts of Interest (FCOI) will be reported to UNC-CH before funding begins and throughout the term of the project.
COI Section Replaces SRCF

- If Subrecipient indicates they do not have a PHS/NSF Compliant policy, they will be prompted to provide necessary information to be added to UNC's COI.

Subrecipient does not have an active and/or enforced Conflict of Interest policy which meets the PHS or NSF standards and hereby agrees to abide by the UNC-CH Individual Conflicts of Interest policy. The UNC-CH published policy is located at [https://policies.unc.edu/TDClient/2833/Portal/KB/ArticleDet?ID=132238](https://policies.unc.edu/TDClient/2833/Portal/KB/ArticleDet?ID=132238).

List the names and e-mail addresses for all individuals responsible for the design, conduct or reporting of the research:

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<th>Name</th>
<th>Project Role</th>
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Tips and Tricks
Tips for Expediting Subagreements

• Ensure all documentation is accurate.
• Verify budget and justification and confirm they match and are correct.
  • Budgets should be broken out for each year of the project.
• Ensure the budget is structured based on the payment method
  • Such as: fixed price, per patient, cost reimbursable.
• SOW should match the science from the prime and provide an accurate description of Subrecipient's work.
Tips for Expediting Subagreements

• Provide necessary documentation and attachments required for the SIP
• Do **NOT** skip any questions when submitting SIP!
• Add any additional information that may be necessary.
  • *Notes are always helpful!*
SIP Amendment Actions

- The SIP is a smart form and will generate questions or required attachments based on how you answer the questions.
- It is imperative that the questions are answered accurately and completely so that the correct information and attachments are collected.

### Amendment Actions: Please answer the following questions

*Note: For any applicable attachments, please go to the correct attachment in RAMBeS and right-click on the name of the attachment, select 'Copy link address' and paste the link in the corresponding field below.*

<table>
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<th>Question</th>
<th>Options</th>
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<td>Do you need to change the performance period?</td>
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<tr>
<td>Do you have a change in funding (includes additional funding, deobligation, or carryover)?</td>
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<tr>
<td>Does this involve a change in scope of work?</td>
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<tr>
<td>Is the Subrecipient PI changing?</td>
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<tr>
<td>Is there a change in the type of research subjects?</td>
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<tr>
<td>Is the Subrecipient subject to UNO’s Conflict of Interest Policy?</td>
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</tr>
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</table>

*Note: This is applicable only for PH8 or NSF sponsored projects.*
Help Us Help You!

- All information requested in a SIP for any type of action is needed in order for the action to be drafted as accurately as possible.
- Incomplete or inaccurate documentation or skipped information on the SIP causes further delays. Feel free to ask questions! OSPSubs@unc.edu
- In order for any changes to a subagreement to be binding, a modification must be fully executed.
Contact & Resources

Kim Austin: kim.Austin@unc.edu
Brie Teer: bteer@email.unc.edu
Main OSP Inbox: OSPSubs@unc.edu

OPS Subagreement Webpage
Subagreement Initiation Portal (SIP) Webpage
The sam.gov website/platform has changed a lot in the last two years, and now they want UEI and not DUNS. I have mostly foreign/non-US subs and this is confusing to them. Any tips or advice?

Yes, there have been a lot of changes to SAM.gov and we have experienced some delays in subcontracts due to these changes, including the changeover from DUNS to UEI. However, you should still be able to access SAM.gov through registration. Please contact OSPHelp@unc.edu if you have specific questions about your registration. If you have further questions regarding specific subcontracts, please contact OSPsubs@unc.edu.
Questions?
THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL