### SPARC: An Update to Subawards

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### **Topics for Today**

- Why are things changing with subs?
- What is changing with subs?
- Subagreement Pre-Drafting Action and Response Certification: SPARC
  - **Contracting Coordinator Review**
  - Initiation
  - Review and Submission by Department
  - Revoked, Returned and Approved
  - No Change in ConnectCarolina so no PCN, now what?
- Tips for a Smooth Process with Subs
- Resources Available

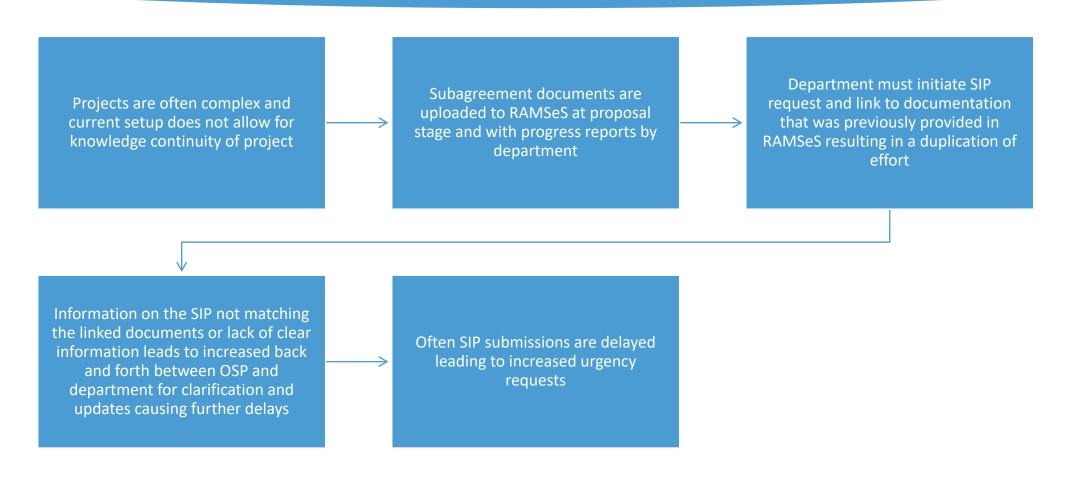


### Why are things changing?





### **Current Process What's Not Working?**





# SO...what's changing?





### **Updated Process Allowing for Greater Efficiency**



Departments have assigned Contracting Officer



Change in ConnectCarolina resulting in Project (Change) Notification related to Subagreement Project ID will initiate a RAM Tracker



OSP will initiate SPARC when a change is made to dates or dollars in ConnectCarolina related to a Subcontract Project ID



OSP will include clarifying questions relating to documentation and action for more targeted and project specific request



OSP will route SPARC to department including most recent documents for subrecipient found in RAMSeS

### No Change in ConnectCarolina, Now What?



If you need to issue a modification to a subrecipient and have not received a SPARC, check RAM Tracker Transparency for a pending action.



If RT Transparency does not indicate an open action, the request will need to be emailed to <a href="mailto:OSPsubs@unc.edu">OSPsubs@unc.edu</a>.



### **Department Initiated SPARC**

Phase 1: Departments will initiate request to OSPSubs@unc.edu for changes to Subagreements not related to dates or dollars that have been processed through ConnectCarolina utilizing Required Documents Matrix for Outgoing Subawards. Please provide the documents outlined in the matrix as well as the action(s) being requested. A SPARC will be initiated for Department review.

These may include, but are not limited to:

- Subrecipient **OR** UNC PI Change
- Early Termination
- Deobligation (if Budget Revision has not been completed)
- Additional Terms and Conditions
- Changes to Reporting Requirements
- Subrecipient Entity Name Updates

\*This is not an exhaustive list



# Subagreement Pre-Drafting Action & Response Certification

### **Contracting Coordinator Review**

The CC reviews the PCN and prime award action RT that initiated the notification, pulling in attachments that appear to be related to the current action.

For efficiency and clarity, it is important that documents are easily identifiable in RAMSeS. When uploading, ensure subrecipient name or initials are in document name.

If subrecipient's budget has changed from original proposed budget, updated subrecipient documents should be uploaded with the RPPR. If they are not uploaded, it will delay the issuance of the modification as they are required for obligating additional funding.



### **Contracting Coordinator Review**



If the subagreement is for an initial award, the CC will send a Research Subjects and Data Transfer (RSDT) form **to the PI** directly as this information needs to be completed by a member of the UNC project team. The information regarding human and animal subjects or human subjects data provided on the RSDT allows the CO to include proper terms and conditions. This information is best provided by someone directly involved in the research.



For foreign subrecipients, the CC will review foreign travel warnings and currency exchange rates. If necessary, the CC will initiate an email to the PI for confirmation to move forward. The foreign travel warnings and currency exchange rate reviews are done to ensure the SOW is not impacted by them.

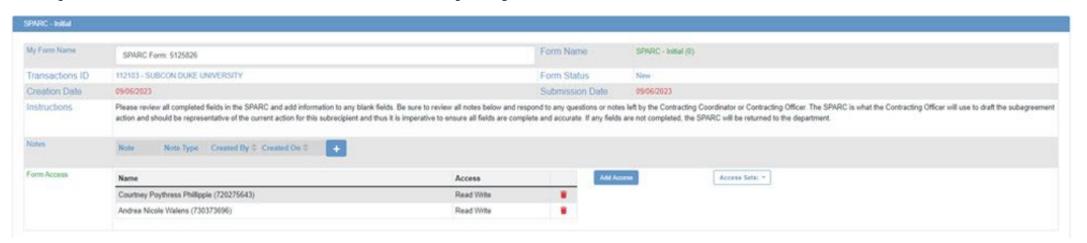


Please note that the subagreement cannot be drafted until these items have been returned to <a href="https://oscitation.org/grand-confirmed">OSPsubs@unc.edu</a> and confirmed complete.



#### **SPARC Initiation**

- CO will update applicable fields in the SPARC, add notes, ask for documentation or additional information necessary to get a clear picture of the current action for the subrecipient.
- The Notes field is heavily encouraged for anything the department feels is pertinent to the action and project.





### **SPARC** Receipt by Department



Department PS Project ID Managers will receive email from <a href="mailto:OSPSubs@unc.edu">OSPSubs@unc.edu</a> with a link to SPARC Form.



Appropriate department person will complete review and certify. If the person who needs to review and certify a SPARC is not listed in the Form Access section, email <a href="mailto:oSPSubs@unc.edu">OSPSubs@unc.edu</a> with the name and email address of the individual(s) needing access.

### **SPARC** Receipt by Department

**RAM Tracker ID:** 

RAMSeS Award Project Number:

Proposal No.: Award Project ID: Subaward Site:

Lead PI:

Proposal Title:

Sponsor:

Prime Sponsor (if applicable):

Award Dept:

A Project Notification has been generated that confirms that there has been action on [PSID#] for subrecipient [Subrecipient Name].

In order to begin the subagreement process, please follow the link below to complete the SPARC form and upload any necessary documentation.

PLEASE NOTE: The subagreement process will not begin until the SPARC form, as well as all documentation required and requested, is received by OSP and approved. All documentation must agree. If any clarification is needed, please make notes in the SPARC.

Link to access the online form through RAM Tracker:

**RAM Tracker** 



**Awaiting Dept Certification:** SPARCs that need department action and have not been submitted to OSP

**Pending OSP Review**: SPARCs that have been certified and submitted by the department, but not yet approved by the CO

**Approved**: SPARCs that have been approved by OSP and are ready for drafting, negotiation and finalization with the subrecipient

- When the SPARC link is clicked, you will be taken to your SPARC Forms.
- Any of the options selected will open the queue containing the SPARCs in that status.





#### Subagreement Information Verification

Please note this is the status of the Research Subjects Data Transfer for this project:

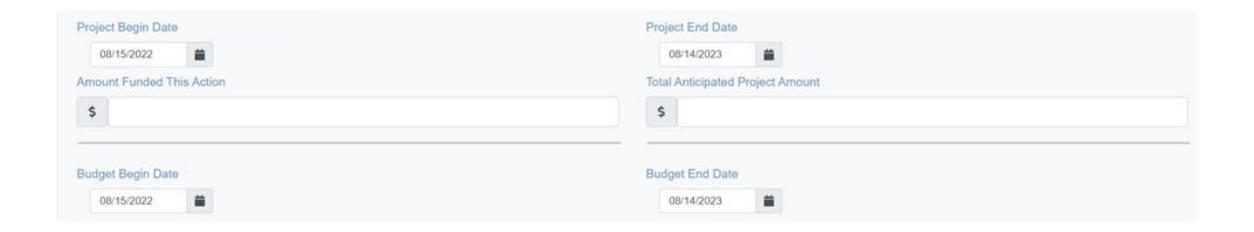
RSDT form is outstanding with your PI. We will not be able to issue the agreement until it has been received. Please work with your PI to expedite this requirement.

RSDT form has been completed and approved by PI or project team member. Please see the RAM Tracker to view information provided.

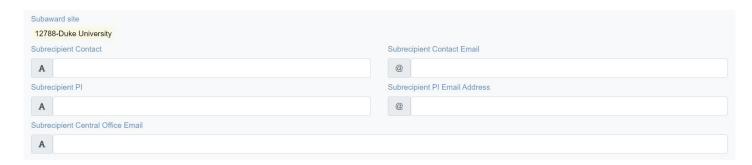
RSDT form is outstanding with your PI. We will not be able to issue the agreement until it has been received. Please work with your PI to expedite this requirement.

# SPARC Review by Department

- All initial agreements include language related to human subjects, animal subjects and any applicable human subjects data transfer.
- The RSDT will now be completed by the PI or a member of the study team
- This will help ensure a proper understanding of what is being done and assist OSP in including proper language



- **Project Begin and Project End Date:** reflection of overall dates *anticipated* that this subrecipient will be involved in this project. Requirement of Uniform Guidance (UG). Does not contractually obligate UNC to subrecipient for the entire period.
- Amount Funded This Action: current amount being obligated to subrecipient with this action. Does not include subrecipient carryover, new money to the subrecipient only.
- **Total Anticipated Project Amount:** reflection of planned amount that this subrecipient will be obligated over the life of the project. Requirement of Uniform Guidance (UG). Does not contractually obligate UNC to subrecipient for the entire amount.
- Budget Begin and Budget End Date: current period we are authorizing for the subrecipient. UNC must have authorization from the prime sponsor for this time period.



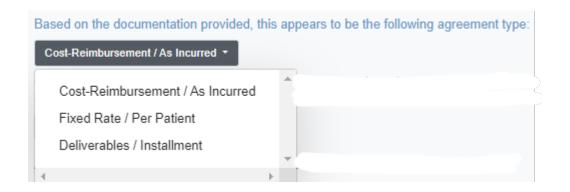
**Subrecipient Contact and Contact Email:** department's contact at subrecipient

Subrecipient Central Office Email: whenever possible include a central inbox to prevent actions from going to an individual no longer with subrecipient

- Foreign subrecipient or community collaborators who cannot cash flow the project may require cash advances.
- For these subrecipients a cash advance <u>up to</u> 25% of the current obligated funding amount is allowable without a justification, 25.1% and greater require a written justification.
- OSP Leadership will review justification.
- A cash advance can be requested for each subsequent action.

Is this subrecipient a foreign organization or community-based collaborator?
select one: Yes *
If you intend to provide funding via cash advance please provide the percentage you wish to issue, and a justification if the percentage is 25.1% or higher. If not, please type No Cash Advance in the text box.





- Confirming the type of payments that the subrecipient is expecting will ensure that the subagreement is drafted accurately.
- The agreement must match the invoices that are received from the subrecipient and paid.

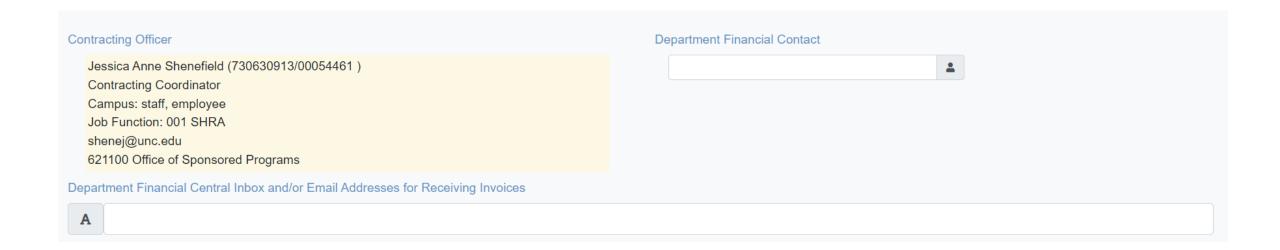
Click the link to review the invoice sample based on the selected agreement type. Please confirm this is how the PI anticipates paying invoices on this project. If this is not how the PI anticipates paying invoices, be sure the budget document provided corresponds with the information you provide regarding payment.

Select one: 

\* If this project requires any specific reporting templates required by the sponsor or for the project?

\* If this project requires any specific reporting template be used by the subrecipient for progress or financial reporting, you will indicate that here and attach the template.





- **Department Financial Contact:** This person is listed in the Subagreement as the departmental person to received financial inquiries relating to this action.
- Department Financial Central Inbox and/or Email Addresses for Receiving Invoices: It is a best practice to use a Central Inbox for Departments to receive invoices. This helps maintain continuity in the event of future staffing changes and ensure the invoices are still received and paid.

#### The purpose of the certifications are to :

- Confirm that the PI is aware and in agreement of any budgetary, dates or term changes provided in the SPARC. The PI is ultimately responsible for the project and should be aware and in agreement.
- Remind the submitter that any incomplete fields or discrepancies in the information provided will delay the initiation of the subagreement. If discrepancies or missing information is found when the CO reviews the SPARC, it will be returned to the department.
- The final approved SPARC is what the Contracting Officer will use to draft the subagreement action and it is imperative that all fields are complete and accurate to ensure the subagreement includes all appropriate terms and contains the correct information.



### **Returned SPARC**



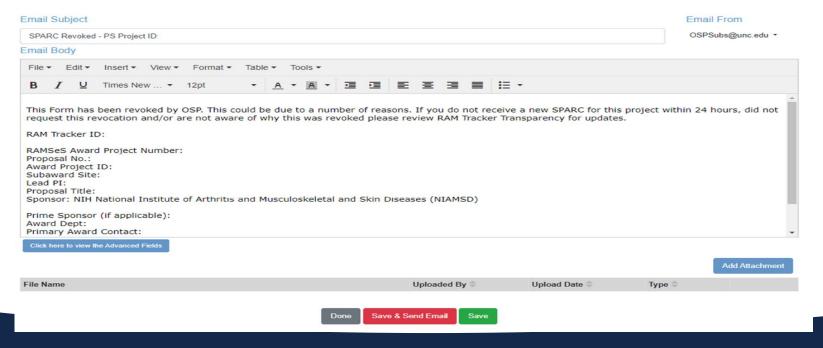
If the CO determines SPARC and documentation don't match or provide enough information to draft the subagreement request, the SPARC will be returned to the department with additional notes.



The SPARC will go back into the Awaiting Dept Certification queue until re-submitted.

#### **Revoked SPARC**

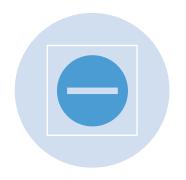
If the CO realizes an error was included in the SPARC immediately after routing, you will receive a notification that the SPARC was revoked. If action should be taken, a new SPARC will be forthcoming.



### **Approved SPARC**



Once CO reviews the SPARC and documents and determines sufficient information has been provided and any outstanding requests to the PI have been satisfied, SPARC will be approved and it will move to the Approved queue.



If the PI has not returned the RSDT and/or approved foreign warnings, the SPARC substatus will be selected and the SPARC will not be approved until they are received. We must have this information to ensure proper terms are included in the subagreement.

### **Checking the status of your SPARC**

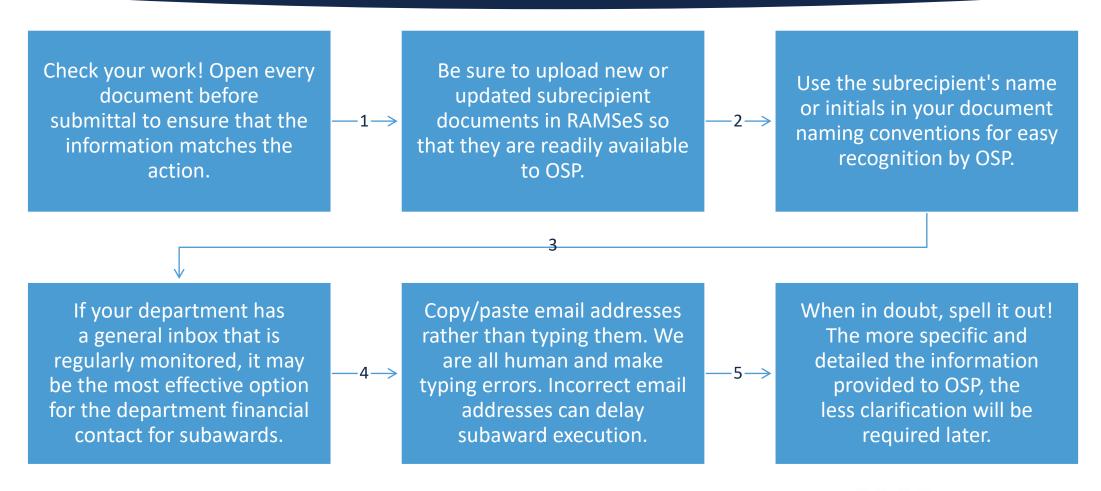


You can check the status of your SPARC action at any time using RAM Tracker Transparency search in RAMSeS.



If you have reviewed the current status of the SPARC and the notes on the RAM Tracker Details and have questions, please contact the Contracting Officer and copy <a href="mailto:OSPsubs@unc.edu">OSPsubs@unc.edu</a>.

### Tips for a Smooth SPARC Process





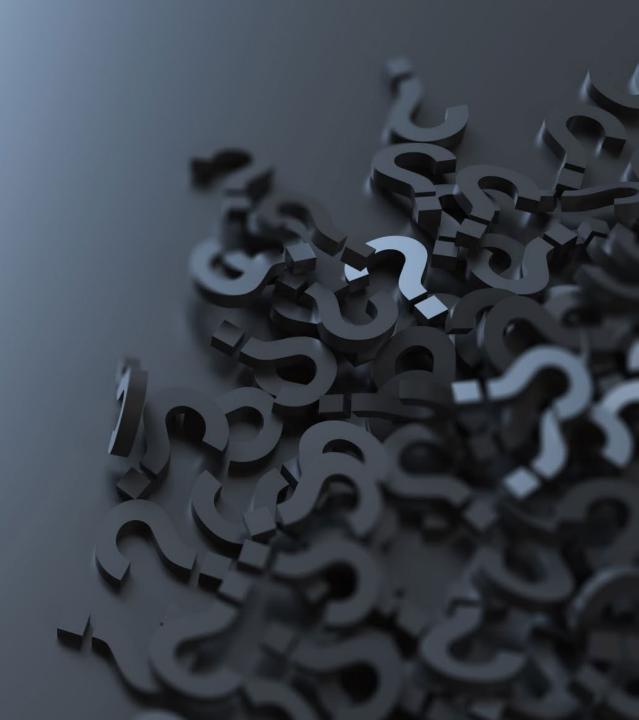
### **Matrix of Required Documents**

	Transaction Type	Detailed Bu	dget Budget Justification	Scope of Work	Prime Award	Sponsor Prior Approval	LOI/Facepage	UNC PI Approval
Amendments	Additional Funding	х			Х			
	Additional Terms & Conditions				Х			
	Carryover and Additional Funds	х			(x)	(x)		
	Carryover Only	х			(x)	(x)		х
	Change in Budget	х				(x)		х
	Change in PI					(x)		х
	Change in UNC PI					(x)		
	Change in SOW			х		х		х
	Deobligation of Funds & Early Termination					(x)		х
	Deobligation of Funds without Early Termination*	(x)				(x)		х
	Early Termination without Deobligation*					(x)		х
	No-Cost Extension				(x)	(x)		(x)
Initial Agreement	Break in Period of Performance	х	х	х	Х		х	
	New Subagreement	Х	х	х	х		Х	

x = Requirement to issue draft agreement. Please note: Detailed Budget should reflect the sponsor's budget requirement and allow for clarity in what is being funded. If you have question, please email OSPSubs@unc.edu.
(x) = Required only if Sponsor Approval is needed for action/ if Sponsor requirement.

<sup>\*</sup>Additional requirements: For deobligation amendments, additional documentation needs to be provided acknowledging subrecipient's confirmation of forthcoming deobligation. Deobligation amendments may require a revised budget and budget justification dependent upon Prime Sponsor requirements.

### Questions?



Can you please clarify if/when an updated LOI form is needed for an outgoing subcontract if the budget amount has changed for a given year from original submission? I have been collecting a new budget, budget justification and LOI if the sub budget has to be reduced due to cuts to initial award (for year 1 initial setup) and at the time of each RPPR submission (to submit with updated budget for RAMSeS IPF based on the next year's anticipated award amount). I also collect a new Budget, Budget Justification and LOI if an out year award comes in less than anticipated based on prior NOA and sub budgets need to be cut yet again. However, I believe the speaker said a new LOI is not needed for the SIP amendment submission for a budget reduction. Is that correct? If so, is what is required for the RAMSeS RPPR IPF and SIP submission different? In other words, we would still need to collect a new LOI for the RAMSeS IPF and associated budget - the subaward team just doesn't require the updated LOI to make an amendment?

Once the award is received, the award amounts typically change and the dates may change as well. Should the subs complete anew LOI with the updated award amount and dates or will the original LOI suffice?



I used to be able to look up DUNS on SAM.gov to see if a potential sub was registered, needed to renew, etc. The sam.gov website/platform has changed a lot in the last two years (login.gov required and access not granted) 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?

Is it possible to remove the feature that asks you to login to submit a SIP? It happened twice that when I went to save the information, the system kicked me out and all the information I had filled out was lost. Another idea is to have a timer pop up letting you know when the system will timeout. One time, it took me 10 minutes to fill out the information and it kicked me out when I hit the "Save" button. There was no record saved. I had to redo the entire SIP.





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