



UCLA

Office of Contract and Grant Administration

Outgoing Subaward Updates (i.e. Reminders)

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Subaward Reminders via updates from our FDP colleagues

What is the FDP?

The Federal Demonstration Partnership (FDP) is an association of federal agencies, academic research institutions with administrative, faculty and technical representation (ex. UCLA), and research policy organizations that work to ***streamline the administration*** of federally sponsored research. FDP members of all sectors cooperate in identifying, testing, and implementing new, more effective ways of managing the more than \$15 Billion in federal research grants.

FDP Federal Agencies

National Science Foundation (NSF)*
National Institutes of Health (NIH)*
Department of Agriculture (USDA)*
National Aeronautics & Space Administration (NASA)*
Environmental Protection Agency (EPA)*
Department of Homeland Security (DHS)*
Office of Naval Research (ONR)
Air Force Office of Scientific Research (AFOSR)
Army Research Office (ARO)
Army Medical Research and Materiel Command (AMRMC)

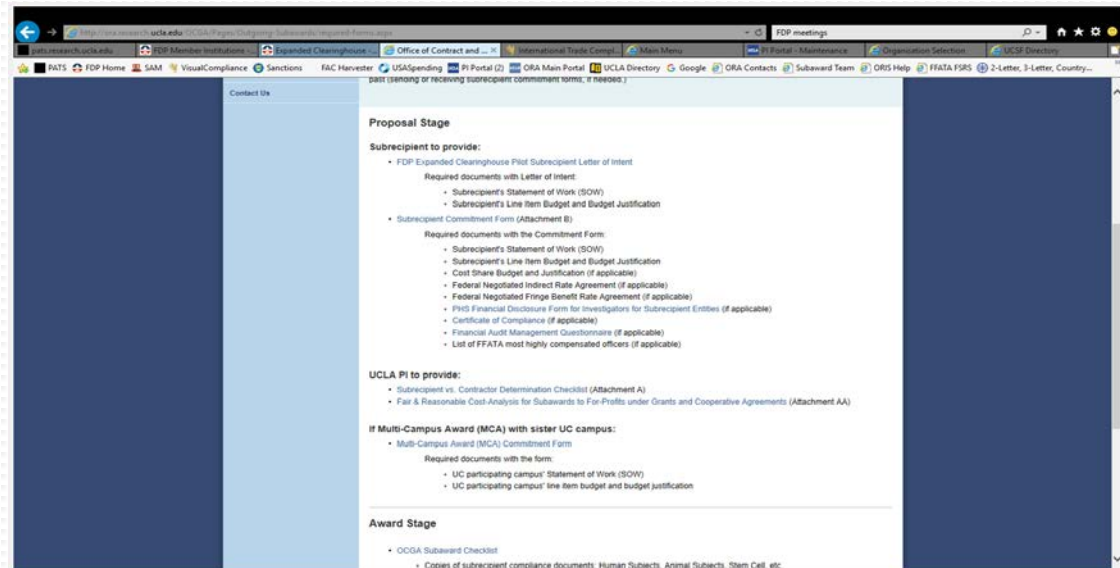
**participating in UG federal-wide RTC (check agency policy for which type of assistance awards UG RTC apply)*

NonFederal Agencies

http://sites.nationalacademies.org/PGA/fdp/PGA_049112

FDP Does Great Things

- Regular Meetings with Federal Sponsors - i.e. updates from last RAF
- Expanded Clearinghouse -
 - This initiative was authorized in 2016 by the FDP to use on-line entity profiles in lieu of Subrecipient Commitment Forms to obtain institutional information needed by pass-through entities when they are issuing subawards or monitoring their subrecipients.
 - **Effective August 18, 2016** when working with an FDP Expanded Clearinghouse ***Institution***, use the short ***Letter of Intent*** instead of the full ***Subrecipient Commitment Form***. The Letter of Intent (LOI) provides ***project specific information*** and eliminates ***institutional information***. [Ex: UCLA Commitment = 5 pages vs. UCLA LOI = 1 page]
 - As of September 2018, ALL FDP members are now participating in the FDP Expanded Clearinghouse.
- Provides an Venue for Feedback/Sharing Among Its Members



FDP Members provide each other feedback -

Example – we share with each other what Auditors were looking for during audits, including our Single Audits.

- Hot Topic For Auditors:

>>>>Subrecipient Monitoring<<<<

UNIFORM GUIDANCE (UG) – Subrecipient Monitoring Required by the §200.331, with § 200.415

- Subrecipient Monitoring is a **Shared** Responsibility at UCLA, and must be documented:
- **200.331(b)**: The OCGA Subaward Team “*Evaluate[s]*” each subrecipient’s *risk* of noncompliance ...” prior to Subaward issuance:
 - If risk is identified, “additional requirements” (ex. reporting, prior approvals, monitoring, etc.) are noted in the Subaward.
 - Ex. Foreign Subrecipients often present risk, therefore, the Subaward often requires monthly invoices
 - The OCGA Subaward Team also “*monitors*” the Subrecipient *institution* [ex. audit] prior to Subaward amendment issuance
- It is up to the **UCLA PI/department** to ensure it is “*monitoring*” the *project* as laid out in the Subaward agreement:
 - “Financial and programmatic reports [as identified in the Subaward] are being reviewed” [**200.331 (d)(1)**]
 - Subrecipient is adhering to “any additional requirements” as identified in the Subaward [**200.331 (a)(3)**]

UNIFORM GUIDANCE (UG) – Subrecipient Monitoring: PI Certification Required by the §200.331(d)

200.331(d)

This ***UCLA Subaward Invoice Certification Form*** was created as part of the Subrecipient Monitoring requirements. The form is kept in UCLA PI/Department files [not submitted to OCGA]. This form certifies that the UCLA PI has reviewed ***and*** approved of each invoice. Also certifies that UCLA PI is monitoring performance of Subaward project.

“As the principal investigator for [Award Title/award number], I have monitored the activities of the Subrecipient that were funded by the Subaward and I have reviewed all financial and programmatic reports (if any) that were submitted to me by the Subrecipient for this Subaward.”

“I certify that all of the Subrecipient’s activities that were funded by the Subaward were carried out for authorized purposes, as defined by the terms and conditions of the Subaward. I further certify that the Subrecipient has carried out all work, as necessary at this stage in the Subaward timeframe, toward achieving the Subaward’s performance goals, as specified in the Subrecipient’s statement of work. To the best of my knowledge, the costs included on the attached invoice are reasonable and appropriate for the work performed.”

UNIFORM GUIDANCE (UG) – Subrecipient Monitoring: Subrecipient Invoice Certification Required by the § 200.415(a)

- **200.415:**

“To assure that expenditures are proper and in accordance with the terms and conditions of the Federal award and approved project budgets, the annual and final fiscal reports or vouchers requesting payment under the agreements **must** include a certification, signed by an [Subrecipient] official who is authorized to legally bind the [Subrecipient], which reads as follows:

‘By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729–3730 and 3801–3812).’”

Outgoing Subawards

- Please share this information with investigators and research administrators in your department/unit.
- In addition, if you have any questions about outgoing Subawards, please see our website at:
<http://ora.research.ucla.edu/ocga/pages/outgoing-subawards/required-forms.aspx>
- Contact the OCGA Outgoing Subaward Team:
 - Subaward Officer, Mary Haskins, mhaskins@research.ucla.edu
- General questions?

Thank you!