

B. UCLA AWARD REVIEW:

RESPONSIBILITY	ACTION
OCGA Grant Officer or Analyst	Upon receipt of acceptable award, generates award snapshot. In the Subawards section, lists the name and dates.
PI and Department	Upon receipt of Transfer of Funds (TOF), appropriates the award, distributes total award amount by Sub account via Transfer of Funds based on approved budget. Funds for Subawards should be allocated to Sub 07.

C. SUBAWARD INITIATION, PREPARATION, AND COMPLIANCE REVIEW:

RESPONSIBILITY	ACTION
PI and Department	<p>For each new (or renewal) Subaward:</p> <ul style="list-style-type: none"> • Verifies any subsequent paperwork needed from the Subrecipient that was not received with the Subrecipient Commitment form, such as: <ul style="list-style-type: none"> ○ Human and/or animal subjects approvals ○ PHS Financial Disclosure Form ○ Certificate of Compliance ○ Financial Audit Management Questionnaire ○ Fair & Reasonable Cost-Analysis ○ F&A and/or fringe rate agreement • Completes in entirety the OCGA Subaward Checklist – Attachment C http://www.research.ucla.edu/ocga/Forms/Subaward. • Specifies in the Bruin Buy (BB) requisition the following information: • Project title, UCLA Principal Investigator, Subrecipient Principal Investigator, Sponsor, and award number of the UCLA grant; • Period of performance for this Subaward (which may not exceed that of the Sponsor’s award); • Dollar amount of the Subaward. • For awards subject to the UCLA federally approved modified total direct cost (MTDC) rate calculation, allocates funds between object code 7310 (for first \$25,000 of Subaward, which is subject to F&A cost recovery) and 7300 (for dollars in excess of \$25,000 and therefore not subject to F&A cost recovery). For other F&A rate calculations, allocates all funds to 7310. • Adds \$1.00 to the requisition. • Sets the BB requisition receiving flag to “Y” so that “receiving” must occur prior to each invoice payment. • Enters BB Requisition # onto the Checklist. • Submits copy of Checklist and attachments, as specified on the Checklist, to OCGA Subaward Team via email ocgasubawards@research.ucla.edu.

RESPONSIBILITY	ACTION
<p>Purchasing Subaward Buyer</p>	<ul style="list-style-type: none"> • Reviews the requisition, Subaward Checklist, and attachments to verify: <ul style="list-style-type: none"> ▪ The “Award Snapshot - Type of Award” is either a grant, subgrant, or a cooperative agreement, ▪ The requisition VCK Name/Address agrees with that on the Checklist, ▪ The receiving flag is set to “Y”, ▪ \$1.00 is added to keep the PO open. • Drafts the PO as a G-class order, and provides PO number to OCGA Subaward Team.
<p>OCGA Subaward Team</p>	<ul style="list-style-type: none"> • Reviews the Checklist and attachments, and informs of subsequent paperwork needed from Subrecipient. Reviews and verifies, as appropriate: <ul style="list-style-type: none"> ▪ Subaward Checklist and PO are current and complete ▪ Determination as Subrecipient, and not Contractor (vendor), is appropriate ▪ Commitment is authorized, and scope and budget are appropriate, including indirect costs and/or cost sharing ▪ Certification requirement checks (conflict of interest, etc.) ▪ Prime terms allow for Subrecipient ▪ Prime funds remain to fund Subrecipient ▪ Subrecipient and Subrecipient PI debarments, suspensions and active agency exclusions ▪ Visual Compliance ▪ System for Award Management (SAM) ▪ Is Subrecipient subject to FFATA requirements ▪ Checks Harvester website for A-133 compliance ▪ Obtains information about Subrecipient as necessary ▪ Reviews appropriate conflict of interest requirements ▪ Reviews all federal compliance regulations, as needed ▪ Includes CFDA number, FAIN number, FFATA if applicable. ▪ Insurance levels as appropriated ▪ Subject Use approvals • Drafts the Subaward, including PO number, flow-down of appropriate award terms and conditions from the Sponsor, PI/Department special provisions, institutional standard clauses/compliance requirements, and other clauses as appropriate to the work being performed. • Attaches copy of Sponsor terms and other documents, as appropriate. <p>NOTE: If under a federal prime sponsor a subaward cannot be issued if the Subrecipient is not registered in System Award Management Systems (SAM).</p>

D. SUBAWARD NEGOTIATION:

RESPONSIBILITY	ACTION
OCGA Subaward Team	As requested, submits the draft Subaward to the PI/Department for review and comment, including scope of work/reporting requirements.
PI and Department	When draft Subaward has been requested, reviews and communicates revisions, if any, to the OCGA Subaward Team.
OCGA Subaward Team	<ul style="list-style-type: none"> Revises Subaward as appropriate. Submits Subaward to the Subrecipient for review and signature. Negotiates revisions requested by Subrecipient, communicating with the PI and appropriate University officials, as necessary (e.g., Legal Counsel, Risk Management, etc.). Forwards revised Subaward to Subrecipient for signature.

E. EXECUTION OF SUBAWARD:

RESPONSIBILITY	ACTION
OCGA Subaward Team	<ul style="list-style-type: none"> Receives and reviews Subaward signed by Subrecipient. Receives and reviews outstanding certifications and assurances. Counter-signs Subaward. Emails, or mails hard copy if requested, fully executed Subaward to Subrecipient. Distributes electronic copies of the executed Subaward in its entirety to the PI/Department, EFM, Purchasing, and Equipment Management, as necessary.
Purchasing Subaward Buyer	<ul style="list-style-type: none"> Posts Subaward PO following receipt of executed Subaward agreement. Completes Review & Award Justification form (RAJ) for PO file. Forwards change order reflecting posting of a Purchase Order to OCGA Subaward team.

F. SUBAWARD MODIFICATIONS/AMENDMENTS:

RESPONSIBILITY	ACTION
PI and Department	<ul style="list-style-type: none"> Completes OCGA Subaward Checklist for Amendment/Change Order and emails Checklist, with applicable back-up documents. Works with the OCGA Grant Officer/Analyst to obtain Sponsor approval, if required.
Purchasing Subaward Buyer	<ul style="list-style-type: none"> For change(s) requiring an executed amendment and/or General Accounting approval, posts change order after receipt of executed amendment from OCGA Subaward Team. For change(s) not requiring an executed amendment, posts change order within five (5) working days after receipt of Checklist or after receipt of General Accounting approval, whichever is later. <p>Note: Encumbrance releases may take more than five (5) working days to post depending on the complexity of action.</p>
OCGA Subaward Team	<ul style="list-style-type: none"> Drafts amendment to the Subaward document. Reviews compliance actions per Section C.
FOLLOW PROCESS AS SPECIFIED IN SECTIONS D, E, G, and H.	

G. ADMINISTRATIVE MANAGEMENT OF UCLA AWARD AND MONITORING OF SUBAWARD:

RESPONSIBILITY	ACTION
<p>PI with Departmental Assistance</p>	<p>Subaward not contemplated by proposal:</p> <ul style="list-style-type: none"> • Shall notify and work with the OCGA Grant Officer/Analyst to obtain Sponsor approval, if required. • Completes all PI/Department steps described in Section A (“Proposal Development and Submission”) through Section E (“Compliance Review and Execution of Subaward”). <p>Programmatic monitoring:</p> <ul style="list-style-type: none"> • Obtains from the Subrecipient deliverables including technical progress reports, case reports, data completion forms, equipment/inventory/property reports, invention reports, etc., as applicable per the Subaward terms and conditions. • Distributes copies to central units, as appropriate. • PI certifies that the Subrecipient’s performance is being achieved and provides current compliance documents, as applicable, when requesting any Subaward modification. • Notifies OCGA Grant Officer/Analyst or Subaward Team in writing of programmatic or technical issues that arise during the period of performance, including lack of progress.
<p>PI with Departmental Assistance</p>	<p>Fiscal monitoring:</p> <ul style="list-style-type: none"> • Obtains invoice (based on the terms included in Subaward agreement). Reviews invoice, verifying that: <ul style="list-style-type: none"> ▪ In accordance with the approved budget, ▪ Provide evidence of costs Incurred within the approved period of performance and overall cost limitations, ▪ Aligned in terms of cost and type of expense with the scientific/technical progress reported to date, ▪ Allowable, allocable, and reasonable, and Certified by the Subrecipient’s institutional official as required in 2 CFR 200.415 (a). • Signs the invoice, certifying items above, have been completed and that the invoice is approved for payment. • Submits signed invoice to Departmental office. • Determines necessity for scheduled programmatic and financial reviews, site visits, and evaluations. Consults with OCGA Subaward Team and/or EFM, as necessary.
<p>Department</p>	<ul style="list-style-type: none"> • Notes PO number on invoice and makes a copy for records. • Submits original invoice bearing Subrecipient’s certification, as well as UCLA PI’s certification and signature, to Accounts Payable. • Performs receiving in BB, being careful to ensure input is on the correct line of the order. Refer to “How to Perform Receiving on Subawards” on the BB website: http://userguide.bruinbuytraining.ucla.edu/ • For awards using the UCLA federal F&A rate calculation, assures that the first \$25,000 of Subrecipient’s invoiced expenditures are posted to object code 7310 and the remaining charges are posted to object code 7300. For assistance refer to BB website: http://userguide.bruinbuytraining.ucla.edu/ • Notifies EFM in writing of financial issues that arise during the period of performance. • Submits copy of final invoice to EFM, and to Equipment Management if equipment has been purchased.

Accounts Payable	<ul style="list-style-type: none"> • Conducts second level review of invoice by verifying: <ul style="list-style-type: none"> ▪ Period of performance specified on invoice falls within obligation period as specified in the PO, ▪ Invoice contains certification statement signed by Subrecipient's authorized representative, ▪ Invoice contains signature approval of UCLA PI, ▪ Subrecipient's invoiced expenditures are posted to the correct object code. • If all criteria are met, "schedules" invoices in BB and releases payment. In the case of any questions or discrepancies, communicates with Departmental contact for resolution.
Department	If not already done, enters receiving information to BB once payment notice is received from Accounts Payable.

OCGA Grant Officer or Analyst and/or Subaward Team	<p>Administrative Monitoring:</p> <ul style="list-style-type: none"> • Provides administrative guidance to PI and Department regarding technical/administrative issues including, but not limited to: <ul style="list-style-type: none"> ▪ Human or animal subjects approval, ▪ Subrecipient stop work due to prime termination/non-payment, ▪ Termination of Subaward for cause (non-performance), ▪ Delinquency of reports, ▪ Unsatisfactory deliverables, ▪ Non-compliance with terms and conditions, <p>Regulatory compliance monitoring:</p> <ul style="list-style-type: none"> • Obtains updates to Subrecipient's certifications, representations, and assurances as necessary/required.
EFM	<ul style="list-style-type: none"> • Provides guidance to PI and Department regarding Subaward financial issues including, but not limited to: <ul style="list-style-type: none"> ▪ Subaward rebudgeting, ▪ Unallowable costs included on invoices, ▪ Late submission of invoices including final invoice, etc. <p>Fiscal compliance monitoring:</p> <ul style="list-style-type: none"> • Reports Subrecipient's expenditures to Sponsor via financials. • As needed, conducts desk audits of select Departments/Subawards. • Performs review of Subrecipient's records and financial management system as deemed necessary to ensure accuracy and integrity of Subrecipient data. • Reports on deficiencies and makes recommendations or provides training to improve fiscal administration of Subawards.
Equipment Management	<p>Asset monitoring and compliance:</p> <ul style="list-style-type: none"> • Monitors equipment purchased by Subrecipient to which UCLA or Sponsor holds title. • Obtains Subrecipient inventory reports from PI/Department and submits to Sponsor as required. • Oversees return of loaned equipment or facilitates transfer of title and physical equipment to Subrecipient if requested and approved.

H. SUBAWARD CLOSE-OUT:

RESPONSIBILITY	ACTION
PI and Department	<ul style="list-style-type: none"> • By date specified in Subaward document, obtains from the Subrecipient (as applicable): <ul style="list-style-type: none"> • Final invoice (marked as such), • Final invention/patent report, • Final financial report, • Final technical report, and • Other final reports as required by Sponsor. • Reviews and approves final report(s), reconciles the Subaward fund allocation, and reviews and approves final invoice. • Submits final invoice bearing Subrecipient’s certification, UCLA PI’s certification and signature, and PO number to Accounts Payable. • Submits copy of final invoice to Purchasing Subaward Buyer, EFM, and Equipment Management. • Verifies that the final invoice is reflected on the general ledger. • Completes Subaward Final closeout certification - Attachment D sends to OCGA/ Purchasing Subaward Team via email ocgasubawards@research.ucla.edu.
Equipment Management	<ul style="list-style-type: none"> • If applicable, working with OCGA Subaward Team or Grants Officer/Analyst, submits letter to Subrecipient’s property administrator regarding the disposition and return of any equipment purchased under Subaward. • Notifies PI/Department, EFM, and OCGA Subaward Team or Grants Officer/Analyst in writing that equipment transactions are complete and closed.
Accounts Payable	Issues final payment to Subrecipient.
EFM	Includes Subrecipient’s final financial/expenditure information in UCLA’s final financial report and submits to the Sponsor.
Purchasing Subaward Buyer	Closes PO and releases encumbrance, if any, after receipt of Subaward Close-Out Certification .
OCGA Subaward Team	Files Subaward closing documentation including Subaward Final Closeout Certification .
EFM	Closes fund.