

## Subaward Activity to another SUNY Campus

**Effective Date:** March 1, 2018

**Function:** Office of Sponsored Program Services

**Contact:** [RFCOSponsoredPrograms@rfsuny.org](mailto:RFCOSponsoredPrograms@rfsuny.org)

### Basis for Procedure

All SUNY campus sponsored program activities are administered through The Research Foundation (RF) and so no formal, third-party subcontract is required to legally bind other SUNY campuses. Nonetheless, these multi-campus collaboration efforts do require an address and acknowledgement of core sponsor documents, regulatory requirements, detailed scope of work, deliverables, budget and reporting requirements as expected with typical subrecipient activity. Thorough communication and sharing information between RF campus locations is necessary to set expectations and make the responsibilities of each site involved clear.

### Procedure Summary

This document outlines the background, considerations and best practices for the establishment and management of subaward activity across multiple RF SUNY campus locations.

If your purpose is not to establish a subrecipient-type relationship with one or more SUNY entities, an internal award may be most appropriate. For more information refer to [Allocating Part of an Award to Another Campus or Department within SUNY](#).

#### I. Pre-Award Actions:

When a sponsored program collaboration between/among SUNY campus locations is anticipated, the prime awardee campus ("Lead Location") will share the sponsor solicitation with, and request relevant documents from-- the potential collaborating campus ("Collaborator Location") for submission to the sponsor during the proposal stage. At minimum documentation from the Collaborator Location should, include:

- Letter of Intent/Campus specific commitment form;
- Scope of Work specific to the Collaborator Location's activity;
- Budget and justification, including appropriate F&A rate(s) and schedule of the Collaborator Location(s);
- PI bio sketches, cost share and other documentation that may be necessary for the Lead Location to fulfill their application/proposal obligations.

All proposal data from a Collaborating Location must be sanctioned and authorized in writing by the Collaborator Location's Sponsored Programs Office.

#### Issuance of an Intercampus Letter of Agreement (ILA)

Once the Lead Location receives an award they must submit the resulting award document and flow down pertinent award specifics, including sponsor terms and conditions, to the Collaborator Location.

To formalize such understandings and responsibilities an Intercampus Letter Agreement (ILA) must be executed between the Lead and each Collaborator Location. The ILA is intended to clarify roles and responsibilities of the Lead Location and Collaborator Location, and provide any sponsor specific information to the Collaborating Location.

The ILA is created and routed by the Lead Location Sponsored Programs Office. The document must be signed by an authorized official at each RF SUNY location. For centralized campus locations the document does not require the signature of RF Central Office.

The ILA may be edited to meet the needs of the Lead Location but, at a minimum, should include the following:

- Prime sponsor
- Start and End date of the of Collaborating Location activity
- Award amount to Collaborating Location
- Scope of Work and Budget, including appropriate F&A rate(s)
- Cost Share information, if applicable
- Oracle Project/Task/Award (if established)
- Reporting requirements of Collaborating Location
- Prime award documents or sponsor specific terms and conditions
- SPO authorized official name and contact information at the lead and Collaborating Locations. The Intercampus Letter Agreement Template can be found on the RF Internal Website, under Sponsored Program Mgt, Agreements, [Agreement Templates](#).

### **Oracle Set-Up – Award Establishment (Subproject)**

It is the responsibility of the Lead Location to have the Oracle account/subproject, including cost share award/tasks if applicable, established and provide a Project Abstract to the Collaborator Location's authorized official.

For centralized Lead Locations, a copy of the ILA should be provided to your RFCO Sponsored Programs Account Establishment (AE) contact. The AE contact will establish the subproject for the Collaborator Location using the information provided in the Intercampus Letter Agreement and send a RF Project Abstract to the Collaborating Locations authorized official (either centralized or decentralized).

Note: Best practice for establishing a subproject at a Collaborator Location, for both centralized and decentralized locations, is to always attach a copy of the Intercampus Letter Agreement to the sub-project in Oracle.

If At Risk activity is necessary the Collaborating Location should connect with the Lead Location official. The Lead Location is responsible for establishing an At Risk award and the Collaborating Location's subproject and task(s). As per the RF's [Responsibility for Losses Policy](#), the Collaborating Location is responsible for their location's expenditures against the award.

For more information refer to [Create a Project for an Award that Crosses Locations - Process Help \(R12\)](#).

## **II. Award Management Process**

The Lead Location can only:

- View award, award/project budget, expenditures and budgetary control information for all Oracle activity under their main award.
- Establish, increase/reduce budgets, and transfer funds on all subproject budgets.
- Monitor the Oracle activity of the Collaborating Location. Expenditure information of the Collaborating Location can be found through the Award Summary Inquiry function in Oracle, Grant Sum Reports by Project Task or in the Report Center RFAIR Dashboards.
- Invoice the Sponsor.
- Post cash to the award.
- Submit reports to the sponsor.

The Collaborator Location can only:

- View project/task information for their project or task only.
- Enter expenditures for their project and task only.
- Submit reports to the Lead Location or other designated entity as specified in the award document and/or the letter agreement. Federal Funding Accountability and Transparency Act (FFATA) Reporting: Since the purpose of the Federal Funding Accountability and Transparency Act is to enforce disclosure and transparency of federal funding the Lead Location should submit FFATA information for intercampus collaboration into FSRS.gov, when applicable. FSRS.gov will use the Data Universal Numbering System (DUNS) number of the Collaborator Location to feed into the USASpending.gov database, this will allow the general public to see how and where funding is allocated. If the Lead Location is a centralized campus location the FFATA report is done at RF Central Office. If the Lead location is decentralized it is the campus responsibility to ensure the FFATA reporting is completed.

### **Charging F & A on the Expenditures of the Subproject**

Each Operating Location can opt to charge F & A on the applicable expenditures of subprojects when they are a Lead Location in accordance with sponsor policies and procedures and the approved budget. Charging F&A as a Lead Location is a campus decision but needs to be treated consistently. The Collaborator Location is allowed to charge F&A on their full budget amount, as appropriate as well.

For awards using the Modified Total Direct Cost (MTDC) base, F&A can generally be charged on the first \$25,000 of the subproject.

The appropriate Oracle budget line for charging F&A on subawards to another SUNY school is FAC\_Override\_SUNYSUB\_F&A.

- The Lead Location must review the subproject expenditures and charge F&A on the Lead Location project using the expenditure type: FAC\_Override\_SUNYSUB\_F&A. The analysis and override adjustments can be done monthly.
- It is recommended that the following reports or screens in the Oracle Grants Module or the Report Center be used for this monitoring:

#### **Oracle Grants Module**

Grant Sum by Project/Task Report

Project Summary Inquiry Form

#### **Report Center**

Award Project Task Tab (APT)

Grants Expenditure Detail for Specified Award or Project Query

Reports in both the Oracle Grants Module or the Report Center can be scheduled and notifications can be sent to user with a link to the report or the report attached for easy monitoring.

- The Lead Location F&A is charged to the award via a Grants Module Usage Batch (F&A Override Adjustment using the new expenditure type FAC\_Override\_SUNYSUB\_F&A). The same expenditure type can be used in the budget to include the total amount of the override that can be made based on the applicable expenditures (first \$25,000 for awards using an MTDC base) on subaward project (applicable expenditures multiplied by F&A rate of the lead location). Lead Location F&A calculations should be part of the proposal budget and negotiated with the sponsor.
- This override acts the same way as the current FAC Override Manual F & A expenditure type and charges for the new override are not included in the nightly indirect cost base calculation. The Lead Location can capture these expenditures at any point after the subaward expenditures are charged in the Oracle system.  
For more information refer to: [Adjust Burden Cost \(F&A, Agency Fees, and Fringe Benefits\) - Process Help \(R12\)](#).

#### **Impact on F&A rate proposal:**

There is no impact on the F&A rate proposal for the collaborating location. The expenditures will be included in the normal course of the F&A rate proposal process.

For the lead location using an MTDC base, subaward amounts up to \$25k per collaborating subaward will need to be imputed and added to the MTDC base when developing the F&A rate proposal.

#### **Subproject F & A Rate**

The F&A rate of the collaborating campus should be used on a subproject. This is done by inputting the F&A rate on the task level using the rate/structure override field.

### **III. Close Out Process:**

It is the responsibility of the Lead Location to coordinate submission of all reporting requirements to the sponsor.

Note: Best practice for ensuring reporting requirements are satisfied is to specify types of reports and due dates in the [Intercampus Letter Agreement](#).

When required to submit the closeout/finalization information to the Lead Location, the Collaborator Location will verify in writing that all expenditures have posted, encumbrances have cleared, purchase orders have been closed and cost share has been entered, if applicable.

### **Definitions**

*Lead Location*- the prime awardee campus.

*Collaborator Location*- RFSUNY Campus receiving part of the prime award directly from the Lead Location.

### **Related Information**

[RF Subrecipient Policy](#)

[RF Subrecipient Toolkit](#)

[Federal Funding Accountability and Transparency Act](#)

[Create a Project for an Award that Crosses Locations - Process Help \(R12\)](#)

[Adjust Burden Cost \(F&A, Agency Fees, and Fringe Benefits\) - Process Help \(R12\)](#)

### **Forms**

[Intercampus Letter Agreement](#)

### **Change History**

Date	Summary of Change
MArch 1, 2018	This document was created to provide the process for establishing and managing subaward activity across multiple RF SUNY campus locations. This document will supersede the obsolete "Awards with Projects at Multiple SUNY Campus Locations".

### **Feedback**

Was this document clear and easy to follow? Please send your feedback to [webfeedback@rfsuny.org](mailto:webfeedback@rfsuny.org).