



	<b>SOP #</b>	OSRA0010
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	<b>Implementation Date:</b>	11/01/2015
<b>SOP Owner:</b> Office of Sponsored Research Administration	<b>Last Reviewed/Update Date:</b>	09/25/2015
<b>SOP Contributor(s):</b> Research Departments, OSRA	<b>Approved Date:</b>	09/28/2015

## **Outgoing Subawards Standard Operating Procedure**

### ***1. Purpose***

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Weill Cornell Medical College (WCMC) Principal Investigators (PIs) often submit collaborative grant applications that assign portions of the application scope of work to faculty and staff at organizations outside WCMC. In such instances WCMC acts as a Prime Site while an outside organization is a Consortium Site. The Consortium Site under the direction of a lead PI is expected to perform a substantive role in the project, dedicating effort and requesting a project budget inclusive of indirect costs.

There can be multiple Consortium Sites listed on a single WCMC application, each of which must provide WCMC with standard documents and information in order to be included in the proposal. OSRA and the WCMC PI are responsible for reviewing all Consortium Site documentation and technical information required to evaluate a Consortium Site's ability to participate in the proposed study. If an application is funded, OSRA is responsible for establishing a subaward agreement with the Consortium Site. A subaward agreement established with a Consortium Site under a WCMC award is identified as an ***outgoing subaward***.

Multi-year projects may require annual modifications to established outgoing subaward agreements, including time extensions and additional funding. OSRA is responsible for issuing all such modifications and adjustments by way of an outgoing subaward amendment. In all cases OSRA, in consultation with PIs and their Departments, is responsible for performing a full risk assessment for each Consortium Site prior to issuing an agreement or amendment.

### ***2. Scope***

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This standard operating procedure (SOP) should be used by OSRA when submitting a grant application containing a Consortium Site and when processing outgoing subaward agreements under WCMC awards.

### ***3. Prerequisites***

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- A WCMC grant application must assign a portion of its scope of work to an external Site
- A grant application containing a Consortium Site must be funded
- The funded application must be processed and released for account creation prior to creation of the outgoing subaward agreement

### ***4. Related Documents***

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Submitting a Competitive Grant Application for OSRA Review ([OSRA 0002](#))  
Processing a Notice of Award SOP ([OSRA 0009](#))



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**5. Responsibilities**

- o **R**esponsibility = person or role responsible for ensuring that the item is completed
- o **A**ccountable = person or role responsible for actually doing or completing the item
- o **C**onsulted = person or role whose subject matter expertise is required in order to complete the item
- o **I**nformed = person or role that needs to be kept informed of the status of item completion

<div style="border: 1px solid black; padding: 5px; width: 150px; height: 100px; position: relative;"> <div style="position: absolute; top: 0; right: 0; text-align: right;">Role</div> <div style="position: absolute; bottom: 0; left: 0; text-align: left;">Process Deliverable (or Activity)</div> </div>	Process Members							
	Principal Investigator	Key Personnel	Academic Department	OSRA Administrator	OSRA Grants Specialist	OSRA Subaward Specialist	OSRA Leadership	OSRA Office
Development/Maintenance of SOP	I	I	I/C	I	I	I	I/C	R/A
Evaluate Consortium Site eligibility at time of application submission	R/A		I/C	R	R			
Review award to determine need for outgoing subaward agreement				R/A	I/C	I		
Perform Consortium Site risk evaluation prior to drafting agreement	I		I/C			R/A	C	
Prepare agreement	I		I/C			R/A		
Approve template	R		R			R	R/A	
Negotiate agreement	I		I			R/A	R	
Approve and sign final agreement	I		I			I/C	R/A	
Update records and shared files						R/A		
Report outgoing subaward commitment in the Federal Subaward Reporting System						R/A		



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**6. Procedure**

Step	Action	Method	Owner	Schedule
<b>Grant Submission Stage</b>				
1.0	<b>Obtain necessary application documents from Consortium Site in anticipation of application submission and list Site in Electronic Routing Form</b>	<b>Electronic Routing Form (ERF)/Email</b>	<b>PI &amp; Department</b>	<b>According to application submission deadlines</b>
1.1	The Consortium Site must complete a statement of intent form, scope of work, detailed budget, and budget justification for all competitive grant submissions			
1.2	For progress report submission, the Consortium Site must provide a scientific report in addition to a budget for the upcoming grant year			
1.3	The WCMC PI and Department must review all Consortium Site documents, confirming acceptance of Consortium Site proposed budget and scope of work			
1.4	The WCMC PI and Department must route all completed Consortium Site forms to OSRA with grant application documents, confirming approval to			



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	include Site in application			
1.5	The WCMC PI and Department must list participating the Consortium Site in the ERF			
<b>2.0</b>	<b>Review of Consortium Site application documents</b>		<b>OSRA Administrator and OSRA Grants Specialist</b>	<b>According to deadlines - see related SOP</b>
2.1	OSRA Grants Specialist will review completed statement of intent form to determine if Consortium Site is eligible to participate in research			
2.1.1	<i>If grant application is for a federal agency and Consortium Site is barred from participating in federally funded research, application cannot be submitted with Consortium Site included</i>			
2.2	OSRA Grants Specialist will review Consortium Site budget and budget justification to ensure calculations are correct and costs are allowable			
2.3	OSRA Grants Specialist will review Consortium Site scope of work to ensure adequate information is provided			



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<b>3.0</b>	<b>Check Consortium Site audit report and mark ERF</b>	<b>Federal Clearinghouse <a href="#">website</a> ; ERF</b>	<b>OSRA Administrator</b>	<b>Upon ERF review</b>
3.1	OSRA Administrator will log into the Federal Clearinghouse site and search for the Consortium Site's most recent summary audit report	harvester.census.gov		
3.2	OSRA Administrator will review audit document and confirm designation of "low risk site"			
3.3	Indicate on ERF if Site is low risk or high risk			
3.4	Save final PDF copy of ERF in grant application file following approval	OSRA Shared Drive		
<b>Grant Award Stage</b>				
<b>4.0</b>	<b>Determine need for outgoing subaward agreement</b>	<b>NOA review</b>	<b>OSRA Administrator</b>	<b>At time of notice of award receipt</b>
4.1	Review submitted proposal and internal forms to determine if a Consortium Site was listed in the proposal			
<b>5.0</b>	<b>Send Department NOA checklist including request for final Consortium Site budget</b>	<b>Email</b>	<b>OSRA Administrator</b>	<b>According to deadlines -see related SOP</b>
5.1	Distribute NOA checklist as per Processing a Notice of Award <a href="#">SOP</a>			



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5.2	If award includes Consortium Site, checklist should indicate a need for a final Site budget and other information as necessary to facilitate the subaward process			
5.2.1	<i>If a non-competing year, request a Consortium Site performance checklists</i>			
5.3	OSRA Administrator must copy subawards listserv when distributing NOA checklists if an award includes a Consortium Site	<a href="mailto:subawards-wcmc@med.cornell.edu">subawards-wcmc@med.cornell.edu</a>		
5.4	All returned documents must be saved in the award file on the OSRA shared drive			
5.5	OSRA Administrator must notify OSRA Subaward Specialist once agreement is released for account creation			
<b>6.0</b>	<b>Review NOA and perform Consortium Site risk evaluation</b>		<b>OSRA Subaward Specialist</b>	<b>Within 7 business days from receipt of documents from PI &amp; Department (along with step 7 outlined below)</b>
6.1	Check most recent subrecipient profile questionnaire (SPQ) for Consortium Site			



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6.1.1	<i>Consortium Site must have completed SPQ within 12 months; if up to date questionnaire is not on file OSRA Subaward Specialist must request a new form</i>			
6.1.2	<i>If a Consortium Site's most recent SPQ indicates that their most recent fiscal year audit is still in process, OSRA Subaward Specialist must request an update and check the Federal Clearinghouse website to determine if site is high risk based on their most recent audit report</i>			
6.2	Review award and project information to determine if Consortium Site will use human subjects, animals, stem cells, or perform any research requiring compliance monitoring			
6.3	If an amendment, review Subaward Performance Checklist to determine any performance deficiencies			
6.4	For competitive awards, review the statement of intent form completed by Consortium Site at the time of submission to determine need for conflicts reporting, the potential for intellectual property development and other project specific compliance items			
6.4.1	<i>Should personnel at Consortium Site identify a potential conflict of interest,</i>			



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	<i>engage Conflicts Management Office and refer to Award Specific Conflicts Notification <a href="#">SOP</a></i>			
6.4	Complete subaward risk assessment tool and determine if agreement is low, medium, high, or unacceptable risk			
<b>7.0</b>	<b>Draft Outgoing Subaward Agreement</b>		<b>OSRA Subaward Specialists</b>	<b>Within 7 business days from receipt of documents from PI &amp; Department (along with step 6 outlined above)</b>
7.1	Based on Award Sponsor, award type, Consortium Site type and risk evaluation, identify appropriate outgoing subaward agreement or amendment template			
7.2	Complete template with information from award and Consortium Site documentation			
7.3	Agreement must include a complete contacts attachment listing all appropriate representatives at both WCMC and the Consortium Site			
7.4	Review final budget and budget justification provided by department and add as exhibit to the outgoing subaward agreement			
7.5	Add the Consortium Site scope of work			





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	as an exhibit to the agreement			
7.6	Based on potential risk factors, add language and/or requirements to the agreement to mitigate risk exposure			
7.7	OSRA Subaward Specialist must send agreement draft to PI and Department for final review and approval prior to distribution to Consortium Site			
7.7.1	<i>PI and Department may request insertion of additional terms and requirements</i>			<i>PI &amp; Department must provide feedback within 2 business days</i>
<b>8.0</b>	<b>Present agreement to Consortium Site and negotiate as necessary</b>	<b>Email</b>	<b>OSRA Subaward Specialist</b>	
8.1	OSRA Subaward Specialist will send agreement template to the appropriate Consortium Site administrative contact, copying the WCMC PI and Department on the email			
8.1.1	<i>Message should include an "acknowledge by" date of five business days</i>			
8.1.2	<i>OSRA Subaward Specialist must follow up weekly should Consortium Site be non-responsive</i>			
8.2	Should Consortium Site request modification to the agreement OSRA Subaward Specialist will handle all agreement negotiation, consulting			



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	OSRA and WCMC leadership as necessary			
8.2.1	<i>OSRA Subaward Specialist must follow up with Consortium site every 10 business days for status updates during negotiation, copying the WCMC PI and Department on messages</i>			
<b>9.0</b>	<b>Agreement Execution</b>		<b>OSRA Subaward Specialist</b>	
9.1	Upon acceptance of agreement by Consortium Site, authorized representatives of both Consortium Site and WCMC will sign off on the agreement			
9.1.1	<i>In all cases, WCMC shall be the final signatory</i>			
9.2	An electronic PDF copy of the executed agreement will be sent to Consortium Site and retained in OSRA records			
<b>10.0</b>	<b>Update OSRA Records</b>			
10.1	Executed agreement must be saved in the OSRA Shared Drive in the primary grant file			
10.2	OSRA Subaward Specialist must update Consortium Site funding amount in Coeus award record			



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10.3	OSRA Subaward Specialist must upload agreement into OSRA SharePoint files, allowing Finance and Grant Accounting access to the agreement			
10.4	OSRA Subaward Specialist must log into FSRS and update subaward commitment in Federal Reporting system			



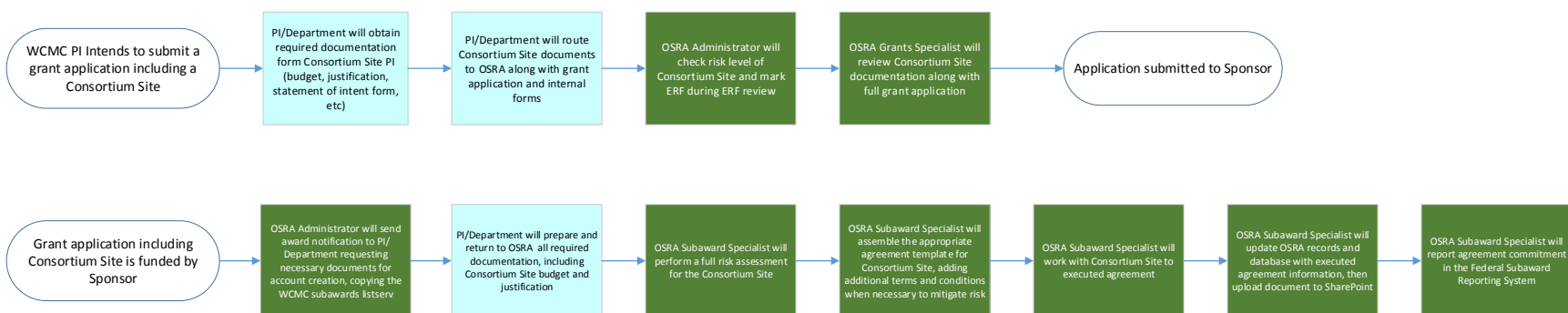
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## 7. Process Maps





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**8. Process Metrics**

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- OSRA Subaward Specialist must perform risk assessment and draft subaward agreement within 5 business days from award release for account creation
- OSRA will begin tracking contract execution timelines to monitor staff performance

**9. References**

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WCMC staff assignments:

[http://osra.weill.cornell.edu/about\\_us/dept\\_assign\\_gco.html](http://osra.weill.cornell.edu/about_us/dept_assign_gco.html)

Federal Subaward Reporting System (FSRS): <https://www.fsrs.gov/>

**10. Definitions**

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**Prime Site** – Institution submitting a grant application directly to a Sponsor. In this SOP, WCMC is the Prime Site.

**Consortium Site** – Collaborating organization listed on WCMC’s application to a sponsor.

**Outgoing Subaward** – If a WCMC application containing a Consortium Site is successful, WCMC will issue an outgoing subaward agreement to the Consortium Site, providing funding and establishing all necessary terms and conditions for proper award management.

**11. Limitations/Exclusions**

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This SOP does not address Incoming Subawards, see related SOP ([OSRA0008](#))