



Office of Research and Project Administration Subaward Policy (Revised May 2005)

Background

As a general rule, collaborative research entails two or more researchers from different institutions joining together to perform research on a single problem or phenomena. Normally, each institution performs separate and independent research on different portions of the total research effort. Under this scenario each entity has its own prime award, and a subaward is not necessary. When a portion of the research is being performed at another institution by a Co-Principal Investigator under the direction of the Principal Investigator of the Prime Award, or when a sponsor does not make accommodations for multiple awards for the same project, the institution providing the intellectual or management leadership for the project should be designated as the lead with the other institution(s) being the subawardee(s).

Applicability

This policy applies when Princeton engages another institution to perform a portion of the work scope, typically presented as part of the research proposal to the sponsor. A subaward is appropriate when 1) its performance is measured against its portion of Princeton's overall scope of work, 2) the subawardee is responsible for programmatic decision making, as opposed to simply providing goods and services for a Princeton program, and 3) the subawardee Principal Investigator may also be a co-author of publications or may seek patent protection for inventions. Subawards are issued to companies, colleges, universities or non-profit agencies (generally referred to as "organizations"), and must comply with requirements such as OMB circulars, and other sponsor requirements.

Subawardees normally retain title to intellectual property or data developed under the collaboration, unless otherwise stated in the agreement. However, the subawardee must provide Princeton and the sponsor with rights to any data, copyrights or other intellectual property developed under the project for use in reports, publications, or patent applications as necessary for Princeton to fulfill its obligations to the sponsor.

Principal Investigator Responsibilities

The Princeton Principal Investigator (PI) is responsible for verifying that the subawardee is suitable and uniquely qualified to carry out the scope of work and for providing ORPA with a scope of work, list of milestones and deliverables, if necessary, with the appropriate dates, and budget for the work to be completed. During the life of the project, the PI is responsible for monitoring the subawardee's work progress, including the receipt of all technical reports and other deliverables as defined in the scope of work. The PI must authorize any changes to the funding for a subawardee, and is responsible for approving the release of funds to the

subawardee based upon satisfactory progress of the work (typically through monthly or quarterly invoicing).

ORPA Responsibilities

ORPA is responsible for assuring that the subawardee’s proposal and budget meet the requirements of the prime sponsoring agency. This includes receiving and verifying indirect cost and other rate agreements and other costs as included in the subaward budget. ORPA will issue and negotiate subaward agreements based upon the PI’s approval, and will amend any subawards to increase or decrease funding, or change the scope of work as necessary. ORPA is responsible for auditing the subawardee’s invoices to assure that they conform to the award budget. This includes checking that the subawardee’s invoices 1) include the appropriate indirect cost and fringe benefits rates, 2) include only expenses that have been approved by Princeton or the sponsor, and 3) do not exceed the amount allocated to the subaward. ORPA will notify the PI once an invoice passes the desk audit, and will arrange for payment based upon the PI’s approval of the work progress.

Roles and Responsibilities Grid

Subaward Management Function	Principal Investigator	ORPA
<u>Subaward Agreements and Modifications</u>		
Requests new subaward be issued to an organization	X	
Approves subawardee’s scope of work	X	
Approves subawardee’s budget	X	X
Issues and negotiates agreement		X
Data entry in Coeus (statistics and contact information) create purchase order in PeopleSoft		X
Requests modifications to existing subawards	X	
Approves changes to subawardee’s scope and budget	X	X
Issues and negotiates modifications		X
<u>Subaward Reports</u>		
Requests and reviews technical or progress reports	X	
Requests and reviews property and patent reports		X
<u>Subaward Invoicing and Payment</u>		
Receives, audits and approves subaward invoice for compliance with subaward requirements		X
Evaluates and approves work progress, % of effort/progress being billed	X	
Processes invoice payment based upon approvals from ORPA and PI		X