Roles & Responsibilities Guidance for International Subaward Setup¹

These tables describe the roles and responsibilities of the individuals at MSU involved in international subawarding. The categories are not all inclusive but rather provide the primary activities and services needed for a successful Subaward. Subaward information should be submitted at the proposal stage (when possible).

Typically, the college/department Research Administrator (RA) is the liaison between the Office of Sponsored Programs (OSP) and Contract and Grant Administration (CGA) and the PI; however, in some instances, the PI may act in that lead role.

<u>Legend:</u> L = Lead Contact R = Reviewer

* = Communicator with OSP/CGA

Step 1 – Research Administrator/PI gathers and reviews information for Subaward compilation:

	OSP/CGA	ΡI	RA	Task
1.1			L	Requests from and works with the subrecipient on completing the Subrecipient Commitment
				Form, and upon receipt, ensures that all information is complete and accurate.
1.2				From Subrecipient Commitment Form - Checks to make sure DUNS number (federal only) is
			L	listed. If Subrecipient does not have one, assists subrecipient with obtaining one. Note an
				Employer Identification Number (EIN) is not required to register for a DUNS number.
1.3			L	<u>From Subrecipient Commitment Form</u> - Checks to make sure Subrecipient Contact
				Information (PI name, address, and sponsored programs contact information) is on form.
1.4			L	<u>From Subrecipient Commitment Form</u> - Verifies subaward performance period
1.5			L	<u>From Subrecipient Commitment Form</u> - Confirms project title
				From Subrecipient Commitment Form - If available, collects Negotiated Indirect Cost Rate
1.6			L	Agreement (NICRA) and confirms rate on agreement with Budget. If a NICRA is not available, the
				subrecipient may be able to use the de minimus rate of 10% for federally funded projects. Verify
				with the agency guidelines or restrictions, RFP, and/or award.
1.7		L	R*	Reviews and confirms statement of work
1.8		R	L	Reviews and consults with subrecipient on Budget (including cost share if applicable) &
1.0		IN .	_	Budget Justification
		R		REGULATORY APPROVALS: Collects human subject approval or animal use approval if
			L	applicable to the project. If prime award is from the National Science Foundation (NSF) or a
1.9				Public Health Service (PHS) agency, obtains all Investigators <u>Annual Disclosures.</u> Verifies
				Investigators complete Financial Conflict of Interest (FCOI) Training if prime award is from the
				National Institutes of Health (NIH). <u>Conflict of Interest Business Procedure FAQs.</u>
1.10		R	L	Requests recent subrecipient audit information, verifies audit is within 21 months of end of
				fiscal year for which the financial audit is issued and is in English or certified English translation.
1.11		L	R*	Confirms type of work subrecipient will be conducting (research, service, etc.)
1.12		L	R*	Drafts plan of payment and schedule (if applicable). OSP/CGA will review/approve in Step 2.
1.13		R	L	Submits a request to OSP/CGA to include a payment advance in a subaward, with the
1.10				applicable approvals.
1.14		R	L	Reviews, verifies salary/consultancy rates, and initials salary/consultancy rates on Employee
				Biographical Data Sheet (EBD). EBDs are only for USAID projects.
1.15			L	Check to make sure Subaward was included on Export Control and Open Research Review
				Worksheet (ECORRW), if applicable (normally required only for subawards issued in sanctioned
				countries)
1.16			L	Email all documents above to OSP/CGA ²

¹ This tool was developed by SPA/OSP/CGA with input from research administrators. The roles and responsibilities may vary by unit/department/college.

² If the sponsor funding the award is a member of the Federal Demonstration Partnership (FDP), CGA is responsible for the tasks in Steps 2 and 3 assigned to "OSP/CGA". For all non-FDP sponsor, OSP performs the tasks in Steps 2 and 3 assigned to "OSP/CGA".

	OSP/CGA	PI	RA	Task
2.1	L			Reviews Subrecipient Commitment Form ensuring all information on form is complete
				and accurate
2.2	L			Checks to make sure DUNS number is listed (federal only).
2.3	L			Subrecipient Contact Information (PI name, address, sponsored programs contact
				information)
2.4	L			Ensures Subaward performance period is within MSU's project period
2.5	L			Verifies project title is on form
2.6	L			Reviews statement of work
2.7	L			Reviews Budget (including cost share if applicable) & Budget Justification for
				allowability and accuracy
2.8	L			Confirms Negotiated Indirect Cost Rate Agreement, NICRA, (if applicable) with budget
				and validates effective period on NICRA
2.9	L			Verifies with IRB/IACUC that the subrecipient's scope of work was approved under
2.9				MSU's protocol (if applicable).
2.10	L			Ensures COI forms are complete (if applicable).
2.11	L			Checks Visual Compliance to be sure there are no known country restrictions or entity
2.11				restrictions with the subrecipient.
	L			Checks ECORRW for Subaward review or if Visual Compliance check requires an
2.12				approval from the Office of Export Control and Trade Sanctions (ECTS), asks the PI to
				complete the form.
2.13	L			Reviews subrecipient recent audit information and assesses risk level
2.14	L			Confirms type of work subrecipient will be conducting (research, service, etc.)
2.15	L			Finalizes plan of payment and schedule (if applicable)
2.16	L			Files payment Advance request, ensuring all appropriate approvals are on request.
	L			Reviews salary/consultancy rates for reasonableness, checks for initials from Research
2.17				Administrator/PI on Employee Biographical Data Sheet (USAID only) and files for audit
				documentation
2.18	L			Files PDF copy of <u>SAM's website</u> search results demonstrating delinquent debt record
				for subrecipient
2.19	L			Writes Subaward (estimated 10-15 business days after all correct documentation has
				been received).
2.20	L			Emails draft Subaward to Research Administrator for PI/RA approval

Step 2 – OSP/CGA reviews all information sent in Step 1 once <u>ALL</u> information is received and complete.

Step 3 – OSP/CGA and Research Administrator/PI finalize the terms of the Subaward with the Subawardee

	OSP/CGA	ΡI	RA	Task
3.1		L	R*	Approves draft Subaward and sends confirmation of approval to OSP/CGA
3.2			L ³	Sends draft Subaward to subrecipient for review and signature and is responsible for
3.2				follow up on signature
3.3	L			Negotiates legal terms of the subaward
3.4		L	R	Negotiates programmatic terms of the subaward
3.5	L			Executes Subaward for MSU
3.6	L			Emails a copy of the fully executed Subaward to the RA and PI.
3.7			L^4	Emails a copy of the fully executed Subaward to the subrecipient.

Step 4 – Subaward is setup by CGA

³ CGA is the Lead Contact for FDP subawards for this task.

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