

UW-Madison Policy on Subawards

Background

As one of the nation's leading research institutions, the University of Wisconsin-Madison recognizes the importance of providing good stewardship of institutional and extramural funds. The University's stewardship responsibilities include complying with federal requirements for subrecipient monitoring and management.

Support for the faculty's research goals is critical to the success of the University. The purpose of this document is to foster excellence in research by promoting the successful support and management of subawards throughout the sponsored projects life cycle. Subaward activities are important at many stages in a research program:

- Proposing collaborative research activities and the funding and resources to support them
- Establishing an understanding of roles and responsibilities of the lead and subrecipient institutions
- Charging subaward expenses in accordance with federal regulations and University policies
- Managing subaward projects to enable successful fulfillment of objectives
- Monitoring activities and expenditures on subawards during the life of the project and prior to award closeout
- Documenting compliance with federal regulations on subaward monitoring and management over the lifecycle of the subaward

Policy Statement

It is the policy of the University of Wisconsin-Madison that all researchers who engage in sponsored projects will comply with University policies and sponsoring agency regulations regarding the proposing, establishing, monitoring, and managing of subaward agreements on those projects.

Principal investigators, faculty, and academic staff who are involved in proposing, executing, directing, or managing sponsored projects with subawards are responsible for:

- Understanding the fundamentals of subawards and the University's subaward policies and procedures
- Providing the subaward scope of work and budget, including F&A applied in accordance with University and sponsoring agency policies, and any other necessary project-related information
- Overseeing subaward project activities toward fulfillment of project objectives
- Monitoring subaward expenditures and providing assurance of their appropriateness, reasonableness, and allowability by approving payment of subaward invoices
- Ensuring receipt of technical information, deliverables, or other required reports from subrecipient

The University will manage subaward agreements in accordance with 2 CFR 200, the Uniform Guidance, including:

- Performing subrecipient versus contractor determinations to classify each agreement as a subaward or a procurement contract
- Ensuring that subawards are clearly identified and contain all required information
- Performing a subrecipient risk assessment to determine appropriate subrecipient monitoring
- Monitoring the activities of the subrecipient as necessary

Reason for Policy

This policy is created in order to:

- Comply with the provisions of the federal Office of Management and Budget's regulations, including 2 CFR 200, the Uniform Guidance, and other relevant sponsor requirements.
- Provide direction to faculty and staff for administration and oversight of subaward activities.
- Promote the best possible alignment between faculty and staff activity and funding sources and, in so doing, enhance work at UW-Madison.
- Establish expectations for proposing, monitoring, and managing subawards by the University.

Further information about the University's procedures for this policy are available on RSP's website at:

<https://www.rsp.wisc.edu/awardmgt/subagmts.cfm>