

The Principal Investigator (PI) is responsible for:

- Ensuring that there is no conflict of interest in the subaward to a subrecipient, as subawards should not be authorized to subrecipients where the PI has ownership, substantial equity, or where he/she will receive individual gain from such agreement
- Establishing and maintaining communication with subrecipients during proposal preparation and submission, and after subaward is issued
- Reviewing initial budget of the subrecipient for reasonableness and that the costs are within the scope of work
- Oversight of subrecipient's compliance with subaward terms and conditions
- Ensuring technical deliverables identified in subrecipient statement of work are complete and received in a timely manner
- Approving subrecipient invoices as an indication of PI's certification that the subrecipient's technical progress is aligned with invoiced charges and authorizes which account is to be charged
- Collecting and reviewing technical reports
- Discussing poor performance or non-performance, or other problems relating to the subrecipient's performance under the subaward with subrecipients and with the Office of Sponsored Research (OSR) as they arise
- Working with the OSR to approve requests for annual increments of funding for multi-year subawards

The Grants Administrator (Controller's Office) is responsible for:

- Reviewing the A-133 audit reports or other audited financial reports of subrecipients prior to issuing a subaward to assess financial risk
- Reviewing pre-award questionnaire to determine risk profile
- Issuing and collecting annual A-133 audit certification letters and financial questionnaires for non A-133 subrecipients
- Working with OSR to identify additional terms and conditions for the subaward for medium and high risk subrecipients
- Reviewing and processing invoices for payment to ensure:
  - Compliance with subaward terms and conditions
  - Costs are aligned with the proposal (budget and statement of work)
  - Costs are allowable, allocable, and reasonable
  - F&A is calculated correctly
  - All costs were incurred within the period of performance
  - Cost sharing commitments (if applicable) are met by the subrecipient
  - The invoice has a certification statement that the costs for reimbursement and any corresponding cost sharing are the actual cost as recorded by subrecipient and expended for the work performed in accordance with the terms of the subaward
  - The invoice is signed by an Authorized Institutional Officer
  - Final invoices are marked FINAL
- Requesting clarification of charges if any unusual, unreasonable, unallowable, unallocable charges are invoiced

The Office for Sponsored Research is responsible for:

- Reviewing and collecting the subrecipient proposal, budgets, and supporting documentation (statement of work, budget, budget justification, DUNS#, letter of commitment) to be included in Bowdoin's proposal to sponsor
- Ensuring proper institutional sign offs on proposals and financial commitments
- Working with the Grants Administrator to assess the level of risk prior to issuing a subaward and determining the appropriate type of subaward to issue.
- Working with the Grants Administrator to identify additional terms and conditions for the subaward for medium and high risk subrecipients
- Negotiating agreements in accordance with College policies and procedures and Federal regulations
- Notifying PIs when additional post award monitoring by PI is required for medium and high risk subrecipients
- Identifying subrecipients who have been suspended or debarred from receiving federal funds, identified as terrorist entities, or associated with terrorists entities
- Gathering additional documentation from subrecipients: certificate of insurance, certifications and letters of assurance, etc.
- Receiving fully-executed subawards from subrecipients and distributing to PIs and required departments
- Serving as administrative contact for matters such as the reallocation of funds, reducing PI effort or change in PI
- Monitoring and providing guidance in interpreting applicable regulations and subaward terms and conditions
- Maintaining file of record, setting up awards, and assigning new award numbers

The Subrecipient is responsible for:

- Submitting a letter of commitment signed by an Authorized Institutional Officer, a statement of work, budget, budget justification, and supporting documentation as needed
- Submitting documentation requested to assess subrecipient risk
- Reviewing, negotiating, and executing the subaward
- Complying with terms and conditions of subaward
- Submitting invoices according to timetable and form defined in subaward
- Submitting Technical Progress Reports and other deliverables as defined in the subaward
- Requesting written changes to the subaward to the attention of the director of sponsored research program