Subcontract Request Form

Please provide the information requested below and attach the following:

1. Subcontractors Statement of Work
2. Subcontractors Budget

The completed request must be signed by Northeastern University’s Principal Investigator and returned to the Research Administration and Finance, 960 Renaissance Park.

1. Request to Issue: ___________________________ P.O. # ___________________________
   [ ] Subcontract
   [ ] Amendment to Subcontract No. ___________________________
   [ ] Termination of Subcontract No. ___________________________

Please complete the following information:

____________________________________________________________________________
Subcontractor

____________________________________________________________________________
Prime Sponsor

____________________________________________________________________________
Northeastern Principal Investigator

____________________________________________________________________________
Prime Grant or Contract Number

____________________________________________________________________________
Subcontract/Amendment Amount

____________________________________________________________________________
Northeastern Budget Number

____________________________________________________________________________
Subcontract/Amendment Period of Performance

____________________________________________________________________________
Prime Grant/Contract Period of Performance

Subcontractor Address, Contact Person, and telephone Number:

____________________________________________________________________________
____________________________________________________________________________
____________________________________________________________________________

Northeastern University Project Title:

____________________________________________________________________________
____________________________________________________________________________

Reason for termination of Subcontract:
Completion or Sole Source Justification (Complete either Section A or B)

A. Completion (Attach separate sheet if necessary)
   1. Name and address of each potential subcontractor contacted

   2. Name and amount proposed by each potential subcontractor responding

   3. Subcontractor selected

   4. Reason for selection

B. Sole Source Justification
   Provide justification for selection of subcontractor if competitive bids were not solicited
   (Attach separate sheet if additional space is needed)

By signing below I certify that I have read the following statements and certify that they are accurate and trustful to the best of my knowledge and belief.

As Principal Investigator I certify that:

These services are essential and cannot be provided by persons currently employed by Northeastern University and/or the physical capabilities do not exist at the University to perform the proscribed tasks.

The project or relationship with this subcontractor (check one) ____ does or ____ does not present a potential for a conflict of interest or the appearance of a conflict for investigators so involved have provided complete disclosure of this matter as instructed by current University policy and/or Federal Regulations.

The Subcontractor’s proposed costs have been reviewed and are reasonable for the technical effort proposed.

Funding is available for this subcontract and is an allowable cost under the terms and conditions of the Prime Award.
Subcontracts and Subrecipient Monitoring

Purpose:

The purpose of this policy is to define subcontracts, identify roles and responsibilities for those requiring subrecipient monitoring, and provide guidance in fulfilling those responsibilities.

Definitions:

What is a subcontract?

A subcontract is a contractual agreement between NU and a third party organization to perform a portion of a University sponsored project. Similar terms that are commonly used are: subaward, subgrant, subagreement, and a pass through. Although these can have slight nuances of meaning, they are all contractual relationships between NU and another institution/organization/corporation.

The purpose of this policy is to define only those contractual relationships that involve transfer to research or programmatic activity to another institution. This policy is not intended to provide guidance on other types of contractual relationships (including consulting agreements) which may occur on sponsored projects. These other types of contracts are vendor relationships and are governed by University procurement policies.

The following grid outlines the key components of subcontracts and vendor relationships and should be used as a guide to proper classification of a contractual relationship.

<table>
<thead>
<tr>
<th>Subcontract/Subaward</th>
<th>Vendor Agreement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subawardee services are uniquely designed in response to each project, and not provided commercially.</td>
<td>Vendor provides the goods or services commercially.</td>
</tr>
<tr>
<td>Subawardee technical lead is usually a scientific collaborator, or even a co-PI on the Northeastern project.</td>
<td>Vendor operates in a competitive environment.</td>
</tr>
<tr>
<td>Subawardee retains rights to intellectual property.</td>
<td>Vendor retains no rights to intellectual property.</td>
</tr>
<tr>
<td>Subawardee participates in development and execution of statement of work.</td>
<td>Vendor provides the goods or services ancillary to the operation of the federal program.</td>
</tr>
<tr>
<td>Subawardee results are likely to be published in the scientific literature and/or subawardee is likely to be a co-author on a Northeastern publication.</td>
<td></td>
</tr>
</tbody>
</table>

In some cases it may be difficult to tell the difference between a subcontract and a vendor agreement, but the budget and statement of work will usually provide enough information to make the determination. If you have any questions when preparing a proposal budget, please contact your Research Administration and Finance preaward grant specialist for assistance. (Please note that it is in the PI’s best interests that vendor agreements and subawards be identified in the proposal budget as accurately as possible, since the assessment of indirect costs will be determined by the characteristics of the subcontract at the time it is issued. These and other restrictions are summarized below.)
Subcontracts and Subrecipient Monitoring

Subaward versus Vendor Agreement – What rules and restrictions apply?

<table>
<thead>
<tr>
<th>Subaward</th>
<th>Vendor Agreement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Requires prior approval of the sponsor, if not originally included in proposal.</td>
<td>Generally does not require prior approval of the sponsor, subject to rebudgeting restrictions imposed on the particular category of cost.</td>
</tr>
<tr>
<td>Indirect costs are only assessed on the first $25,000 of the subaward. No additional indirect costs will be assessed on a subaward during the approved period of the award under which it was issued (e.g., during the 3 year lifespan of an NSF award). However, if there is follow-on funding beyond the originally approved period of the award (e.g., competitive renewal), then indirect costs will again be assessed, on the first $25,000 of each subaward. It is particularly important to keep this in mind when preparing proposal budgets.</td>
<td>Indirect costs are assessed on entire amount, just as with most other direct costs.</td>
</tr>
<tr>
<td>Is exempt from sole-source justification or open-bid requirements (unless issued under a federal contract).</td>
<td>Is subject to sole-source documentation or open-bid requirements.</td>
</tr>
<tr>
<td>Is subject to federal subrecipient monitoring requirements.</td>
<td>Is not subject to federal subrecipient monitoring requirements.</td>
</tr>
</tbody>
</table>

Guidelines for Subawards and Subrecipient Monitoring:

As a prime recipient and a pass-through entity of Federal awards, Northeastern University is required to monitor the activities of subrecipients. The following is provided to assist faculty and staff in ensuring that subrecipients conduct their portions of research projects in compliance with laws, regulations, and the provisions of awards or subawards; and that project costs incurred by subrecipients are reasonable and allowable.

Governing Requirements:
The requirements for subrecipient monitoring are contained in 31 USC 7502 (f)(2)(B) (Single Audit Act Amendments of 1996 (Pub. L. 104-156), OMB Circular A-133 ($...225 and ($...400 (d), OMB Circular A-110 ($...51 (a)), Federal awarding agency program regulations, and the terms and conditions of an award.

General Guidelines for Subrecipient Monitoring:

Subrecipient monitoring can take on various forms and is not limited by the practices described below. The OMB Compliance Supplement (1) outlines the following forms of monitoring activity:

- Reporting – Reviewing financial and performance reports submitted by the subrecipient.
- Site Visits – Performing site visits at the subrecipient to review financial and programmatic records and observe operations.
- Regular Contact - Regular contacts with the subrecipients and appropriate inquiries concerning program activities.
Subcontracts and Subrecipient Monitoring

Research Administration and Finance may review all active subcontracts for which monitoring is mandated and may inquire further into those that are deemed to require closer scrutiny in light of consideration such as:

- Size of the subrecipient award.