

# Roles and Responsibilities - Detailed

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**Principal Investigator (PI):** A Purdue University faculty or staff member responsible for the overall design, conduct, reporting, and management of externally sponsored projects.

## Key Responsibilities:

- Proposal Stage:
  - Assess subrecipient qualifications and ensure proposed labor rates are reasonable and allowable under federal regulations.
- Project Oversight:
  - Monitor subrecipient performance through regular communications (email, calls, meetings, reports, site visits).
  - Review and approve subrecipient costs—including labor rates—to ensure compliance with award terms, federal cost principles, and proper documentation (per 2 CFR Part 200).
  - Verify that labor charges are justified and appropriate for the work performed.
- Invoice Review:
  - Approve invoices only when accomplishments align with billing; escalate concerns or discrepancies to the business office and Sponsored Program Services (SPS) promptly.
  - The PI's review and approval of the invoices should include the following:
    1. Review the invoice to determine that the amount being requested for payment is consistent with the accomplishments of the subrecipient during the billing period and approve in a timely manner as outlined in [2 CFR 200.305\(b\)\(3\)](#). This review should include receipt of any progress reports or other deliverables due during this period. Notify [subaward@purdue.edu](mailto:subaward@purdue.edu) regarding any issues.
    2. If there are problems with the invoice or with the subrecipients' work, such as equipment purchased without any required or approved do not approve the invoice for payment. In this situation, the PI should immediately consult with their business office and Sponsored Program Services (SPS) to resolve the issue.
    3. Should it be necessary to terminate the award early for any reason but especially for nonperformance, immediately notify SPS.
    4. Final invoices are only to be approved and signed off for payment when the subrecipient has completed its performance under the award and submitted all required reports (financial & technical) and/or other deliverables, and that the costs incurred are appropriate for that performance. If any reports or deliverables are missing, please notify SPS immediately at [subaward@purdue.edu](mailto:subaward@purdue.edu).
- Stewardship:
  - Maintain oversight to ensure compliance and responsible management of

sponsor funds throughout the subrecipient process.

**Pre-Award:** During the proposal process Pre-Award is responsible for:

- Determination of whether the entity will participate as a [subrecipient or contractor](#).
- Budgeting the subrecipient in accordance with their role.
- Verifying the appropriate F&A rate is used by the subrecipient (negotiated or de minimis).
- Obtain all subrecipient(s) contact information (PI and administrative contacts).
- Gather relevant information from the subrecipient including:
  - Letter of Intent
  - Budget
  - Budget Justification
  - Statement of Work
  - W9
  - Entity Profile (if the organization is not in the FDP Clearinghouse)
- Review for debarred status, appropriate rates, regulatory information, etc.
- Restricted Party Screening for Foreign Entities
  - [Purdue login to Visual compliance](#) (Two-factor authentication will be required to log in)
- Flag for potential high risk subrecipient.

**Post Award Subaward Officer:** Once it is determined that a subaward is appropriate, the Subaward Officer will do the following prior to drafting and negotiating the subaward:

- Review PERA for all pertinent information regarding the subrecipient and coordinate with Post Award Subaward Team for any information which may be missing.
- Review prime award for any special terms and conditions which may be required to be included in subawards (ensures compliance with terms and conditions and/or requirements potentially established by prime award).
- Review all compliance issues (i.e. risk assessment, regulatory and/or export control issues) to determine appropriate language for subaward and/or risk mitigation strategy.
- Review statement of work, budget and budget justification to ensure the information corresponds to subaward.
- Review cost sharing (as applicable) requirements.
- Review reporting requirements to include financial, technical, invention, property and inventory reports.
- Review Uniform Guidance / Non-Uniform Guidance status.
- Determine which subaward template and risk mitigation strategy is most appropriate.
- Draft the terms of the subaward for Subrecipient review, ensuring all terms and conditions for compliance, payment, risk assessment and regulatory are

addressed.

- Distribution of subaward to Subrecipient for review.
- Engage the Risk Assessment Committee in negotiation where appropriate.
- Upload the completed Subrecipient Mitigation Strategy and fully executed Subaward in PERA.

#### **Post Award Subaward Funding Administrator:**

- Determination of whether the entity will participate as a [subrecipient or contractor](#).
- Conduct an assessment of the entity to be issued a subaward and complete the Risk Analysis Form.
- For high risk subrecipients, notify sponsors as required by the agency.
- Verifying that cost share and memo match commitments are documented in accordance with university guidelines and certified by subrecipients.
- Verifying the subrecipient and subrecipient PI have not been debarred or suspended from receiving federal funds at SAM.gov. This will be done when issuing an initial subaward and any amendment of the subaward.
- Prepare, sign, and send amendments to subrecipients for increases or decreases in funding or no cost extensions.
- Complete FFATA information when required.
- Restricted Party Screening for Foreign entities.
  - [Purdue login to Visual compliance](#) (Two-factor authentication will be required to log in)
- Review and recommend subrecipient invoices for approval by forwarding them to the PI. Subrecipient invoices should be entered in the Subrecipient Calculator 5 days from the date of receipt.
- Monitor outstanding subrecipient invoice reports and follow up to ensure compliance with Uniform Guidance 2 FR 200.305 (b)(3) requirement to pay within 30 calendar days.
- Review the closeout of the subaward at least 60 days prior to the conclusion of the subcontractor period of performance.
- Assist SPS Post Award in obtaining PI approval/certification for subaward invoices to ensure timely processing of payments
- Review the closeout of the subaward at least 60 days prior to the conclusion of the subcontractor period of performance.

#### **Research Quality Assurance:**

- Review annual audit reports for current subrecipient entities.
- Review audit reports sent from Post Award if the Subrecipient does not have an Audit Risk Summary on file.
- Complete and upload Subrecipient Audit Risk Summary in PERA Organization.

**Risk Assessment Committee:** The Risk Assessment Committee (RAC) is comprised of Post-Award, Contracting, Research Quality Assurance (ROA). The RAC is chaired by the Director of Post Award. The responsibilities of the RAC include the following:

- Determine appropriate method(s) to initially mitigate risks, as needed.
- Recommend appropriate language for the Subcontract language.
- Determine and recommend risk monitoring steps to be followed during the life of the subaward.
- Oversight of Subrecipient Monitoring processes and procedures.
- Review of Subrecipient Monitoring Process bi-annually and recommend process changes.