Roles and Responsibilities

Principal Investigator (PI): A member of the Purdue University faculty/staff who is responsible for the overall design, conduct, reporting and management of an externally sponsored project. PI is the person who is most familiar with the subrecipient's performance through email, telephone conversations, technical meetings, progress reports, or site visits. The PI should assess the subrecipient to determine that the subrecipient is qualified to complete the work/tasks assigned to them for the project. The obligations of the PI include appropriate monitoring of a subrecipient's performance and costs.

The subrecipient is required to submit periodic invoices for review, approval, and payment authorization. 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. This should include receipt of any progress reports or other deliverables due during this period.

2. If there are problems with the invoice, such as equipment purchased without any required or approval, do not approve the invoice for payment. In this situation, the PI should consult with the 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.

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.
- Review for debarred status, appropriate rates, regulatory information, etc.
- Restricted Party Screening for Foreign entities

https://www.purdue.edu/apps/account/cas/login?service=https%3A%2F%2Fwww.purdue.edu%2Fapps%2Fidphs%2FAuthn%2FExtCas%3Fconversation%3De1s1&entityId=http%3A%2F%2Fsso.visualcompliance.com%2FWFSP

- Flag for potential high risk subrecipient.

Contracting:

Once it is determined that a subaward is appropriate, Contracting team will

Prior to drafting and negotiating the subaward:

- Review SAP for all pertinent information regarding the subaward and coordinate with Post Award for any information which may be missing.
- Review prime award for any special conditions which may be required for any subawards not already included in SAP (ensures compliance with terms and conditions potentially set by federal award).
- Review all compliance issues (i.e. risk assessment, regulatory or export control issues) to determine appropriate language for subaward or risk mitigation strategy for subaward.
- Review budget, statement of work and budget justification to ensure the information corresponds to subaward.
- Review cost sharing (if appropriate) terms and conditions.
- Review requirements for financial, technical, property and inventory reports.
- Review and determine UG / Non-UG status.
- Determine which subaward template and risk mitigation strategy is most appropriate.
- Draft the terms of the subaward with sponsor, ensuring all terms and conditions for compliance, payment, closing, risk assessment and regulatory are included.
- Distribution of subaward to sponsor for review.
- Engage the Risk Assessment Committee in negotiation where appropriate.
- Route completed Subrecipient Mitigation Strategy and fully executed Subaward to spsopers@purdue.edu.

Post Award/Ag Field Office:

- Determination of whether the entity will participate as a subrecipient or contractor.
- Conduct an assessment of the entity to be issued a subcontract and refer to the Risk Assessment Committee as necessary.
- Reviewing and recommending subrecipient invoices and forwarding them to the PI for review and approval. Subrecipient invoices should be entered in the Subrecipient Calculator 5 days from the date of receipt.
- 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. https://www.purdue.edu/apps/account/cas/login?service=https%3A%2F%2Fwww.purdue.edu%2Fapps%2Fidphs%2FAuthn%2FExtCas%3Fconversation%3De1s1&entityId=http%3A%2F%2Fsso.visualcompliance.com%2FWFSP
- Review the closeout of the subaward at least 60 days prior to the conclusion of the subcontractor period of performance.

Business Office:

- Assist SPS Post Award in obtaining PI approval/certification for subaward invoices.
- 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.
- Review audit reports sent from Post Award if the Subrecipient is not in the Portal.
- Complete and upload Subrecipient Audit Risk Summary to the Portal in Perceptive Content.

Risk Assessment Committee: The Risk Assessment Committee (RAC) is comprised of Post-Award, Contracting, Research Quality Assurance (RQA). 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 Portal.
- Review of Subrecipient Monitoring Process bi-annually and recommend process changes.