



Section 500: Award Management

OSR Policy 500.11 — Outgoing Subcontracts

Responsible Officer: Director
Responsible Unit: Award Management
Effective date: July 1, 2008
Last revised on: October 19, 2009

Policy Statement

UNC Chapel Hill is responsible for monitoring the programmatic, financial, and conflict of interest (COI) status of its sponsored research award subrecipients. The Office of Sponsored Research ([OSR](#)), the administrative department and the Principal Investigator (PI) share responsibilities for monitoring subcontractors (known as subrecipients of funds) during the life of the sponsored project.

OSR ensures the subcontractor meets the audit requirements provided in OMB [Circular A-133](#) and that funds used by the subcontractor in conjunction with the project have been spent in accordance with applicable laws and regulations.

Upon acceptance of an award, OSR provides each subcontractor with a subcontract agreement, which establishes the subcontractor's legal responsibilities in light of the regulations and guidelines of the primary award agreement between the University and the sponsoring agency. Any necessary negotiations are the responsibility of the appropriate OSR Awards Manager.

Department administrators are responsible for monitoring expenditures and collecting invoices from subcontractors for payment. PIs are required to review and sign each invoice to indicate approval of the expenditures prior to forwarding the invoice to Disbursement Services.

Reason for Policy

This policy has been formulated to assist faculty and staff in ensuring that subrecipients conduct their portions of research projects in compliance with applicable regulations and that their expenses are reasonable and allowable.

Exclusions/Exceptions

Because subaward agreements are determined by the specifics of each award agreement, they are each treated individually.



Subcontractors provide services directly applicable to the sponsored research project. They differ from Service Agreements, which are products or services that indirectly support sponsored research.

Procedures and Related Policies

There are no directly related procedures associated with this policy. However, PIs are requested to provide all subcontractor information at the proposal stage of the project, according to the following policy:

- [Policy 300.8](#) [Direct Costs: Non-Personnel](#)
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OSR Research Tool Kits

[Proposal Development and Submission](#)

Contacts

Questions and concerns can be submitted online at [Ask OSR](#) or by using the [OSR staff directory](#). Within [RAMSeS](#), the “*Speak to Someone*” option assists in locating the staff member best suited to address project-specific issues.

References

 [Research Administration Glossary at Carolina](#)

1. Office of Management and Budget, Circular 133-A, *Audits of States, Local Governments, and Non-Profit Organizations*.

Revision History

Prior Revisions: The policies in the *Office of Sponsored Research Policies & Procedures Manual* supersede any OSR policies, procedures and appendices previously included in the *University Business Manual*, a publication of UNC Chapel Hill’s [Division of Finance](#).
