# Incoming Subaward
## Standard Operating Procedure

### 1. Purpose

Weill Cornell Medicine (WCM) Principal Investigators (PIs) frequently participate in sponsored projects led by external organizations. In these circumstances, WCM serves as a subrecipient (consortium site) and receives funding through an incoming subaward agreement issued by the prime recipient organization.

Incoming subaward agreements establish the funding, scope of work, reporting obligations, and terms and conditions governing WCM's participation in a sponsored project. OSRA is responsible for reviewing, negotiating, executing, and managing incoming subaward agreements to ensure compliance with institutional policies and sponsor requirements.

### 2. Scope

This SOP outlines the procedures for the review, negotiation, execution, and administration of incoming subaward agreements issued to WCM under sponsored projects. It applies to all incoming subawards and incoming subaward amendments received from external organizations.

### 3. Prerequisites

The following conditions must be met before an incoming subaward agreement can be processed:

- WCM is included as a consortium site or subrecipient on an externally submitted proposal.
- The subrecipient proposal documentation has been submitted through appropriate institutional review and routing processes.
- The prime recipient has received an award from the sponsoring agency.
- The prime recipient has issued an incoming subaward agreement or amendment to WCM.

### 4. Definitions

**Prime Recipient** – The organization that receives a sponsored award directly from a sponsor and is responsible for overall project management.

**Subrecipient (Consortium Site)** – An institution performing a substantive programmatic portion of a sponsored project under a subaward agreement. In this SOP, WCM serves as the Subrecipient.

**Incoming Subaward** – A legally binding agreement issued by a prime recipient organization to WCM that provides funding and establishes the terms and conditions governing WCM's participation in a sponsored project.

**Subaward Amendment** – A modification to an existing incoming subaward agreement that may revise funding, reporting requirements, project terms, or the period of performance.

**WRG-PT** – Weill Research Gateway – Proposal Tracking

## *5. Policy*

All incoming subaward agreements received by WCM must be reviewed, negotiated, and executed through OSRA. PIs and Departments may not independently process and sign agreements with collaborating institutions that involve the transfer of sponsored project funds.

OSRA is responsible for evaluating incoming subaward terms and conditions, coordinating institutional review, facilitating negotiations when necessary, and obtaining appropriate signatures prior to acceptance.

PIs and Departments are responsible for ensuring that the sub-application was properly routed through the Weill Research Gateway (WRG) at the time of proposal submission. If a WRG record does not exist, the PI and Department must create and route a record before OSRA can begin its review of the agreement. PIs and Departments are also responsible for reviewing the proposed scope of work, budget, and project requirements to ensure they accurately reflect the work to be performed at WCM.

Only authorized institutional officials may execute incoming subaward agreements on behalf of WCM.

## *6. Roles and Responsibilities*

| Role | Responsibilities |
|---|---|
| OSRA | Oversees institutional review, negotiation, execution, and administration; coordinates required reviews and authorized signatures; and maintains the official award record. |
| OSRA Subaward Specialist | Reviews agreements and supporting records; coordinates PI, Department, and stakeholder input; negotiates with the prime recipient; tracks activity in WRG-PT; and completes post-execution updates. |
| Principal Investigator (PI) | Confirms the scope of work, budget, project period, and programmatic requirements; provides timely feedback; identifies compliance needs; and maintains required research approvals. |

| | |
|---|---|
| Department | Supports proposal and award routing; reviews administrative and financial information; provides requested documentation; and works with the PI and OSRA to resolve outstanding issues. |
| Authorized Institutional Officials | Execute incoming subaward agreements and amendments on behalf of WCM. |

## *7. Procedure*

**Agreement Receipt and Review**

Incoming subaward agreements and amendments received from a prime recipient will be assigned to an OSRA Subaward Specialist for review and processing.

The Subaward Specialist will review the agreement alongside the proposal record and supporting documentation to confirm consistency with the approved scope of work, budget, sponsor requirements, and institutional policies. Any issues requiring clarification or modification will be identified for discussion with the prime recipient and WCM stakeholders.

All stages of subaward review, negotiation, and execution will be documented and tracked in the **Agreement Tracking** tab within WRG-PT.

**PI and Department Review**

The Subaward Specialist will provide the incoming subaward agreement to the PI and Department for review.

The PI and Department are responsible for confirming the accuracy and acceptability of the proposed budget, scope of work, project period, and other programmatic requirements. Any requested revisions must be communicated to OSRA for review and coordination with the prime recipient.

**Agreement Negotiation**

When modifications to the agreement are required, OSRA will conduct all negotiations with the prime recipient.

The Subaward Specialist will review proposed revisions, coordinate with institutional stakeholders as necessary, and communicate requested changes to the prime recipient until mutually acceptable terms are reached. Project personnel should not independently negotiate contractual terms.

**Compliance Review**

Prior to execution, OSRA will confirm with the PI and Department that all required institutional approvals and compliance requirements have been satisfied.

This review may include human subjects research approvals, animal subjects research approvals, conflict of interest requirements, export control considerations, and other project-specific compliance obligations.

**Agreement Execution and Award Setup**

Once the agreement has been finalized, OSRA will obtain the required institutional signatures and coordinate execution with the prime recipient.

Upon receipt of a fully executed agreement, the Subaward Specialist will finalize the award details in the **Agreements** tab, upload a copy of the fully executed agreement, and update the WRG record status to **"Award Received."** This status change enables OSRA Operations to initiate award setup and account creation in accordance with the **Processing a Notice of Award or Agreement SOP**.

**Record Maintenance**

OSRA will maintain executed agreements, amendments, correspondence, and supporting documentation within the official award record in WRG.

Award records will be updated as necessary to reflect executed agreements, amendments, and other project modifications.

## *8. Process Metrics*

- OSRA will review and distribute incoming subaward agreements to the PI and Department within three (3) business days of receipt and initiate the Agreement tracking record in WRG-PT.
- The PI and Department should provide requested feedback and supporting documentation within five (5) business days unless alternative arrangements have been established.
- OSRA will communicate significant negotiation updates to the PI and Department throughout the review process and will log each update in the Agreement tracking record in WRG-PT.
- Fully executed agreements will be released for award setup upon completion of all required approvals and signatures.

## *9. Special Consideration*

**IRB Approval** – WCM subawards conducting human subjects research must maintain all required approvals and certifications throughout the project period. If using a non-WCM/external IRB to serve as the IRB of record, an acknowledgement letter from WCM IRB is needed before the study may be initiated.

**IACUC Approval -** WCM subawards conducting animal subjects research must maintain all required approvals and certifications throughout the project period. WCM IACUC concurrence is required on all proposed animal subjects work at a collaborating site.

**Agreement Amendments** – Modifications involving additional funding, changes in scope, revised reporting requirements, or extensions of the project period must be reviewed and processed by OSRA prior to implementation.

**High-Risk Terms and Conditions** – Agreements containing unusual legal, financial, intellectual property, publication, confidentiality, or compliance provisions may require additional institutional review and negotiation before execution.

## *10. Related Documents*

- Competitive Grant Application Review and Submission (OSRA 0002)
- Processing a Notice of Award (OSRA 0009)