



SOP #	OSRA0010
Effective Date:	09/14/2026
SOP Owner:	OSRA

Outgoing Subawards Standard Operating Procedure

1. Purpose

Weill Cornell Medicine (WCM) Principal Investigators (PIs) frequently collaborate with external organizations that perform a substantive portion of a sponsored project. These collaborating organizations, referred to as subrecipients or consortium sites, may receive funding from WCM through an outgoing subaward agreement. OSRA is responsible for reviewing subrecipient documentation during proposal submission, assessing subrecipient risk, issuing and negotiating outgoing subaward agreements, processing amendments, and maintaining required records and reporting. Proper management of outgoing subawards ensures compliance with sponsor requirements, appropriate stewardship of sponsored funds, and successful project performance.

2. Scope

This SOP outlines the procedures for reviewing subrecipient participation during proposal submission and for establishing, modifying, and managing outgoing subaward agreements under sponsored awards issued to WCM. It applies to all outgoing subawards and subaward amendments issued by OSRA.

3. Prerequisites

The following conditions must be met before an outgoing subaward agreement can be issued:

- A sponsored project proposal includes one or more external subrecipients performing a portion of the project scope of work.
- The proposal has been submitted through appropriate institutional review and routing processes.
- The sponsor has issued an award to WCM.
- The award has been processed and released for account creation in accordance with the **Processing a Notice of Award SOP**.
- Required subrecipient documentation has been received and reviewed.

4. Definitions

Outgoing Subaward – A legally binding agreement issued by WCM to a subrecipient that provides funding, establishes the terms, and conditions governing participation in a sponsored project.

Prime Recipient – The organization that receives a sponsored award directly from a sponsor and is responsible for overall project management. In this SOP, WCM serves as the Prime Recipient.

Subrecipient (Consortium Site) – An external organization that performs a substantive programmatic portion of a sponsored project under a formal subaward agreement.

Subaward Amendment – A modification to an existing outgoing subaward agreement that may provide additional funding, extend the period of performance, or revise project terms and conditions.

SPQ – Subrecipient Profile Questionnaire used to evaluate organizational and compliance risk.



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SAM.gov Subaward Reporting (previously FSRs) – The federal reporting system integrated within SAM.gov for prime recipients of federal awards to report first-tier subawards to support transparency in federal spending.

WRG-PT – Weill Research Gateway – Proposal Tracking

5. Policy

All outgoing subawards issued under WCM-sponsored projects must be reviewed, approved, and executed through OSRA. PIs and Departments may not independently establish agreements with collaborating institutions that involve the transfer of sponsored project funds.

Subrecipients must provide all documentation required for proposal submission and award management. OSRA is responsible for evaluating subrecipient eligibility, performing risk assessments, determining appropriate monitoring requirements, and issuing subaward agreements consistent with sponsor regulations and institutional policy.

The Principal Investigator retains primary responsibility for the programmatic oversight of all subrecipients participating in a sponsored project. The PI shall maintain regular communication with the subrecipient Principal Investigator and project team, review progress toward completion of the approved scope of work and ensure that work performed is satisfactory and consistent with project objectives. If performance concerns, delays, non-compliance issues, or other risks are identified, the PI must promptly communicate with the subrecipient to address the issue and notify OSRA as soon as practicable. OSRA will work with the PI and Department to determine whether additional monitoring, corrective actions, modifications to the subaward, or other administrative actions are necessary.

Prior to issuing a new agreement or amendment, OSRA must assess the subrecipient's organizational, financial, compliance, and performance risk. Additional monitoring requirements may be imposed when risk factors are identified.

All outgoing subaward agreements and amendments must be reviewed by the PI and Department before distribution to the subrecipient. Authorized institutional officials must complete final execution.

Programmatic oversight of subrecipient performance remains the responsibility of the WCM Principal Investigator throughout the project period

6. Procedure

Proposal Submission Stage

When a proposal includes a subrecipient, the PI and Department are responsible for obtaining all required documentation from the collaborating organization. Required documents include [WCM's Statement of Intent](#) (SOI), scope of work, detailed budget, and budget justification. For non-competing continuation submissions, scientific progress information and updated budget documentation may also be required.

The PI and Department must review and approve all subrecipient documentation before including the organization in the proposal package within the Weill Research Gateway (WRG) and routing to OSRA.



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The OSRA Grants Team will review in accordance with the **Competitive Grant Application Review and Submission SOP**.

Award Processing Stage

Upon receipt of a funded award, OSRA Operations will review the Notice of Award (NOA) and coordinate the account setup process with the Department in accordance with the **Processing a Notice of Award SOP**. Once the award has been processed and released for account creation, the WRG record status will automatically change to **"Outgoing Subaward"** if the awarded budget includes one or more subawards. This status change will trigger an automated email notification to the Subawards Team, initiating the subaward agreement or amendment process. The Subaward Specialist will retrieve the budget, budget justification, scope of work, and Form 3B from the application record and provide these documents to the Department for review. Upon receipt of the revised subaward documents from the Department, the Subaward Specialist will prepare and initiate the applicable subaward agreement(s) and/or amendment(s). All stages of subaward preparation, negotiation, and execution will be documented and tracked in the **Agreement Tracking** tab within WRG-PT.

Subrecipient Risk Assessment

Prior to drafting an agreement or amendment, OSRA will perform a risk assessment for the subrecipient. The review may include:

- Evaluation of the current Subrecipient Profile Questionnaire.
- Review of recent audit reports and financial information.
- Assessment of human subjects, animal subjects, stem cell, or other compliance-related activities.
- Evaluation of prior performance under existing subawards.
- Consideration of any sponsor-specific requirements.

Based on the review, OSRA will determine the overall risk level and establish any additional monitoring or agreement requirements necessary to mitigate identified risks.

Agreement Preparation and Negotiation

OSRA will select the appropriate agreement or amendment template based on sponsor requirements, award type, organizational characteristics, and risk assessment results. The agreement will incorporate the approved budget, budget justification, scope of work, applicable sponsor terms and conditions, and institutional requirements.

Draft agreements must be reviewed by the PI and Department prior to distribution to the subrecipient. Additional project-specific requirements may be incorporated when appropriate.

OSRA is responsible for all negotiations with the subrecipient. Any modifications requested to the agreement will be reviewed by OSRA in consultation with institutional stakeholders, as necessary. Project personnel should not independently negotiate contractual terms with subrecipients.



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Performance Concerns and Escalation

The PI is responsible for addressing routine scientific, technical, and operational concerns directly with the subrecipient PI or designated project personnel. When concerns cannot be resolved through project-level discussions, or when issues materially affect project performance, compliance, deliverables, timelines, invoicing, or the approved scope of work, the PI must promptly notify OSRA. OSRA will coordinate with the Department, institutional officials, and the subrecipient organization, as appropriate, to evaluate the matter and determine whether corrective actions, formal correspondence, amendment of the subaward, suspension of activities, termination, or other administrative actions are warranted.

Agreement Execution

Once all parties approve the agreement, authorized representatives of both organizations will execute the document. WCM shall serve as the final signatory. Fully executed copies will be distributed to the subrecipient and retained within WRG-PT.

Record Maintenance and Reporting

OSRA will maintain all executed agreements, amendments, supporting documentation, and risk assessment records. Appropriate award records will be updated to reflect subaward commitments and modifications.

When required by federal regulations, OSRA will report subaward commitments through the SAM.gov.

7. Process Metrics

- OSRA will review subrecipient documentation during proposal submission in accordance with institutional proposal review timelines outlined in the **Competitive Grant Application Review and Submission SOP**.
- OSRA will initiate outgoing subaward activities once the sponsored award is released for account creation.
- OSRA will perform risk assessment and prepare an outgoing subaward agreement or amendment within five (5) business days of receiving **all** required documentation and award release information.
- OSRA will monitor agreement execution timelines and maintain records to support continuous process improvement.

8. Special Consideration

High-Risk Subrecipients – Additional monitoring requirements, reporting obligations, invoicing restrictions, or other risk mitigation measures may be imposed when a subrecipient is determined to present elevated organizational or compliance risk.

IRB Approval – Subrecipients conducting human subjects research must maintain all required approvals and certifications throughout the project period. As prime, acknowledgement from



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WCM's IRB must be obtained even if all the human subjects' work is occurring at the subsite. 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 - Subrecipients conducting animal subjects research must maintain all required approvals and certifications throughout the project period. If the animal work proposed all occur at a collaborating site, the PI/Department must complete the [IACUC Collaboration Form](#) and submit to the IACUC office. WCM IACUC concurrence is required on all proposed animal subjects work at a collaborating site.

Conflict of Interest Reviews – If a subrecipient identifies a potential conflict of interest, OSRA will coordinate with WCM's Conflict of Interest Office to ensure required disclosures and management plans are implemented.

Annual Amendments and Continuations – Multi-year projects frequently require additional funding increments, period extensions, or other modifications. OSRA is responsible for issuing appropriate subaward amendments to support these changes once the WCM department confirms the need.

Federal Reporting Requirements – Federal awards may require reporting of subaward obligations and modifications through SAM.gov or other sponsor-mandated systems. OSRA is responsible for ensuring applicable reporting obligations are met.

Delayed Subaward Execution – OSRA's goal is to fully execute outgoing subaward agreements within ninety (90) calendar days of the start of the applicable budget period. Subawards may continue to be issued after this timeframe when justified and permitted by sponsor terms and conditions; however, delays may affect the subrecipient's ability to incur and receive reimbursement for project costs, complete project activities within the approved period of performance, obtain required compliance approvals, and meet sponsor reporting deadlines. Departments and PIs should work with OSRA and collaborating institutions to provide required documentation and respond to negotiations in a timely manner to minimize administrative and programmatic impacts associated with delayed execution.

8. Related Documents

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