

Table of Contents

OSP GMAS Subagreement High Level Business Process.....	1
Overview	1
Scope.....	2
Subagreement Draft Requester (Department Administrator).....	2
Central Reviewer (Grants & Contracts Specialist).....	2
Subagreement Drafter (Subcontract Specialist)	3
Negotiator (Grants & Contracts Officer).....	3
Operations (Sponsored Programs Administrator)	3
Process Steps	3
Initiating a Draft Request	3
Completing the Central Review	4
Assigning the Drafter	5
Drafting the Subagreement	5
Sending the Draft to the Subrecipient	7
Negotiations.....	8
Executing the Subagreement.....	8
Ready for Revision	9
Document History	10

OSP GMAS Subagreement High Level Business Process

Overview

Harvard routinely enters into outgoing subagreements (“Subagreements”) with other institutions (each such institution, together with a particular PI and a particular statement of work at such institution, a “Subrecipient”) for the performance of particular aspects of a research project. Such agreements flow down funds, and often certain terms and conditions, received by Harvard under a prime agreement (“Prime Award”) between Harvard and a sponsoring institution (the “Prime Sponsor”).

Subagreements are drafted using standard templates that address the Subrecipient's obligations in connection with the research. Based on the nature of the Prime Award and the intended Subrecipient, an appropriate template will be selected and tailored to incorporate project specific terms.

Scope

This document defines the high-level process from the initiation of a subagreement draft request in GMAS through the review, drafting, negotiation with the subrecipient, recording of signature(s), and full execution of the subagreement. It focuses on how OSP will implement the University wide business process to meet the needs of the OSP Pre-Award organizational structure and roles and responsibilities.

This document does not include the process to set up the subrecipient in GMAS via an Initial Proposal or Subrecipient at Addition at No Additional Cost.

It does not pertain to purchase orders, billing agreements, vendor agreements, consulting agreements or other procurements. While the templates referenced below are used for the vast majority of Subagreements, there will be cases where a special template will be required. In such instances, the Subcontract Specialist will be responsible for selecting the appropriate form. The general process outlined below must still be followed.

For additional details and definitions, please refer to the [University wide GMAS Subagreement business process](#) as well as the [GMAS subagreement job aids](#).

Subagreement Draft Requester (Department Administrator)

The Draft Requester will gather and enter required information in the GMAS Subagreement draft request and lock and route the draft request. They will ensure all required subagreement documents are uploaded to the GMAS document repository and categorized.

Once the draft request is locked and routed, the Draft Requester is responsible for

- Responding to any questions and/or requests for additional information from the Central Office using GMAS statuses and workflow assignment functions to communicate and keep the subagreement moving through the workflow.
- Tracking the status of all subagreements in their portfolio using the GMAS subagreement dashboard.

Central Reviewer (Grants & Contracts Specialist)

The Central Reviewer is responsible for vetting the subagreement draft request. This includes:

- Reviewing the draft request as entered in GMAS by the Department
- Reviewing the subagreement draft before it is sent to the subrecipient
- Determining when a segment revision is required for a subagreement, providing instructions for the segment revision, and reviewing and committing the revision.

Subagreement Drafter (Subcontract Specialist)

The Subagreement Drafter is responsible for drafting the subagreement based on information in the GMAS draft request. If any questions arise, the Subagreement Drafter will update the subagreement status and assign the agreement to the appropriate contact to obtain the needed information. After drafting the drafter is responsible for:

- Uploading the draft/partially executed subagreement in the GMAS subagreement document repository.
- Assigning for GCS review prior to sending the subagreement to the subrecipient
- Sending draft agreement to the subrecipient and communicating with the subrecipient as needed.
- Assigning the subagreement to the negotiator as needed.

Negotiator (Grants & Contracts Officer)

It is the responsibility of the Negotiator to work with the Subrecipient to reach agreement on terms and conditions and revise the draft as appropriate. During the negotiation process, should clarifications be required, the Negotiator will use GMAS functionality to obtain information from the appropriate contact when possible. When agreeable terms have been reached, the Negotiator will:

- Obtain both Harvard and subrecipient signatures (if applicable)
- Upload the signed subagreement to GMAS document repository and set the status to “Fully Executed.”
- Assign the subagreement to the appropriate GCS for segment revision.

Operations (Sponsored Programs Administrator)

When a subagreement has been fully executed, and dates and/or dollars or accounts are impacted, a GMAS segment revision is required. It is the responsibility of Operations to complete the GMAS revision to set up or adjust subagreement accounts and issue the Action Memo to inform the Project Administrative team that the subagreement has been activated.

Process Steps

Initiating a Draft Request

The Subagreement Draft Requester gathers and enters the information required to initiate a Subagreement in the GMAS Subagreement homepage (including all required documentation). In nearly all cases, the relevant school or department will be the Draft Requester. It is possible that a Grants and Contracts Specialist (a “GCS”) may initiate a Subamendment, but that would be in the following limited circumstances:

- To flow down new/amended terms and conditions from the Prime Agreement,

- To incorporate corrections and/or administrative changes to a Subamendment that would not affect dates, dollars, or the statement of work.

The drafter requester will ensure all required Subagreement documents are uploaded to the GMAS document repository and categorized. At a minimum, this includes:

- Signed letter of Intent
- Statement of Work
- Budget
- Budget Justification

The Draft Requester then locks and routes the draft request and assigns the appropriate Central Reviewer. The GMAS status is updated to “Central Review.” This sends the draft request to the Grants and Contracts Specialist.

Completing the Central Review

The GCS will receive a GMAS notification when the draft request is locked and routed and assigned to them. They will vet the Subagreement draft request as entered by the Draft Requester. This review includes, but is not limited to, confirming dates and dollars, ensuring risk assessment requirements have been met, confirming required documents have been uploaded in the document repository, and obtaining sponsor approval for the Subrecipient when needed.

Risk assessments recorded in GMAS on the subrecipient organization record are displayed on the subagreement homepage. If the subrecipient has not been assessed or if the next assessment date is in the past, the GCS will send an email to subrecipientmonitoring@harvard.edu to request that a risk assessment be completed and note that the request has been made in Central reviewer comments. The draft request may be moved to Ready for drafting while this risk assessment is pending.

During this review, the GCS may roll the draft request back to “Under Development” and back to the Draft Requester in any of the following cases:

- missing, incomplete or inaccurate support documents in GMAS
- edits to dates, dollars, and/or the statement of work
- If prior approval is needed but not in place (e.g., change of PI, or a Subrecipient at no additional cost).

If any other questions arise, or additional information is required, the GCS uses GMAS Clarifications Requested functionality to follow up with the Draft Requester. The GCS then updates the status of the draft request in GMAS to “Ready to Draft” to move it on to the Subcontract team, but does not assign the drafter

Note that if the GCS ascertains that the sub buckets need adjusting, the GCS will log a JIRA ticket to request a revision to adjust the sub buckets. The draft request may proceed through the workflow while that revision is being processed.

Assigning the Drafter

The Grants and Contracts Officer (“GCO”) Manager finds any draft request on the sub dashboard that is in Ready for Drafting Status and is unassigned. The GCO Manager assigns the draft request to the Drafter. In most cases this will be the Subcontract Specialist but may also be assigned to an Officer.

Drafting the Subagreement

Initial Draft

The subcontract specialist will receive an email notification when the draft request is assigned. When the subcontract specialist is ready to begin drafting, they will update the status to Drafting.

The Subcontract Specialist reviews the request/supporting documentation and prepares the initial draft using the appropriate template: ¹

- If the prime award is a federal grant or cooperative agreement subject to the standard agency research terms and conditions, and if the Sponsor is an FDP member agency, use the appropriate FDP template based on Sponsor and whether the Subrecipient is a Harvard Affiliate.
- If the Sponsor is either a federal agency that is not an FDP member or a non-federal entity, and/or the prime award is a contract (or a cooperative agreement that is subject to award-specific terms and conditions²), choose the appropriate Harvard template based on the relationship of the parties (Federal/Non-Federal Sponsor; Affiliate, domestic, or international Subrecipient).
- The Subcontract Specialist may also identify any “flow down” provisions from the Prime Award that should be incorporated into the Subagreement.

¹ GMAS prepends the project “nickname” to the project title. In drafting the Subagreement, care must be taken to exclude project title text in bold print preceding the colon when adding the project title.

² The FDP templates are intended to be used for subawards under federal financial assistance awards that are subject to the participating agency’s Standard Research Terms and Conditions. Where an agency has not adopted such Terms and Conditions for cooperative agreements, the appropriate Harvard template should instead be used.



- The Subcontract Specialist checks the risk assessment of the Subrecipient in GMAS to identify the risk level of the Subrecipient.
 - If the Subrecipient is rated “Green”, “Yellow,” or “No risk assessment required” no further review is needed.
 - If the Subrecipient is rated “Red”, the Subcontract Specialist notes this in the GMAS comments, places the draft request in Indefinite hold status, and confers with the GCO. The GCO will consult with the Subrecipient Monitoring team as needed.
 - If the Subrecipient has not been assessed, or the assessment is not current, a member of the Subrecipient Monitoring team will perform the risk assessment as requested by the GCS and notify the Subcontract Specialist.³ The Subcontract Specialist will then proceed.
- The expected turnaround time from the assignment of the draft request in GMAS to the Subcontract Specialist to submission of the initial draft to the GCO for review is 5 - 10 business days. Note that simple Subagreements, addressed below, do not go to the GCO.

Drafting Process: Simple Subagreement

If the draft Subagreement is on the FDP form (agreement or amendment) or is a simple amendment (e.g., extending the Period of Performance), the Subcontract Specialist does not involve the GCO. Instead, the Subcontract Specialist drafts the Subagreement, uploads the draft Subagreement to GMAS, and then sets the GMAS status to “In Review” and assigns it back to the GCS.

- If the GCS has changes to the draft, the GCS will enter those changes in the GMAS comments, remove the “In Review” status, and re-assign the draft to the Subcontract Specialist. The Subcontract Specialist will revise the draft accordingly.
- If the GCS does not have any changes to the draft, the GCS will remove the “In Review” status and re-assign the draft back to the Subcontract Specialist.
- If a department has requested that they review the draft before it is sent to the Subrecipient, the GCS will discuss this request with the Awards Management & Operations team Manager. If a decision is made to continue with the department review, the GCS will remove the draft request from “Under Review”, then reset the status to “Under Review” and assign it to the appropriate contact. The department contact will review, add comments, then remove it from Under Review.

Drafting Process: More Complex Subagreements

If the draft subagreement is neither on the FDP form nor a simple subamendment, but rather is on a Harvard form or is otherwise more complex. the Subcontract Specialist then will involve the GCO. The

³ For more details on the risk assessment process, please see the [Subrecipient Monitoring Policy](#).

subcontract Specialist drafts the subagreement, uploads the draft to GMAS, then sets the GMAS status to In Review and assigns it back to the GCS.

- If the GCS has changes to the draft, the GCS will enter those changes in the GMAS comments, remove the “In review” status, and re-assign the draft to the Subcontract Specialist.
- The Subcontract Specialist will revise the draft accordingly, upload the revised draft, apply the “In review” status and re-assign the draft to the GCS. These steps may occur more than once.
- If the GCS does not have any changes to the draft, or if the GCS has received the changes from the Subcontract Specialist and is now satisfied with the draft, the GCS will then remove the status from “In review” and assign the draft to the GCO.
- If the department has requested that they review the draft before it is sent to the subrecipient, the GCS will discuss this request with the Awards Management & Operations team Manager. If a decision is made to continue with the department review, the GCS will remove the draft request from “In review” then resent the status to “In review” and assign it to the appropriate contact. The department contact will review, add comments, then remove it from “In review”.
- The GCO will review and revise the draft agreement as necessary.
 - The GCO should pay particular attention to any “flow down” provisions from the Prime Award that need to be incorporated. These include both express “flow down” provisions and other applicable provisions, such as restriction on the use of the Prime Sponsor’s name or indemnification language, which must be flowed down to subrecipients to ensure Harvard’s ability to comply with the conditions.
 - The expected turnaround time for the GCO to review is 5 – 10 business days.
 - The GCO will upload to GMAS (A) a word document with any edits in red line if applicable, and (B) a clean PDF copy of the subagreement including any edits with the GCO’s initials by the signature block, The GCO will then update the status to “In review” and assign the draft back to the GCS.
- If the GCS has further edits to the draft, the GCS will add those comments and reassign to the GCO, revisiting the steps above as necessary.
- The expected turnaround time for final review by the GCS is less than 5 business days. If additional time is needed, including to incorporate feedback from the Department Admin/PI, the GCS should inform the Subcontract Specialist and keep them updated on any further delays by using the “Provide update” function in GMAS.
- Once the GCS is satisfied with the draft, the GCS will remove the status from “In review” and assign the draft to the Subcontract Specialist.

Sending the Draft to the Subrecipient

- The Subcontract Specialist preps the Subagreement for sending to the subrecipient via email. The subcontract Specialist sets the GMAS status to “With subrecipient” and uploads the draft (with attachments) to the subagreement document repository and categorizes the document.



- The following are added to the Subagreement in PDF file format:
 - Exhibit A” Prime Award (certain financial details may be redacted)
 - Exhibit B: SOW
 - Exhibit C: Budget and Budget Justification if applicable
- The subagreement must also be accompanied by a word version of Exhibit D (Notices)⁴ when sent to the subrecipient, and if the Sponsor is a federal agency, a word version of Exhibit E (FFATA required data elements).

Negotiations

Any comments and/or revisions proposed by the Subrecipient will be forwarded to the GCO for review. If substantive review is required, the GCO shall email the Subrecipient within a reasonable time period (no more than 3-5 business days), acknowledging receipt and stating that the review is in process.

- The GCO will set the status to “In Negotiation”
- The GCO will use the GMAS secondary statuses (e.g., “Clarification Requested”, “Indefinite Hold.” Etc.), along with comments to keep the project team apprised of the negotiations and will remove the draft request from “in negotiation” as appropriate (e.g., once the subagreement has been partially executed).

Executing the Subagreement

- Unless the GCO has taken over negotiations, the Subcontract Specialist will follow up with the subrecipient (within 10 business days of sending the subagreement) until a partially executed subagreement is returned. The Subcontract Specialist (or, if applicable, the GCO), will record any follow up contact in the “Subrecipient last contacted” comments in GMAS.
- Once received, the Subcontract Specialist (or, if applicable, the GCO), will upload the partially executed Subagreement in GMAS, record the date of signature, and set the status to “Partially Executed”.
 - If the subagreement is subject to FFATA reporting requirements and the Primary place of performance has not yet been entered, the Subcontract Specialist will enter the information in GMAS.
- The Subcontract Specialist shall ensure that the completed copies of each of the attachments (e.g., Exhibit D, Exhibit E) have been received and uploaded to GMAS prior to sending to the GCO for final review and signature.
- The GCO will identify Partially executed subagreements on the Sub dashboard, sign the subagreement, and record the Harvard signature date which sets the status to Fully executed.
- The fully executed Subagreement will be returned to the Subrecipient by the Subcontract Specialist, copying the GCS and the GCO.

⁴ Exhibit D: Notices provides a listing of Harvard University & Subrecipient contacts



- If the GCO had taken over negotiations, the GCO may return the Fully executed subagreement to the subrecipient, copying the GCS and the Subcontract Specialist.
- These actions must be completed no later than the 9th of the month after the date the Subagreement was fully executed in order to meet FFATA reporting requirements.

Ready for Revision

- Once the GMAS status has been updated to “Fully executed” by the GCO, the secondary status is automatically set to “Ready for revision.” The GCO will forward the Fully executed subagreement (in the GMAS draft request) to the appropriate GCS by selecting “Update with revision instructions” and assigning it to the GCS.
- The GCS will determine if a segment revision is required. Segment revisions are only required if Dates, Dollars, or account are impacted.
 - If a revision is not required, the GCS will select “Remove from ready for revision” status, and the workflow is complete.
 - If a revision is required, the GCS will select “Update with revision instructions”, enter revision instructions, and assign the GMAS draft request to Operations.
- The Sponsored Programs Administrator (SPA) will locate the draft request on the Sub Dashboard, assign it to themselves and process a segment revision.
 - If the SPA has questions, they will also use the “Update with revision instructions” function to request clarification from the GCS. They will assign the draft request back to the GCS, enter their question, and a GMAS email notification will be sent to the GCS.
 - The GCS will respond to the SPA using “Update with revision instructions”, assign the draft request back to the SPA and enter their response. A GMAS email notification will be sent to the SPA.
- When the SPA has all the information they need, they will select “Make revision” on the subagreement homepage. They will review the “Subagreement revision overview” which provides a listing of all subagreements on the segment in Ready for revision status that will be pulled into the revision and subagreements on the segment in prior statuses that will be pulled into the revision if they change to fully executed/ready for revision before the revision is completed.
- When the SPA has completed the revision, the SPA will notify the GCS to review and commit the revision by using the “Update with Revision instructions again and assigning the GCS.”
 - Assuming that all information is correct. The GCS will commit the revision, an Action memo is generated, “Ready for revision” status is removed, and the workflow is complete.
 - If the GCS identifies that a correction should be made in the revision, the GCS will use the “Update with revision instructions function to assign the subagreement back to the SPA and enter the corrections to be made. The SPA will correct the revision and



communicate back to the GCS using the “Update with Revision instruction” function to request another review and commit.

Additional Resources

- [Subagreement Job Aids](#)
- [Subagreement Workflow Step-by-Step Instructions](#)
- [GMAS Subagreement Online Training for Central Administrators Overview](#) (HTP)
- [GMAS Subagreement Online Training for Central Administrators Demonstration](#) (HTP)
- [Subrecipient Monitoring Policy](#)
- [Subrecipient Monitoring Toolkit](#)
- [Subrecipient vs. Contractor Guidance](#)

Document History

Table 1 Document History

Version	Date	Author	Rationale
1.0	02/15/23	M. Haley	Initial