

Subaward Execution and Approval Policy



Policy Number: 600-013
Effective Date: April 3, 2007
Last Updated: June 14, 2025
Issuing Authority: Office of the Senior Vice President for Research
Responsible Office: Sponsored Programs Office (SPO), Office of Procurement and Contracting (OPC) and Office of the General Counsel (OGC)

Purpose

The purpose of this policy is to establish clear procedures for the execution, negotiation, and monitoring of outgoing subawards (Sub-Outs) issued by Howard University to external entities as part of a sponsored award agreement. This policy ensures compliance with Uniform Guidance ([2 CFR 200](#)), sponsor-specific requirements, and institutional policies.

This policy applies only to outgoing subawards (Sub-Outs). If Howard University is receiving a subaward as a subrecipient (Sub-In), refer to the Award Acceptance and Setup Policy (600-006) for acceptance and setup procedures.

This policy should be read in conjunction with the Award Acceptance and Setup Policy (600-006), which governs all incoming sponsored awards, including incoming subawards.

Policy

It is the policy of Howard University that all outgoing subawards (Sub-Outs) must be reviewed, negotiated (if necessary or appropriate), and formally executed by the Sponsored Programs Office (SPO) before the subrecipient begins work.

- Subawards cannot be executed until the prime award is fully accepted and set up in Workday, as outlined in the Award Acceptance and Setup Policy (600-006).
- Only an Authorized Organizational Representative (AOR) within SPO is authorized to sign subaward agreements.
- Subawards must be issued in compliance with sponsor terms, institutional policies, and federal regulations, including [2 CFRs 200.331 – 200.333](#), Subrecipient Monitoring and Management.
- Howard University, as a pass-through entity, is responsible for ensuring that all subrecipients comply with federal and sponsor requirements.

All fully executed subawards must be stored in Cayuse for tracking and compliance purposes.

Business Process Description

The execution of outgoing subawards follows a structured process to ensure compliance with federal and sponsor requirements.

The business process follows these key steps:

- **Subrecipient Determination & Risk Assessment:** SPO confirms the subrecipient status in accordance with [2 CFR 200.331](#) and conducts a risk assessment to determine appropriate monitoring measures
- **Subaward Agreement Drafting & Negotiation:** SPO drafts the agreement using an approved template, negotiates terms as needed, and seeks OGC review when legal risks exist.

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- **Subaward Execution & Workday Setup:** The subaward is signed by an AOR within SPO and submitted to SPO for financial setup in Workday, which automatically notifies relevant stakeholders.
- **Post-Award Subrecipient Monitoring:** SPO and the PI ensure compliance with [2 CFR 200.332](#) through financial and technical reporting, invoice verification, and site visits for high-risk subrecipients.

For detailed procedures on subrecipient monitoring and financial oversight, refer to the Subrecipient Monitoring SOP.

Roles and Responsibilities:

- **Sponsored Programs Office (SPO):** Responsible for determining subrecipient status, drafting subawards, negotiating terms, executing agreements, and overseeing subrecipient monitoring. Manages the financial setup of subawards in Workday and ensures compliance with financial reporting requirements.
- **Authorized Organizational Representative (AOR):** The designated signatory within SPO authorized to execute subawards.
- **Principal Investigator (PI):** Responsible for monitoring the subrecipient's technical and financial performance, approving invoices, and ensuring compliance with reporting requirements.
- **Office of General Counsel (OGC):** Reviews subawards when legal risks exist, including liability concerns, IP issues, and foreign collaborations.

Compliance Considerations:

All outgoing subawards must comply with:

- [2 CFR 200 \(Uniform Guidance\)](#)
- Terms and Conditions imposed by the prime sponsor
- Terms and Conditions awarded in outgoing subaward

Monitoring and Enforcement:

- Unauthorized subawards will not be recognized by Howard University, and the individual responsible may face administrative consequences.
- Failure to comply with subrecipient monitoring requirements may result in funding restrictions, financial penalties, or termination of the subaward.
- The Subrecipient Monitoring SOP outlines the full compliance and enforcement framework applicable to subawards.