

Research and Sponsored Projects Manual (RSP)

RSP 503–05: Subaward Agreements

Effective: 1/1/1992

Revised: 11/1/2024

Purpose

To assure university compliance with federal, state, and ABOR requirements for the issuance of subawards

Sources

Code of Federal Regulations – 2 CFR 200.332: Requirements for pass-through entities

Department of Defense FAR Supplement (DFAR) Subpart 244

Arizona Board of Regents Policy Manual - 3–801 – 3–811, “University Procurement Code”

Applicability

This policy applies to all subawards issued by ASU under a [sponsored project](#).

Policy

Responsibility and compliance

The Office of Research and Sponsored Projects Administration (ORSPA) is responsible for ensuring that proposed subawards are compliant with applicable federal, state, and ABOR laws, regulations, and statutes.

Review and evaluation

ORSPA will exercise due diligence in the review, evaluation, and selection of subawards to ensure an appropriate and compliant subaward is awarded, including evaluating subrecipients for risk of noncompliance as required by 2 CFR 200.443(b).

Negotiation and documentation

The Research Operations director and/or their designee(s) is responsible for conducting or being involved in all formal negotiations with subawardees to establish contractual relationships under all sponsored projects. The director’s involvement is intended to assure, to the maximum extent practical, that the procurement:

1. Provides open and free competition
2. Does not present a conflict of interest
3. Complies with all relevant federal, ABOR, and university statutes, regulations, and policies
4. Is properly documented.

ORSPA will determine whether prior approval is required to initiate or amend a subaward, based on sponsor terms and conditions. ORSPA will include, as flow-down provisions, all applicable clauses in the ASU award. Subaward funds are obligated in the Workday FMS by processing a Subrecipient Award Supplier Contract Event upon agreement execution.

Procedure(s)

See [researchadmin.asu.edu > manage subawards](https://researchadmin.asu.edu/manage-subawards) for procedures.

Additional Resources

For more information about subawards, see [researchadmin.asu.edu>subawards](https://researchadmin.asu.edu/subawards).

For definitions of underlined terms, see the [ORSPA Acronyms and glossary](#) webpage.

Cross-Reference

- [RSP 101](#), “General Research Policy”