

Yale New Subaward Checklist

Subrecipient Legal Name

IRES #

Pre-Award and Post-Award DBOs: Please select the box that indicates the stage at which the step was completed. If a step is not applicable to this Subaward, please select N/A. Refer to the Yale New Subaward Checklist Guide for detailed instructions.

Pre-award	JIT	Post-award	N/A
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1. Budget, Budget Justification, signed SIC and SOW uploaded into IRES

2. Subrecipient Questionnaire completed and uploaded into IRES along with a copy of most recent financial statements or internal audit records.

3. Agency-specific COI compliance is certified (Link provided on SIC form)

4. Subrecipient is an active Workday Supplier

5. Subrecipient has a UEI #

6. Subrecipient's IACUC approval is in place

7. Subrecipient's IRB approval is in place

8. Human Subjects Data type:

9. Human Subjects Data direction:

10. If this is a Clinical Trial, and the Subrecipient is administering an intervention as part of the Clinical Trial, completed Attachment 2B sent to Subaward Manager.

11. Final budget and budget justification that match the Subrecipient amount funded are forwarded to the Subaward Manager.

Yale New Subaward Checklist Guide

This checklist is designed for Pre-Award and Post-Award DBOs to account for all information and materials the Subaward Team needs to issue a New Subaward. Not all steps are handled during the same stage for every proposal. Therefore, the checklist includes boxes for DBOs to indicate whether the task was completed at the Pre-Award, JIT, or Post-Award stage.

Note: For Subawards being added after proposal stage, the Post-Award DBO is responsible for all items on the checklist. Please visit [this page](#) for information on issuing after-the-fact Subawards.

Please see the list below for additional details on each question:

1. Budget, Budget Justification, [Subrecipient Information and Compliance Form](#), and Scope of Work are required from all Subrecipients at Proposal stage. Pre-Award DBO collects these materials from the Sub.
2. The Subrecipient Questionnaire can be found [here](#), and is used in lieu of a 2 CFR 200 Single Audit to help assess Yale's risk of subcontracting to the Subrecipient. The Subrecipient must also include a copy of either their most recent financial statements or internal audit records.
3. Check the SIC form (or the FDP Expanded Clearinghouse, if the Subrecipient is a participant), for whether the Subrecipient certifies that they have a Sponsor-compliant COI policy in place, if applicable, and have included a link to the policy on the SIC form. Federal agencies that have specific Conflict of Interest policies are listed on the SIC form. A Subrecipient must have a compliant policy implemented before they can receive funds. Yale **does not** allow Subrecipients to state that they will follow Yale's compliant COI policy.
4. To confirm whether the Subrecipient is a Supplier in Workday:
 - a. Login to Workday, and search for the "Find Suppliers – Yale" report
 - b. In the "Supplier Name" field, enter the name of the Subrecipient
 - c. If no Supplier is found, or the Supplier is found but is listed as Inactive, follow the instructions outlined in [3401 PR.01 Supplier Setup and Change](#)
5. Subrecipients are required to have a UEI# for Subawards on federally funded awards. Check the SIC form for the Subrecipient's UEI.
6. Check the SIC form to indicate if applies, and if so, whether the approval was in place at the time SIC was submitted. Yale's standard practice is to withhold a subaward until IACUC approval is in place. It is the DBO's responsibility to confirm and maintain documentation of current approval for a project.
7. Check the SIC form to indicate if applies, and if so, whether the approval was in place at the time SIC was submitted. It is Yale's standard practice to withhold a subaward until IRB approval is in place. If the Subrecipient's IRB is ceding to Yale's, a reliance agreement must

be on record. The DBO is responsible for confirming and maintaining documentation of current protocol approval.

8. Human Subjects Data: The most common types of data transfer are:
 - a. De-identified Data (see [45 CFR 164.514\(a\)](#))
 - b. Limited Data Set (see [45 CFR 164.514\(e\)\(2\)](#))
 - c. Protected Health Information (PHI) (see [45 CFR 164.103](#))
 - d. Personally Identifiable Information (see [OMB Memorandum M-07-16.](#))

If the type of data being transferred does not match any of these options, please contact your Subaward Manager with the specific data information.

9. Human Subjects Data can be shared from the Subrecipient to Yale, from Yale to the Subrecipient, or both directions.
10. If an HHS-funded project, the NOA will indicate whether this is considered a Clinical Trial (for NIH, the indicator is in Section IV.) If the project is clinical research with an **intervention**, it is considered a Clinical Trial. If the Subrecipient is also administering the intervention, they are considered involved in Clinical Trial work. DBOs should work with the PI to complete Attachment 2B if applicable.
11. The final budget must align with the initial amount of funding we are providing to the Subrecipient. If the proposed budget does not match what will be funded, the Subrecipient must provide the DBO with an updated budget. Subsequent years do not need to be adjusted if their actual funding amount is not yet known. If the budget must be revised, it's best if the budget justification is revised as well, but not required.

Please refer to the matrix on the following three pages for the party responsible for each step throughout the pre-award, JIT, and award stages.

Question	Stage	Responsible Parties
	PRE-AWARD	
1. Budget, Budget Justification, signed SIC, and SOW uploaded into IRES		Pre-Award DBO: Obtain all documents from Subrecipient for proposal submission
2. Subrecipient Questionnaire completed and uploaded into IRES along with a copy of most recent financial statements or internal audit records.		Pre-Award DBO: Obtain all documents from Subrecipient (needed if new sub and not subject to Single Audit)
3. Agency-specific COI compliance is certified (Link provided on SIC form)		Pre-Award DBO: Review SIC for completeness
4. Subrecipient is an active Workday Supplier		Pre-Award DBO: check if supplier exists in Workday and is Active
5. Check if Subrecipient has UEI#		Pre-Award DBO: Check if UEI# is listed on SIC Form (required for federally funded awards)
	JIT	
2. Subrecipient Questionnaire completed and uploaded into IRES along with a copy of most recent financial statements or internal audit records		Pre-Award DBO: Obtain all documents from Subrecipient
3. Agency-specific COI compliance is certified (Link provided on SIC form)		Pre-Award DBO: Review SIC for completeness. If no COI policy link is provided, notify Subrecipient. Subrecipient: Obtain a financial COI policy and post it to a publicly available webpage. Send link to Pre-Award DBO.
4. Subrecipient is an active Workday Supplier.		Pre-Award DBO: check if supplier exists in Workday and is Active. If not, notify Subrecipient. Subrecipient: Complete Workday Supplier Gateway steps to register as a supplier
5. Check if Subrecipient has UEI#		Pre-Award DBO: If not previously listed on SIC form, notify Subrecipient

		Subrecipient: Complete Steps in SAM.gov to obtain UEI# and send to Pre-Award DBO
6. Subrecipient's IACUC approval is in place		Pre-Award DBO: Receive from PI or Subrecipient, upload into IRES
7. Subrecipient's IRB approval is in place		Pre-Award DBO: Receive from PI or Subrecipient, upload into IRES
8. Human Subjects Data type		Pre-Award DBO: If Human Subjects Data will be exchanged, obtain information from PI and upload email into IRES
9. Human Subjects Data direction		Pre-Award DBO: If Human Subjects Data will be exchanged, obtain information from PI and upload email into IRES
	POST-AWARD	
2. Subrecipient Questionnaire completed and uploaded into IRES along with a copy of most recent financial statements or internal audit records.		Post-Award DBO: Confirm documents are in IRES. If not, obtain all documents from Subrecipient and forward to Subaward Manager.
3. Agency-specific COI compliance is certified (Link provided on SIC form)		Post-Award DBO: Review SIC for completeness. If no COI policy link is provided, notify Subrecipient. Subrecipient: Obtain a financial COI policy and post it to a publicly available webpage. Send link to Post-Award DBO.
4. Subrecipient is an active Workday Supplier.		Post-Award DBO: check if supplier exists in Workday and is Active. If not, notify Subrecipient. Subrecipient: Complete Workday Supplier Gateway steps to register as a supplier. Notify Post-Award DBO when supplier ID is received.
5. Check if subrecipient has UEI#		Post-Award DBO: If not previously listed on SIC form, notify Subrecipient Subrecipient: Complete Steps in SAM.gov to obtain UEI# and send to Post-Award DBO
6. Subrecipient's IACUC approval is in place		Post-Award DBO: Check if in IRES. If not, request from PI or Subrecipient, forward to Subaward Manager

7. Subrecipient's IRB approval is in place		Post-Award DBO: Check if in IRES. If not, request from PI or Subrecipient, forward to Subaward Manager
8. Human Subjects Data type		Post-Award DBO: Check if in IRES. If not, obtain information from PI and forward to Subaward Manager
9. Human Subjects Data direction		Post-Award DBO: Check if in IRES. If not, obtain information from PI and forward to Subaward Manager
10. If this is a Clinical Trial, and the Subrecipient is administering an intervention as part of the Clinical Trial, completed Attachment 2B sent to Subaward Manager.		Post-Award DBO: Check NOA (NIH) to see if this meets the definition of clinical trial. If so, confirm with PI if this applies. Subaward Manager will provide DBO with a copy of Attachment 2B to complete. Yale PI: Complete Attachment 2B if this applies and send to Post-Award DBO
11. Final budget and budget justification that match the Subrecipient amount funded		Post-award DBO: Obtain any revised budget and budget justification documents from Subrecipient and forward to Subaward Manager.