

80.11 Subrecipient Monitoring

Approval Authority: Cabinet
Responsible Executive(s): Provost and Vice President for Academic Affairs
Responsible Office(s): Office of Sponsored Programs
Effective Date: March 20, 2018

I. Purpose of this Policy

The University receives funding from federal, state and other sponsors in support of research, instruction and other activities awarded through grants, contracts and cooperative agreements (“Sponsored Projects”). Pursuant to OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200 (“Uniform Guidance”), the University is responsible for monitoring the programmatic and financial activities of any party to whom the University subcontracts using funds from a Sponsored Project (“Subrecipient”), in order to ensure proper stewardship of sponsor funds. This Policy delineates the roles and responsibilities of University offices and employees with respect to monitoring of Subrecipients.

II. Policy

The University has an obligation to provide financial oversight of Subrecipients and to monitor Subrecipients in order to ensure achievement of programmatic goals and compliance with applicable laws, regulations and the terms and conditions of the primary awarding contract, grant or agreement.

This Policy requires the following monitoring activities:

- A. The Office of Sponsored Programs (“OSP”) shall administer a risk assessment process consistent with federal regulations and document the process for each Subrecipient in a manner which includes the following:
 - i. Prior to issuance of the subaward, collect and review information provided by each potential Subrecipient via OSP Form 400 “Subrecipient Audit and Data Form” and the Subrecipient’s current Report on Compliance for Each Major Federal Program, Report on Internal Control Over Compliance, and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance (known as the “Single Audit” or “A-133”), and assign a risk rating based upon established criteria;
 - ii. Where a Subrecipient’s risk assessment reveals high potential for financial risk or non-compliance with federal regulations, the Executive Director of OSP will develop a risk mitigation plan in consultation with the Vice Provost for Research;

- iii. Based upon the risk assessment, OSP will incorporate additional contract terms in the sub-award documentation which may include styling payments as reimbursement rather than advance payments, requiring additional detailed financial reporting and additional monitoring of progress on the sub-award; and
 - iv. OSP will review each Subrecipient annually by requiring completion of OSP Form 400a “Subrecipient Annual Compliance Questionnaire.” Based upon review of each such form, OSP will update the risk assessment of each Subrecipient.
- B. The principal investigators (“PI”) for each Sponsored Project must monitor the technical progress of the Subrecipient and promptly escalate concerns to OSP. In particular, the PI must ensure the Subrecipient is:
- i. Advancing toward the completion of programmatic goals as outlined in the scope of work;
 - ii. Submitting accurate and timely invoices and technical reports; and
 - iii. Complying with all Subrecipient project requirements, including Institutional Review Board and Institutional Animal Care and Use Committee approvals, Conflict of Interest disclosures and Export Control assurances.