Subrecipient Monitoring Review Procedure

POLICY BACKGROUND
A Subrecipient is any entity that receives a Subaward or Subcontract (“Agreement”) from San Francisco State University (SFSU) for a portion of a sponsored project. As a recipient of federal sponsored projects, SFSU must comply with the guidelines outlined in OMB Circulars A-21, A-110, and A-133. All Subrecipients, regardless of the source of funds of the prime award or contract, are subject to these regulations and are therefore required to make an annual disclosure of any sponsored research audit findings to SFSU. SFSU will check a proposed Subrecipient entity for debarred status prior to issuing an Agreement or paying a Subrecipient’s invoice, and will review all invoices for allowability, allocability, and compliance with federal regulations.

PRIOR TO ISSUING AN AGREEMENT
A. Grant Administrator (GA) will verify that the entity should be considered a Subrecipient, rather than a vendor. If the entity is a vendor, the procedure described in this document will not apply.
B. Grant Support Coordinator (GSC) completes a Subrecipient Risk Analysis form and consults with their GA or Sponsored Programs Manager if they have any questions.
C. GSC Checks for the entity’s debarment status at https://www.sam.gov to verify the Subrecipient is not excluded from receiving Federal funds. Saves a copy of the results page.
   ▪ If the Subrecipient is on the Debarred List, the ORSP Director will be notified and no action will be taken until reviewed and approved by ORSP Director.

POST AWARD ADMINISTRATION OF AGREEMENT
A. Subrecipient does work as described in the Scope of Work and within the defined Budget limits, and submits invoices for work completed to the GA.
B. Upon receipt of a Subrecipient invoice, GSC runs a check for the Subrecipient entity at www.sam.gov to verify they have not been barred from receiving federal funds. A printout from www.sam.gov is attached to the invoice.
   ▪ If the Subrecipient is on the Debarred List based on the SAM check, the ORSP Director will be notified and no action will be taken until reviewed and approved by ORSP Director.
C. GSC checks BI and the PO to ensure there are enough remaining funds to pay the invoice, then stamps the invoice with approval statement requesting the PI’s signature; forwards invoice to PI for approval (with a “cc” to the GA).
D. PI approves invoice and returns to ORSP for payment processing.
E. After PI has returned the signed invoice, GA/GSC:
   ▪ Signs invoice to approve payment
   ▪ Forwards to Accounts Payable for payment processing
   ▪ Notes the invoice amount paid on the spreadsheet kept on the left-hand side of the Subrecipient folder