



## Subrecipient Monitoring Policy

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On December 26, 2014, the federal government implemented new guidelines for the management of grants, referred to as the Uniform Guidance (2 CFR §200), that replaced OMB Circulars A-21, A-110 and A-133. Awards issued prior to this date will continue to be managed under OMB Circulars. This document is applicable to grants awarded after December 26, 2014 and references the Uniform Guidance.

### POLICY

San Francisco State University (SF State) is responsible for financial and programmatic monitoring of sponsored project funds awarded to SF State that are subcontracted to another institution, organization, or individual ("Subrecipient"). For Subawards or Subcontracts ("Subrecipient Agreements") that include federal funds, Subrecipients are required to make an annual disclosure of any sponsored research audit findings. As a recipient of federal sponsored projects, SF State must comply with the guidelines outlined in Code of Federal Regulations Title 2 Subtitle A Chapter II Part 200 (§200.331). To provide the monitoring required by these federal regulations, and to ensure good stewardship of sponsored projects, staff in the Office of Research and Sponsored Programs (ORSP) review all Subrecipient expenditures for allowability, allocability, reasonableness, and compliance with applicable terms and conditions.

Subrecipients are informed of federal laws or regulations, terms and conditions of the prime award or agreement, and SF State-specific requirements that apply to the Subrecipient relationship, via the Subrecipient Agreement issued by SF State. Additionally, the Subrecipient Agreement provides information regarding the prime award, including the Catalog of Federal Domestic Assistance (CFDA) number (if applicable), Federal Award Identification Number (FAIN), title, award name and number, award dates, and sponsoring agency, and other information as required by 2 CFR §200.331. A signature from the Subrecipient is considered intent to comply with all stated requirements.

### SCOPE

This policy applies to all Subrecipient Agreements issued under sponsored projects awarded to SF State, regardless of the source of funding. The objectives are to:

- A. Monitor Subrecipient costs and activities to ensure that expenditures charged to SF State are allowable, allocable, and reasonable, and reflected in the budget as well as in the scope of work.
- B. Ensure that the performance goals set forth in the scope of work are being met in a timely manner.
- C. Ensure that cost-share commitments made by Subrecipients are documented and adhere to all relevant regulations.
- D. Conduct a *Subrecipient Risk Assessment Questionnaire (RAQ)* for each proposed Subrecipient prior to initiating an Agreement in order to determine if a Subrecipient requires closer scrutiny.
- E. Ensure that Subrecipients expending \$750,000 or more in federal awards during the Subrecipient's fiscal year have met the single audit requirements for that fiscal year.
- F. Issue management decisions on audit findings within six months after receipt of the Subrecipient's audit

report and ensures that the Subrecipient takes appropriate and timely corrective action.

- G. Consider whether Subrecipient audits necessitate adjustment of SF State's records, such as budget modifications, or re-allocation of cost-shared resources.

## **ROLES & RESPONSIBILITIES**

### **Office of Research and Sponsored Programs**

#### **Grant Support Coordinator (GSC)**

- Conducts a risk assessment of proposed Subrecipients before an Agreement is issued and at the time of Agreement amendment in order to determine the level of oversight needed on each project.
- Checks the Subrecipient's debarment statues to verify the Subrecipient is not excluded from receiving federal funds, prior to issuing an agreement and/or processing for payment when an invoice is received.

#### **Grant Administrator (GA)**

- Reviews the budget and scope of work before Agreement is signed.
- Reviews invoices submitted by the Subrecipient to ensure that costs are allowable, allocable, and reasonable. Reviews back-up documentation provided for expenditures.
- Ensures that cost-share commitments are met and documented in the invoicing process.
- Authorizes approval for invoices based on level of signature authority.

#### **Sponsored Programs Manager (SPM)**

- Reviews Subrecipient Agreements prior to submission to the Procurement Office for review and signature.
- Reviews and approves all invoices above the signature limit of the GA.

#### **ORSP Director**

- Reviews and approves all invoices over the signature authority limit of the SPM.
- Determines how to proceed, should an entity be debarred from receiving federal funds.
- Determines how to proceed with a "high risk" Subrecipient.

#### **Compliance Unit (CU)**

- Responsible for ensuring that Subrecipients complete an annual certification to disclose any sponsored research audit findings.
- Ensures that cost-shared commitments of Subrecipients are met and documented.
- Performs periodic mini audits of Subrecipient invoices.
- Reviews audit reports filed by Subrecipients and any audit findings.
- Reviews corrective actions cited by Subrecipients in response to audit findings, and determines sanctions imposed on Subrecipients who are unable or unwilling to conduct required audits or address issues of non-compliance.
- Works with the Office of Internal Audit and Advisory Services to coordinate site visits, or review of high risk agreements, as necessary.

### **Academic Department**

#### **Principal Investigator (PI)**

- Certifies that expenses invoiced by the Subrecipient for work and effort committed are

- appropriate to the approved budget and scope of work of the Subrecipient Agreement.
- Reviews technical or performance reports submitted by the Subrecipient.
  - Ensures that project deliverables (reports, financial or programmatic) are submitted to ORSP in a timely manner.

## **RELATED DOCUMENTS**

- [Code of Federal Regulations Title 2 Subtitle A Chapter II Part 200](#)