



Subrecipient Monitoring Policy

Revised: July 2018

Background

Federal law requires the California State University East Bay (CSUEB) to monitor all subrecipients, as defined in 2 CFR 200.93, on federal grants in accordance with 2 CFR 200.330, 2 CFR 200.331 and 2 CFR 200.332. to ensure that grant compliance and performance objectives are met. Monitoring occurs at the pre-award stage through closeout of an award. All Principal Investigators (PIs) and administrators at CSUEB within all schools, units, divisions, university departments and centers/institutes, must comply with this subrecipient monitoring policy.

Prior to proposal submission, PIs must provide ORSP with the following from each subrecipient institution included in the proposal:

- Subrecipient commitment form
- Copy of latest A-133/Single Audit report (applicable to subrecipients expending \$500,000 or more in federal awards during the subrecipient's fiscal year)
- Copy of subrecipient's Facilities and Administrative (F&A) Agreement (if applicable)
- All relevant proposal information including Scope of Work, Budget, Budget Justification, CV/Biographical Sketch, Letters of Support, Institutional Review Board (IRB) and Institutional Animal Care and Use Committee (IACUC) compliance, and other compliance related documents
- Relevant Assurance & Conflict of Interest forms
- Cost Sharing Commitment forms and letters (if applicable)

Note: All subrecipients who receive federal funding must be registered in Sam.gov and must have no exceptions that exclude the subrecipient from receiving federal funds.

During the award stage:

Work done prior to an agreement is done at the risk of the subrecipient institution. PIs are strongly encouraged to advise potential collaborators of this policy.

The ORSP compliance staff will complete a timely risk assessment using a risk assessment matrix for each subrecipient. The risk assessment will be completed as soon as possible beginning at the award stage and no later than one year after the execution of the initial subaward or before the termination of the subaward (if it is less than one year). The risk assessment matrix identifies the areas of risk as low, medium or high. The compliance staff will provide the PI with a memo identifying the areas that should be addressed in the subrecipient monitoring plan. The PI will review the memo, provide edits (if necessary), sign, and submit to the compliance staff. This memo is meant to address each area of risk and guide the PI in the development of the Subrecipient Monitoring Plan to help ensure compliance with applicable federal and state requirements. The Subrecipient Monitoring plan is required for all federal subawards.

When it has been determined that an agreement is necessary, the PI will submit to ORSP the following documentation for each subrecipient:

- Subrecipient Request Form (Notification from PI to establish the agreement).
- Approved CSUEB Budget
- Subrecipient Scope of Work
- Approved Subrecipient Budget
- Approved Subrecipient Budget Justification
- Approved Subrecipient Monitoring Plan (if deemed by ORSP to be applicable)

Please note that subrecipient agreements must be renewed annually using the subrecipient request form. The PI should notify ORSP 30 days prior to the subrecipient's award termination date of their intent to renew or terminate the agreement.

Invoicing: Prior to payment, PI's must approve subaward invoices for allowability, and either sign or provide written confirmation of their approval of the invoice for payment (this can be done via email) and send to ORSP who will also review and provide approval. If there are any issues or concerns with an invoice, PIs must notify ORSP immediately.

Reporting: Subrecipients are required to adhere to the financial reporting and programmatic reporting requirements established by the sponsor and included in their subaward agreement. Cost sharing/match reporting is required for all applicable awards. Such reports are to be reviewed by the PI for accuracy.

After the award has ended:

Subrecipients must provide the PI with the following within 30 days of award termination:

- Final technical/progress report (if applicable)
- Financial report/invoice (if applicable)
- Final Cost Sharing report (if applicable)

Subrecipient Monitoring Shared Responsibilities:

Principal Investigators (PIs) have the primary responsibility of monitoring subrecipients' progress, and ensuring their compliance with Federal regulations and both prime and subrecipient award terms and conditions. PIs are also responsible for developing monitoring plans, which may include but are not limited to addressing:

- Specific monitoring activities
- Level of communication with subrecipient (possible site visits)
- Analysis of funds spent versus programmatic work completed to date
- Technical and progress reports in relation to as deliverables
- Steps to prevent late invoices
- Review of invoiced costs for allowability
- Report any monitoring related issues to the Director of Compliance as soon as possible
- Propose risk-mitigation strategies for subrecipients where risks have been identified
(*Internal Memo*)

Using the standard Subrecipient Monitoring Report template, the Subrecipient Monitoring Report, including a copy of their most recent A-133/single audit report, must be submitted to ORSP annually (due by January 31st of each year) and upon request for all federal subawards.

The Office of Research and Sponsored Programs (ORSP) compliance staff will provide PIs with a memo detailing the results of the Risk Assessment Matrix. The PI reviews the memo, signs it, and returns it to ORSP. ORSP uses this memo in conjunction with the annual Subrecipient Monitoring Report provided by the PI to review the subrecipient performance. ORSP also helps to monitor the subrecipient by reviewing all subrecipient expenditures for allowability, allocability, reasonableness, and compliance with applicable terms and conditions. ORSP ensures that the University's subrecipient monitoring policies and procedures comply with federal and other applicable regulations and are applied consistently. ORSP may provide further training and guidance in interpreting regulations and subrecipient award terms and conditions. The ORSP compliance staff will also be responsible for completing risk assessment for each subrecipient as soon as possible beginning at the award stage and no later than one year after the execution of the initial subaward. Annually, ORSP compliance staff will review the Subrecipient Monitoring reports and A-133/single audit reports for all federal subawards.