



**Subrecipient Monitoring Internal Procedures**

**July, 2018**

1. Prior to the submission of a proposal, pre-award staff will work with the PI to complete the Subrecipient Commitment Form and obtain the following documents from each subrecipient:
  - latest A-133 or Single Audit report (if applicable),
  - a copy of the subrecipient's F&A agreement,
  - relevant proposal information including the Scope of Work, subrecipient budget and justification, biosketches, etc.,
  - assurance and conflict of interest forms,
  - cost sharing commitment forms (if applicable).
2. If the proposal is funded, the PI will complete the Subrecipient Request Form including the CSUEB and subrecipient's budgets, and the subrecipient's scope of work, and submit to the ORSP post-award staff. At award orientation, ORSP post-award staff will confirm subaward documents have been submitted and provide the PI with a copy of the subrecipient monitoring policy.
3. ORSP compliance staff will review all documents obtained in connection with a subaward (i.e., Subrecipient Commitment Form and other supporting documents).
4. Using the Risk Assessment Matrix, compliance staff will identify areas of low to high risk 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 less than one year).
5. Compliance staff will provide the PI with a memo that outlines a draft of monitoring requirements based upon the assessed risk. Each area of risk should be listed on this memo and will outline how the PI will address the areas of risk, as needed. Once the PI reviews (and coordinates any changes with ORSP), the PI must provide ORSP with a signed copy where they agree to monitor as outlined on the memo.
6. Compliance staff will provide the PI with the standard Subrecipient Monitoring Report template for all federal subawards.
7. The PI will consult with the Director of Compliance in the development a subrecipient monitoring plan that specifies monitoring activities for all federal subawards.
8. Every year in December, the compliance staff will send a reminder to the PI to submit a copy of the annual subrecipient monitoring report and the subrecipient's most recent A-133/single audit report, due the following January 31 each year and signed by the PI. The report must document the activities that the PI engaged in to monitor the subrecipient. The report must provide sufficient detail and include correct dates and/or timeline for monitoring activities.
9. Annually, ORSP compliance staff will review the Subrecipient Monitoring reports and A-133/single audit reports for all federal subawards.