CSUEB Subrecipient Monitoring
Federal law requires California State University, East Bay Foundation Inc., to monitor all subrecipients on federal grants in accordance with OMB A-133 guidelines. These guidelines require CSUEB to monitor subrecipients in order to ensure compliance and performance objectives are met.

All Principal Investigators and administrators at CSUEB within all schools, units, divisions, university departments and centers/institutes, must comply with this policy.

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

- Completed and signed subrecipient vs. vendor determination form
- Subrecipient must complete subrecipient commitment form
- Copy of latest A-133 audit report (if applicable)
- 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)/Institutional Animal Care and Use Committee (IACUC), and other compliance related documents
- Relevant Assurance & Conflict of Interest Forms
- Cost Sharing Commitment Forms and Letters
- Complete Subrecipient Risk Matrix (Completed by ORSP)

Note: All subrecipients who receive federal funding must be registered in Sam.gov. Entities with active exclusions may require additional review and in some instances may be ineligible to receive federal funding.

During the award stage:
ORSP requires PIs to notify ORSP prior to any work being conducted by the subrecipient. Work done prior to an agreement is done so at the risk of the subrecipient institution. PIs are strongly encouraged to advise potential collaborators of this policy.

When it has been determined that an agreement is necessary ORSP will need the PI to submit following:

- 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 by PI Advisory Committee (if applicable).
- Subrecipient Monitoring Record (if applicable) must be submitted to ORSP annually (due by January 31st of each year) and upon request.

Please note that subrecipient agreements must be renewed annually using the subrecipient request form. ORSP requires PIs to notify ORSP 30 days prior to the subrecipient’s award termination date of intent to renew/terminate agreement.

Invoicing: Prior to subaward payments. PIs must review and certify all subrecipient invoices before payments are reviewed and approved by ORSP. Certification requires PI to sign invoice or provide written confirmation.
of their approval (this can be done via email). If there are any issues or concerns 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.

**After the award has ended:**
Subrecipients must provide the PI and ORSP with the following within 30 days of award termination:
- Final technical/progress report
- Financial report/invoice
- 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:
- 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
- Late invoices
- Review of invoiced costs for allowability
- Reporting of any issues to ORSP and PI Advisory Committee,
- Proposed risk-mitigation strategies subrecipients where risks have been identified

The University PI Advisory Committee (established by ORSP) as needed reviews subrecipient risk assessments, assists in developing monitoring plans, and reviews results of subrecipient findings, corrective action plans, and other issues brought to its attention.

Office of the Provost reviews and approves subrecipients where risks have been identified at the proposal stage and as necessary during the life of the award based on the provost’s review criteria.