Office of Research and Sponsored Programs



Subrecipient Monitoring Internal Procedures

July, 2018 Rev. March 2024

- 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 Single Audit report, if applicable, or certification of non-applicability
 - 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).
 - SAM registration confirmation when sponsor is federal
- 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 the noted subaward documents have been submitted and will provide the PI with a copy of the subrecipient monitoring policy.
- 3. ORSP pre-award and post-award staff will review all documents obtained in connection with a subaward (i.e., Subrecipient Commitment Form and other supporting documents).
- 4. For federally-funded awards, using the Risk Assessment Matrix, designated post-award staff will identify areas of low to high risk for each subrecipient. The risk assessment will be completed as soon as possible after award receipt and prior to issuance of the subaward.
- 5. ORSP post-award 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.
- When needed based on the risk assessment, the PI will consult with the designated ORSP Staff and ORSP Director, Grants Administration in the development of a subrecipient monitoring plan that specifies additional monitoring activities for all federal subawards.
- ORSP post-award staff will provide the PI with the standard Subrecipient
 Monitoring Report template for all federal subawards, which includes items for
 follow up as determined in item 6 above. For example, monthly reports, detailed
 invoices.

Office of Research and Sponsored Programs



- 8. Every year in December, the ORSP designated post-award 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 no later than the last day of February. If the report(s) (signed by the PI) are not received by January 31 each year for the previous calendar year ORSP will send a reminder notice. The report must document the activities that the PI engaged in to monitor the subrecipient. The report must provide sufficient detail and include dates and/or a timeline for when the monitoring activities occurred.
- 9. Annually, ORSP compliance staff will review the Subrecipient Monitoring reports and A-133/single audit reports for all federal subawards.