CSUEB Subrecipient Monitoring Policy
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. 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 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:
ORSP requires PIs to notify ORSP prior to any work being conducted by the subrecipient. 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.

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 (if deemed by ORSP to be applicable)

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 review and approval of subaward payments by ORSP, PIs must review and certify all subrecipient invoices. PI’s are to sign the invoice or provide written confirmation of their approval of the invoice for payment (this can be done via email). 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
- 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 working with ORSP in 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
- Steps to prevent late invoices
- Review of invoiced costs for allowability
- Reporting of any issues to the ORSP and its Subrecipient Monitoring Committee
- Proposed risk-mitigation strategies for subrecipients where risks have been identified
- Subrecipient Monitoring Record (if applicable) must be submitted to ORSP annually (due by January 31st of each year) and upon request.

Office of Research and Sponsored Programs (ORSP) reviews all subrecipient expenditures for allowability, allocability. Reasonableness and compliance with applicable terms and conditions. In addition, 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. ORSP is responsible for completing risk assessment for each subrecipient, creating subaward agreements, collecting annual subrecipient monitoring reports from PI and working with PI to resolve any monitoring issues disclosed in monitoring reports.