

## Quick Reference Guide Subrecipient Monitoring

At the time of proposal submission, SCSU represents to the prime sponsor that all activity, including that of the subrecipient, will be carried out consistent with sponsor requirements. Additionally, per the [Federal Uniform Guidance](#), SCSU must evaluate each subrecipients' risk of noncompliance with federal regulations, include specific terms and conditions in the subaward as necessary, and monitor the activities of the subrecipient through various mechanisms. These mechanisms include: Training and technical assistance to subrecipients, on-site reviews, review of audit results, increased reporting requirements and enforcement action, if necessary.

SCSU will review each subrecipient entity prior to the issuance of a subaward. This risk assessment includes an entity level review of their fiscal systems, past audit activity, and if required, financial statements of the entity as well as the project specific activity proposed and that the required research compliance approvals (IRB, IACUC) are obtained.

The subrecipient monitoring requirements are comprised, at a minimum, of the following:

- Completion of the SCSU Subaward risk assessment (Certs & Reps, Annual Audit Certification);
- Receipt and acknowledgment of outgoing subaward terms and conditions;
- Receipt of regular progress reports from subrecipient;
- Tracking of subrecipient's invoices and cumulative totals of subaward invoices through SPAR;
- Maintenance within the prime award file of a record of the subaward agreement, subrecipient entity progress reports, approved invoices, back-up documentation & any delegation of authority relevant to approval of subrecipient materials.

SCSU will check that a subrecipient entity is not debarred, suspended or otherwise ineligible to participate or do business with SCSU.

For **all awarded projects with subcontracts**, subrecipient monitoring information will be gathered annually following the date of the award. Subrecipient monitoring information is collected at the pre-award stage for subawards exceeding \$25,000.