BRANDEIS UNIVERSITY POLICY

Policy: Subrecipient Monitoring Policy

Responsible Office: Office of Financial Affairs and Treasury Services
Responsible Official: Senior Vice President for Financial Affairs
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Policy Statement

Brandeis University monitors the programmatic, administrative, and financial activities of its subrecipients in order to ensure proper stewardship of sponsor funds. This policy sets forth guidance to assist the University in ensuring that subrecipients conduct their portion of the project in compliance with applicable laws, regulations, and terms and conditions of the award and that project costs incurred by subrecipients are reasonable and allowable.

Purpose of Policy

OMB Uniform Guidance (UG), 2 CFR Part 200- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and specifically §200.331 & 332, requires prime recipients of federal funds to monitor subawards and to ensure subrecipients meet the audit requirements in Uniform Guidance 2 CFR 200 Subpart F – Audit Requirements, and use funds in accordance with applicable laws, regulations and terms of the award.

As the Prime Award recipient, all Principal Investigators at Brandeis University are responsible for ensuring that performance goals are achieved and the scope of work is met while sponsor funds are managed appropriately. Failure to adequately monitor the compliance of subrecipients could result in reputational damage to the University and jeopardize current and future funding. It is the responsibility of Brandeis, as the Pass-Through Entity, to ensure the good stewardship of sponsored funding. All funds assigned to subrecipient organizations should receive the same diligence as sponsored funds that remain at Brandeis.

Applicability

This policy applies to all subawards issued under sponsored assistance awards made to Brandeis University without regard to the primary source of funding. Contractor/vendor agreements are not subject to this policy. All Principal Investigators (PIs) and administrators at Brandeis University within all schools, units, divisions, institutes, and centers, who are involved with the administration and conduct of sponsored awards that issue and manage subawards must comply with this policy.
Subrecipient Monitoring Process

A subrecipient/contractor determination is made by the Principal Investigator and confirmed by ORA prior to the submission of the proposal as part of the Project Approval process, and ORA completes an initial risk assessment. The next subrecipient review stage includes receiving the award from the funding agency and all of the activities necessary to assess the potential risk of any subrecipient(s) in advance of entering into the subaward agreement. Post-award/ongoing monitoring includes activities undertaken to monitor the subrecipient’s administration, invoicing, and technical progress. Frequency and intensity of monitoring are based on the risk assessment performed and any changes to that assessment during the life of the sub-award. All post-award subrecipient monitoring is documented and maintained by SPA and the department. The PI will review technical performance reports or other specified deliverables on a timely basis. Any unforeseen issues should be documented, investigated, and resolved.

Accordingly, Subrecipient Monitoring Roles and Responsibilities are shared among the following:

**Roles and Responsibilities**

**Principal Investigator (PI)**
- Identifies proposed subrecipient(s) in a proposal to a funding agency and is responsible for completing attachment B1 in the Project Approval Form that determines the participating organizations status as a subrecipient versus a contractor
- Collects, reviews and submits to ORA, with the assistance of Department/Unit, all sponsor-required documentation from the subrecipient including an institutional commitment from the subrecipient
- Participates in developing and implementing a subaward management plan if required
- Monitors subrecipients to ensure compliance with federal regulations regarding both prime and subrecipient award terms and conditions
- Reviews program/progress reports and maintains regular contact with the subrecipient
- Reviews and approves the invoices submitted by the subrecipient and questioning expenditures, if necessary
- Obtains all required deliverables including the technical/progress reports, patent invention documentation, and equipment reports from the subrecipient as part of the University’s closeout process
- Reviews all technical/financial reports to ensure the subrecipient provided all project deliverables and met project objectives

**Departments/Units**
- Assists PI in collecting, reviewing, and submitting to ORA all sponsor-required documentation from the subrecipient including an institutional commitment from the subrecipient
- Assists PI in developing and implementing a subaward management plan if required
- Reviews budgets and invoices from subrecipients and questioning expenditures, if necessary
- Maintains documentation of departmental monitoring efforts
- Ensures that all documentation related to the project’s performance and financial obligations have been met, and confirms that the final invoice is marked “final” and is processed

**Office of Research Administration (ORA)**
- Reviews and confirms subrecipient/contractor determination in the Project Approval Form
- Reviews subrecipient proposal documentation in accordance with sponsor and University policies and procedures
Completes the Collaborating Institution Pre-Award Risk Analysis form and at the proposal stage, determines whether further risk assessment will be required in the event of an award. Sends FDP Risk Assessment Questionnaire (RAQ) combined with Continuing Assessment Tool (CAT) to any subrecipients that do not have a single audit. Completes Collaborating Institution Pre-Award Risk Analysis form prior to issuing Subaward and any subsequent funding increments. and sends to SPA for its assessment, recommended actions, and approval. Negotiates and issues Subaward or funding increment, incorporating federal regulations and/or all other applicable requirements, and if required, additional terms deemed necessary as a result of the risk assessment process.

**Definitions**

**Award:** Financial assistance received directly from a Federal or non-federal sponsor that provides support to accomplish a purpose. The term award includes grants, cooperative agreements, contracts and other agreements in the form of money or property, by the sponsor to Brandeis University.

**Pass-through Entity:** A recipient of funding, but the assistance assigned to it may be “passed on” or “passed-through it” to another recipient.

**Prime Award:** A governing agreement between the recipient and the awarding agency.

**Subaward:** A legally binding executed agreement that transfers or delegates a portion of research or substantive intellectual effort of a prime award to another institution or organization. Subawards are not written to individuals. The term subgrant is used when the prime award is a grant and the term subcontract is used when the prime award is a contract.

**Subrecipient:** The recipient of a subaward awarded to a foreign or domestic organization (either a non-profit, educational institution, state or local government, or private industry) for the performance of a portion of the work statement covered by a prime agreement that is funded either directly or indirectly with sponsored funds. It does not include agreements with individuals for consulting services or purchase orders for equipment, materials or other services. A subrecipient receives an award of assistance from a pass-through entity and conducts its own scope of work. Also referred to as subawardee, subgrantee or lower-tier institution.
Subrecipient Monitoring: A UG and Brandeis University compliance requirement which establishes that prime agreement awardees have the responsibility to monitor the activities of subrecipients in accordance with the governing agreement and federal, state and local laws, to assure that awarded funds are used for authorized purposes in compliance with the provisions of the agreement, and to ensure that performance goals are achieved.

Regulatory Sources

OMB Uniform Guidance, 2CFR 200:330 Subrecipient Monitoring and Management: http://www.ecfr.gov/cgi-bin/text-idx?SID=1889a78a6c20b51ca509663ff7298b19&mc=true&node=se2.1.200_1330&rgn=div8

Forms Referenced

Project Approval Form, Attachment B1

Collaborating Commitment Form

Collaborating Institution Pre-Award Risk Analysis form

FDP Risk Assessment Questionnaire (RAQ) combined with Continuing Assessment Tool (CAT) /or FDP Financial Questionnaire (see comment)