

Subrecipient Monitoring Policy

Revised: July 2018
Revised: March 2024

Background

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.

Monitoring occurs at the pre-award stage through closeout of an award. 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:

- x Subrecipient commitment form
- x Copy of latest A-133/Single Audit report (applicable to subrecipients expending \$750,000 or

Please note that subrecipient agreements must be renewed annually using the subrecipient request form. The PI should notify ORSP 30 days prior to the subrecipient's award termination date of their intent to renew or terminate the agreement.

Invoicing: Prior to payment, PI's must approve subaward invoices for allowability, and either sign or provide written confirmation of their approval of the invoice for payment (this can be done via email) and send to ORSP who will also review and provide approval. 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:

- x Final technical/progress report (if applicable)
- x Financial report/invoice (if applicable)
- x 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:

- x Specific monitoring activities
- x Level of communication with subrecipient (possible site visits)
- x Analysis of funds spent versus programmatic work completed to date
- x Technical and progress reports in relation to as deliverables
- x Steps to prevent late invoices
- x Review of invoiced costs for allowability
- x Report any monitoring related issues to the Director of Compliance as soon as possible
- x Propose risk-mitigation strategies for subrecipients where risks have been identified (Internal Memo)

Using the standard Subrecipient Monitoring Report template, the Subrecipient Monitoring Report, including a copy of their most recent A-133/single audit report, must be submitted to ORSP annually (due no later than the last day of February each year) and upon request for all federal subawards.

The Office of Research and Sponsored Programs (ORSP) post-award staff will provide PIs with a memo detailing the results of the Risk Assessment Matrix. The PI reviews the memo, signs it, and returns it to ORSP. ORSP uses this memo in conjunction with the annual Subrecipient Monitoring Report provided by the PI to review the subrecipient performance. ORSP also helps to monitor the subrecipient by reviewing all subrecipient expenditures for allowability, allocability, reasonableness, and compliance with applicable terms and conditions. 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. The ORSP staff will also be responsible for completing a risk assessment for each subrecipient as soon as possible beginning at the award stage and prior to subaward issuance. Annually, ORSP compliance staff will review the Subrecipient Monitoring reports and A-133/single audit reports for all federal subawards.