



## **SUBRECIPIENT MONITORING**

### **POLICY 3.1.04**

#### **PURPOSE:**

Monitoring of subrecipients is a collective effort by Center for Veterans Research and Education (CVRE) staff, Principal Investigators (PIs), and the subrecipient institution that occurs throughout the life of the subaward. The 2CFR200 Uniform Guidance (UG) requires that subrecipients receiving federally funded subawards be closely monitored to ensure federal compliance requirements. As the Pass-Through Entity (PTE), CVRE is responsible for ensuring the procedures are in place to monitor subrecipients on a consistent and timely basis, and to ensure audit requirements are fulfilled and any audit findings are resolved.

This policy does not apply to professional services and consultant agreements or the procurement of goods or services from contractors.

#### **POLICY:**

CVRE requires that subrecipients receiving federal funds passed through from CVRE be monitored to assure compliance with State and Federal laws, regulations and requirements. The PI is responsible for the supervision of the technical progress of the subaward.

#### **PROCEDURE:**

##### **Principle Investigator:**

The PI of the PTE is the individual with the education and experience to determine whether a subrecipient is meeting its obligations of the subaward. Therefore, the PI should be in regular communication with the subrecipient PI to track and monitor technical progress. PIs have the primary responsibility of monitoring the subrecipients' progress, including communication with the CVRE office if changes need to be made to the statement of work, reporting requirements, budgeting, etc. As a part of this activity, PIs are required to sign invoices authorizing payments to subrecipients.

##### **Center for Veterans Research and Education Staff:**

CVRE staff reviews and approves subrecipients at the proposal stage and as necessary during the lifetime of the award. Prior to issuing a federal pass-through subaward, CVRE will be responsible for the following:

- Completing a Risk Assessment Form to determine any measures necessary to appropriately monitor the Subrecipient. These may include additional monitoring procedures, additional contract language or inclusion of special terms and conditions.
- CVRE shall verify whether the Subrecipient has completed a Single Audit when a risk assessment is completed.

- CVRE shall confirm the Subrecipient has a DUNS number.
- CVRE will include in the subaward the necessary terms and conditions of the Prime Award and will also include the CFDA number and title of any federal pass-through subaward.

**EXCEPTIONS:**

None

**APPLIES TO:**

CVRE researchers and staff

**DEFINITIONS:**

Contractor: An entity that receives a contract by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.

Pass-through Entity (PTE): A non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program.

Prime Institution: Applicant institution which has been awarded the primary grant, contract, or cooperative agreement

Subaward: an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient: A Non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

Uniform Guidance: The Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, 2 CFR Chapter I, Chapter II, Part 200, addressing the administrative requirements for grants and agreements with institutions of higher education, hospitals, and non-profit organizations

**CONTACTS:**

Executive Director, 612-467-5732

**RELATED:**

Uniform Guidance 2CFR200 <http://www.ecfr.gov/cgi-bin/text-id?SID=53037da1f61ee252f5191a22acc9851d&mc=true&node=pt2.1.200&rgn=div5>

**BOARD APPROVED:**

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