

## **Subrecipient Monitoring**

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### **Purpose & Scope**

Colorado Mesa University (CMU) is committed to ensuring the proper management and monitoring of subrecipient sponsored awards in accordance with federal with [Federal Uniform Guidance \(2 CFR Part 200\)](#). This policy outlines the procedures for subrecipient award management, monitoring, and compliance to safeguard the proper use of sponsored funds and fulfill our obligations as a recipient of sponsored dollars.

### **Definitions**

- *Subrecipient*: an entity that receives a subaward from CMU to carry out a portion of the scope of work under a sponsored award. Subrecipients are responsible for programmatic and financial management of their subaward.
- *Subaward*: a legally binding agreement used by CMU to transfer a portion of a sponsored award to a subrecipient to perform specific project-related activities.

### **Responsibilities**

#### ***Principal Investigator (PI)/Project Director (PD)***

- Identify the need for a subrecipient and assist in the selection process.
- Collaborate with the Office of Sponsored Programs (OSP) to initiate subrecipient agreements.
- Provide technical assistance, guidance, and oversight to subrecipients.
- Ensure subrecipients submit timely and accurate reports as required.

#### ***Office of Sponsored Programs (OSP)***

- Oversee the subrecipient selection and procurement process.
- Prepare subrecipient agreement in compliance with Federal Uniform Guidance.
- Monitor subrecipient financial and programmatic performance.
- Conduct risk assessments for subrecipients, as necessary.
- Ensure subrecipients comply with federal regulations.

## **Monitoring Procedures**

### ***Selection and Procurement***

- Perform risk assessment of potential subrecipients.
- Conduct a competitive selection process per CMU's purchasing and procurement policies and procedures.
- Negotiate subrecipient agreements in compliance with Federal Uniform Guidance.

### ***Financial Monitoring***

- Review subrecipient invoices and financial reports for accuracy and compliance.
- Ensure subrecipient expenditures are reasonable, allowable, and allocable.
- Verify cost-sharing, if applicable.

### ***Programmatic Monitoring***

- Review subrecipient progress reports to ensure project goals are met.
- Provide technical assistance and support as needed.
- Ensure subrecipients follow the scope of work.

### ***Reporting and Documentation***

- Maintain detailed records of all subrecipient transactions per the university's records retention policy.
- Retain all necessary documentation for audits and reporting requirements.

## **Corrective Actions**

In the event of subrecipient non-compliance, CMU shall take appropriate corrective action, which may include, but are not limited to:

- Withholding funds.
- Remediation plans to address non-compliance.
- Suspension or termination of the subrecipient agreement.