Subrecipient Monitoring

Created: 6/22/23
Last Reviewed: 2/27/24

Purpose & Scope:
Colorado Mesa University (CMU) is committed to ensuring the proper management and monitoring of subrecipient sponsored awards in accordance with federal with 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 Uniform Guidance.
- Monitor subrecipient financial and programmatic performance.
- Conduct risk assessments for subrecipients, as necessary.
- Ensure subrecipients comply with federal regulations.

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