

Subrecipient Monitoring and Management Procedure

Responsible Officer: Vice President for Research

Sponsoring Department: Office of Grant and Contract Services

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Errors or changes to: ogcs@uta.edu

Procedure Objective

The University of Texas at Arlington is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of sponsor funds. This procedure addresses institutional responsibilities regarding subrecipient monitoring and assists Principal Investigators (PIs) and administrators to ensure that, in addition to achieving performance goals, subrecipients comply with applicable federal laws and regulations and with the provisions of each subaward agreement.

OMB Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically 200.331, requires pass-through entities to evaluate each subrecipients's risk of noncompliance in order to determine appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that the subrecipients are audited as required by Subpart F of the Uniform Guidance.

Scope

The following procedure applies to all subawards issued under sponsored programs made to the University of Texas at Arlington that are:

- Federally funded
- Funded by other sources that adhere to the requirements of 2 CFR 200.331

Responsibilities

Subrecipient monitoring responsibilities are shared among the following:

Principal Investigators (PIs) have primary responsibility for monitoring subrecipients to ensure compliance with federal regulations and both prime and subrecipient award terms and conditions.

- In conjunction with UTA Pre Award staff, assess potential subrecipient organizations for programmatic, financial, and administrative suitability at the time of the proposal.
- Request subrecipient organization information (Subrecipient Commitment Form or Letter of Commitment signed by an authorized institutional representative, statement of work, budget and budget justification).
- Confirm the statement of work, review any non-standard terms and conditions and identify appropriate programmatic reporting requirements and or deliverables of the subaward during the subaward agreement negotiation process.
- Review performance via Technical Reports or other deliverables, in conjunction with Subrecipient invoices and approved budget.

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- Evaluate potential subrecipient organizations for programmatic, financial and administrative suitability at the time of proposal.
- At the time of award, review information obtained for subrecipient organization risk assessment and assign a risk rating.
- If applicable, incorporate additional terms into subawards based on information from the PI, PI unit or the risk assessment of the subrecipient organization.
- Work with PIs and departments to resolve issues on subawards as they arise.
- Gather information on new subrecipient organizations and review existing subrecipient organizations periodically.

Summary

The following procedures outline the process for monitoring subrecipients. Per 2 CFR 200.331, UT Arlington is required to review each subrecipient organization and monitor each individual subaward.

Reviewing and Assessing Subrecipient Organizations

The Office of Grant and Contract Services (OGCS) will obtain completed UTA Single Audit Certification Form, or similar information from the FDP Clearinghouse website, if the entity is subject to 2 CFR 200, Subpart F, or request financial and other relevant information for institutions not subject to the Single Audit requirements.

Including Subawards in a Proposal

OGCS Pre-Award staff, in conjunction with the PI, should review each proposed relationship to determine the appropriate classification of subrecipient or contractor. Before including a subaward in a proposal, investigators, in conjunction with Pre Award staff, should consider the ability of the subrecipient organization to perform the work and adequately and manage the administrative and financial responsibilities in accordance with the subaward terms and conditions.

Drafting and Negotiating a Subaward

All applicable terms and conditions of the prime award must be flowed down to the subrecipient organization. When drafting the subaward agreement, OGCS will review all available information to determine if additional terms and conditions should be included in the subaward agreement

Procedures

Pre-Award Actions:

- Make project role determination if applicant is a subrecipient or contractor. If contractor role, subrecipients information request will not be required.
- Obtain all subrecipient(s) contact information (PI and administrative contact)
- Obtain signed Subrecipient Commitment Form or letter of commitment, statement of work, budget and budget justification
- Upon award, complete risk assessment
- Review the budget

Post Award Actions:

- Review subaward information received from Pre Award: budget, budget narrative, scope of work, and risk assessment
- Non FDP Subawards and Pre Award determined medium- high risk subawards are forwarded to the contract administrator for agreement establishment
- Issue standard FDP Subawards for low risks subrecipients. Agreements include standard FDP attachments 1 through 5 (i.e., reporting requirements, carry forward restrictions, and flow down terms)
- Upon receipt of fully executed Subaward agreement, confirm vendor supplier setup with PI Department, establish purchase orders within the financial system to encumber obligated funds for all Subawards
- With acceptable progress and PI approval, process Amendments for Subawards (i.e., extensions, additional funds, carryforward) and update purchase order
- Review and approve, in collaboration with the PI, prior approval requests
- Review Subaward spending and progress with PI to obtain PI approval before processing subaward amendments to extend and increase funding increments
- Require and obtain A-133 certifications and annual reports (i.e. progress, invention and property reports as appropriate)
- Complete Subaward closeout (i.e. final reports – invention/patent/property/subcontractors release)

Agreements Manager Actions:

- Subaward documents, to include Risk Assessment, Subrecipient Statement of Work, Budget and Budget narrative, are forwarded to the Agreements Manager for establishment of non-FDP Subrecipient agreements. Any known issues or concerns that should be considered during the establishment of the agreement are also provided.
- Based on the risk assessment completed by Pre Award, the Agreements Manager will consider using specific subaward terms to mitigate risk of non-compliance to the University and the federal government.
- After first year of monitoring if there are issues that arise that should be addressed by university officials Post Award will make recommendations to the Agreements Manager and Director of OGCS for consideration review and approval.
- Agreement Manager facilitates non-FDP and non-standard subaward amendments

Forms and Tools/ Online Processes

Subrecipient Monitoring Policy

UTA Subrecipient Commitment Form

UTA Single Audit Certification Form

Definitions

Per 2 CFR 200:

“§ 200.93 Subrecipient.

Subrecipient means 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.”

“§ 200.330(a) *Subrecipients*. A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. See § 200.92 Subaward. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- (1) Determines who is eligible to receive what Federal assistance;
- (2) Has its performance measured in relation to whether objectives of a Federal program were met;
- (3) Has responsibility for programmatic decision making;
- (4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- (5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.”

Related Statutes, Policies, Requirements, or Standards

[2 CFR 200 - UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS](#)

Contacts

If you have any questions about this UT Arlington Procedure, contact the following departments:

Subject	Office Name	Telephone	Email/URL
All topics in Procedure	Office of Grant and Contract Services	(817) 272-2105	ogcs@uta.edu
Website access	Administrative Information Management	(817) 272-0222	aim@uta.edu http://www.uta.edu/aim