

Subrecipient Monitoring

Operating Details:

1.0 Policy Statement

Mississippi University for Women is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure compliance with federal, state and University regulations. The following policy applies to all subawards issued under sponsored programs made to Mississippi University for Women without regard to the primary source of funding. Failure to adequately monitor the compliance of subrecipients could result in damage to the University and jeopardize current and future funding. All Principal Investigators (PIs) and administrators at Mississippi University for Women within all schools and colleges, University-wide initiatives, and centers, who are involved with the administration and conduct of sponsored awards that issue and manage subawards must comply with this policy.

2.0 Purpose

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 subrecipient's risk of noncompliance in order to determine the 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 subrecipients are audited as required by Subpart F of the Uniform Guidance. It is the responsibility of Mississippi University for Women as the pass-through entity, to ensure the good stewardship of sponsored funding. All funds assigned to subrecipient organizations should receive the same diligence as sponsored funds that remain at the University.

3.0 Definitions

- 3.1 Pass-through entity – Non-federal entity that provides a federal award to a subrecipient to carry out a federal program; sometimes referred to as the “prime” or “lead” organization.
- 3.2 Sponsored award – Funding arrangement in which the University is providing a return benefit to, or agrees to provide a defined deliverable or complete a set of activities for, the sponsor in exchange for the funds, regardless of whether the funding instrument is designated a contract, cooperative agreement, grant, consortium agreement, or otherwise.
- 3.3 Subaward – Enforceable agreement, issued under a prime sponsored project, between a pass- through entity and a subrecipient for the performance of a

substantive portion of the program; these terms do NOT apply to the procurement of goods or services from a contractor (vendor).

- 3.4 Subrecipient Database – A database managed by Unit of Sponsored Programs of all the University’s Subrecipient organizations.
- 3.5 Subrecipient (subcontractor or subawardee) – a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program. Subrecipients are responsible for performing a substantive portion of the program, as opposed to providing goods and services.

4.0 Additional Information

- 4.1 PIs are responsible for:
 - Submitting request for a preliminary review of the subrecipient organization at the proposal stage to the Unit of Sponsored Programs (USP), if necessary.
 - Confirming the statement of work and reviewing any non-standard terms and conditions of the subaward during the subaward agreement negotiation process.
 - Monitoring programmatic progress and ability of the subrecipient to meet objectives of the subaward.
 - Reviewing and approving subrecipient invoices ensuring that costs are allocable and allowable.
 - Keeping detailed records of communication regarding satisfactory and unsatisfactory performance by the subrecipient.
- 4.2 Unit of Sponsored Programs and Grants and Contracts are jointly responsible for:
 - Assessing subrecipients to determine the level of monitoring that should be performed in order to ensure compliance with federal program laws and regulations.
 - Incorporating additional terms into subawards based on information from the PI and the risk assessment of the subrecipient organization.
 - Notifying PIs when issues are identified with a subrecipient organization at the proposal stage or during the performance period.
 - Conducting annual assessments on active subrecipient organizations.
 - Ensuring that subrecipients meet the audit requirements of A-133.
 - Reviewing A-133 reports for subrecipients expending \$750,000 or more.
- 4.3 The University may perform on-site reviews of subrecipients’ program operations if deemed necessary.

5.0 Employee Adherence

Employees are required to adhere to these guidelines. Willful disregard of this policy shall be considered non-compliance and may result in a formal reprimand up to and including termination. The information stated in this policy pertains and applies to applicable employees, departments and funding sources of the University.