

## **Policy on Subrecipient Monitoring**

### **Subrecipient Monitoring**

The University of North Alabama, as a prime recipient, is responsible for ensuring that all awarded project activity, including that of its subrecipients, is compliant with award terms and conditions and applicable federal regulations.

### **Roles and Responsibilities**

***Principal Investigator (PI):*** Before selecting a potential subrecipient, the Principal Investigator (PI) should be aware of the “Codes of Conduct” section Subpart C.42 of OMB Circular A-110, at the following link <http://www.whitehouse.gov/OMB/circulars/a110.html#42>. It is the PI’s responsibility to ensure that there is no conflict of interest in the sub-award to a subrecipient, as sub-awards should not be authorized to subrecipients where the PI has ownership, substantial equity, and where he/she will receive individual gain from such arrangement.

The Federal Government places primary responsibility for management of federally funded projects with the PI. This includes monitoring of subrecipients, particularly the subrecipient’s technical and programmatic activities. The PI is responsible for verifying the subrecipient work is conducted in a timely manner and that the results delivered are in line with the proposed statement of work. Other responsibilities include reviewing and approving subrecipient invoices (reviewing expenditures to ensure allowability, allocability and reasonableness of cost and ensuring charges are within the period of performance) and maintaining regular contact with the subrecipient.

***The Office for Sponsored Programs (OSP):*** OSP is responsible for the oversight of subrecipient monitoring. These responsibilities include, reviewing whether a subrecipient or vendor relationship exists; determining whether or not the subrecipient or its PIs are debarred or suspended from receiving Federal funds; including identification of federal awards in subagreements; advising subrecipients of requirements imposed on them; requiring subrecipients to permit access, as necessary, to their records; monitoring activities of subrecipients, as necessary, to ensure compliance; ensuring that subrecipients subject to OMB Circular A-133 are in compliance with its requirements and reviewing and following up on the results of those A-133 reports; assessing the potential risk associated with subrecipients and taking necessary action if a subrecipient is determined to be a high risk (such as, pre-award audits, monitoring during the contract, post-award audits or requiring documentation to support invoices).

**Vice President for Business and Financial Affairs (VPBFA) :** VPBFA is responsible for ensuring that UNA has received a fully executed subagreement before any payments are made to the subrecipient; invoices are within the period of performance; charges (expenditures) add correctly on subrecipient invoices and that charges appear to be on a cost reimbursable basis and not based on allocation of budget; F&A (IDC) calculates correctly, if applicable; cost share is

included in the invoice, if required; invoice is certified/signed by subrecipient officials; PI has reviewed invoice and signed approval form, verifying that the subrecipient is performing as expected and required progress reports have been received; final invoices are marked final and that a subcontractor release form is received; and post award audit of any expenditures that do not appear allowable, allocable, and/or reasonable.