

Subrecipient Monitoring and Management Policy

Effective Date:	October 1, 2020
Supersedes:	Subrecipient Policy
Policy Review Date:	To be reviewed every 3 years from effective date
Issuing Authority:	Research Foundation President
Policy Owner:	VP Sponsored Programs & Regulatory Affairs
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Reason for Policy

The Research Foundation is responsible for monitoring the programmatic and financial activities of its Subrecipients in order to ensure proper stewardship of sponsored funds. This policy seeks to: (i) ensure that both The Research Foundation, as Prime Awardee, and Subrecipients are in compliance with applicable laws, regulations, and the provisions of the Prime Award; (ii) ensure that risks associated with a Subrecipient or sponsored program are identified and managed prior to the issuance of a Subaward; (iii) promote compliance with applicable regulations relating to Subrecipient monitoring; and (iv) address appropriate responsibility and accountability for the establishment, management and monitoring of Subawards.

Statement of Policy

The Research Foundation must comply with any Prime Award's specific requirements for issuance of Subawards. All terms and conditions of the Prime Award that are applicable to the Subaward must flow down to be accepted by the Subrecipient. This Subrecipient Policy applies to all Subawards issued under sponsored programs made by The Research Foundation, without regard to the primary source of funding.

The Research Foundation views its responsibility for the programmatic and financial monitoring of its subrecipients as an active, fiduciary responsibility. Active monitoring and management must include, at minimum:

- A preliminary determination whether the collaboration is a Subaward or Contractor relationship
- Prior to issuance, and on an annual basis, evaluate the risk level of each Subrecipient and determine appropriate actions to mitigate elevated risk levels.

- Actively monitoring the programmatic and financial progress of the sponsored activity (i.e. review of progress reports, and invoices).
- Perform an annual review of the subrecipient organization (i.e., single audit status, debarment or suspension, etc.), The Research Foundation will undertake an annual review and request copies of relevant audits or other information, as needed, and review any findings. The Research Foundation will also review any corrective action that the subrecipient has taken. If the findings are related to the Research Foundation subaward or subcontract, the Research Foundation may consider further actions.
- Take enforcement actions against noncompliant subrecipients.

The Research Foundation has issued mandatory Subrecipient monitoring and management procedures to support this Policy, which are found [here](#).

Responsibilities

The following table outlines the responsibilities for compliance with this Policy:

Responsible Party	Responsibility
RF Central (Office of Sponsored Programs)	<p>Maintain and enforce this policy and associated procedures, including amendments, to reflect future changes</p> <p>Establish procedures for conducting Subrecipient monitoring and management activities</p> <p>Maintain Subaward Agreement templates for use by campuses</p> <p>Complete, negotiate, and execute Subaward Agreements/amendments for centralized campus locations upon request of appropriate party</p>
Campus	<p>Must follow the Subrecipient Management and Monitoring procedure which includes the following: conduct determination of Subrecipient activity, perform a risk assessment and risk analysis for each Subaward/Subrecipient, and periodic and ongoing active monitoring of Subrecipient performance.</p> <p>Take enforcement actions against noncompliant subrecipients.</p> <p>Complete, negotiate, and execute Subaward Agreements/amendments at decentralized campus locations.</p>

Principal Investigator	<p>Process payments to Subrecipients in accordance with terms of the Subaward Agreement, after determining satisfactory performance.</p> <p>The PI monitors the ongoing activity of the subrecipient to ensure that the statement of work is being satisfactorily completed and within the budget.</p>
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Definitions

Subrecipient - An entity that expends funds received from a pass-through entity to carry out objectives of a program.

Prime Awardee - The entity granted the award by the sponsor. (The award recipient)

Prime Award - The award made directly from the sponsor to the recipient.

Subaward – An award provided by a pass-through entity to an eligible third party (subrecipient), or by a subrecipient to a lower tier recipient, to conduct an essential portion (including the design, performance, and reporting) of the project work in compliance with the sponsor's terms and conditions.

Subaward Agreement – A form of contract that sets forth the terms and conditions that will govern the performance of the Subaward.

Contractor – a contractor typically is in a procurement relationship and does not generally participate in the design of the project. Please use the decision tree to determine whether the recipient is a subrecipient or a subcontractor.

Related Information

[Subrecipient Monitoring and Management Procedure](#)

Forms

None

Document History

Date	Summary of Change
May 24, 2024	Policy reviewed
October 1, 2020	Revision provides a uniform approach to Subrecipient monitoring and management and clarifies the responsibilities of both RF Central Office and campus representatives. New title.
December 26, 2014	New additional policy with reference to 2 CFR Part 200

Feedback

Was this document clear and easy to follow? Please send your feedback to webfeedback@rfsuny.org.