

Subrecipient Monitoring and Management Procedure

Effective Date: October 1, 2020

Function: Office of Sponsored Programs Services

Contact: RFCOSponsoredPrograms@rfsuny.org

Basis for Procedure

This procedure implements The Research Foundation for The State University of New York's ("Research Foundation" or "RF") [Subrecipient Monitoring and Management Policy](#).

Procedure Summary

This procedure outlines the process to ensure that risk(s) associated with a Subrecipient and sponsored program activity are identified, managed, and documented prior to the issuance of a subaward or amendment; and to promote active and compliant subrecipient monitoring aligned with applicable regulations relating to Subrecipient monitoring and management.

Procedure Steps

Prior to issuance of a subaward agreement or amendment the Prime Awardee must:

Step	Role or Responsibility	References or Tips
Make a case-by-case determination for each subrecipient to ensure the activity is correctly classified as subaward activity, as opposed to a contractor or vendor.	Campus Representative in consultation with Principal Investigator	The Subrecipient vs. Contractor decision tree can help in this determination.
Collect information on the Subrecipient in order to evaluate the Subrecipient's risk level	Campus Representative	Subrecipient Risk Assessment Questionnaire Annual Subrecipient Questionnaire for Renewal Activity/Amendments
Perform a Risk Analysis for each Subaward to determine appropriate risks and reduce elevated risk levels.	Campus Representative in consultation with Principal Investigator	Risk Analysis

At Award stage:

Step	Role or Responsibility	References or Tips
Issue subaward agreement or amendment to subrecipients with appropriate terms and conditions, risk mitigation requirements (as applicable), and applicable flow-down provisions from the Prime Award.	<p>Campus Representative (for Decentralized campus locations)</p> <p>Office of Sponsored Programs (for Centralized Campus locations)</p>	<p>RF Subaward Agreement templates or templates available from the Federal Demonstration Partnership.</p> <p>For centralized campus locations the Subaward Checklist, or a variation of the form, must be used to request a new subaward agreement</p>

Ongoing and Periodic monitoring and management:

Step	Role or Responsibility	References or Tips
<p>Monitor the programmatic and financial activities of the Subrecipient and Subaward, including review of the financial and programmatic reports; and follow up on any deficiencies.</p> <p>At least annually, collect information on the Subrecipient in order to evaluate the Subrecipient's risk level.</p>	<p>Principal Investigator</p> <p>Campus Representative</p>	<p>Invoice Checklist</p> <p>Performance Monitoring Checklist</p> <p>Annual Subrecipient Questionnaire for Renewal Activity/Amendments</p>
Take enforcement actions on non-compliant subrecipients or areas of concerns, as necessary	Campus Representative in consultation with Principal Investigator	Enforcement Measures Checklist

Definitions

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

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.

Related Information

[Subrecipient Monitoring and Management Policy](#)

[RF Subaward Agreement Templates](#)

Forms

[Subrecipient vs. Contractor Decision Tree](#)

[Subrecipient Risk Assessment Questionnaire](#)

[Annual Subrecipient Questionnaire for Renewal Activity/Amendments](#)

[RF Risk Analysis](#)

[Subaward Checklist](#)

[Standard Subaward Template](#)

[Standard Subaward Amendment Template](#)

[Invoice Checklist](#)

[Performance Monitoring Checklist](#)

[Enforcement Measures Checklist](#)

Change History

Date	Summary of Change
October 1, 2020	New Procedure.

Feedback

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