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:

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<th>Step</th>
<th>Role or Responsibility</th>
<th>References or Tips</th>
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<td>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.</td>
<td>Campus Representative in consultation with Principal Investigator</td>
<td>The <a href="#">Subrecipient vs. Contractor decision tree</a> can help in this determination.</td>
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| 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:

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| 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. | Campus Representative (for Decentralized campus locations)  
Office of Sponsored Programs (for Centralized Campus locations) | RF Subaward Agreement templates  
or templates available from the Federal Demonstration Partnership.  
For centralized campus locations the Subaward Checklist, or a variation of the form, must be used to request a new subaward agreement |

Ongoing and Periodic monitoring and management:

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| 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.  
At least annually, collect information on the Subrecipient in order to evaluate the Subrecipient's risk level.  
Take enforcement actions on non-compliant subrecipients or areas of concerns, as necessary | Principal Investigator  
Campus Representative in consultation with Principal Investigator | Invoice Checklist  
Performance Monitoring Checklist  
Annual Subrecipient Questionnaire for Renewal Activity/Amendments  
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

<table>
<thead>
<tr>
<th>Date</th>
<th>Summary of Change</th>
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<tbody>
<tr>
<td>October 1, 2020</td>
<td>New Procedure.</td>
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Feedback
Was this document clear and easy to follow? Please send your feedback to webfeedback@rfsuny.org.