

## Subrecipient Monitoring and Management Procedure

**Effective Date:** October 1, 2020

**Function:** Office of Sponsored Programs Services

**Contact:** [RFCOSponsoredPrograms@rfsuny.org](mailto: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 <a href="#">Subrecipient vs. Contractor decision tree</a> can help in this determination.
Collect information on the Subrecipient in order to evaluate the Subrecipient's risk level	Campus Representative	<a href="#">Subrecipient Risk Assessment Questionnaire</a>  <a href="#">Annual Subrecipient Questionnaire for Renewal Activity/Amendments</a>
Perform a Risk Analysis for each Subaward to determine appropriate risks and reduce elevated risk levels.	Campus Representative in consultation with Principal Investigator	<a href="#">Risk Analysis</a>

At Award stage:

<b>Step</b>	<b>Role or Responsibility</b>	<b>References or Tips</b>
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)	<a href="#">RF Subaward Agreement templates</a> or templates available from the <a href="#">Federal Demonstration Partnership</a> .  For centralized campus locations the <a href="#">Subaward Checklist</a> , or a variation of the form, must be used to request a new subaward agreement

Ongoing and Periodic monitoring and management:

<b>Step</b>	<b>Role or Responsibility</b>	<b>References or Tips</b>
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.	Principal Investigator  Campus Representative	<a href="#">Invoice Checklist</a>  <a href="#">Performance Monitoring Checklist</a>  <a href="#">Annual Subrecipient Questionnaire for Renewal Activity/Amendments</a>
Take enforcement actions on non-compliant subrecipients or areas of concerns, as necessary	Campus Representative in consultation with Principal Investigator	<a href="#">Enforcement Measures Checklist</a>

## 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

Was this document clear and easy to follow? Please send your feedback to [webfeedback@rfsuny.org](mailto:webfeedback@rfsuny.org).