

SUBRECIPIENT MONITORING

Policy Statement

The University of Oklahoma is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of sponsor funds. The following policy applies to all subawards issued under sponsored programs made to the University, without regard to the primary source of funding.

Purpose of Policy

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) (“Uniform Guidance”), specifically §200.332, requires pass-through entities to evaluate each subrecipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance.

Scope: This policy applies to all subawards issued by the University of Oklahoma.

Perform a Subrecipient Risk Assessment:

1. Conduct a risk assessment of each subrecipient to determine the appropriate level of monitoring. Factors to consider include the subrecipient’s prior experience with similar awards, the amount of the award, the financial stability of the sub, results of previous audits, the type of agreement, compliance history and the extent and their internal control structure.
2. Review for suspension and debarment.
3. As a pass-through entity, the University of Oklahoma must specify any required financial and programmatic reports in the sub-contract per OMB 200.331(d)(1). Ensure any additional terms and conditions are communicated to the Office of Research Services for inclusion in the subaward agreement.
4. Fixed price subawards are allowed up to the simplified acquisition threshold (SAT) with agency approval provided that the subaward meets the requirements for fixed amount awards in §200.201.

Monitoring Procedures:

1. Establish and implement procedures to monitor the activities of subrecipients to ensure that the subaward is used for authorized purposes and that performance goals are achieved. Monitoring activities may include:
 - Reviewing financial and performance reports submitted by the subrecipient.
 - Continue to review for suspension and debarment as invoices are received.
 - Performing site visits to review program operations.
 - Providing training and technical assistance as needed.
 - Evaluating audit reports and following up on any findings.
 - Taking corrective action if necessary.

Reporting and Record Keeping:

1. Maintain records of all subrecipient monitoring activities, including risk assessments, subaward agreements, financial and performance reports, site visit reports, and any corrective actions taken.
2. Ensure payments are made within 30 days of receipt of a proper invoice per OMB 200.305(b)(3).
3. Ensure that subrecipients submit required financial and performance reports on time and that these reports are reviewed for accuracy and completeness.

Audit Requirements:

1. Verify that subrecipients are audited as required by Subpart F of 2 CFR 200.
2. Review subrecipient audit reports and ensure that any audit findings are resolved in a timely manner.

Corrective Actions:

1. If noncompliance or performance issues are identified, take appropriate corrective actions, which may include:
 - Providing additional training or technical assistance.
 - Imposing specific conditions on the subaward.
 - Withholding payments pending correction of the deficiency.
 - Terminating the subaward if necessary.

Responsibilities:

- Research Financial Services is responsible for implementing this policy and ensuring compliance with federal regulations.