

Subrecipient Monitoring Policy

Effective: March 10, 2025

Executive Summary: Barnard College is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of sponsor funds. This policy addresses institutional responsibilities and assists Principal Investigators (PIs) and administrators to ensure that, in addition to achieving performance goals, subrecipients comply with applicable federal laws and regulations and with the provisions of each subaward agreement.

Reason for the Policy: Barnard College is responsible for ensuring that all subrecipient/subaward agreements issued by the College comply with federal regulations and sponsor guidelines. The appropriate College staff and faculty must monitor the use of funds received from sponsors and confirm their use/distribution to subrecipients in accordance with applicable laws, regulations, and terms/conditions of the award.

Who Is Responsible for This Policy: Responsible Administrators: Senior Director of Sponsored Research, Senior Associate Director of Sponsored Research, Senior Associate Director of Institutional Funding, and the Senior Associate Director, Post-Award Administration and Compliance Officer, Senior Associate Controller.

Responsible Offices: The Development and Alumnae Relations, Institutional Funding and Sponsored Research Office (IFSR); Office of the Provost; and Finance and Operations

Who Is Governed by This Policy: All Principal Investigators (PIs) and administrators at Barnard College who are involved with the administration and conduct of sponsored awards and who issue and manage subawards must comply with this policy.

Definitions:

A “**Pass-through Entity**” is a non-federal entity that provides a federal award to a subrecipient to carry out a federal program; sometimes referred to as the “prime” or “lead” organization.

A “**Subaward**” (also referred to as a subcontract if the prime award is a contract) is an instrument through which financial or other support is awarded to an eligible and qualified organization for the performance of a portion of the program or project with the authority to make key decisions about program eligibility and implementation of the project funded under the prime award. The term also includes awards made by a subrecipient to a lower-tier subrecipient. The term does not include procurement of goods and services (i.e., a

contractor agreement is not a subaward).

A **“Subrecipient”** (also referred to as a subawardee, or subgrantee if the prime award is a grant, or a subcontractor if the prime award is a contract) is the legal entity that receives a subaward and that is accountable to Barnard for the use of sponsor funds provided to the entity to carry out a portion of the College’s programmatic and research activity under the prime award. The term may include but is not limited to institutions of higher education, for-profit corporations, not-for-profit organizations, and international organizations at the discretion of the funding sponsor.

A **“Contractor”** (also commonly referred to as “vendor,” “consultant , and supplier”) is an entity from whom the College purchases goods or services to carry out the project or program. Characteristics that support a contractor relationship (including that of an individual consultant) include, for example, when the entity provides the goods or services within normal business operations, and the entity is providing similar specified services to a range of customers. A contractor may provide research support but does not significantly participate in the design or conduct of the research itself and is not directly responsible to the sponsor for the research.

Policy Statement:

Barnard College is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of sponsor funds. This policy addresses institutional responsibilities and assists Principal Investigators (PIs) and administrators to ensure that, in addition to achieving performance goals, subrecipients comply with applicable federal laws and regulations and with the provisions of each subaward agreement. The monitoring and management of subawards issued through a federal source must comply with [2 CFR Part 200 Subpart D - Subrecipient Monitoring and Management](#). This policy and the associated Subrecipient Monitoring Procedures document ensure that Barnard is in compliance with 2 CFR Part 200 Subpart D.

In addition, subawards must also include provisions addressing:

- Statutory requirements such as non-discrimination, drug-free workplace, animal protections, and human subject protections,
- Any applicable award terms and conditions,
- Any additional requirements necessary for the pass-through entity to meet its own responsibilities to the federal awarding agency (i.e., timely submission of financial, technical, and/or performance reports),
- The indirect cost rate(s) and base(s) approved for use on the subaward,
- Audit requirements and the pass-through entity’s access to records,
- The pass-through entity’s right to conduct technical and administrative site visits,
- Termination clauses and/or legal remedies for non-performance or non-compliance and

- Closeout procedures for when the subaward is completed.

Related Policies and Documents:

[Subrecipient Monitoring Procedures](#)

[Policy on Determining Allowability, Reasonableness and Allocability of Costs for Sponsored Projects](#)

[Cost Allowability Policy](#)

Website for This Policy:

<https://barnard.edu/provost/research/funding-sponsored-research/forms-policies>

Revision History: N/A