

Subrecipient Monitoring Procedures

Effective: March 10, 2025

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.

PROCEDURES:

Subawards issued by the College through a federal source must comply with [2 CFR Part 200 Subpart D - Subrecipient Monitoring and Management](#).

Described below are subrecipient management processes throughout the lifecycle of a subaward, organized in four phases: Proposal Preparation, Time of the Award, Post-award, and Close-out.

Phase 1: Proposal Preparation

Principal Investigator (PI) Responsibilities:

- Ensure Institutional Funding and Sponsored Research (IFSR) is aware of the intention to include and/or issue a subaward (IFSR will work with PI to determine subrecipient vs. contractor or consultant relationship)
- Determine appropriate budget levels for the subrecipient and relay pertinent information to the subrecipient PI

Institutional Funding and Sponsored Research (IFSR) Responsibilities:

If intent to issue a subaward is known at the time of proposal, IFSR will evaluate the subrecipient's fraud risk and risk of noncompliance, as per [2 CFR 200.332\(c\)](#).

When conducting this evaluation, IFSR will consider:

1. The subrecipient's prior experience with the same or similar subawards;
2. The results of previous audits;
3. Whether the subrecipient has new personnel or new or substantially changed systems; and
4. The extent and results of any Federal agency monitoring of the subrecipient (for example, if the subrecipient also receives Federal awards directly from the Federal agency).

IFSR will complete the following steps:

1. Confirm subrecipient vs contractor status (see Definitions section, which describes the distinction between a subrecipient and a contractor—also referred to as a vendor or supplier). The Federal Demonstration Partnership's [Checklist to Determine Subrecipient or Contractor Classification](#) may be used to aid in making the correct determination.
2. Compile information for risk assessment
 - a. Collect the completed Sponsored Research Subrecipient Profile Questionnaire from the potential subrecipient
 - b. Review the Sponsored Research Subrecipient Profile Questionnaire and ensure it is fully completed
 - c. Examine audit reports for material weaknesses and significant deficiencies
 - d. Conduct status checks for subrecipient and subrecipient key personnel via the [System for Award Management \(SAM\)](#), debarment, or suspension, as per [2 CFR 200.332\(a\)](#)
 - e. Check [FAPIS](#) to rule out “not qualified” status if subaward is greater than

- i. \$150,000
- f. Complete and sign the Federal Demonstration Partnership's [Risk Assessment Questionnaire](#) (RAQ)
 - i. The RAQ includes questions about the proposed subrecipient's compliance practices and administrative capacity, the nature of the collaboration, and the amount to be awarded. Based on the responses, the form will generate a numerical value. A higher score generally represents a higher risk level. IFSR has the discretion to add points based on the complexity of the project and/or prior experience with the proposed subrecipient.
 - ii. Barnard College's scoring methodology consists of the following thresholds for determining risk pools: 0-20 low risk, 21-50 medium risk, 51 or higher, high risk
 - iii. Individualized risk management plans are required for subrecipients identified as medium or high risk and should be described in the *Notes* section of the RAQ. Management plans should include additional oversight necessary to adequately monitor the subaward. Additional monitoring requirements may include more frequent reporting, shorter periods of performance, more detailed invoices and backup documentation, or other actions as described in [2 CFR 200.332\(e\)](#).
- g. Send completed FDP RAQ and supporting documents to the Senior Associate Director, Post-Award Administration and Compliance Officer for review and approval
- h. File RAQ package with grant proposal/award materials
- 3. Review Scope of Work, Budget, and Budget Justification and incorporate subrecipient materials into Barnard College proposal
- 4. Secure written approval from the Provost and the Dean of the Faculty for including the subaward in the main grant application (as part of the grant routing process)

Phase 2: Time of Award

Senior Associate Director, Post-Award Administration and Compliance Officer
Responsibilities:

1. Reissue Sponsored Research Subrecipient Profile Questionnaire for confirmation of information and/or updated information
2. Perform Risk Assessment and review based upon any new information provided or confirm proposal stage risk assessment if no updates
 - a. Update management plans for Medium- and High-Risk Subrecipients documented in the RAQ compiled during Phase 1 if applicable
3. Request from the Barnard PI the following information:
 - a. any changes to the approved subaward budget

- b. specific deliverables
 - c. reporting requirements for the subrecipient
- 4. Prepare the Subaward Agreement using Federal Demonstration Partnership (FDP) templates and attachments (Cost Reimbursement Research Subaward Agreement)
- 5. If there is deviation from the template as a result of the negotiation process, ask for review by Barnard's Office of General Counsel (OGC) after you have completed negotiation of the business terms but before the subrecipient signs.
- 6. Issue subaward agreement to subrecipient entity for signature
- 7. Route partially executed subaward agreement to the Provost and Dean of the Faculty for approval for signature
- 8. Send fully executed subaward agreement to subrecipient and Barnard College PI
- 9. Send fully executed agreement and budget to Finance office to set up award account for Barnard PI

Phase 3: Post-award

Principal Investigator (PI) Responsibilities:

After Subaward Has Been Issued:

1. Retain correspondence with subrecipient PI
2. Track and monitor the technical progress of the subrecipient to ensure the specifications described in the scope of work are being met, and reimbursements are made in connection with the progress
3. Technical/progress reports can be requested as needed by the PI
4. Document any changes in expectations of work to be performed by subrecipient and follow up with the subrecipient PI
 - a. Determine if changes require a subaward modification (all changes in the award amount or changes to scope of work or period of performance start/end dates require a modification)
 - b. Notify the IFSR and the Senior Associate Director, Post-Award Administration and Compliance Officer when a modification is needed
 - c. Some modifications may require pre-approval by sponsor. Please confirm with IFSR and Post-Award teams.
5. Verify all subrecipient's invoices; the Senior Associate Director, Post-Award Administration and Compliance Officer and the Grants Accountant will ask for review and approval before payment can be made
 - a. If appropriate technical progress has not been made or specific goals/benchmarks have not been met, invoices should not be approved
 - b. If required work has not been completed, PI will work with the subrecipient PI to work out a timeframe for completion
 - c. Invoices will be paid when a suitable agreement for deliverables has been determined
6. For purchases over \$5,000, request documentation if an expense was not included in

the approved application budget. Expenses must be reasonable (cost must be justifiable), allocable (directly related to the project), and allowable (considered an acceptable expense according to agency regulations), with additional considerations like prior written approval for certain costs in some situations.

**Senior Associate Director, Post-Award Administration and Compliance Officer
Responsibilities:**

After the subaward has been issued:

1. Report subawards totaling \$30,000 or more through FSRS until February 28, 2025, and through SAM.gov beginning March 1, 2025
2. Regularly discuss with PIs the subrecipient's progress and performance; ensure work effort matches subaward scope of work
3. Review financial reports and invoices and verify:
 - a. Charges are allowable, allocable, and reasonable
 - b. Expenses were incurred during the period of performance
 - c. There is an available balance to cover the invoice amount
4. Ensure these elements are included in all subrecipient invoices:
 - a. Project name
 - b. Barnard College grant/award number
 - c. Approved budget lines
 - d. Current period expenditures by line item
 - e. Total expenditure to date
 - f. Balance due
 - g. Remaining balance
 - h. Fiscal agent certification
5. Request that certification language be included on subrecipient invoices and final reports;
6. Monitor payment to subrecipient to ensure agreed upon budget total is not exceeded;
7. Create and send out modifications (amendments, extensions) as necessary with approval by PI (have the subrecipient complete the Sponsored Research Subrecipient Profile Questionnaire for each modification – verify/update information and perform risk assessment as appropriate);
8. Issue management decisions as appropriate: corrective action that outlines the steps to identify the problem, analyze the root cause, develop an action plan, and follow up.

Phase 4: Close-out

A subaward is closed out when its period of performance comes to an end and after the collection and review of the subawardee's final reports, verification of subaward data, and incorporation of the subawardee's research results into all technical reports to the sponsor, as

warranted.

Principal Investigator (PI) Responsibilities:

PIs are responsible for obtaining final technical reports from their subrecipients and retaining a copy in their project file. PIs are encouraged to remind subrecipients of this need well in advance of the due date for such reports.

Senior Associate Director, Post-Award Administration and Compliance Officer Responsibilities:

Pre-Closeout Review:

1. Ninety (90) days before the award end date, alert the PI to the upcoming end date.
2. Follow up again sixty (60) days before the end date.
3. If the award is eligible for a no-cost extension, work with the PI to file a no-cost extension request with the sponsor.
4. Discuss a corresponding no-cost extension for the subrecipient, issuing a subaward amendment if applicable.
5. Alert the subrecipient to the upcoming award end date.

Closeout Period:

6. Upon receipt of the final invoice (45 - 60 days after the award end date), review the expenditures with the PI, confirming their allowability, allocability, and reasonableness for the project.
7. Submit the final invoice for payment processing.
8. Confirm a technical report was submitted to PI, and that the report has been reviewed and accepted by the PI.
9. If applicable, confirm that the required cost-share has been met and report this to the sponsor.
10. If applicable, report patents or inventions.
11. Confirm the final payment to the subrecipient has been posted to the grant ledger.
12. If the subrecipient did not expend the total obligated to them, prepare a subaward amendment to decrease the obligation by the unexpended amount.

Failure to Comply with This Policy:

Failure to adequately monitor the compliance of subrecipients could result in legal, reputational, or other damage to Barnard College and jeopardize current and future funding. As the prime recipient of sponsor funds, it is the College's responsibility to ensure the good stewardship of sponsored funding.

A "failure to comply with subaward monitoring policy" for a PI means that the principal investigator on a research project has not adequately overseen the work of a subrecipient, potentially neglecting to review their progress, financial reports, or compliance with the

terms of the subaward agreement, in the determination of the Post-Award Administration and Compliance Officer.

Related Policies and Documents:

[Subrecipient Monitoring Policy](#)

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

[Cost Allowability Policy](#)