

Subrecipient Monitoring Procedure

Compliance, Proposals, Agreements & Strategic Services (COMPASS) and Office of Sponsored Programs (OSP)

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Overview

UW uses an award life-cycle approach to Subrecipient Monitoring starting with proposal development and throughout award closeout. The following procedure is outlined using this approach:

- [Proposal Review](#)
- [Subaward Execution](#)
- [Prime Award Management](#)
- [Prime Award Closeout](#)

Proposal Review

Principal Investigators (PIs) prepare proposals and corresponding budgets based on the agency's application requirements. PIs identify any proposed collaborators in the application and include the required information if the collaborator is a subrecipient based on Uniform Guidance section [200.330](#) (a)-(b).

These applications should be reviewed and endorsed by COMPASS. If the application includes proposed collaborators (vendors or subrecipients), COMPASS should perform the following additional reviews before endorsing the proposal on behalf of UW:

- (1) Confirm that any proposed collaborators are classified correctly as a vendor or a subrecipient [If the classification is incorrect, work with the PI to correct prior to submission.]
- (2) Ensure each subrecipient has the approval of the PI and appropriate department/center and school officials at UW
- (3) Review each subrecipient budget for allowable costs
- (4) Ensure that the required documents and certification are included in the application for each subrecipient. Required documents may include Subrecipient Information Form, Scope of Work (SOW), budget, Letter of Intent, and any sponsor required documents.

Subaward Execution

COMPASS will initiate a new subaward after a prime award has been received that includes subrecipients.

1. PI is responsible for requesting that the Subaward Coordinator initiate the subaward.
2. The following steps should be completed by the Subaward Coordinator for each subrecipient named in the UW's prime award:

2.1. Complete a Risk Assessment based on the following:

- 2.1.1. Review the status of the subrecipient in SAM.gov and save a PDF to the Subaward record. [If the subrecipient is debarred or suspended from doing business with the Federal government, a subaward should not be issued.

Contact the UW PI to determine if there is an alternate subrecipient and follow the award guidelines for requesting a change in subrecipient if an alternative is provided.]

2.1.2. Complete Financial review:

2.1.2.1. If the subrecipient *is required* to complete an annual audit per [Uniform Guidance – Subpart F](#): Review the audit information provided by the subrecipient or go to the [Federal Audit Clearinghouse](#) to review the latest audit report and complete Risk Assessment.

2.1.2.2. If the subrecipient is not required to complete an annual audit per Uniform Guidance – Subpart F: Complete financial review of the subrecipient based on the information provided in the Subrecipient Information Form.

2.1.3. Review all other information provided in the Subrecipient Information Form

2.2. Communicate per the Subaward Compliance Review section.

2.3. After completion of the Risk Assessment, the Subaward Coordinator will prepare a subaward agreement, incorporating relevant mitigation measures as needed based on the results of the Risk Assessment.

2.4. Modification

2.4.1. PI is responsible for requesting that the Subaward Coordinator issue modifications.

2.4.2. Complete an updated Risk Assessment:

2.4.2.1. Review SAM.gov registration, current audit information as available, FDP Clearinghouse if applicable, and PI concerns.

2.4.3. Prepare the subaward modification with revised terms and conditions (No Cost Extensions, additional funding, change in PI, etc.)

2.4.4. Communicate the modification of terms and conditions with the PI and the Departmental Fiscal Manager. Review cumulative FFATA requirements.

Prime Award Management

A Purchase Order is created in Oracle WyoCloud by department support staff for each new Subaward. A Change Order is completed to update existing PO's when a Subaward is amended. Subaward invoices are routed to the PO requestor and Accounts Payable for processing by the Office of Sponsored Programs (uw_subaward_invoices@uwyo.edu).

- PO Receipt: PO requestor is responsible for completing a financial review of the invoice and for creating a Receipt in WyoCloud if the budget to actuals are in-line with the Subaward agreement. In the event the level of detail included on an invoice is not sufficient, or if it appears that some costs may be excessive, unallowable, or understated, the PI or department administrator should question the subrecipient's expenditures by requesting further documentation or explanation prior to Receipting the invoice. The Office of Sponsored Programs (uw_subaward_invoices@uwyo.edu) should be CC'd on the communication.
- The [Subrecipient Monitoring- Department Checklist](#) is available to aid in the review and documentation of Subrecipient invoices.
- Subaward Invoice Approval: Accounts Payable will enter the Subaward Invoice in WyoCloud for approval and processing. The PI is responsible for reviewing and approving the invoice in WyoCloud. The PI should only approve invoices that include appropriate costs consistent with the Subaward terms and conditions and the subrecipient's progress as of the date of the invoice. In the event there are issues with subrecipients progress, the PI should include Office of Sponsored Programs (uw_subaward_invoices@uwyo.edu) in communication with Subrecipient.

Subrecipient payments are subject to the Uniform Guidance section [200.305](#) (b)(3). OSP queries outstanding payments due to subrecipients in order to ensure compliance with 2 CFR 200.305(b)(3). **Any financial or programmatic issues related to subawards must be promptly communicated to both the Principal Investigator (PI) and UW Subawards (uw_subaward_invoices@uwyo.edu).**

Subrecipient Compliance Review

For Subawards that have been identified as High Risk, COMPASS will communicate with, the OSP Specialist, PI, and Department Administration to ensure all parties are aware of any additional requirements that may need to be provided by the subrecipient.

The OSP specialist will complete an additional review prior to the submission of an invoice or financial report. To ensure costs are appropriate, allowable under the Subaward terms and conditions, and consistent with the subrecipient's approved budget, further discussions or additional documentation may be required. Examples of such documentation include expenditure detail sheets, copies of original receipts, effort reporting, timecards, & technical reports.

The majority of UW subrecipient's are subject to the annual audit ("Single Audit") requirements included in [Uniform Guidance – Subpart F](#). OSP completes an annual review of subrecipient Single Audit reports using [Federal Audit Clearinghouse](#) (FAC) data and tracks the results of the review.

OSP should complete this review based on the subrecipient's fiscal year end. Subrecipient will provide this information when completing the Subrecipient Information Form.

OSP reviews audit reports for internal control findings or questioned costs relevant to the award. OSP will issue management decisions for subrecipient audit findings within six months of acceptance of the audit report by the FAC as required by [200.521](#). A copy of the management decision will be stored in the eRA system.

For those subrecipients not subject to the Single Audit, OSP Costing & Reporting will provide the Subrecipient/Subcontractor Audit Requirements Form. This form requests that the subrecipient confirm they are not subject to the Single Audit requirements, provide a brief explanation, and provide information regarding the financial controls, accounting practices, and systems used to manage federal funds.

The results of these reviews and any corrective actions should be maintained in the Annual Subaward Monitoring tracking sheet.

Subrecipient Audit Requirements	Possible Items to Review
Single Audit	<ul style="list-style-type: none"> • Single Audit report results and any corrective action plans • Any Office of Inspector General or other government audit results
No Single Audit	<ul style="list-style-type: none"> • Financial Statement audit results • Results from previous projects at UW Sampling of transactions from invoices; backup request to subrecipient

Prime Award Closeout

COMPASS includes a final invoice and any final deliverables in subaward terms based on the risk assessment. Subrecipients must submit their final invoices no later than the deadline specified in the subaward agreement to allow sufficient time for review and processing. WyoCloud sends an automated notification to Principal Investigators 90 days prior to the current budget period end date to remind PIs of the closeout requirements. When the final invoice is received, OSP, PO Requestor, and the PI follow the same invoice procedure as described above. OSP will work with the PI and department to collect additional closeout items such as invention reports, or asset management requirements as needed.

PO Requestor is responsible for submitting a Change Order to reduce any remaining Obligated amounts (Unspent Balance of Subaward) in a timely manner.

If the PI indicates that there are problems with the subrecipient for the award, COMPASS and OSP will work with the PI and subrecipient to resolve any issues. If the issues are unresolved, OSP will notify COMPASS on the shared Subaward Tracking Sheet, so that any future subawards can be evaluated for additional risk.

Additional Resources:

- [Subrecipient Monitoring- Department Checklist](#)
- [UW Policy on Subrecipient Monitoring DAPP](#)
- [Create a Subaward Requisition for a Sponsored Program](#)
- [Roles and Responsibilities Matrix](#)
- Uniform Guidance section [200.305](#)
- [RoamWyo](#)
- [Federal Audit Clearinghouse](#)