University of Oregon

Subrecipient Monitoring

A subrecipient is any institution or entity that receives a subagreement from the University of Oregon (UO) to perform a portion of a sponsored project. As a recipient of federal sponsored projects, the UO must comply with the guidelines outlined in the Office of Management and Budget (OMB) Circular A-133. Therefore, subrecipient entities must make an annual disclosure of any sponsored research findings. The Office of Research Services and Administration (ORSA) coordinates the request for, receipt, review and risk assessment for this function. In the event of unfavorable findings or disallowances affecting the financial integrity or scope of the subaward, ORSA will work with the Principal Investigator (PI) to determine a management plan for continuing work under the sub-agreement.

The UO is responsible for financial and programmatic monitoring of sponsored project funds awarded to the UO that are subcontracted to another institution, organization, or individual (sub-recipient).

To provide the monitoring required by federal regulations and to ensure good stewardship of sponsored projects, the UO must review all subrecipient expenditures for allowability, allocability, reasonableness, and proper compliance.

PI Responsibilities:

- Submitting requests for new sub-awards or amendments to existing sub-awards to ORSA
- Obtaining and approving budget and scope-of-work from sub-recipient
  - Monitoring technical progress or agreement terms
- Ensuring that the performance goals set forth in the scope of work are being met in a timely manner
  - Reviewing technical progress in relation to invoiced amounts
  - Authorizing payments to the sub-recipient
- Assuring the receipt of all technical reports prior to final payment
  - Notifying ORSA of any problems or issues
- Retaining all original technical reports, financial and subaward related materials as stipulated in the UO Records Retention Schedule
**ORSA Responsibilities:**

- Providing subrecipient with terms and conditions of the prime award, laws, regulations and any other requirements that apply to the subagreement
- Monitoring financial activity and invoices
- Assisting PI with project management issues
- Monitoring subrecipient's activities to provide reasonable assurance that the subrecipient administers Federal awards in compliance with Federal requirements.
- Assisting with administrative actions for sub-award
- Obtaining all non-technical reports and certifications, and A-133 audits for the agreement period
- Ensuring that sub-recipients expending $500,000 or more in federal awards during the sub-recipient's fiscal year have met the OMB Circular A-133 audit requirements for that fiscal year.
- Retaining original subaward contract documents as stipulated in the UO Records Retention Schedule

**Other important considerations in the monitoring of sub-awards by the PI and ORSA:**

- Management or elimination of any conflict of interest that arises from a sub-agreement by the UO to an entity in which the UO, PI, or key personnel have a financial interest. Additional information regarding conflict of interest may be found in UO Policy Statement 09.00.05 Potential Conflicts of Interest and at the Office for the Responsible Conduct of Research website.
- Costs and activities of subrecipients must be monitored to ensure that expenditures charged are allowable, allocable and reasonable, and reflected in the scope of work of the subagreement.
- Ensure that cost-share commitments made by subrecipients are documented and adhere to all relevant regulations.