**Federal Subrecipient Monitoring Guide**

**Appendix – Subrecipient Monitoring Roles and Responsibilities**

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| **A** | **Pre-Subaward** | | |
|  | **Description** | **Role** | **Responsibility** |
| A1 | Determine subaward vs. contract/PO | OCA, Procurement Services | Reviews subaward statement of work and appendix “Determination for subrecipient vs. contractor/PO”. |
| A2 | Debarred / Suspended List | OCA | Ensure subrecipient organization is not on list. Also ensure that subrecipient PI is not on the list. |
| A3 | Cost Reimbursable or Fixed | OCA, Department | Determine cost reimbursable or fixed. Ensure uniform guidance complied with. |
| A4 | Conduct Pre-subaward Review | OCA | * For Single Audit organizations, review most recent Single Audit report. * For non-Single Audit organizations, send out and review completed questionnaire and related documents. |
| **B** | **Post-Subaward** | | |
|  | **Description** | **Role** | **Responsibility** |
| B1 | Necessary changes to subaward agreement | Principal Investigator and Department | Inform OCA of any necessary changes in the subaward agreement (e.g., dollar amount, award period, etc.). |
| B2 | Invoices | Accounts Payable, OCA, Finance-Sponsored Programs, PI | Accounts Payable, OCA and F-SP check for inclusion/completion of specific data (e.g., unique invoice number, subaward number, invoice amount is within total dollars of subaward, timeliness of invoices, etc.).  PI reviews and certifies to: allocability, allowability, indication of required cost sharing, and reasonableness of costs, costs are within invoiced period, etc. as stated in standard certification/concurrence.  PI also certifies that the programmatic and financial aspects of the subaward’s progress are being monitored and are acceptable to the PI. |

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| **B** | **Post-Subaward, continued** | | |
|  | **Description** |  | **Description** |
| B3 | Reports supporting technical performance | Principal Investigator | The PI is the individual with the ultimate responsibility for the administrative and programmatic aspects of the project including ensuring funds are spent in accordance with University and sponsor guidelines. |
| B4 | Annual review of organizations for which there are one or more active U-M subawards during year under review | OCA | For Single Audit organizations, ensures Single Audit reports are available on FAC database. Review findings, if any, in Single Audit Report to see if applicable to U-M subawards. Assign risk and update U-M subrecipient database. If applicable, document management findings in a management letter.  For organizations not subject to the federal Single Audit, ensure that updated questionnaire and related documents are received. Review, assign risk, and update U-M subrecipient database.  New risk applies to all organization’s active U-M subawards as well as future subawards. |
| B5 | Subaward Closeout | Office of Contract Administration, and F-SP | Ensure:   * “Final” invoice has been received in good order. * Closeout documents (e.g., regarding property, inventions, and subcontracts/awards – both positive and negative reports are required, whichever is applicable) are included with final invoice. * Remaining required (if any) financial reports, and updated questionnaires have been received. * PI has approved final invoice for payment.   Approve invoice for payment and update subrecipient database. |

