

Subrecipient Monitoring Policy

Revised: February 2019

BACKGROUND

On December 26, 2014, the federal government implemented new guidelines for the management of grants, referred to as the Uniform Guidance (2 CFR 200), that replaced OMB Circulars A-21, A-110, and A-133. Awards issued prior to this date will continue to be managed under OMB Circulars. This document is applicable to grants awarded after December 26, 2014, and references the Uniform Guidance.

POLICY

In compliance with ICSUAM 11002.06, it is the policy of CSU Dominguez Hills (CSUDH) and CSUDH Foundation to maintain financial controls and procedures in place to ensure compliance with sponsor requirements for subrecipient monitoring. This policy provides guidance to ensure financial and programmatic responsibility for contractual subrecipient relationships.

This policy does not apply to consultant agreements or procurement of good or services from vendors/contractors. This policy applies to subrecipients on federal awards as defined by 2 CFR 200.

CSUDH must establish and maintain procedures for subrecipient risk assessment and monitoring on federal awards in compliance with 2 CFR 200, applicable standards of other sponsors, CSU and CSUDH policies and/or procedures. CSUDH procedures shall provide consideration for documentation of compliance with minimum requirements of 2 CFR 200 as it relates to subrecipient monitoring, giving consideration to high risk subrecipients as necessary.

Universities and Auxiliaries of the CSU are typically considered “low risk” for subrecipient risk assessment in accordance with 2 CFR 200. Single Audit Reports, including any corrective action plans, are available on the CSU Sponsored Programs intranet.

SCOPE

This policy applies to federal Subrecipient Agreements issued under sponsored projects awarded to CSUDH Foundation. The objectives are to:

- A. Monitor Subrecipient costs and activities to ensure that expenditures charged are allowable, allocable, and reasonable, and reflected in the budgets as well as in the scope of work.
- B. Ensure that the performance goals set forth in the scope of work are being met in a timely manner.
- C. Ensure that cost-share commitments made by Subrecipients are documented and adhere to all relevant regulations.
- D. Conduct a *Subrecipient Risk Assessment Questionnaire (RAQ)* for each proposed Subrecipient prior to initiating an Agreement in order to determine if a Subrecipient requires closer scrutiny.

- E. Ensure that Subrecipients expending \$750,000 or more in federal awards during Subrecipient's fiscal year have met the single audit requirements for that fiscal year.
- F. Issue management decisions on audit findings within six months after receipt of the Subrecipient's audit report and ensures that the Subrecipient takes appropriate and timely corrective action.
- G. Consider whether Subrecipient audits necessitate adjustment of CSUDH Foundation's records, such as budget modifications, or re-allocation of cost-shared resources.