



Subrecipient MONITORING



Office of Contracts and Grants
UNIVERSITY OF COLORADO **BOULDER**

Be Boulder.



SUBRECIPIENT MONITORING

Presenter Introductions

Outgoing
Subawards

OFFICE OF

Contracts & Grants

Throughout the lifecycle of an award, the Office of Contracts and Grants (OCG) partners with faculty, staff and students to obtain and manage external support for sponsored activities through our specialized regulatory and organizational expertise.

About Us

Gary Henry

DIRECTOR OF CONTRACTS
OFFICE OF CONTRACTS AND GRANTS



Megan Schosker

SENIOR SUBCONTRACT OFFICER
OFFICE OF CONTRACTS AND GRANTS



BIG PICTURE

Why Do We Monitor Subrecipients?

SUBRECIPIENT MONITORING

Pass-through entities (CU) must monitor the activities of subrecipients as necessary to ensure that the subrecipient does the following:

Failure could result in damage to the University via reputation, current funding, and future funding

Uses Funds for Authorized Purposes

Complies with Federal Statutes & Regulations

Follows Terms & Conditions of the Subaward

Achieves Performance Goals

Required by the Uniform Guidance



Roles & RESPONSIBILITIES

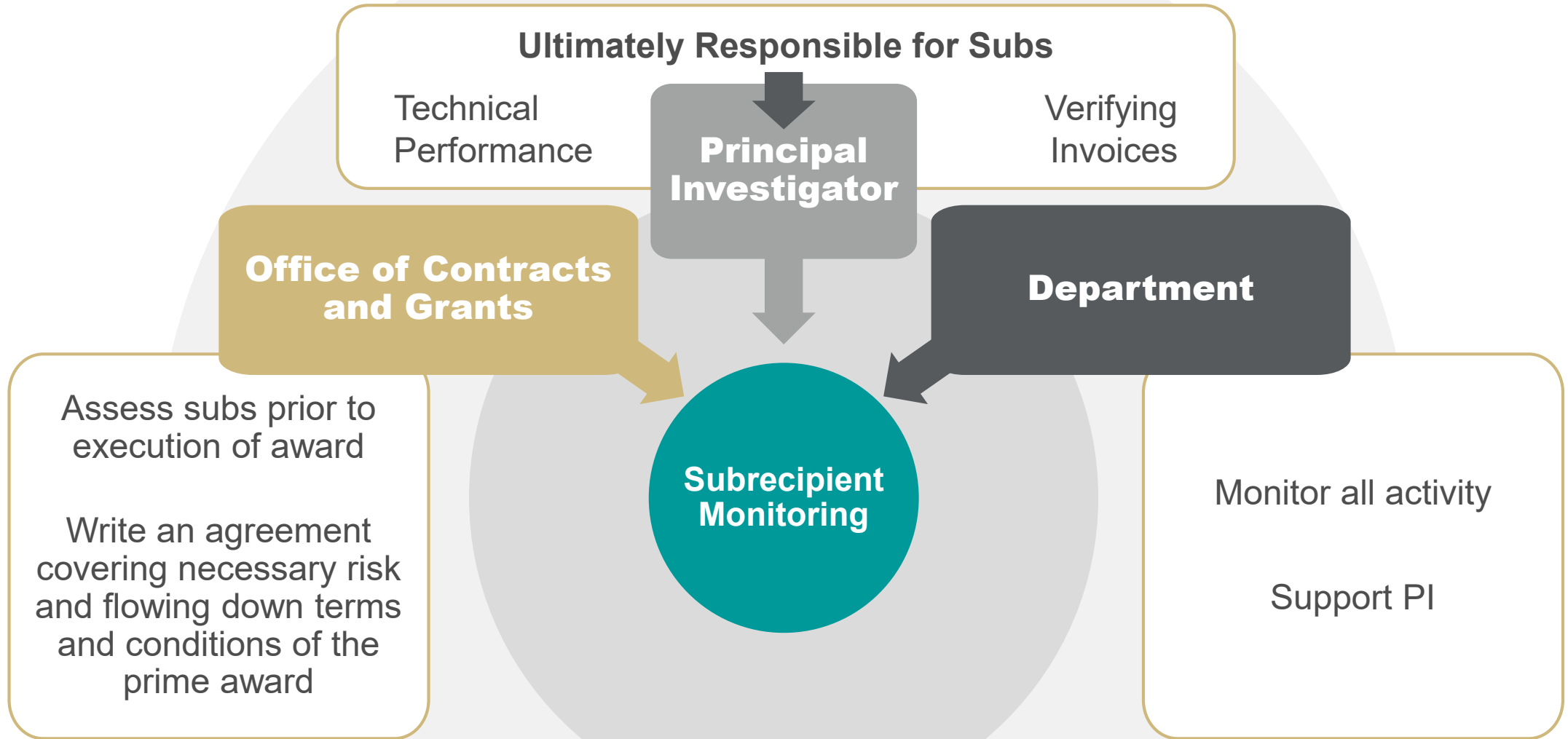


Office of Contracts and Grants
UNIVERSITY OF COLORADO **BOULDER**

Be Boulder.

ROLES & RESPONSIBILITIES

Who Is Responsible for Monitoring Subs?



ROLES & RESPONSIBILITIES

Central Administration (OCG)

Prior to Award Execution

Completes Risk Analysis and Risk Assessment with checklist



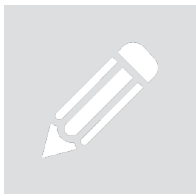
Runs System of Award Management (SAM.gov, initial/modification)
Runs Visual Compliance (only foreign subrecipients)



Completes Budget Review
Completes Cost Price Analysis (only on subcontracts)



Writes an agreement covering all necessary risks and flows the terms and conditions of the prime award



Throughout Life of the Award

Obtain and review the subrecipient's audit annually

Reviews Subrecipient Commitment Form or Letter of Intent, Sole Source Justification (only subcontracts) and Sub Review Form

Ensures IRB or IACUC approvals are obtained when necessary

Get written PI and department approval for every change to award via the marked up SPO

ROLES & RESPONSIBILITIES

Principal Investigator

Prior to Award Execution

Correctly identify vendor vs. sub

Review past performance to assess the risk level of potential subrecipient organizations

Submit a request to OCG for a preliminary review of the subrecipient at proposal stage, if necessary

Confirm the SOW and review any non-standard terms and conditions of the sub-agreement during negotiation

Accept responsibility for all subrecipients by completing the **Sub Review Form** and noting any potential issues



Throughout Life of the Award

Monitor each subrecipient throughout the period of performance; escalate concerns to OCG if necessary

Provide consistent and thorough monitoring and review of subrecipient's technical performance and programmatic progress

Review the sub-agreements reports and verify technical performance to invoices

Review and obtain written approval of subrecipient invoices by PI or designee

Department Administrator



Department Admin

Support Principal Investigator with subrecipient monitoring tasks

Provide written confirmation of the review of each sub-agreement modification to OCG via a **marked up SPO**

Utilize the **Invoice Monitoring/Approval Checklist** prior to sending to PI for approval



ROLES & RESPONSIBILITIES

“Who Does What Again?” Quizlet

Activity

Open your web browser on your phone or laptop

Join the game at
www.kahoot.it

Type in the game PIN



Kahoot!



How to Monitor SUBRECIPIENTS



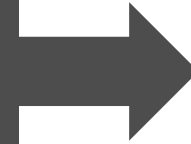
Office of Contracts and Grants
UNIVERSITY OF COLORADO **BOULDER**

Be Boulder.

HOW TO MONITOR SUBRECIPIENTS

Invoice Monitoring

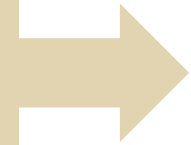
Accurate demographic information
Date is sequential & in period of performance



**General
Information**



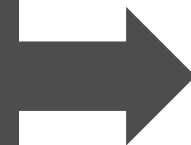
Accurate totals & allowable expenses
Burn rate consistent with timeline
Compare to previous invoice
Accurate F&A calculation
Expenses consistent with SOW
US Dollars, conversion rate agreement (Int'l)



**Financial
Information**



Sub's AOR signature with certification statement
Subrecipient PI signature via DocuSign Tool
Appointed designee's signature, if MOU in place
Final invoice is marked "FINAL"



**Signatures
& Markings**



Mitigating Risk

What should we do if we identify risk?

- Require incremental funding on smaller amounts and shorter budget periods
- Withhold funds until evidence of acceptable performance
- More detailed reporting
- Additional monitoring
- Require grantee to obtain technical or management assistance
- Establish additional prior approval





Scenario 2: Invoices

Activity

What is wrong with this invoice?

STANFORD UNIVERSITY
Office of Research Administration
Office of Sponsored Research
Tax ID Number 94-1156365

INVOICE

Award Number: PCDGY
Date 07/25/2017

Invoice Number: 1084-1888656-43
Billing Period: 08/20/13 - 05/31/17
Sponsor Ref No: 1554157;1550766
PO# 1000702906

Payment Terms : 30 NET

SUBMIT PAYMENT WITH INVOICE No. TO:
Stanford University
P.O. Box 44253
San Francisco, CA 94144-4253

TO:
UNIVERSITY OF COLORADO
PROCUREMENT SERVICE CENTER
ACCOUNTS PAYABLE
1800 GRANT STREET, SUITE 500
DENVER, CO 80203

Award Title: Molecular Characterization of Cardiomyopathy
Mutations in Human Cardiac Myosin
PI: Spudich, James A.

Stanford University Expenditure Categories	Approved Budget	Cumulative Expenditures	Current Expenditures	Unexpended Balance
SALARY	475,585.23	345,309.81	0.00	130,275.42
STAFF BENEFITS	0.00	97,375.45	0.00	-97,375.45
EQUIPMENT	0.00	473.47	0.00	-473.47
EXPENDABLE MATERIALS & SERVICES	115,246.42	144,593.99	230.02	-29,347.57
TRAVEL - FOREIGN OR DOMESTIC	0.00	985.77	0.00	-985.77
Total Direct Costs	590,831.65		230.02	2,093.16
Total IDC IDC Type/Rate: MIDC/ 0.570	333,349.35		131.11	-1,962.58
Total	924,181.00	924,050.42	361.13	130.58

TOTAL AMOUNT DUE: \$361.13

I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812)

Please remit "Total Amount Due" with this invoice to prevent further collection efforts. If payment has been made, please disregard this message. Please call (650) 725-0086 or email RFCS-receivables@lists.stanford.edu for questions.

I hereby affirm that the above bill is correct and just and that payment thereof has not been received
THE BOARD OF TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY



Using Resources & TOOLS FOR SUB MONITORING



Office of Contracts and Grants
UNIVERSITY OF COLORADO **BOULDER**

Be Boulder.

RESOURCES & TOOLS

Adding to Your Toolbox

- Subrecipient Monitoring Guide
- Invoicing DocuSign Tool
- Risk Assessment Questionnaire
- Risk Assessment Matrix
- [FDP website](#)
- Mini-Audit Questionnaire
- Sub vs. Vendor Determination form
- Invoice Monitoring/Approval Checklist
- Sub Review Form
- [OCG Subrecipient Monitoring webpage](#)

Contact Us

Find Your OCG
Subcontract Officer



[www.colorado.edu/
ocg/directory](http://www.colorado.edu/ocg/directory)



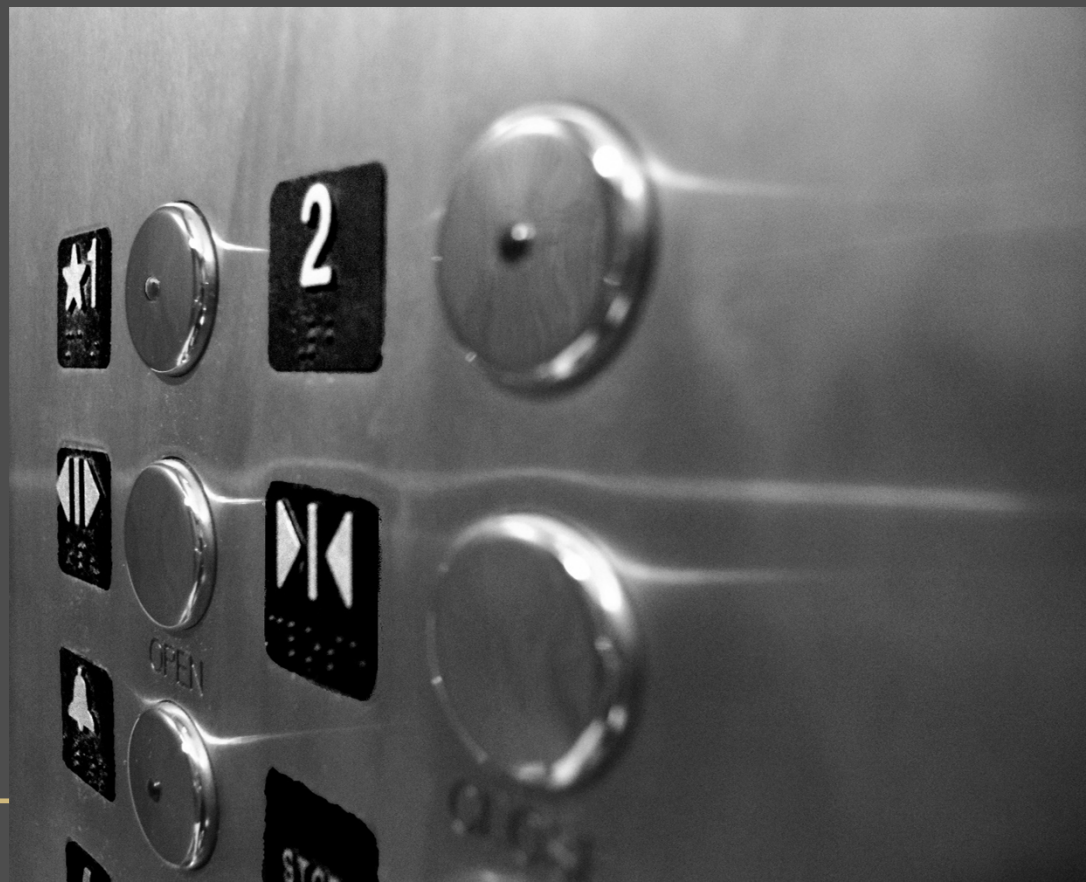
SUBRECIPIENT MONITORING

Role Play: Elevator Pitch

Activity

Why is it important for the Department & Principal Investigator to monitor their subrecipients?

Think.
Write.
Pair.
Share.



SUBRECIPIENT MONITORING
Questions



Contact Us

megan.schosker@colorado.edu

gary.henry@colorado.edu



[https://www.colorado.edu/ocg/
manage-awards/outgoing-
subawards](https://www.colorado.edu/ocg/manage-awards/outgoing-subawards)