

Subrecipient Monitoring Responsibilities After the Award

The University of Southern Mississippi monitors subawards in accordance with the Office of Management and Budget, "Uniform Guidance" 2 CFR 200. Principal Investigators/Project Directors and the Office of Research Administration (ORA) have responsibilities for monitoring programmatic and financial activities.

Principal Investigators/Project Directors are responsible for the following activities:

- Read and understand the terms of the prime award and subaward. Contact ORA with questions.
- Maintain regular contact with the subrecipient's PI. Monitor performance regularly to ensure programmatic progress is sufficient relative to rate of expenditure.
- Review technical/programmatic reports to ensure work performed during the time period is reasonable and on schedule. Collect reports as required by the subaward agreement and prime funding agreement.
- Ensure deliverables are accurate and received on schedule.
- Review and approve subrecipient invoices and any required expense documentation. (ORA will not approve payment of the subrecipient's invoice until the PI/PD approves it.) Consider, for example:
 - Is the cost reasonable for the work performed?
 - Is the rate of expenditure reasonable?
 - Are expenses necessary for conduct of the project?
 - Does the sponsor allow this type of expense?
- Alert ORA to concerns about performance or invoices.
- Maintain documentation in accordance with USM's record retention policy.

The Office of Research Administration is responsible for the following:

- Offer training and assistance to inexperienced subrecipients.
- Conduct annual risk assessments.
- Perform audits of administrative and financial compliance if desirable or necessary, especially if the subrecipient is not in the "low risk" category.
- Review and approve subrecipient invoices and any required documentation, in compliance with sponsor requirements and 2 CFR 200. Consider, for example,
 - Has F&A been calculated correctly?
 - Is any required cost share/match properly identified and documented?
 - Are all costs allowable, allocable, and reasonable?
 - Do any expenses duplicate an earlier invoice?
 - Did expenses occur in the proper time period?
- Document PI/PD approval.
- Submit invoice for payment.
- Take enforcement actions such as withholding payments, disallowing costs, suspending or terminating award, etc., if necessary.
- Prepare subrecipient agreement modifications.
- Work with PI/PD to resolve questions and concerns; escalate problems to Director or Associate Vice President for Research as necessary.