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 subaward activities.

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

- Read and understand the terms of the award. 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 invoices for allowability, allocability, and reasonableness. Compare budget to actual expenses. If the invoice is correct, provide approval to ORA. If it is not or if there are any questions, communicate with the subrecipient to request changes or explanation.
- Ensure cost sharing is met, if necessary.
- Coordinate with ORA to address financial or programmatic concerns as soon as they are identified.
- 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.
- Perform audits of administrative and financial compliance if desirable or necessary, especially if the subrecipient is not in the “low risk” category.
- Review invoices to ensure correct F&A rate and calculation, expenses are not duplicates, compare expense to budget, and expenses occurred in the proper time period.
- Ensures cost sharing is met, if necessary.
- Submit invoice for payment.
- Take enforcement actions such as withholding payments, disallowing costs, suspending or terminating award, etc., if necessary.
- Prepare subrecipient agreement modifications.
- Conduct annual risk assessment.
- Communicate with the PI/PD to ensure documentation of compliance and to address any concerns.

*Please contact the Office of Research Administration if there are any questions related to subrecipient monitoring.*

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