

Subrecipient Monitoring – PI Responsibilities

Per federal guidelines, the **Principal Investigator and staff must monitor subrecipients to ensure that 1) performance goals are met, and 2) subrecipients comply with Federal laws and regulations and with the provisions of the agreement that governs the subaward.** This requirement applies to all subawards issued under sponsored programs made to ANR, without regard to the funding source.

Responsibilities

The Principal Investigator (PI) or Project Director (PD) must monitor subaward performance to ensure compliance with award terms and conditions and satisfactory performance of the subrecipient's portion of the project. Upon receipt of a completed subaward agreement, the PI/PD should familiarize themselves with the subaward terms and conditions, subaward scope of work/budget, and prime award requirements including invoicing or progress report requirements. These are the items/requirements that you will be monitoring your subrecipient against during the course of the award.

Monitoring activities include:

- PI/PD should maintain an active collaboration and communicate regularly with the subrecipient PI about project progress.
- PI/PD should review technical performance reports or other specified deliverables on a timely basis. Is the Subrecipient sticking to their Statement of Work? Is the content and form of the deliverables/reports satisfactory and provided by the required due dates? Any unforeseen issues should be documented, investigated, and resolved.
- PI/PD and staff should perform an expense-to-budget comparison when reviewing invoices.
- PI/PD will review and authorize payment of sub recipient invoices to verify the completeness and acceptability of work performed, the reasonableness of expenditures, and fulfillment of any cost-sharing commitments.
- PI/PD should request additional information from the subrecipient if any concerns or significant deviations prior to approving an invoice for payment.
- PI/PD and/or staff may conduct on-site visits to evaluate subrecipient's compliance with the project's objectives, and the appropriateness of the subrecipient's administrative systems, processes, and charges.
- PI/PD must ensure that compliance approvals are up to date.
- The Office of Contracts and Grants conducts a risk assessment prior to issuing the subaward and will notify the PI and Account Manager if additional monitoring requirements are necessary.
- Invoices must be signed by the Subrecipient's authorized official. If the prime sponsor is federal, the subaward invoices must include the following certification language. If the certification language and/or the authorized official signature is missing, the invoice must be returned to the subrecipient for revision.

“By signing this report, 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).”

PI and staff must maintain documentation and be prepared to demonstrate their compliance with the sub recipient monitoring requirements to provide to auditors upon request.

Processing an Invoice

After the PI/PD reviews the invoice in accordance with the above monitoring guidance, the PI/PD must reach out to their applicable BOC/Statewide/ REC program account manager. The PI/PD must either sign the invoice itself or communicate their approval via email as supporting documentation for the financial transaction.

Amending a Subaward

To request an amendment to a subaward or to provide alert of problems with the subrecipient, please reach out to your assigned Contracts and Grants analyst. Subawards are typically issued in annual increments and confirmation from the PI/PD that the subrecipient is meeting performance expectations may be required prior to releasing subsequent budget year funding.