

Williams College Policy

Subrecipient Award & Monitoring Policy

Effective Date: January 1, 2023

Approval Date: January 1, 2023

Approval Office: Grants Office

Williams College is responsible for ensuring that all subrecipient/subaward agreements issued by the College comply with federal regulations. The appropriate College staff and faculty must monitor the use of funds received from federal sponsors and confirm their use/distribution to subrecipients in accordance with applicable laws, regulations, and terms/conditions of the award.

Subawards issued by the College through a federal source must contain ALL required elements identified by [2 CFR §200.331](#) and must also provide general provisions for:

- Statutory requirements such as non-discrimination, drug-free workplace, animal rights, human subjects protections, and any applicable award terms and conditions,
- Any additional requirements necessary for the pass-through entity to meet its own responsibilities to the federal awarding agency (i.e., timely submission of financial, technical, and/or performance reports),
- The indirect cost rate(s) and base(s) approved for use on the subaward,
- Audit requirements and the pass-through entity's access to records
- The pass-through entity's right to conduct technical and administrative site visits,
- Termination clauses and/or legal remedies for non-performance or non-compliance, and
- Closeout procedures for when the subaward is completed.

Williams College Grants Office Responsibilities

per uniform guidance ([2 CFR §200.331](#)(d), (f), (g) and (h))

If intent to issue a sub award is known at time of proposal, the following steps must be completed:

1. Collect Subrecipient Information & Compliance Form from potential sub recipient
 - a. Confirm sub recipient vs contractor status
 - b. Review eligibility and compliance information provided from subrecipient
2. Perform Risk Assessment and review of potential subrecipient using risk assessment matrix (examine audit reports, experience level, personnel, internal systems and controls, etc.)
 - a. Determine risk level and implement monitoring plan of action for med – high risk sub recipients
 - b. Conduct status check for vendor, terrorist, debarment or suspension via the System for Award Management (SAM)

- c. Check FAPIIS to rule out “not qualified” status if subaward is greater than \$150,000.
 - d. Document findings and file with grant proposal/award materials
3. Review Scope of Work, Budget and Budget Justification and incorporate sub materials into Williams College proposal

At time of award complete the following steps:

1. Reissue Subrecipient Information and Compliance Form for confirmation of information and/or updated information
2. Perform Risk Assessment and review based upon any new information provided or confirm proposal stage risk assessment if no updates
3. Prepare Subaward Agreement using Federal Demonstration Partnership (FDP) templates and attachments (Cost Reimbursement Research Subaward Agreement); include the following:
 - a. Subrecipient name (which must match UEI)
 - b. Federal Award Identification Number (FAIN)
 - c. Federal Award Date
 - d. Subaward period of performance start and end dates
 - e. Amount of federal funds obligated to the subrecipient
 - f. Total amount of the federal award
 - g. Federal award project title and/or description
 - h. Name of federal awarding agency
 - i. CFDA number
 - j. Subaward number (Williams Account)
 - k. Identification of award type: R&D
 - l. Indirect cost rate information
4. Include attachments or documentation as needed/required:
 - a. Cover letter as appropriate
 - b. Subaward Agreement certifications and assurances
 - c. Prime award terms and conditions
 - d. Pass-through entity contacts; subrecipient contacts
 - e. Reporting requirements
 - f. Award notice, proposal, scope of work, budget, budget justification
 - g. Vendor ACH authorization form and W9 form
5. Issue sub award to subrecipient entity for review and negotiation; request signed copy be returned for full execution
6. Send fully executed subaward agreement to subrecipient and Williams College PI
7. Send fully executed agreement to budget office to set up award account for Williams PI

After the subaward has been issued

1. For sub awards totaling \$25,000 or more, file via the Federal Funding Accountability and Transparency Act Subaward Reporting System to meet FFATA reporting requirements (budget office to complete)

2. Monitor subrecipient's progress and performance, document any contacts with sub, whether routine or more involved (i.e., technical or administrative site visits) via invoicing (monitored by budget office), reports (monitored by grants office and PI)
3. Review performance reports with PI to ensure work effort matches subaward scope of work
4. Review financial reports and invoices and verify (budget office/PI):
 - a. Charges are allowable, allocable, and reasonable
 - b. Expenses were incurred during the period of performance
 - c. There is an available balance to cover the invoice amount
 - d. The correct encumbrance number is being used on the invoice
5. Ensure these elements are included in all subrecipient invoices (budget office):
 - a. Project name
 - b. Williams College project/award number
 - c. Approved budget lines
 - d. Current period expenditures by line item
 - e. Total expenditure to date
 - f. Balance due
 - g. Remaining balance
 - h. Fiscal agent certification
6. Request that certification language be included on subrecipient invoices and final reports
7. Monitor payment to subawardee to ensure agreed upon budget total is not exceeded
8. Send form annually to request subrecipient UG audit compliant certification for each year subaward is active (budget office)
9. Create and send out modifications (amendments, extensions, annual installments) as necessary with approval by PI (complete subrecipient information and compliance form for each modification – verify/update information and perform risk assessment as appropriate)
10. Issue management decisions as appropriate: corrective action for deficiencies, adjustments and/or enforcements for elevated risk levels, etc.

Principle Investigator (PI) responsibilities

At proposal stage or at time of award issue

1. Ensure Grants Office is aware of intention to include and/or issue a subaward (Grants Office will work with PI to determine subrecipient vs. contractor or consultant relationship)
2. Determine appropriate budget levels for subrecipient and relay pertinent information to subrecipient PI

After subaward has been issued:

1. Document routine contacts with subrecipient PI and retain documentation
2. Track and monitor technical progress of the subrecipient to ensure effort described in the scope of work is being met and reimbursements are made in connection to progress

- a. Technical/progress reports can be requested as needed by the PI and should supplement informal communications
 - b. If there are specific deliverables or reporting requirements, the PI and Grants Office should include them in the subaward agreement
3. Document any changes in expectations of work to be done by subrecipient and follow up with the subrecipient PI
 - a. Determine if changes require a sub award modification (all changes in the award amount or changes to scope of work or period of performance start/end dates require a modification)
 - b. Notify the Grants Office when a modification is needed
4. Verify all subrecipient's invoices; Budget office will ask for review and approval before payment can be made
 - a. If appropriate technical progress has not been made or specific goals/benchmarks have not been met, invoices should not be approved
 - b. If required work has not been completed, PI will contact subrecipient PI and request it
 - c. Invoices will be paid when a suitable agreement for deliverables has been determined
5. Give special attention to purchases greater than \$3,000 and ask for documentation to indicate subrecipient is in compliance with the price or rate quotation requirements as cited in Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200.317-326).