

Subrecipient Monitoring Notice

The following subaward/subcontract has been executed under DU Grant #: _____

[DU policy](#) requires that subrecipients are monitored to provide reasonable assurance that the use of resources is in compliance with laws, regulation, award terms, and that performance goals are achieved. The attached checklist will serve as a tool to help determine compliance with this requirement.

Subcontractor Information

Subrecipient: _____

Subcontract #: _____ PO #: _____

Project Name: _____

Period of Performance: _____ to _____

Monitoring Requirements

Principal Investigators (PI's) and departments have primary responsibility for:

- Establishing channels of communication with subrecipients
- Ensuring performance goals are achieved;
- Reviewing invoices from subrecipients for compliance with regulations and award terms and conditions as needed based on subrecipient assessment
- Reviewing and documenting performance; and,
- Approving final invoices in a timely manner for closeout.

Upon audit or request, DU and the PI must provide documentation that monitoring has occurred. This includes documenting correspondence and progress reports received. A sample template for a "Subrecipient Monitoring Record" is attached.

Additional Requirements

This subrecipient has been designated a _____ risk grantee. In addition to the above monitoring the following will be required on this subcontract:

No additional monitoring required.

Invoices must be approved by PI.

Subrecipient monitoring record submitted to ORSP: _____

PI Site review required/submit to ORSP by: _____

ORSP Desk/Site review by: _____

Assistant Controller, Research Administration

Date



Subrecipient Monitoring Checklist

Performance

Has the subrecipient submitted the required reports in a timely fashion?

Document when performance reports were received. (*See sample "Subrecipient Monitoring Record"*)

Does PI make a periodic evaluation of subrecipient performance?

Is the PI satisfied with the performance? If no, contact subcontract and ORSP.

Did PI/program staff conduct a site visit? If so, is it documented?

Is the full scope of services listed in agreement being done? If deviation, document and notify ORSP project administrator

Document any other ways subrecipient being monitored.

Program Income

If applicable is income properly recorded and deposited as collected?

Compliance Assurances

If project requires IRB, IACUC, or IBC has everything been approved?

If PI or key personnel has a relationship with sub, COI must be disclosed.

Satisfaction with Subrecipient

Be sure and summarize overall satisfaction with subrecipient. If problems, ORSP must be notified.



Subrecipient Invoice Approval Checklist

Upon receipt of an invoice or request for payment from a subrecipient:

Review all submitted progress reports and financial reports received from the subrecipients.

Determine if all progress reports required to date under the terms of the agreement have been submitted in an acceptable and timely manner.

Does the invoice have an institutional official signature certifying that charges are true and accurate and/or for appropriate purpose.

Review the expenditures on the reimbursement request/invoice. Do the expenditures follow along the same lines as what was budgeted or are there additional items listed that were not originally budgeted for?

Do you see any potentially unallowable items listed in the reimbursement request such as food/meals/entertainment/alcohol, etc. or items that should have been charged as an indirect cost such as office supplies/general purpose computers/clerical and administrative salaries/postage.

Do the expenditures shown on the reimbursement request seem reasonable in relation to the amount of time and work expected of the subcontractor to date? (For example, does it appear likely that they will have spent a minimum of 75% of their budget by the time the current budget period has concluded? Alternatively, does it look like they might exceed the amount available by the end of the budgeted period? Are there appropriate reasons for such variations?) If something is amiss, follow up with the subrecipient for an explanation.

Does it appear that there were charges that are not allocable to the project? (Such as travel costs to places not anticipated in the scope of work or other charges or salaries for individuals not associated with the work?)

If all required progress reports are up to date and acceptable, and the request appears reasonable given the nature of the projects and amount of work completed to date, sign off on the invoice and forward to ORSP for approval for payment.

Please note: by signing off and approving an invoice, you are attesting that the subrecipient has been appropriately monitored and has met all of the conditions of #1 above. If you have any doubts, please do not approve and go to Step #3 on the next page.

If progress reports are not up to date and acceptable, or you see something that does not appear right, do not forward the invoice for payment. Instead, immediately contact the subrecipient and ask for missing or unacceptable reports to be sent and/or request additional documentation as necessary and appropriate. Once issues have been acceptably resolved, and/or, if necessary, a revised request has been submitted by the subrecipient, you can forward the reimbursement request or invoice to ORSP for approval for payment.

Note: *Most invoices/reimbursements do not include a large amount of detail, but, if something does not appear right on the surface, our contracts allow us the right to ask the subrecipient for back-up documentation for specific budget line items, especially for high-risk agreements.*



Subrecipient Monitoring Record

EXAMPLE

PROJECT TITLE

PI Name _____

Subrecipient _____

DU Grant # _____

Sub PI _____

Contract/PO# _____

Sub Contact _____

Performance Period _____

Project Invoicing __Mo__Qtr__Other

Person responsible for this record: _____

Scheduled Reporting Dates (based on the terms of the award)

These should be filed with the grant files in the department and retained in the same manner as other grant documents.

DATE	COMMENTS	ACTUAL DATE*
6/1/15	Annual progress report	5/28/15
6/1/15	Annual progress report	5/26/15
6/1/14	Annual progress report	5/29/14

*dates entered as each report is submitted

Informal Progress Reports Completed (these should generally take place at least quarterly)

DATE	METHOD	COMMENTS
6/20/14	Email with PI	Hiring process delayed because of ARRA hires taking priority
7/15/14	Email with PI	New hires started last week and project now in full swing.
11/1/14	Telephone call with PI	Discussed that start up process was on schedule and equipment purchased per scope
3/20/14	Email between Post Docs	Samples collected successfully and will be shipped today.
6/10/15	Telephone call with PI	Data is looking promising. Remaining samples should be collected by 7/1/10(on schedule)
10/7/15	Site Visit	Discussed the progress of the entire study.