

## ***PI ARTICLE: Subrecipient Monitoring – Roles and Responsibilities***

Per the Uniform Guidance (**§ 200.331 Subrecipient and contractor determinations**) a subcontract (subaward) is given to a subrecipient for the purpose of carrying out a significant portion of an award and creates a Federal assistance relationship with the subrecipient. Subrecipients act as collaborators, could be considered key personnel, have its performance measured in relation to whether the objectives of the Federal program are met, and have responsibility for programmatic decision-making over their portion of the scope of work. As outlined in [GT Policy 5.3 \(Subrecipient Monitoring\)](#), the roles/responsibilities associated with subrecipient monitoring include:

### **Principal Investigators (PI)**

PIs have primary responsibility for monitoring a subrecipient's technical and financial performance to ensure compliance with federal regulations and both prime and subrecipient award terms/conditions. The Federal Government places primary responsibility for management of federally funded projects with the PI. This includes:

- Monitoring of the subrecipient's programmatic and financial activities related to the sub-award **(documenting that programmatic and financial progress are in sync).**
- Reviewing technical/performance reports as required.
- Verifying the subrecipient work is conducted in a timely manner and that the results delivered are in line with the proposed statement of work.
- Reviewing and approving subrecipient invoices (this is a responsibility that can ONLY be delegated in writing AND to an individual who has first-hand programmatic and financial knowledge of the work performed). This includes reviewing expenditures to ensure the charges are allowable, allocable, reasonable, and that the charges are within the period of performance.
- Maintaining regular contact with the subrecipient.

### **Unit Financial Officers (Departmental Administrators)**

- Reviewing invoices from subrecipients to ensure invoices are within the parameters of the sub-award budget, and questioning expenditures if necessary.
- Ensuring that invoices are submitted online to OSP (with the PI in the Workday approval chain).
- Requesting clarification for unusual or excessive charges invoiced by the subrecipient.
- Maintaining supporting documentation to allowability of costs.
- Maintaining documentation of monitoring efforts (copies of e-mail, phone log, etc.).
- Assisting the PI's in carrying out their subrecipient monitoring responsibilities.

### **Office of Sponsored Programs (OSP)**

OSP is responsible for the oversight of subrecipient monitoring and ensuring that the Institute's subrecipient monitoring procedures are compliant with federal and other applicable regulations. These responsibilities include:

- Identifying to the subrecipient the Federal award information as required in (**§ 200.332 Requirements for pass-through entities**), applicable compliance requirements, and any flow-down provisions from the prime agreement.
- Ensuring the use of the subrecipient is well documented and cost price analyses are performed.
- Confirming that the subrecipient or its PI's are not debarred or suspended from receiving Federal funds.
- On an annual basis, reviewing all active sub-awards for which monitoring is mandated. Accordingly, OSP requests audit certification letters from all subrecipients expending ≥ \$750,000 in Federal funds annually.
- Adding additional conditions to the subaward when appropriate in accordance with (**§ 200.208 Specific conditions**) to manage any risk posed by subrecipient. (Note that risk mitigation is a collective effort with the PI and Grants and Contracts).

Please note that this topic and many others related to research administration can be found in the Grants and Contracts (G&C) PI Manual: <https://www.grants.gatech.edu/pi-project-management-reference-manual/>.

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