



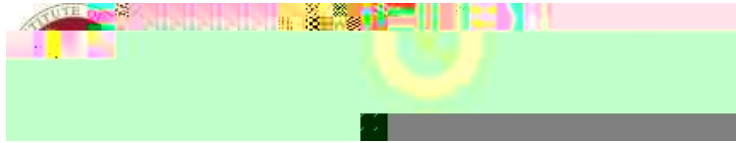
UNIFORM GUIDANCE SUBAWARDS AND SUBRECIPIENTS

DEFINITIONS

Subaward. Subaward means an award provided by a pass-through entity (prime, e.g. Florida Tech) to a subrecipient (non-federal entity) to carry out part of a federal award received by the pass-through entity. A subaward may be provided through any form of legal agreement, including an agreement that the prime considers a contract (Uniform Guidance §200.92).

Subrecipient. Subrecipient is a non-federal entity that receives a subaward from the prime to carry out a part of a federal award. A subrecipient may also be a recipient (prime) of other federal awards directly from a federal awarding agency (Uniform Guidance §200.93).

Subagreement.



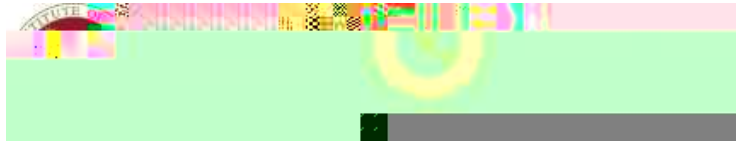
- d) Is responsible for adherence to applicable federal program requirements specified in the federal award as well as compliance responsibilities; and
- e) In accordance with the agreement, uses the federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

Characteristics indicative of a procurement relationship between the non-federal entity and a contractor are when the non-federal entity receiving the federal funds³:

- (a) Provides the goods and services within normal business operations;
- (



in the budget submitted to the agency by Florida Tech (e.g., including both direct costs and overhead). If multiple subawards are to be included, each subaward should



5. Requirement the Subrecipient Permits Prime and Auditors to Access Subrecipient Records and Financial Statements. This is as necessary for the prime to meet requirements of this part of the award.

6. Appropriate Terms and Conditions Concerning Subaward Close-out.

ASSESSING RISK (Uniform Guidance §200.331):

The PI evaluates the risk associated with the -compliance with federal statutes, regulations, and the terms and conditions of the subaward to determine the level of monitoring needed.
new personnel, changed systems, other federal awards, and financial data review.

MONITORING SUBRECIPIENTS ON A GRANT

PIs have primary responsibility for monitoring subrecipients to ensure compliance with federal regulations as well as both prime and subrecipient award terms and conditions. The federal government places the primary responsibility for management of federally funded projects with the PI. ~~2.3 Tm(m)-4(e)-5(t)-t3(t)-4f]Tf~~



Best Practices for Monitoring:

The monitoring activities include:

1. ***Staying in Contact*** Stay in regular contact with the PI of the subaward in maintaining oversight of technical and financial activities. Maintain documentation of communication with the subawardee to include technical and financial aspects.
2. ***Checking Performance*** Ensure all deliverables are being completed in a timely manner and according to the terms of the subaward.
3. ***Reviewing All Documentation*** Store all deliverables, including technical and financial, to document the performance of the subawardee. This includes scheduled reports in meeting deadlines specified in the subaward.
4. ***Approving All Invoices*** Review and approve invoices to verify charges are allowable, allocable, reasonable, and timely. Ensure deliverables have been met.
5. ***Approving Closeout*** Review final invoice to ensure all deliverables have been met and all reports have been received as specified in the subaward agreement. Upon receiving final payment, the subaward is closed.
6. ***Keeping Sponsored Programs (SP)SP Informed*** Stay in constant contact with the Director of Contracts in the Office of Research regarding any questions or concerns related to the above responsibilities. Be sure to notify Sponsored Programs promptly if there are any concerns about allowable charges, timely reporting, or failure to meet deliverables.

Requests for modifications to the subaward are sent to the Director of Contracts to obtain approval.

It is important for the PI to monitor the performance and expenditures associated with the subaward on an ongoing basis. Any issues associated with the technical or financial aspects of the subaward should be addressed in a timely manner and before the final invoice is approved.

REMEDYING NONCOMPLIANCE

If a subrecipient fails to comply with federal statutes, regulations or terms and conditions of a federal award, the prime or the federal agency may impose additional conditions (Uniform Guidance §200.207). If the noncompliance cannot be remedied, then additional actions may be taken to include⁴:

- temporarily withholding of cash payments pending corrective action;
- disallow all or part of the cost of the activity or action not in compliance;

⁴ .Refer to Uniform Guidance 200. §338 for more information.



wholly or partly suspend or terminate the federal award;
initiate suspension or disbarment proceedings;
withhold further federal awards for the project; or
take other remedies that may be legally available

CONTACT INFORMATION:

The Director of Contracts, Ms. Carolyn Lockyer, should be consulted in regards to any concerns related to the performance, technical reporting, or expenditures associated with a subaward.

Director of Contracts: clockyer@fit.edu

Office of Research: (321)674-8960