

# Subrecipient Monitoring Policy

UW-River Falls Administrative Policy	Subrecipient Monitoring Policy
Policy ID: AP-02-111	Maintained by: VCBF
Effective: January 21, 2016	Policy Owner: Grant Accountant/Grants Office
Reviewed: August 2022	Approved by: Chancellor
Review: 3 years	Next Review Date: August 2025

## Policy

With the issuance of the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (“Uniform Guidance”) [2 CFR Chapter 1, Chapter 2, Parts 200, 215, 220, 225 and 230] issued by the federal Office of Management and Budget (OMB) effective December 26, 2014, the University of Wisconsin-River Falls has implemented new procedures for risk assessment and monitoring of subrecipients in accordance with the new Uniform Guidance. 2 CFR 200.331(b) requires that institutions, at a minimum, “evaluate each subrecipient’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring. . .” Subrecipient monitoring includes activities undertaken to review the financial status and management controls of a subrecipient to mitigate the risk of entering into an agreement with a subrecipient organization. These procedures are to be followed when engaging subrecipients on federal proposals from UWRF ***including shared grant arrangements with other University of Wisconsin institutions.***

## Authority

The UW-River Falls Chancellor issues this policy in accordance with the Administrative Policy process.

The Vice Chancellor for Finance and Administration is responsible for the administration of this policy.

## Sanctions and Appeals Process

Failure to adhere to the provisions of this policy may result in appropriate disciplinary action as provided under existing procedures applicable to students, faculty, and staff, and/or civil or criminal prosecution.

## Procedure

Upon receipt of a federal grant award involving subrecipients the PI, Grant Accountant, and Director of Grants & Research must complete the following steps:

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1. Complete the “UWRF Subrecipient Determination Questionnaire” (found on the Grants and Research website). A guide to determine whether an entity should be considered a subrecipient or contractor.
2. If it is determined that the entity will serve as a subrecipient, send the UWRF Subrecipient Form (found on the Grants and Research website) to the entity for completion and return.
3. Once the Subrecipient Commitment Form is provided the Grant Accountant and Director of Grants & Research will complete the UWRF Subrecipient Risk Assessment Form (found on the Grants and Research website).
4. If the risk analysis results in a high level of financial risk the Grant Accountant and Director of Grants & Research will consult with the PI and Controller.

## University Responsibilities

The University is responsible for complying with federal uniform guidance.

## Department/Unit Responsibilities

The Director of Grants and Research is responsible for monitoring this policy.

## Contact

To direct questions about this policy, mailto: [administrative-policy@uwr.edu](mailto:administrative-policy@uwr.edu).