

Subrecipient Monitoring Policy – Overview for Principal Investigators

Purpose

When The Citadel receives an external grant that includes a subrecipient (another organization performing part of the project), federal regulations require us to ensure that funds are used properly and that the subrecipient complies with all award terms. This process is called subrecipient monitoring.

The Office of Research & Grants and the Principal Investigator (PI) share responsibility for ensuring that subrecipients perform their work as proposed and follow all applicable laws, regulations, and sponsor rules.

Principal Investigator Responsibilities at a Glance

1. Pre-Award: Subrecipient Selection and Documentation

- Choose subrecipients based on their ability to complete the work successfully—evaluate past performance, technical capability, and budget reasonableness.
- Coordinate with the subrecipient to collect required documentation for the Office of Research & Grants:
 - Statement of work
 - Itemized budget and justification
 - Federally negotiated F&A and fringe rate agreements (if applicable)
 - Most recent Single Audit (A-133) report
 - Completed Subrecipient Eligibility Form (signed by their Authorized Organizational Representative)
- The Office of Research & Grants will verify that the subrecipient is not suspended or debarred.

2. Post-Award: Monitoring Subrecipient Performance

- Track technical progress throughout the project to ensure deliverables match the scope of work.
- Communicate regularly with subrecipient personnel; request technical reports as needed.
- Notify the Office of Research & Grants before making any changes to the project (e.g., scope, key personnel, budget, reporting requirements, or payment terms).
- Ensure that progress supports payment—invoices should only be approved when work has been satisfactorily completed.

3. Reviewing and Approving Invoices

- Before approving payment, confirm that invoiced costs are:
 - Allowable, allocable, and reasonable
 - Consistent with the approved budget and project scope
 - Properly documented
- Question any unusual or excessive charges and request clarification or backup documentation from subrecipient when needed.
- Approve invoices only when the subrecipient's progress aligns with the work completed.

- Route invoices for payment through Chrome River, ensuring that the PI is included in the approval workflow.

4. Ongoing Oversight and Risk Management

- The Office of Research & Grants conducts risk assessments for each subrecipient (low, medium, or high) to determine the appropriate level of monitoring.
- Medium- or high-risk subrecipients may require additional oversight.
- The Office of Research & Grants may review subrecipient audit reports and periodically audits invoices to confirm compliance.

5. Corrective Actions and Noncompliance

- If problems or audit findings occur:
 - The subrecipient must follow a Corrective Action Plan.
 - The PI helps monitor the plan's completion.
 - Serious or repeated noncompliance may result in withholding payment, suspending the award, or terminating the subaward in coordination with the Office of Research & Grants.

Together, these steps ensure compliance with federal regulations and protect the integrity of The Citadel's sponsored projects.