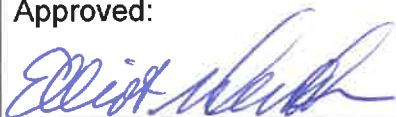




Number	23-01
Effective	9-13-2023
Page	1 of 2
Approved:  Dr. Elliot Weinstein, Chair	

SUBRECIPIENT MONITORING POLICY FOR FEDERAL AWARDS

PURPOSE	Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) (“Uniform Guidance”), specifically §200.332, requires pass-through entities to evaluate each subrecipient’s risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance.
POLICY STATEMENT	<p>First 5 San Bernardino, as a recipient of Federal Awards, is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of funds. The following policy applies to all subawards issued under sponsored programs. This policy addresses institutional responsibilities and assists Program and Fiscal Staff to ensure that, in addition to achieving performance goals, subrecipients comply with applicable federal laws and regulations and with the provisions of each subaward agreement.</p> <p>Procedures have been created to implement the policy and are intended for use by Program and Fiscal Staff Administrators at First 5 San Bernardino to define their respective roles and responsibilities for subrecipient monitoring.</p>
ACCOUNTABILITY	<p>It is the responsibility of First 5 San Bernardino, as the pass-through entity, to ensure the good stewardship of all funding.</p> <p>Failure to adhere to these Federal regulations in connection with a specific subrecipient monitoring may result in the withholding of new awards and could result in the reputational damage to First 5 San Bernardino.</p> <p>Additional consequences for non-compliance include possible individual discipline for failure to follow applicable First 5 San Bernardino policies and requirements.</p>
DEFINITIONS	<p><u>Contractor (Vendor)</u> Organization that provides goods and services within normal business operations. Contractors (vendors) provide similar goods and services to many different purchasers, operate in a competitive environment, and provide goods or services that are ancillary to the operation of the sponsored program.</p> <p><u>Federal Audit Clearinghouse</u> Division of the Office of Management and Budget (OMB) that collects information on Single Audit (formerly A-133) results.</p> <p><u>Pass-through entity</u> Non-federal entity that provides a federal award to a subrecipient to carry out a federal program; sometimes referred to as the “prime” or “lead” organization.</p>

DEFINITIONS

Recipient

Non-federal entity that receives a Federal Award directly from a federal awarding agency to carry out an activity under a federal program. The term recipient does not include subrecipients.

Subaward

Enforceable agreement, issued under a prime sponsored project, between a pass-through entity and a subrecipient for the performance of a substantive portion of the program; these terms do NOT apply to the procurement of goods or services from a contractor (vendor).

Subrecipient (subcontractor or sub awardee)

Organization eligible to receive a financial award. A subrecipient's performance is measured against whether the objectives of the sponsored program are met; subrecipients have responsibility for programmatic decision-making and for adherence to applicable program compliance responsibilities. Subrecipients are responsible for performing a substantive portion of the program, as opposed to providing goods and services.

Uniform Guidance

OMB publication entitled "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (2 CFR 200).