



Executive Owner: President, VP or Provost
Dept/Unit Owner: Office of Sponsored Programs
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Required Prerequisites: N/A; Faculty Approval
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SPP 03023030 Subawards & Subrecipient Monitoring Policy

Purpose:

Insure that subrecipient awards are qualified, compliant with University policies, receive all necessary approvals and are properly monitored throughout the grant period.

Policy:

A subaward is a formal written agreement made between Plymouth State University and another legal entity (subrecipient) for programmatic activity under a University sponsored project.

Subrecipient vs Contractor

It is important to correctly determine whether an entity should be considered a subrecipient or a contractor, so that the appropriate terms and conditions are applied, and budget calculations are performed accurately. A subaward is likely appropriate if you can answer "yes" to any of the following questions:

- Does the entity's scope of work represent an intellectually significant portion of the programmatic effort of the overall project?
- Does the entity have responsibility for programmatic decision making?
- Could the entity's work result in intellectual property developed or publishable results (including co-authorship)?
- Will the entity need animal and/or human subjects' approval for its portion of the work?
- An entity would be considered a contractor if they provide goods or services within normal business operations to many different purchasers and operates in a competitive environment.

Procedures and Forms:

Inclusion of a Subrecipient in a new proposal or ongoing project

Inclusion of subawards in a sponsored project always requires approval by the sponsoring entity. As such, subawards require formal documentation and commitment prior to proposal submission, OR sponsor prior approval if added subsequent to an award that did not initially include a subaward. Plymouth State University requires the following documentation from a subrecipient organization for inclusion of a subaward in a sponsored project:

- PSU [Subrecipient Commitment Form](#) completed and signed by authorizing official of the organization
- Detailed Statement of Work from the Subrecipient Organization
- Detailed line item budget for each year of the proposed work
- Detailed narrative budget justification
- Letter of commitment including the project title, period of performance, dollar amount of requested funds and cost shared funds (if applicable), signed by an authorizing official of the organization

Post-Award Subrecipient Monitoring

Federal guidelines require that prime awardees perform regular monitoring of subawards during the period of performance to ensure progress with carrying out the scope of work and prudent fiscal management of funds. The project Principal Investigator/Project Director at Plymouth State University has primary responsibility for monitoring of subawards. The PI has responsibility for maintaining regular communication with the subaward organization's PI, and documenting progress relative to billed expenses and cost sharing (if applicable) by the subaward organization. To facilitate this process, the PI is required to utilize the following forms:

- [PSU Subrecipient Monitoring Agreement](#)
- [PSU Subrecipient Monitoring Record](#)

The Office of Sponsored Programs will provide these forms at the outset of the project and ask for the [Monitoring Agreement form](#) to be signed and returned at the outset of the project.