

**BURRELL COLLEGE
OF OSTEOPATHIC MEDICINE
POLICY MANUAL**

SECTION: Finances

Policy B3080

TOPIC: Federal Subrecipient Award Administration

Approval Date: 9-5-2023

Effective Date: 9-5-2023

Approved: Signature on File

Page 1 of 1

POLICY:

The College will ensure that the proposing, awarding and monitoring of subrecipients on College federal awards is in full compliance with federal regulations, and with all sponsor terms and conditions.

RESPONSIBLE OFFICIAL(S):

Dean's Office, Office of Research and Sponsored Projects (ORSP), Finance Office, Principal Investigator (PI)

PROCEDURE:

The Dean's Office shall assign a Program Manager to develop and implement appropriate procedures to control subrecipient compliance. This shall include the following:

1. The Program Manager will work with the PI to document at the proposal stage why a subrecipient versus a vendor is being proposed.
2. The Program Manager for any proposal including a subrecipient will ensure that the subrecipient receives required information in advance of the proposal being submitted to the federal sponsor.
3. The Program Manager will work with the identified PI at the proposal stage to formally evaluate and document the risk of noncompliance prior to including the subrecipient in the proposal.
4. The ORSP will evaluate the documented communications with, and evaluation of, the proposed subrecipient as a part of reviewing the overall proposal packet with a recommendation to proceed.
5. Following award, the Program Manager will work with the PI to monitor the activities of the subrecipient to ensure that the subrecipient is in compliance with the terms of the subaward, is meeting financial and programmatic requirements, and following up to ensure that the subrecipient takes timely and appropriate action to correct any noted deficiencies.
6. The Finance Office will monitor any audit findings and corrective action related to the performance of the subrecipient.

CROSS REFERENCE:

2 CFR §200.330-332

Policy B3050 Federal Funds Compliance