



Office of Research & Sponsored Programs

Subrecipient Policy

Effective Date: December 2021

Responsible Office: Office of Research & Sponsored Programs (ORSP)

Supersedes: June 2017 Version

Purpose

This policy establishes institutional guidelines for the management and monitoring of subawards issued under federally sponsored awards, in accordance ICSUAM 11002.06 and as required by the Code of Federal Regulations, specifically 2 CFR Part 200, Cost Principles, and Audit Requirements for Federal Awards.

This policy applies to all subawards issued under federally sponsored awards made to CSULB. It does not apply to vendor contracts, consulting agreements, or awards not governed by Uniform Guidance.

Policy Statement

CSULB Research Foundation is committed to ensuring that subawards are issued and monitored in compliance with federal regulations, sponsor requirements, and institutional policies.

Subrecipient monitoring is a shared responsibility between ORSP, Sponsored Programs Administration (SPA), and Principal Investigators (PIs).

The Office of Research and Sponsored Programs (ORSP) administers sub-awards consistent with 2 CFR 200, **ONLY** if the sub-award will be made under a prime award to which 2 CFR 200 is applicable. Additional requirements may include CSULB internal requirements, applicable sponsor regulations, and prime award terms and conditions. The goal of these procedures is to establish guidelines so that the sub-award satisfies institutional and governmental reviews while providing adequate stewardship of the CSULB research enterprise.

Definitions

Pass-through entity

Pass-through entity (PTE) means a non-Federal entity that provides a sub-award to a sub-recipient to carry out part of a Federal program. (CSULB is the pass-through entity when it receives a prime award and passes funding to a sub-recipient outside the institution.)

Sub-recipient

Sub-recipient means a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program; however, it does not include an individual that is a beneficiary of such a program.

Sub-award

Sub-award means an award provided by a pass-through entity to a sub-recipient in order to carry out part of a Federal award. Sub-awards do not include payments to a contractor or payments to an individual who is a beneficiary of a Federal program. A sub-award may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Sub-recipient Monitoring

Sub-recipient monitoring means all activities undertaken to review the financial status and management controls of a sub-recipient to mitigate the risk of entering into an agreement with a sub-recipient organization.

Subrecipient Determination

During proposal development, ORSP and the PI must determine whether a collaborating entity is a subrecipient or contractor, using the criteria outlined in 2 CFR §200. The Subrecipient Commitment Form must be completed to document this determination.

Concept of Substantive Work

Sponsored research awards made to CSULB are primarily conducted by CSULB faculty and staff. On occasion substantive programmatic work is carried out by one or more institutions (aka sub-recipients), who are made responsible for a portion of an award made to CSULB. The concept of substantive work conducted by a sub-recipient is defined as follows: Project activities with a primary purpose of the research program, which are not conducted at CSULB. These activities constitute a significant portion of the research program and require the leadership and direction of a responsible investigator located at the work site of the cooperating entity. (Normally, a sub-recipient organization will provide critical project expertise, which CSULB as the PTE does not possess.)

Distinguishing between a Sub-Award Recipient and a Contractor

2 CFR 200.330 provides guidance in the distinction between a sub-recipient doing substantive work and a contractor providing goods and services as outlined below.

<i>Sub-Award Recipients.</i> A sub-award is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the sub-recipient. See §200.92 Subaward. Characteristics which support the classification of the non-Federal entity as a sub-recipient include when the non-Federal entity:	<i>Contractors.</i> A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. See §200.22 Contract. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:
Determines who is eligible to receive what Federal assistance;	Provides the goods and services within normal business operations;
Has its performance measured in relation to whether objectives of a Federal program were met;	Provides similar goods or services to many different purchasers;



Has responsibility for programmatic decision making;	Normally operates in a competitive environment;
Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and	Provides goods or services that are ancillary to the operation of the Federal program; and
In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.	Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

Pre-Award Requirements

- Completion of the Subrecipient Commitment Form.
- Verification of SAM.gov registration and Unique Entity Identifier (UEI).
- Confirmation of audit status and review of recent Single Audit Reports.
- Certification of compliance with applicable federal regulations (e.g., IRB, IACUC, FCOI, RCR, Debarment/Suspension, Lobbying).
- Risk assessment conducted by SPA using a standardized Subrecipient Risk Assessment Questionnaire.

Risk Assessment & Monitoring

Subrecipients are categorized as Low, Medium, or High Risk based on:

- Audit findings
- Financial controls
- Prior performance
- Compliance history

Monitoring activities may include:

- Review of invoices and supporting documentation
- Annual audit review and corrective action plans
- Technical and financial reporting
- Site visits (for high-risk subrecipients)

FFATA Compliance

In accordance with the Federal Funding Accountability and Transparency Act (FFATA) and 2 CFR §200

- Subawards of \$30,000 or more must be reported in SAM.gov within the end of the month following the subaward execution.
- Required reporting includes:
 - Subrecipient name, address, UEI
 - Subaward number, amount, and purpose
 - Executive compensation data (if applicable)

ORSP is responsible for ensuring timely and accurate FFATA reporting.

Roles & Responsibilities

- **Principal Investigator (PI):**



- Define scope of work and budget
 - Review and approve subrecipient invoices
 - Monitor technical performance
 - Report concerns to ORSP/SPA
 - **ORSP:**
 - Determine subrecipient vs. contractor status
 - Collect proposal documentation
 - Coordinate with PI
 - Conduct risk assessments
 - Negotiate and issue subawards
 - Monitor subrecipient compliance
 - Report subawards in SAM.gov
 - Maintain Subrecipient Review Logs
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References

- [2 CFR Part 200 – Uniform Guidance](#)
- [2 CFR §200.331–§200.339 – Subrecipient Monitoring and Management](#)
- FFATA Subaward Reporting System (FSRS.gov)
- ICSUAM Policy 11002.06 – CSU Sponsored Programs Subrecipient Monitoring

