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**Monitoring Responsibilities and Requirements for Federal Subawards**

The Office of Grants and Contracts (OGC) has executed your subaward request. This document identifies your responsibilities to successfully manage your subawards and comply with federal requirements.

**Monitoring Requirements**

PIs and their administrative units must ensure continuous and ongoing monitoring of the financial and programmatic performance of each federal subaward, per [2 CFR 200.332(d)](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332) and [University policy](http://www.ucdenver.edu/faculty_staff/employees/policies/Policies%20Library/2XXX%20Finance/2036%20-%20Subrecipient%20Monitoring.pdf). As a steward of federal funds, PIs and administrative units must have reasonable assurance each subrecipient complies with the terms and conditions of the subaward and is making adequate progress towards the subrecipient’s project goals and outcomes.

Auditors and federal agencies regularly request monitoring records to assess the University’s compliance with federal requirements. Failure to maintain a monitoring record may result in cost disallowances associated with our subaward. **Per University policy, “any penalties, disallowance, or losses of funding caused by non-compliance…will be the responsibility of the administrative unit in violation of the policy.”**

To meet these responsibilities, PIs and their administrative units must:

* Maintain regular contact with the subrecipient to gauge project progress;
* Ensure all deliverables, including subrecipient progress reports, are timely and satisfactory;
* Verify the subrecipient adheres to the terms and conditions of the subaward;
* Address subrecipient non-compliance by communicating with OGC if changes to the statement of work, reporting requirements, or rebudgeting are needed
* Verify subrecipient invoices are timely, complete, and accurate;
* Ensure all subrecipient costs conform to the terms and conditions of the subaward and approved budget; and,
* Confirm that costs are aligned with technical progress.

**Documenting Monitoring Activities**

Monitoring activities **MUST** be adequately documented. The University provides a [Monitoring Record Template](https://research.cuanschutz.edu/docs/librariesprovider148/ogc_documents/subrecipientmonitoringrecord_2015octec4e92e5302864d9a5bfff0a001ce385.docx?sfvrsn=2366f6b9_0) and [Monitoring Invoice Checklist](https://research.cuanschutz.edu/docs/librariesprovider148/ogc_documents/subrecipientmonitoring_invoice-checklist_2015sept9c4e92e5302864d9a5bfff0a001ce385.doc?sfvrsn=5366f6b9_0) that may be used or modified as needed.

**Risk Assessment**

OGC conducts a risk assessment on each federal subrecipient before a subaward is executed. If the risk assessment surpasses a certain risk score, our subcontracts team will discuss the assessment with you prior to providing an executed subcontract. If you would like a copy of the risk assessment for your subaward, please email [ogc.subcontracts@ucdenver.edu](mailto:ogc.subcontracts@ucdenver.edu).

**Resources**

[OGC’s Subcontracts website](https://research.cuanschutz.edu/ogc/home/award-lifecycle/contracting/OGCContracts/subcontracts#ac-subrecipient-monitoring-documents-3) provides additional subrecipient monitoring guidance and tools.

**Contacts**

For questions and assistance related to your subaward agreement, please contact [ogc.subcontracts@ucdenver.edu](mailto:ogc.subcontracts@ucdenver.edu).

For questions and assistance related to subrecipient compliance, please contact Shane Jernigan at [shane.jernigan@cuanschutz.edu](mailto:shane.jernigan@cuanschutz.edu)