



UNIVERSITY OF PUERTO RICO AT CAYEY SUBAWARD MONITORING PROCESS

I. INTRODUCTION

The University of Puerto Rico at Cayey (UPR Cayey) is committed to promoting high standards of compliance in the administration of sponsored programs. These guidelines set forth the conditions for subawards and subcontract monitoring process. These procedures are based mostly in the University of Puerto Rico, SERIAL ORCI-2016-01, UNIVERSITY OF PUERTO RICO RISK MANAGEMENT PROCEDURES FOR FEDERAL GRANTS SUBAWARDS (Attachment A) parts of this document has been extracted from it “at verbatim”. We have also based these procedures on the OMB Uniform Guidance.

II. SCOPE

The policy describes the process and roles of the parties involved in the subaward monitoring during the stages of the process: proposal, issuance, oversight, and closeout of subawards. These include the responsibilities of assessing and overseeing risk associated with a subrecipient, monitoring subawards, review and processing of invoices, proper management of equipment purchased, fabricated or otherwise acquired under subawards, application of Facilities and Administrative Costs (F&A costs), subaward reporting, and closeout.

These guidelines apply to all subawards/subcontracts sponsored by all sources of funds.

III. DEFINITIONS

- A. Grantor - Institution awarding a subaward/subcontract. In this procedure it refers to the University of Puerto Rico at Cayey.
- B. Grantor PI - Principal Investigator/Project Director of the project awarding the subcontract or subaward.
- C. Subaward Monitoring Process - Process in which the grantee ensures that the subawardee complies with all the terms and conditions in the subaward agreement as well as the rules and regulations governing the grant award.
- D. Subaward Monitoring Plan – Document that includes specify risk mitigation strategies to address the potential risk of non-compliance by the subawardee.
- E. OSPR - Office for Sponsored Programs and Research
- F. Pass-through entity - a non-federal entity that provides an award to a subrecipient to carry out a program as stated in the Statement of Work on a sponsored project. The pass-through entity assumes responsibility for negotiation, issuance, oversight, and management of a subaward. The entity will also assume many of the responsibilities

typically assigned to a prime sponsor in issuance and oversight of an award to a grantee or contractor, including verification of the financial viability, adequacy of compliance controls and audit status of its subrecipients as well as oversight and verification of the subrecipient's fulfillment of its portion of the programmatic effort. The campus/unit serves as the pass-through entity for subawards issued under its sponsored projects.

- G. Period of Performance: Period during which the subaward or subcontract is active. It must be within the period of performance of the grant award.
- H. PI/PD: PI refers to principal investigator while PD refers to project director. In some occasions, this is the same person (role).
- I. Authorized Representative (AR): refers to an individual officially designated and authorized to act responsibly, consent and participate on behalf of the PI/PD in procedures involved in the grant, subawards and other activities.
- J. Subaward/subcontract Agreement- A formal legal written agreement between the UPR Cayey and another organization (subrecipient) to perform a portion of the Statement of Work under a sponsored project. A subaward must include a clearly defined, intellectually significant Statement of Work (SOW) to be performed by the Subrecipient. The Subrecipient's SOW is performed by its personnel, using its own facilities and resources. Work is usually performed at the Subrecipient's site. The Subrecipient takes full responsibility for adhering to the terms and conditions of the subaward including those issued from UPR Cayey's sponsor under the Prime Award. Subawards differ from procurement contracts which are used to acquire goods or services from vendors.
- K. Subrecipient /Subawardee- a non-campus/unit entity that expends awards received from UPR Cayey to carry out a portion of the programmatic effort under a sponsored project. There must be an arms-length relationship between UPR Cayey and its subrecipients. The Subrecipient may be another educational institution, an independent laboratory, a foundation, a for-profit corporation, a non-profit corporation or other organization, and may be a domestic or foreign entity.
- L. Facilities & Administrative Costs (F&A): Known in the past as indirect costs. They are used to reimburse the institution for administrative expenses that can't be charged to a grant as direct costs.

IV. SUBRECIPIENT MONITORING PROCESS

As grantor, the UPR Cayey is responsible for monitoring the programmatic and financial activities of the subcontracted entity to ensure that the terms and conditions of the subaward are fulfilled. For this purpose, the University of Puerto Rico, through the Office for Research Compliance and Integrity, issued a system-wide policy, SERIAL ORCI-2016-01, UNIVERSITY OF PUERTO RICO RISK MANAGEMENT PROCEDURES FOR FEDERAL GRANTS SUBAWARDS. The procedure provides a collection of documents

to assist administrators with the subrecipient monitoring tasks. The use of these tools and scope of monitoring procedures should be determined by the PI and administrators based on the nature of the grant and the perceived risk associated with the subrecipient. All the forms represent a minimum requirement to handle risks associated with a subrecipient. However, additional monitoring efforts should be implemented if there is any question about the subrecipient's ability to ensure proper use and financial management of sponsor funds during any stage of the award.

A. Subrecipient Monitoring at Initial Stage (Pre-award activities)

The initial award stage includes proposal through award set-up. The goal at this stage is to ensure that the subrecipient is capable of compliantly spending the funds and meet the project goals.

1. Subrecipient selection and review

An investigator who plans to include another institution to undertake responsibility for a substantive portion of the programmatic effort described in a proposal must provide a number of documents from the proposed subrecipient institution in advance of proposal submission. At a minimum, these documents include:

- ✓ Evidence of commitment to participate in the project and abide by all the associated terms and conditions.
- ✓ Statement of work, including identification of the use of human subjects and/or animals.
- ✓ Detailed budget and budget justification.

The PI should select a subrecipient based on an assessment of the subrecipient's ability to perform the work successfully. This should include an analysis of the subrecipient's past performance and technical capability as well as an assessment of the proposed costs for the work to be done. The subrecipient organization must certify that it will comply with all appropriate representations, approvals, assurances, and certifications related to the research project -- including human subjects, animals, export controls, and financial conflict of interest -- before the subaward can be fully executed.

At this stage, it is required to:

- a. Perform a risk assessment to assess the potential risk level of a subrecipient. This step is helpful for subrecipients with whom the institution has had no previous experience.
 - ✓ Documents to be completed:
 - Subrecipient Profile Questionnaire (Attachment B)
 - Subrecipient Risk Assessment Evaluation Form (can be completed when proposal is awarded) (Attachment C)

- b. Development of Subaward Monitoring Plan. The results of the risk assessment should be used to determine the frequency and scope of subrecipient monitoring. The Subaward Monitoring Plan should include strategies to mitigate potential risks of non-compliance.

- ✓ Guide document
 - Invoice Monitoring Guide (Subrecipient Monitoring Plans) (Attachment D)

The Subaward Monitoring Plan must specify risk mitigation strategies that may include special terms and conditions in the subaward agreement, site visits or other forms of more robust monitoring procedures in accordance with the OMB Uniform Guidance.

2. Subaward Preparation

A subaward action must have been approved as part of a grant award. The PI will use this work plan to establish the need to grant a subaward. Subawards issued under a federal prime award will include the following information as required by OMB Uniform Guidance. This information will also be required for subawards sponsored by other sources of funds, when applicable:

- ✓ Federal Award Identification
- ✓ Subrecipient name
- ✓ Subrecipient's DUNS number
- ✓ Federal Award Identification Number (FAIN)
- ✓ Federal Award Date
- ✓ Subaward Period of Performance Start and End Date
- ✓ Amount of Federal Funds Obligated by this action
- ✓ Total Amount of Federal Funds Obligated to the subrecipient
- ✓ Total Amount of the Federal Award
- ✓ Federal award project description
- ✓ Name of Federal awarding agency, pass-through entity, and contact information for awarding official
- ✓ CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement
- ✓ Identification of whether the award is R&D
- ✓ Indirect cost rate for the federal award.

3. Procedure:

- a. PI/PD or authorized official completes forms to assess the sub awardee level of risk and monitoring process required (see attached forms):
 - ✓ Subrecipient Profile Questionnaire (Attachment B)
 - ✓ Subrecipient Risk Assessment Evaluation Form (Attachment C)

- b. PI/PD or authorized official, based on the risk assessment, develop a monitoring plan, complete a Subaward Agreement Draft (see attached forms) and forward it to the OSPR for revision.
- c. OSPR revises the draft, and forwards it to PI/PD or authorized representative for corrections and award negotiation with Sub awardee institution.
- d. After negotiations and agreements, the PI/PD or authorized representative, submits the subaward to the OSPR for the final revision.
- e. OSPR provides final approval of the draft.
 - ✓ PI/PD or authorized official process subaward Agreement to PI/PD of subawardee institution for signature, and to OSPR for Chancellor's signature.
 - ✓ PI/PD or authorized official receives Subaward Agreement signed by all parties and further process the Subaward Agreement to:
 - Office of Legal Affairs – for registration in the Register of Execution of Contracts, Deeds, and Other Related Documents, Puerto Rico Office of the Comptroller.
 - Original Subaward Agreement is sent to Accounts Payable Office.
 - Copy of the Subaward Agreement is sent to the Accounting Office.
 - Copy in project file is maintained.

4. Responsibilities

- a. PI/PD or Authorized Representative (AR):
 - ✓ Complete the following forms to assess the sub awardee level of risk and monitoring process required:
 - Subrecipient Profile Questionnaire (Attachment B)
 - Subrecipient Risk Assessment Evaluation Form (Attachment C)
 - ✓ Based on this assessment of low or high risk, a mentoring plan is developed.
 - ✓ Prepares a Subaward Agreement Draft and submitted it to the OPSR. The draft includes a scope of work, responsibilities by the sub awardee, preliminary budget, work calendar and deliverables. The essential items of consideration included in the draft are:
 - The cost items, personnel and justifications provided by the sub awardee. These must be:

- 1) Aligned to the proposal and the primary award received at UPR Cayey from the sponsor and their schedule
 - 2) In compliance with federal and state laws costs regulations
 - The supporting documents to be included with the invoices
 - The progress reports and other documents to be submitted to the UPR Cayey and their schedule.
- ✓ Upon OSPR revision and pre- approval by the OSPR, the subaward with subawardee institution is negotiated.
 - ✓ After negotiations and agreements, submit the subaward to the OSPR for the final revision, processes and signatures.
 - ✓ Further process the signed Subaward Agreement to:
 - Office of Legal Affairs – for registration in the Register of Execution of Contracts, Deeds, and Other Related Documents, Puerto Rico Office of the Comptroller.
 - Original Subaward Agreement is sent to Accounts Payable Office.
 - Copy of the Subaward Agreement is sent to the Accounting Office.
 - Copy in project file is maintained.

b. Office of Sponsored Programs and Research

- ✓ Provides support and guidance at all stages.
- ✓ Review Subaward Agreement draft, gives final approval, and forwarded it to PI/PD or Authorized Representative for corrections or award negotiation with Subawardee institution. Provides subaward negotiations support.
- ✓ Forward Subaward Agreement when signed by the awardee institution, to the Chancellor for signature. Once the Subaward Agreement has been signed by all parties the documents are forwarded to the PI/PD or Authorized Representative.

B. Ongoing Monitoring

Ongoing monitoring includes activities undertaken to monitor the subrecipient's administration, billing and scientific progress as well as on-going risk assessments (i.e. review of annual audit findings). Frequent communication between the PI, responsible offices staff and research administrators at UPR Cayey and the subrecipient institution is essential to ensure a compliance and successful collaboration. A letter and/or sample invoice that outlines UPR Cayey's business practices and expectations can be sent to the subrecipient with new awards.

Guiding documents:

- Guide for review of subaward invoices – provides a list of 10 questions to consider when monitoring invoices for completeness and compliance with policies and regulations. (Attachment E)
- Subrecipient Monitoring Record – a fill out form used to document subrecipient monitoring efforts and maintains an audit trail. (Attachment F)

The grantor must ensure that any entity subcontracted with federal funds in excess of \$750,000 a year must comply with the OMB Super Circular. To evidence this, the grantee must request copy of the Audit completed for the subcontracted entity in compliance with this circular. The grantor should ensure that any existing findings in this audit are considered by the subcontracted entity in a diligent manner. Failure to comply with the requirement will result in an immediate contract cancellation.

1. Procedure

- a. PI/PD or authorized representative verifies the progress reports submitted by the PI/PD of the subawardee institution. The lack of compliance or dissatisfaction with the labor performed should be discussed immediately with the subawardee to ensure all corrective actions are taken.
- b. Evaluates invoices submitted by subawardee to assure compliance of allowable costs and with terms and conditions within the grant and subcontract. All amounts must be within the budgetary terms of the subcontract. The Guide for Review of Subaward Invoices provides criteria for the revision of invoices and the Invoice Monitoring Guide provides guidance to determine which monitoring plan to follow for each subrecipient based on risk assessment. The evaluation must consider that:
 - ✓ All costs are incurred and accounted for within the current period of the subcontract.
 - ✓ The expenses billed do not exceed the total authorized by the subcontract.
 - ✓ Expenses are necessary for the implementation and administration of the Project. These are allowable, reasonable and consistent with work being performed. Any inappropriate charge will be referred to the PI/PD of subawardee institution for clarification.
 - ✓ Facilities and Administrative Costs (F&A) are applied correctly.
 - ✓ Each expense cost has the pertinent evidence establishing that it was charged adequately. This evidence can be, but is not limited to, purchase orders, invoices, payrolls, canceled checks. If any necessary evidence is missing, the invoice will be discussed with the subawardee to request further information.
 - ✓ Invoices are received as scheduled in the contract.
- c. If PI/PD or authorized representative has any questions regarding the invoices, they will not be approved until all items are appropriately resolved. If evaluation

findings establish that the invoice **is not in compliance** the PI/PD or AR is responsible of correcting any findings, requesting a new invoice or obtaining any required documents before submission for payment.

- d. PI/PD approves all invoices, certifying that the charges are reasonable, allowable, and updated progress for the project are in compliance and that they can be submitted for payment.
- e. The Guide for Review of Subaward Invoices provides criteria for the revision of invoices (Attachment E). The Invoice Monitoring Guide provides guidance to determine which monitoring plan to follow for each subrecipient based on risk assessment (Attachment D).
- f. Once PI/PD approves the invoice, PI/PD or authorized representative, prepares and submit the payment voucher along with all supporting documents to the Deanship of Academic Affairs (or corresponding Deanship) for approval and endorsed to the Accounts Payable Office for payment.
- g. PI/PD or Authorized Representative completes and update the Subrecipient Monitoring Record form (Attachment F) to document any monitoring actions during each performance year of the subaward. Copy of this form will be part of the fiscal file.
- h. Accounts Payable Office receives and registers the payment vouchers with attached approved subawardees' invoices and documents, and match them with the corresponding subaward contract.
 - ✓ Verifies payment vouchers (accountant in charge) for legality, corrected amounts and signatures.
 - ✓ Once verified, the payment voucher is sent to the Accounting Office for de-obligation of funds.
 - ✓ Registers and validates the payment in the University Financial Integrated System.
- i. Accounts Payable Office forwards the payment voucher to the Disbursement Office.
- j. The Disbursement Office runs the payment process. The check is sent to the subawardee's financial contact identified in the Subaward Agreement or an electronic payment is made depending on what was agreed upon.

2. Responsibilities

a. **PI/PD or Authorized Representative:**

- ✓ PI/PD or Authorized Representative receives invoices from Subawardee and revises the following:
 - Verifies that all costs are incurred and accounted for within the current period of the subcontract.
 - The expenses billed do not exceed the total authorized by the subcontract.
 - The expenses are necessary for the implementation and administration of the Project and are aligned with the tasks, budget justifications and costs established in the subaward
 - Any inappropriate charge will be referred to the PI/PD of subawardee institution for clarification.
 - The costs items are as negotiated.
 - The project has submitted and complied with the requested deliverables. These can include preliminary progress reports, quarterly, bi annual or annual progress reports, final project report.
 - Prepares payment voucher once the invoice is approved by the PI/PD, includes certification of approval and supporting documents to the Deanship of Academic Affairs (or corresponding Deanship) for authorization and due process.
 - Gives follow up for invoice payment and properly accounted.

- ✓ Revises the outcomes of evaluations. Evaluations outcomes of the invoices will determine the need of a site visit to the subawardee. In a subaward/subcontract of three years or less, a fiscal monitoring site visit will take place if necessary. In the case of subawards/subcontracts of more than three years, two fiscal monitoring site visits will take place, if deemed necessary based on the financial reports or technical/programmatic reports.

- ✓ Monitor (with site-visits if deemed necessary) the subawardee to gather information and verify the purchase, location and the appropriate use of equipment obtained with subcontract funds.

b. Accounting Office:

- ✓ Verifies that all the information in the Subaward Agreement is correct and in accordance with the grant award. Any discrepancies should be brought to the PI/PD's attention.

- ✓ Keeps copy of the Subaward Agreement in the financial file of the award.

- ✓ Obligates the total funds of the Subaward in the university Financial Integrated System.

- ✓ De-obligates funds in the University Financial Integrated System to process the payments for each approved subawardee's invoice.

- ✓ Verifies that the payment was correctly accounted.
- ✓ Maintains evidence of all reports and certifications for a period of three (3) years or the period established by the sponsoring agency, whichever is greater, after the termination date of the grant.

c. Accounts Payable Office:

- ✓ Receives the Subaward Agreement, and enters it into the register of received documents.
- ✓ Assigns the Agreement to an Accountant for pre-intervention.
- ✓ Receives and registers the payment vouchers with attached approved subawardees' invoices and documents, and match them with the corresponding subaward contract.
- ✓ Verifies payment vouchers (accountant in charge) for legality, corrected amounts and signatures.
- ✓ Once pre-intervened, the payment voucher is sent to the Accounting Office for deobligation of funds.
- ✓ Registers and validates the payment in the University Financial Integrated System after the funds are deobligated.
- ✓ Sends the payment voucher with supporting documents to the Disbursement Office for the final process.

d. Disbursement Office:

- ✓ Runs the payments process. The check is sent to the subawardee's financial contact identified in the Subaward or an electronic payment is made depending on what was agreed upon.
- ✓ Keeps the document in the archives for the period established by the applicable regulations.

C. Closeout of Subaward

The award closeout includes activities related to ensuring that the work was performed and properly billed. At the end of the award, PI/PD or AR and the Accounting Office have the responsibility to ensure that all documentation related to project performance and financial obligations are received. Subrecipient monitoring activities that should be performed at award closeout include verifying final invoice and reviewing all

technical/financial reports to ensure that the subrecipient provided all project deliverables and met project obligations.

1. PI/PD or AR responsibilities:

- a. Assures that the subawardee submits the final invoice with the corresponding supporting documents within the following 60 calendar days after the expiration date of the subaward or as established in the Subaward Agreement. All encumbrances must have been liquidated and all expenses incurred invoiced at that time.
- b. The PI/PD or AR certifies before a final invoice, that all technical reports and /or deliverables have been received and that the subrecipient has fulfilled its obligations. Final verification of technical completion by the subrecipient is indicated by the PI's signature and date on the final invoice. In addition, final close out documents [residual property; inventions and discoveries (including a negative report); subrecipient's release forms (where applicable), final risk and an assessment review.
- c. Assures that final technical/programmatic reports are submitted to the within 60 calendar days after the expiration of the subaward or as established in the Subaward Agreement. These reports must be approved by the PI/PD and submit a copy to the Accounting Office.

2. Accounting Office:

- a. Assures all subawardee invoices are paid and properly accounted for in the corresponding project accounts in the University Financial Integrated System.

ATTACHMENTS

June 2, 2016

Central
Administration
University of
Puerto Rico

SERIAL ORCI-2016-01

FEDERAL GRANTS MANAGEMENT UNITS AND OFFICES, GRANTS MANAGERS AND
ANY OTHER RELATED PERSONNEL

Carlos Rodríguez Rivera
Director**UNIVERSITY OF PUERTO RICO RISK MANAGEMENT PROCEDURES FOR
FEDERAL GRANTS SUBAWARDS**

Certification No. 2 CFR Part 200 establishes the uniform administrative requirements, cost principles, and audit requirements for federal awards. These are to be fulfilled for financial management systems, procurement, reports and records, and grant closeouts for non-federal entities. The requirements also include responsibilities of federal awarding agencies and pass-through entities in awarding, monitoring, and closing out of grant awards.

Vice Presidency
for Research
and Technology

Regarding risk monitoring of subawards, the 2 CFR 200, section 200.331 (6)(b) indicates the following need:

Office for
Research
Compliance
and Integrity

“Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraph (e) of this section, which may include consideration of such factors as...”

Also, section 200.331(6)(e) of the Certification provides:

“Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals...”

In accordance, the Office of Research Compliance and Integrity, of the Vice Presidency for Research and Technology, has developed the enclosed procedures so as to comply with the mandated review and risk management concerning subawards of federal grants where the UPR is the prime recipient.

Please contact the Office of Research Compliance and Integrity for questions and further information about these procedures.

Jardín Botánico Sur
1187 Calle Flamboyán
San Juan, Puerto Rico
00926-1117

Regards.

sdr

Tel (787) 765-8767
Fax (787) 751-7378

Enclosures

c. Dr. Uroyoán R. Walker Ramos
Dr. José A. Lasalde Dominicci
Chancellors



Subrecipient Monitoring Guide

The University of Puerto Rico (UPR) is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of federal sponsor funds in accordance of the; 2 CFR Part 200 requirements. This guide is designed for subawards that are subject to federal and/or agency-specific regulations established by the federal prime sponsor.

The Office of Research Compliance and Integrity provides the following collection of documents to assist administrators at the responsible offices and central level with subrecipient monitoring. The use of these tools and scope of monitoring procedures should be determined by the PI and administrators based on the nature of the grant and the perceived risk associated with the subrecipient. All of the following forms represents a minimum requirement to handle risks associated with a subrecipient; however, additional monitoring efforts should always be implemented if there is any question about the subrecipient's ability to ensure proper use and financial management of sponsor funds during any stage of the award.

Information related to the recommended use of each form is found in the document's page header. The University of Puerto Rico Subrecipient Monitoring Guide includes the following documents, by award stages:

I. Initial Award Stage Monitoring:

- Subrecipient Profile Questionnaire
- Subrecipient Risk Assessment Evaluation Form
- Subrecipient Monitoring Plans

II. Ongoing Monitoring:

- Invoice Monitoring Guide
- Subrecipient Monitoring Record

III. Subaward Closeout



I. Initial Award Stage

The initial award stage includes proposal through award set-up. The goal of subrecipient monitoring efforts at this stage is to ensure that the subrecipient is capable of **compliantly spending the federal funds** and meeting the project goals.

Compliantly performing a risk assessment: A risk assessment should be performed to assess the potential risk level of a subrecipient. This step is especially helpful for subrecipients with whom the UPR has had no previous experience. A questionnaire relating to the organization's financial and management strength can be completed internally or by the subrecipient.

Useful tools:

- Subrecipient Profile Questionnaire
- Subrecipient Risk Assessment Evaluation Form

Developing a monitoring plan: The results of the risk assessment should be used to determine the frequency and scope of subrecipient monitoring. The monitoring plan should include strategies to mitigate potential risks of non-compliance.

Useful tools:

- Subrecipient Monitoring Plans

II. Ongoing Monitoring

Ongoing monitoring includes activities undertaken to monitor the subrecipient's administration, billing and scientific progress as well as on-going risk assessments (i.e. review of annual audit findings).

Communication with subrecipient: Frequent communication between the PI, responsible offices staff and research administrators at UPR and the subrecipient institution is essential to ensure a compliant and successful collaboration. A letter and/or sample invoice that outlines UPR's business practices and expectations can be sent to the subrecipient with new awards.

Invoices: Attests that the charges appear reasonable and progress to date for the project. To ensure proper use of sponsor funds, the invoices must be monitored for completeness.

Record of subrecipient monitoring efforts: Best practice dictates documenting all efforts related to subrecipient monitoring, especially if there are issues such as late billing or communication difficulty.

Useful tools:

- Invoice Monitoring Guide
- Subrecipient Monitoring Record

III. Subaward Closeout

Award closeout includes activities related to ensuring that the work was performed and properly billed. At the end of the award, the responsible office had the responsibility to ensure that all documentation related to project performance and financial obligations are received. Subrecipient monitoring activities that should be performed at award closeout include verifying final invoice and reviewing all technical/financial reports to ensure that the subrecipient provided all project deliverables and met project obligations.



Subrecipient Profile Questionnaire

How to use: The questionnaire is used to help determine a subrecipient organization’s financial and management strength, which helps assess risk and dictates the monitoring plan for subrecipients. The questionnaire can be completed by the subrecipient or by the UPR responsible office before an agreement is made with the subrecipient. Questions may be omitted or added to obtain information most useful for developing a monitoring plan.

Fill out the information below, as appropriate or verify the information below and make corrections or additions as needed.

1. Complete address and contact information:

Name: _____
Address: _____
City: _____
State: _____
Zip Code: _____
Phone: _____
Fax: _____
Email: _____
URL: _____

2. Company Information:

Incorporated in: _____
Incorporated Date: _____
Number of Employees: _____
EIN
(Employee ID Number): _____
DUNS Number: _____
Register on PR GSA?* _____ Yes _____ No

*Puerto Rico General Service Administration

3. Type of organization (check one):

- | | |
|---|---|
| <input type="checkbox"/> Federal Government | <input type="checkbox"/> Higher Education Institution |
| <input type="checkbox"/> State Agencies | <input type="checkbox"/> Non-Profit Organization |
| <input type="checkbox"/> Municipalities | <input type="checkbox"/> Corporation / Private |
| <input type="checkbox"/> Foreign Government | <input type="checkbox"/> Foundation |

11. Does the financial system provide for the control and accountability of project funds, property, and other assets?

_____ Yes _____ No

12. Do policies exist that address:

Pay rates and Benefits?	[] Yes	[] No
Time and Effort?	[] Yes	[] No
Leave or absence?	[] Yes	[] No
Discrimination?	[] Yes	[] No
Conflicts of Interest in Research?	[] Yes	[] No
Travel?	[] Yes	[] No
Purchasing?	[] Yes	[] No

13. Contact information:

a. Contact for Fiscal Information:

Name: _____
Title: _____
Email: _____
Signature: _____
Date: _____

b. Contact for Scientific Information:

Name: _____
Title: _____
Email: _____
Signature: _____
Date: _____



Subrecipient Risk

Assessment Evaluation Form

How to use: The Subrecipient Risk Assessment Evaluation Form is used by responsible offices to assess the level of risk posed by the subrecipient. If the UPR is issuing a subaward to an organization with whom the University has no previous relationship, it is advised to perform a risk assessment at the pre-award stage to determine if a monitoring plan is needed.

Subrecipient Risk Assessment Evaluation Form – Guidance Document

The purpose of this document is to provide an overview of using the University of Puerto Rico Risk Assessment Evaluation Form and the intent behind some of the questions. The form focuses on federal and federal flow-through funds and should not be used for external funds other than that. It is a tool to assist a flow-through entity (PTE) with determining the risk of a subrecipient, and should not be recycled as a questionnaire to send to a subrecipient to complete.

The form is organized into four separate sections: Threshold Questions, Other Considerations, Institutional Questions, and Project Specific Questions.

The Institutional Questions and the Project Questions are scored independently.

Threshold Questions

These questions are intended to quickly identify the highest risk candidates: debarred or suspended, lack of COI policy, and the existence or not of an established accounting system, and acceptable procurement system. “Yes” to answers 1 through 3, and “No” to answers 4 to 7 should prompt your institution to carefully evaluate its ability to issue and successfully manage a project with that subrecipient. If the subrecipient is identified as debarred or suspended, on the SAM system, and the UPR still need to make an agreement with this specific subrecipient, then it is required to obtain prior approval from the prime sponsor.

Other Considerations

These questions are intended to assess risk that may or may not result in additional language in the subaward.

Institutional (Subrecipient) Questions (Scored)

These questions focus on institutional characteristics of the subrecipient and are independently scored. For institutions that receive \$750,000 or more in federal funds, this institutional score should be static during the year, but may change after their single audit has been completed. For institutions under the \$750,000 threshold, this number may change during the year. Some of these questions are similar to those in other sections. For example, the question related to COI in this section is trying to evaluate the institution’s experience with COI, not just if they have a compliant policy (where compliant policy may depend on the sponsor/specific project).

Project Questions (Scored)

These questions focus on the characteristics of the project and are independently scored. Again, some are similar to prior questions. For example, Question #6, on Project Specific Questions section, related to place of performance is trying to evaluate the risk of a project being awarded to a domestic

institution, but where the research may be performed in a foreign country, or where the work is being performed outside of their institution.

Scoring Methodology

A subaward with another UPR campus or unit should be considered as low risk. Also a subaward may be considered as low risk if it receives an institutional score of at most 9, a project score of at most 13, or a combination total of institutional and project score below 26. An institutional score over 9, a project score over 13, or total combined score equal or above 26 constitute a high risk subaward.



Subrecipient Risk

Assessment Evaluation Form

UPR Form Handling Information:		
Completed by:	Office	Date (mm/dd/yyyy)

Institution/Organization ("Subrecipient") Information:
Name: _____
UFIS Project Number: _____
Prime Sponsor: _____
Project Title: _____
CFDA Number: _____
DUNS: _____
FAC EIN: _____

I. Threshold Questions (not scored)
SAM questions (If yes to 1, 2, or 3, consider alternative to initiating agreement)
<p>1. Is the Subrecipient institution currently debarred or suspended?</p> <p>_____ Yes</p> <p>_____ No</p>
<p>2. Is the Subrecipient institution's PI presently debarred or suspended?</p> <p>_____ Yes</p> <p>_____ No</p>
<p>3. Does the Subrecipient indicate or display in SAM with "delinquent federal debt"?</p> <p>_____ Yes</p> <p>_____ No</p> <p><i>(If no to 4, 5, 6 or 7, consider alternative to initiating agreement)</i></p>
<p>4. If the sponsor requires a Conflict of Interest Policy, does the Subrecipient have a compliant policy in place?</p> <p>_____ Yes</p> <p>_____ No</p>
<p>5. Does the Subrecipient have an acceptable accounting system?</p> <p>_____ Yes</p> <p>_____ No</p>

6. Does the Subrecipient have an acceptable procurement system?

Yes

No

7. If required, has the Subrecipient completed an audit under A-133 or the Uniform Guidance for the most recent fiscal year?

Yes

No

II. Other Considerations (Use this section to enhance risk management plan)

1. Does the project include work covered by ITAR or EAR (at Subrecipient, or Subrecipient accessing ITAR/EAR work done at Prime Institution)?

Yes

No

2. Is there a potential or identified conflict of interest? (If yes, include mitigation plan and supporting documentation)

Yes

No

3. Is cost-share required or included?

Yes

No

4. Is participant support included in the Subrecipient's budget?

Yes

No

5. Does the Subrecipient have adequate experience receiving same or similar federal awards?

Yes

No

III. Institutional Questions

	Score
1. Is the Subrecipient institution foreign or domestic?	
a. Subrecipient is a U.S. based institution	0
b. Subrecipient is a foreign location with stable government and financial systems	3
c. Subrecipient is a foreign location with unstable government or financial systems	6
d. Subrecipient is in a restricted foreign location	9
2. What is the Subrecipient Organization type?	
a. University	0
b. Other non-profit	4
c. Industry	6

3. Does the Subrecipient have a Negotiated (F&A) Indirect Cost Rate Agreement?	
<input type="checkbox"/> Yes	0
<input type="checkbox"/> No	3
4. Were the results of the most recent audit under A-133/the Uniform Guidance (or similar)	
a. Yes, audit is clean (no findings) or no relevant findings	0
b. A-133/UG audit has findings but no significant deficiencies or material weaknesses	1
c. A-133/UG audit has qualified or adverse opinions.	4
d. No A-133/UG audit, but has alternative recurring annual audit with no relevant findings	1
e. No A-133/UG audit, but successfully completed an audit or major review by a federal agency	2
f. No A-133/UG audit, but has alternative recurring annual audit with relevant findings	6
g. No audit	6
5. Is the Subrecipient Institution mature?	
a. Subrecipient experience 10+ years	0
b. Subrecipient experience 5-9 years	2
c. Subrecipient experience 1-4 years	4
d. Subrecipient is start-up (less than 1 year)	6
6. Does the Subrecipient Institution have experience with determining conflicts of interest (evidence of an acceptable Conflict of Interest Policy)?	
<input type="checkbox"/> Yes	0
<input type="checkbox"/> No	6
Institutional subtotal	
IV. Project Specific Questions	
1. What is the Prime Award type?	
a. Grant	0
b. Contract	6
2. Amount of Outgoing Funds?	
a. Outgoing Funds > \$650,000	3
b. Outgoing Funds \$150,000 – \$649,999	2
c. Outgoing Funds \$25,000 - \$149,999	1
d. Outgoing Funds \$1 - \$24,999	0

3. What is the percentage of the Prime Award being subcontracted (specific to this Subrecipient-not total)?	
a. 0-24%	0
b. 25-49%	3
c. 50% +	9
4. Does the work include Human Subjects, Animal Subjects or Embryonic stem cells?	
a. No	0
b. Human or Animal Subjects approved by Subrecipient IRB or IACUC	1
c. Embryonic stem cells	4
d. Sponsor must approve	6
e. Subrecipient using Prime Recipient's IRB or IACUC	9
5. Scope of Work/Deliverables	
a. The Subrecipient will only submit progress reports	0
b. The Subrecipient is responsible for tangible products	1
c. The UPR's PI's work is dependent upon Subrecipient's work	3
d. The UPR's work is dependent upon Subrecipient's work and continuation funding for UPR's is tied to performance.	6
6. Where is the Place of Performance?	
a. All work will be performed at the Subrecipient's Institution	0
b. Some work will be performed at the PTE's Institution	4
c. All work will be performed at the PTE's Institution	6
	Project subtotal _____
	Grand total (Institutional + Project subtotals) _____



Invoice Monitoring Guide

How to use: This guide is a list of 10 questions for responsible offices to consider when monitoring invoices for completeness and compliance with UPR’s policies.

NOTE: Using the guidance provided in the Subrecipient Risk Assessment Evaluation Form, determine which monitoring plan to follow for each subrecipient.

Subrecipient Monitoring Plans

How to use: The monitoring plans give suggested examples of subrecipient monitoring plans for responsible offices to implement based on a subrecipient’s perceived riskiness. The Risk Assessment Matrix is used in tandem to help determine the potential riskiness of an organization. If the risk assessment reveals a high potential for financial risk, the responsible office should develop a proposed risk mitigation strategy where the frequency and monitoring strategies are based upon the specific organization and the nature of the scope of work to be completed by the subrecipient.



1. Review audit reports through the Federal Clearinghouse
2. If findings exist in the subrecipient’s audit report, determine how material they are and the risk(s) involved (operational, financial or compliance risks)
3. Review invoices frequently to ensure:
 - Timeliness, completeness and accuracy
 - Science is in line with spending
 - PI approval states “okay to pay”
4. Work is performed within the period of performance
5. Compliance with special terms (if applicable)



- Review all steps in the “Lower Risk” category in addition to the following:**
1. Exercise your right to audit or consider performing a site visit or desk review
 2. Request supporting detail for all financial invoices and expenses
 3. Request and review financial reports more frequently
 4. Request regular contact and communication with the PI
 5. Document conversations and retain pertinent emails
 6. Withhold payments if necessary
 7. Elevate potential risks to the Office of Compliance Research and Integrity for review and discussion.



Guide for review of subaward invoices

Are the expenses allowable per the subaward and the prime award? Remember the prime award requirements and budget restrictions flow down to the sub-recipient.
Are the invoiced expenses included in the subaward budget? The subrecipient should only invoice for approved expenses per the subaward or ask for approval of budget changes when necessary to modify the original terms/budget.
Are the expenses in the agreement consistent with the programmatic plan or work completed to date? The expenses invoiced should agree with the work incurred.
Did the PI sign the invoice approving it for payment?
Were all the expenses incurred within the subaward start and end dates? Ensure that the dates on the invoice are within the subaward dates.
Are the cumulative expenses within the overall approved budget amount? Ensure that subrecipients are not invoicing for amounts over the approved budget.
Are the invoice expenses per budget category in agreement with the budgeted amount per line item category?
Do expenses appear to be based on actual expenses? Cost reimbursable subcontracts require invoicing based on actual expenses only .
Is the invoice total correct?
Are the Facilities & Administration (F&A) costs calculated correctly with the correct and agreed upon rate for the subrecipient? Ensure the calculated F&A agrees with the methodology in the budget and only includes Modified Total Direct Cost (MTDC) base expenses that can accrue F&A.
Is the invoice signed by an authorized institutional official ?

REMEMBER: Most invoices do not include a large amount of detail. Ask the sub recipient for back-up documentation on specific budget line items if something does not appear correct. Verify that charged expenses are in accordance to the subrecipient agreement. **IF THERE ARE ANY QUESTIONS ON THE INVOICES, DO NOT APPROVE UNTIL ALL ITEMS ARE APPROPRIATELY RESOLVED.**



Subrecipient Monitoring Record

How to use: The Subrecipient Monitoring Record is used by responsible offices to document subrecipient monitoring efforts and maintain an audit trail. Use of the tracking record is encouraged at all risk levels but is strongly encouraged for high risk subrecipients.

Form for responsible offices to maintain a record of subrecipient monitoring actions

1. University of Puerto Rico

PI Name:

UFIS Project#

Subcontract #:

2. Subrecipient

Subrecipient Institution:

Subrecipient PI:

Subrecipient Contact:

3. Sub-Award Period of Performance:

From:

To:

4. Project Invoicing Frequency:

Monthly

Quarterly

5. Name and position of the person of the UPR responsible for overseeing this record:

Name:

Position:

6. Scheduled Reporting Dates (based on the terms of the grant award)

Date (mm/dd/yyyy)	Comments	Actual Date* (mm/dd/yyyy)

*dates entered as each report is submitted

University of Puerto Rico

Subrecipient Monitoring Contact Information



Office of Research Compliance and Integrity

Phones:

787-281-0994 Direct

787-250-0000 ext. 3141, 3126, 3151, 3125

Email: compliance@upr.edu

Central Finance Office

Phones:

787-250-0000 ext. 4001, 4311

Email: gloria.soto@upr.edu

University of Puerto Rico

Subrecipient Profile Questionnaire



How to use: The questionnaire is used to help determine a subrecipient organization's financial and management strength, which helps assess risk and dictates the monitoring plan for subrecipients. The questionnaire can be completed by the subrecipient or by the UPR responsible office before an agreement is made with the subrecipient. Questions may be omitted or added to obtain information most useful for developing a monitoring plan.

Fill out the information below, as appropriate or verify the information below and make corrections or additions as needed.

1. Complete address and contact information:

Name: _____
 Address: _____
 City: _____
 State: _____
 Zip Code: _____
 Phone: _____
 Fax: _____
 Email: _____
 URL: _____

2. Company Information:

Incorporated in: _____
 Incorporated Date: _____
 Number of Employees: _____
 EIN
 (Employee ID Number): _____
 DUNS Number: _____
 Register on PR GSA?* _____ Yes _____ No

*Puerto Rico General Service Administration

3. Type of organization (check one):

Federal Government Higher Education Institution
 State Agencies Non-Profit Organization
 Municipalities Corporation / Private
 Foreign Government Foundation

11. Does the financial system provide for the control and accountability of project funds, property, and other assets?

_____ Yes _____ No

12. Do policies exist that address:

Pay rates and Benefits?	[] Yes	[] No
Time and Effort?	[] Yes	[] No
Leave or absence?	[] Yes	[] No
Discrimination?	[] Yes	[] No
Conflicts of Interest in Research?	[] Yes	[] No
Travel?	[] Yes	[] No
Purchasing?	[] Yes	[] No

13. Contact information:

a. Contact for Fiscal Information:

Name: _____
Title: _____
Email: _____
Signature: _____
Date: _____

b. Contact for Scientific Information:

Name: _____
Title: _____
Email: _____
Signature: _____
Date: _____

University of Puerto Rico



Subrecipient Risk

Assessment Evaluation Form

How to use: The Subrecipient Risk Assessment Evaluation Form is used by responsible offices to assess the level of risk posed by the subrecipient. If the UPR is issuing a subaward to an organization with whom the University has no previous relationship, it is advised to perform a risk assessment at the pre-award stage to determine if a monitoring plan is needed.

Subrecipient Risk Assessment Evaluation Form – Guidance Document

The purpose of this document is to provide an overview of using the University of Puerto Rico Risk Assessment Evaluation Form and the intent behind some of the questions. The form focuses on federal and federal flow-through funds and should not be used for external funds other than that. It is a tool to assist a flow-through entity (PTE) with determining the risk of a subrecipient, and should not be recycled as a questionnaire to send to a subrecipient to complete.

The form is organized into four separate sections: Threshold Questions, Other Considerations, Institutional Questions, and Project Specific Questions.

The Institutional Questions and the Project Questions are scored independently.

Threshold Questions

These questions are intended to quickly identify the highest risk candidates: debarred or suspended, lack of COI policy, and the existence or not of an established accounting system, and acceptable procurement system. “Yes” to answers 1 through 3, and “No” to answers 4 to 7 should prompt your institution to carefully evaluate its ability to issue and successfully manage a project with that subrecipient. If the subrecipient is identified as debarred or suspended, on the SAM system, and the UPR still need to make an agreement with this specific subrecipient, then it is required to obtain prior approval from the prime sponsor.

Other Considerations

These questions are intended to assess risk that may or may not result in additional language in the subaward.

Institutional (Subrecipient) Questions (Scored)

These questions focus on institutional characteristics of the subrecipient and are independently scored. For institutions that receive \$750,000 or more in federal funds, this institutional score should be static during the year, but may change after their single audit has been completed. For institutions under the \$750,000 threshold, this number may change during the year. Some of these questions are similar to those in other sections. For example, the question related to COI in this section is trying to evaluate the institution’s experience with COI, not just if they have a compliant policy (where compliant policy may depend on the sponsor/specific project).

Project Questions (Scored)

These questions focus on the characteristics of the project and are independently scored. Again, some are similar to prior questions. For example, Question #6, on Project Specific Questions section, related to place of performance is trying to evaluate the risk of a project being awarded to a domestic

institution, but where the research may be performed in a foreign country, or where the work is being performed outside of their institution.

Scoring Methodology

A subaward with another UPR campus or unit should be considered as low risk. Also a subaward may be considered as low risk if it receives an institutional score of at most 9, a project score of at most 13, or a combination total of institutional and project score below 26. An institutional score over 9, a project score over 13, or total combined score equal or above 26 constitute a high risk subaward.



Subrecipient Risk

Assessment Evaluation Form

UPR Form Handling Information:		
Completed by:	Office	Date (mm/dd/yyyy)

Institution/Organization ("Subrecipient") Information:
Name: _____
UFIS Project Number: _____
Prime Sponsor: _____
Project Title: _____
CFDA Number: _____
DUNS: _____
FAC EIN: _____

I. Threshold Questions (not scored)
SAM questions (If yes to 1, 2, or 3, consider alternative to initiating agreement)
<p>1. Is the Subrecipient institution currently debarred or suspended?</p> <p>_____ Yes</p> <p>_____ No</p>
<p>2. Is the Subrecipient institution's PI presently debarred or suspended?</p> <p>_____ Yes</p> <p>_____ No</p>
<p>3. Does the Subrecipient indicate or display in SAM with "delinquent federal debt"?</p> <p>_____ Yes</p> <p>_____ No</p> <p><i>(If no to 4, 5, 6 or 7, consider alternative to initiating agreement)</i></p>
<p>4. If the sponsor requires a Conflict of Interest Policy, does the Subrecipient have a compliant policy in place?</p> <p>_____ Yes</p> <p>_____ No</p>
<p>5. Does the Subrecipient have an acceptable accounting system?</p> <p>_____ Yes</p> <p>_____ No</p>

6. Does the Subrecipient have an acceptable procurement system?

Yes

No

7. If required, has the Subrecipient completed an audit under A-133 or the Uniform Guidance for the most recent fiscal year?

Yes

No

II. Other Considerations (Use this section to enhance risk management plan)

1. Does the project include work covered by ITAR or EAR (at Subrecipient, or Subrecipient accessing ITAR/EAR work done at Prime Institution)?

Yes

No

2. Is there a potential or identified conflict of interest? (If yes, include mitigation plan and supporting documentation)

Yes

No

3. Is cost-share required or included?

Yes

No

4. Is participant support included in the Subrecipient's budget?

Yes

No

5. Does the Subrecipient have adequate experience receiving same or similar federal awards?

Yes

No

III. Institutional Questions

	Score
1. Is the Subrecipient institution foreign or domestic?	
a. Subrecipient is a U.S. based institution	0
b. Subrecipient is a foreign location with stable government and financial systems	3
c. Subrecipient is a foreign location with unstable government or financial systems	6
d. Subrecipient is in a restricted foreign location	9
2. What is the Subrecipient Organization type?	
a. University	0
b. Other non-profit	4
c. Industry	6

3. Does the Subrecipient have a Negotiated (F&A) Indirect Cost Rate Agreement?	
<input type="checkbox"/> Yes	0
<input type="checkbox"/> No	3
4. Were the results of the most recent audit under A-133/the Uniform Guidance (or similar)	
a. Yes, audit is clean (no findings) or no relevant findings	0
b. A-133/UG audit has findings but no significant deficiencies or material weaknesses	1
c. A-133/UG audit has qualified or adverse opinions.	4
d. No A-133/UG audit, but has alternative recurring annual audit with no relevant findings	1
e. No A-133/UG audit, but successfully completed an audit or major review by a federal agency	2
f. No A-133/UG audit, but has alternative recurring annual audit with relevant findings	6
g. No audit	6
5. Is the Subrecipient Institution mature?	
a. Subrecipient experience 10+ years	0
b. Subrecipient experience 5-9 years	2
c. Subrecipient experience 1-4 years	4
d. Subrecipient is start-up (less than 1 year)	6
6. Does the Subrecipient Institution have experience with determining conflicts of interest (evidence of an acceptable Conflict of Interest Policy)?	
<input type="checkbox"/> Yes	0
<input type="checkbox"/> No	6
Institutional subtotal	
IV. Project Specific Questions	
1. What is the Prime Award type?	
a. Grant	0
b. Contract	6
2. Amount of Outgoing Funds?	
a. Outgoing Funds > \$650,000	3
b. Outgoing Funds \$150,000 – \$649,999	2
c. Outgoing Funds \$25,000 - \$149,999	1
d. Outgoing Funds \$1 - \$24,999	0

3. What is the percentage of the Prime Award being subcontracted (specific to this Subrecipient-not total)?	
a. 0-24%	0
b. 25-49%	3
c. 50% +	9
4. Does the work include Human Subjects, Animal Subjects or Embryonic stem cells?	
a. No	0
b. Human or Animal Subjects approved by Subrecipient IRB or IACUC	1
c. Embryonic stem cells	4
d. Sponsor must approve	6
e. Subrecipient using Prime Recipient's IRB or IACUC	9
5. Scope of Work/Deliverables	
a. The Subrecipient will only submit progress reports	0
b. The Subrecipient is responsible for tangible products	1
c. The UPR's PI's work is dependent upon Subrecipient's work	3
d. The UPR's work is dependent upon Subrecipient's work and continuation funding for UPR's is tied to performance.	6
6. Where is the Place of Performance?	
a. All work will be performed at the Subrecipient's Institution	0
b. Some work will be performed at the PTE's Institution	4
c. All work will be performed at the PTE's Institution	6
	Project subtotal _____
	Grand total (Institutional + Project subtotals) _____

University of Puerto Rico

Invoice Monitoring Guide



How to use: This guide is a list of 10 questions for responsible offices to consider when monitoring invoices for completeness and compliance with UPR's policies.

NOTE: Using the guidance provided in the Subrecipient Risk Assessment Evaluation Form, determine which monitoring plan to follow for each subrecipient.

Subrecipient Monitoring Plans

How to use: The monitoring plans give suggested examples of subrecipient monitoring plans for responsible offices to implement based on a subrecipient's perceived riskiness. The Risk Assessment Matrix is used in tandem to help determine the potential riskiness of an organization. If the risk assessment reveals a high potential for financial risk, the responsible office should develop a proposed risk mitigation strategy where the frequency and monitoring strategies are based upon the specific organization and the nature of the scope of work to be completed by the subrecipient.



1. Review audit reports through the Federal Clearinghouse
2. If findings exist in the subrecipient's audit report, determine how material they are and the risk(s) involved (operational, financial or compliance risks)
3. Review invoices frequently to ensure:
 - Timeliness, completeness and accuracy
 - Science is in line with spending
 - PI approval states "okay to pay"
4. Work is performed within the period of performance
5. Compliance with special terms (if applicable)



Review all steps in the "Lower Risk" category in addition to the following:

1. Exercise your right to audit or consider performing a site visit or desk review
2. Request supporting detail for all financial invoices and expenses
3. Request and review financial reports more frequently
4. Request regular contact and communication with the PI
5. Document conversations and retain pertinent emails
6. Withhold payments if necessary
7. Elevate potential risks to the Office of Compliance Research and Integrity for review and discussion.

University of Puerto Rico

Guide for review of subaward invoices



Are the expenses allowable per the subaward and the prime award? Remember the prime award requirements and budget restrictions flow down to the sub-recipient.
Are the invoiced expenses included in the subaward budget? The subrecipient should only invoice for approved expenses per the subaward or ask for approval of budget changes when necessary to modify the original terms/budget.
Are the expenses in the agreement consistent with the programmatic plan or work completed to date? The expenses invoiced should agree with the work incurred.
Did the PI sign the invoice approving it for payment?
Were all the expenses incurred within the subaward start and end dates? Ensure that the dates on the invoice are within the subaward dates.
Are the cumulative expenses within the overall approved budget amount? Ensure that subrecipients are not invoicing for amounts over the approved budget.
Are the invoice expenses per budget category in agreement with the budgeted amount per line item category?
Do expenses appear to be based on actual expenses? Cost reimbursable subcontracts require invoicing based on actual expenses only .
Is the invoice total correct?
Are the Facilities & Administration (F&A) costs calculated correctly with the correct and agreed upon rate for the subrecipient? Ensure the calculated F&A agrees with the methodology in the budget and only includes Modified Total Direct Cost (MTDC) base expenses that can accrue F&A.
Is the invoice signed by an authorized institutional official ?

REMEMBER: Most invoices do not include a large amount of detail. Ask the sub recipient for back-up documentation on specific budget line items if something does not appear correct. Verify that charged expenses are in accordance to the subrecipient agreement. **IF THERE ARE ANY QUESTIONS ON THE INVOICES, DO NOT APPROVE UNTIL ALL ITEMS ARE APPROPRIATELY RESOLVED.**

University of Puerto Rico

Subrecipient Monitoring Record



How to use: The Subrecipient Monitoring Record is used by responsible offices to document subrecipient monitoring efforts and maintain an audit trail. Use of the tracking record is encouraged at all risk levels but is strongly encouraged for high risk subrecipients.

Form for responsible offices to maintain a record of subrecipient monitoring actions

1. University of Puerto Rico

PI Name:

UFIS Project#

Subcontract #:

2. Subrecipient

Subrecipient Institution:

Subrecipient PI:

Subrecipient Contact:

3. Sub-Award Period of Performance:

From:

To:

4. Project Invoicing Frequency:
 Monthly

 Quarterly

5. Name and position of the person of the UPR responsible for overseeing this record:

Name:

Position:

6. Scheduled Reporting Dates (based on the terms of the grant award)

Date (mm/dd/yyyy)	Comments	Actual Date* (mm/dd/yyyy)

*dates entered as each report is submitted

