

### Subrecipient Management and Monitoring Procedure Guidelines

This procedure outlines the tasks involved in implementation of the Policy on Subrecipient Monitoring: University Policy 4009. All faculty, staff and administrators involved in sponsored research activities that include a subaward are required to follow these procedures.

Under the Uniform Guidance framework set forth in 2 CFR 200.331 George Mason University, as the Prime institution, has responsibility for oversight of subrecipient activities, which begin at the proposal stage and carry through award closeout.

Upon the Office of Sponsored Programs' ("OSP") receipt of the RAMP Agreement Request and Budget Approvals, the procedure below is initiated.

Tasks	Responsible Party*	Resources
<b>Proposal Submission (inclusive of subawards)</b>		
1. Review subrecipient SOW and budget <ul style="list-style-type: none"> <li>a. Confirm agreement type (subaward vs contractor agreement)               <ul style="list-style-type: none"> <li>i. If agreement is misclassified as a subaward, work with the PI to correct classification and budget</li> </ul> </li> </ul>	OSP PreAward Team	Subrecipient Determination Tool
2. Submit subrecipient documents to sponsor as part of Mason proposal package: <ul style="list-style-type: none"> <li>• Statement of Work</li> <li>• Budget</li> <li>• All required representations and certifications</li> <li>• Letter of Commitment from an authorized official at the subrecipient organization</li> <li>• Completed Subrecipient Commitment Form</li> <li>• Substitute Virginia W-9</li> </ul>	OSP PreAward Team	Budget Template  FDP subrecipient commitment form  Non-FDP subrecipient commitment form
<b>Award Negotiation Stage</b>		
<b>OSP Contracts Team reviews and finalizes Mason prime award.</b>		
<b>Awarded Agreement (inclusive of incoming subawards)</b>		
1. As part of the award set-up process, review prime award and confirm intent to issue subawards, including the entity, budget and SOW <ul style="list-style-type: none"> <li>a. Request OSP Contracts initiate the subaward execution process by entering the agreements request in RAMP</li> </ul>	OSP Award Administration Team	Subaward Procedures Checklist
2. Review request for subaward entered in RAMP <ul style="list-style-type: none"> <li>a. Confirm agreement type (subaward vs contractor agreement)               <ul style="list-style-type: none"> <li>i. If agreement is misclassified as a subaward, work with the PI to correct classification and budget</li> </ul> </li> <li>b. If sponsor approval is required to issue the subaward (e.g. if not included in the original proposal) follow Mason procedures to require prior sponsor approval</li> </ul>	OSP - Contracts	Subrecipient Determination Tool  Subaward Execution Checklist

Tasks	Responsible Party*	Resources
<p>3. Complete the Subrecipient Risk Assessment to determine the level of risk for the subrecipient inclusive of the following factors:</p> <ul style="list-style-type: none"> <li>• The subrecipient's prior experience with the same or similar Mason subawards;</li> <li>• The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with the Uniform Guidance, and the extent to which the same or similar subaward has been audited as a major program;</li> <li>• Whether the subrecipient has new personnel or new or substantially changed systems; and</li> <li>• The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).</li> </ul>	<p>OSP - Contracts</p>	<p>Subrecipient Risk Assessment Tool</p> <p>Subaward Execution Checklist</p>
<p>4. If the subrecipient is deemed <i>More than Normal Risk</i></p> <ol style="list-style-type: none"> <li>a. Conduct additional risk assessment activities, as outlined in the Subrecipient Risk Assessment and Monitoring Guide</li> <li>b. Determine appropriate Subrecipient Monitoring Activities</li> <li>c. Identify any specific subaward conditions to be included in the subagreement pursuant to OMB Guidance</li> <li>d. If risk areas of related to Intellectual Property, request review and input from the Office of Technology Transfer on strategies / terms and conditions to manage this risk</li> <li>e. For other complicated risk areas, request review and input from the Office of University Counsel, specifically as it relates to drafting terms and conditions to be included in the subaward in to manage risk.</li> </ol>	<p>OSP – Contracts</p> <p>In cooperation with, if necessary:</p> <p>OTT</p> <p>OUC</p> <p>PI/Department</p> <p>Controller</p>	<p>Subrecipient Risk Assessment and Monitoring Guide</p>
<p>5. Notify the PI via email if the subrecipient is deemed <i>More than Normal Risk</i></p> <ol style="list-style-type: none"> <li>a. Communicate the identified Subrecipient Monitoring Activities</li> <li>b. Confirm the PI is willing to accept the risk and perform escalated Subrecipient Monitoring Activities</li> <li>c. Include Associate Dean for Research and Chief Business Officer for the School or College if escalation is required</li> <li>d. Save all records of the communication to the associated RAMP agreements record</li> </ol>	<p>OSP – Contracts</p>	<p>Subaward Procedures Checklist</p>
<p>6. Document the results of the Subrecipient Risk Assessment by:</p> <ol style="list-style-type: none"> <li>a. Completing the Subrecipient Risk Assessment Tool</li> </ol>	<p>OSP - Contracts</p>	<p>Subaward Procedures Checklist</p>

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<ul style="list-style-type: none"> <li>b. Save completed documentation and associated communications to the RAMP agreements record</li> </ul>		
<p>7. Draft subaward to incorporate the following:</p> <ul style="list-style-type: none"> <li>• Details about the prime funding source, including for federal awards: Catalog of Federal Domestic Assistance (CFDA) title and number, award name, award date, award number and prime sponsor name</li> <li>• All applicable provisions from the prime award</li> <li>• Specific conditions that address risk mitigation strategies identified during the review process</li> <li>• Requirements that those subrecipients subject to OMB Uniform Guidance Subpart F comply with all requirements and disclose any audit findings and corrective action plans related to their Mason subaward</li> <li>• Financial and reporting terms and conditions including a requirement for the subrecipient's fiscal agent to certify invoices</li> <li>• Requirement to allow access to financial and technical records, as needed</li> <li>• Appropriate terms and conditions concerning closeout of the subagreement</li> <li>• Appropriate terms and conditions concerning Subrecipient Monitoring Activities for more than minimal risk subrecipients, as necessary</li> </ul>	OSP - Contracts	<p>Subaward Procedures Checklist</p> <p>Mason Subaward Templates</p>
<p>8. Include an invoice template requiring the following be included on any subaward invoices:</p> <ul style="list-style-type: none"> <li>• Project Name</li> <li>• Mason Encumbrance Number</li> <li>• Approved Budget</li> <li>• Current Period Expenditures</li> <li>• Total Expenditures to Date</li> <li>• Remaining Balance</li> <li>• Fiscal Agent Certification <ul style="list-style-type: none"> <li>○ As stated in CFR § 200.415: The annual and final fiscal reports or vouchers requesting payment under the agreements must include a certification, signed by an official who is authorized to legally bind the non-Federal entity, which reads as follows: <i>“By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the</i></li> </ul> </li> </ul>	OSP - Contracts	<p>Subaward Procedures Checklist</p> <p>Mason Subaward Invoice Template</p>

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<p><i>omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812)."</i></p>		
<p>9. Obtain approval and execution of the subaward.</p> <ul style="list-style-type: none"> <li>a. If subaward is greater than \$3 million, prepare cover memo for the Vice President for Fiscal Services.</li> <li>b. If subaward is greater than \$8 million, prepare cover memo for the Senior Vice President for Administration and Finance.</li> <li>c. Send .pdf package with VPFS or SVP cover letter on top to AVP, Research Services and VPR to obtain AVP Research Services' signature on the cover memo.</li> <li>d. Send subaward package with signed cover memo to the VPFS or SVP, as appropriate, for their signature.</li> <li>e. Return fully executed award to subrecipient.</li> <li>f. Upload the fully executed subaward and completed Subaward Procedures checklist in RAMP and activate to ensure it is received by the OSP Subcontracts Administrator.</li> </ul>	OSP - Contracts	Subaward Procedures Checklist
<p>10. If the subaward falls within the FFATA requirements, submit FFATA report within specified timeframe.</p> <ul style="list-style-type: none"> <li>a. Utilize the information provided in the Subcommitment Form to upload the information into the FSRS website.</li> <li>b. Print report and save documentation to RAMP record.</li> </ul>	OSP - Contracts	Subaward Procedures Checklist
<p>11. Upon full execution, complete set-up of subaward</p> <ul style="list-style-type: none"> <li>a. Obtain signed subaward from the Contract Administrator</li> <li>b. Submit W-9 to AP for vendor create and/or look up G number in FTIIDEN</li> <li>c. Enter Subaward information in FGAENCB</li> <li>d. Create subaward electronic invoicing ledger documenting invoicing terms, any special conditions or restrictions, subaward POP &amp; prime award POP</li> <li>e. Send copies of foreign subaward to International Tax Manager</li> <li>f. Upload final copy of subaward to RAMP subawards tab on the award record</li> <li>g. Add subaward to tracking log, Include details on tracking of risk level and atypical monitoring requirements. Add to cost share log if applicable.</li> </ul>	OSP – Subaward Administrator	Subaward Procedures Checklist

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12. Communicate the completed subaward execution <ol style="list-style-type: none"> <li>a. Specifically alert the PI and Department Administrator of atypical monitoring requirements assigned to the PI as well as documentation requirements</li> </ol>	OSP - Contracts	Communication Template
13. Repeat steps above for each annual increment / amendment for each subaward	OSP - Contracts	
<b>Subaward Invoice Review and Payment</b>		
1. Receive invoices submitted to Mason and route to required approvers (initially OSP) via Banner Workflow system.	Accounts Payable	
2. Review and approve the subaward invoice in Banner Workflow within 3 business days <ol style="list-style-type: none"> <li>a. Verify billing period is within the period of performance and there is no overlap with previous invoices, there is sufficient balance remaining, the invoice is consistent with the payment schedule if applicable, and certification statement and other required invoice elements are present.</li> <li>b. If there are specific restrictions (i.e. F&amp;A not allowed or equipment not allowed) Subaward Administrator will note on the ledger at the time of subaward set up and check the invoices for those costs. Subaward Administrator will also review for overtime or unallowable fees.</li> <li>c. If additional supporting documentation is required as a Subrecipient Monitoring Activity, review back-up documentation for allowability within the terms and conditions of the subaward and reconcile to the invoice</li> <li>d. If unallowable costs / concerns are identified, Subaward Administrator will follow up with subrecipient or PI as appropriate to request clarification or additional information.</li> </ol>	OSP – Subaward Administrator	
3. Route the subaward invoice to the PI via Banner Workflow for review and approval within 3 business days.	OSP – Subaward Administrator	
4. Review and approve the subaward invoice via Banner Workflow within two business days. The system will send overdue reminders if a transaction has been waiting for more than 3 business days. <ol style="list-style-type: none"> <li>a. Verify cost categories / amounts for allowability within the terms and conditions of the subaward and SOW</li> </ol>	PI & Department Administrator	

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<ul style="list-style-type: none"> <li>b. Verify that invoice amount and expense categories are consistent with technical progress</li> <li>c. If unallowable costs / concerns are identified, PI should return the invoice to OSP through workflow with comments. The Subaward Administrator will follow up with subrecipient to request clarification or additional information. Note: issues must be resolved prior to invoice payment.</li> </ul>		
<p>5. Upon invoice approval, issue payments to subrecipient (no more than 30 days following invoice receipt by Mason)</p>	Accounts Payable	
<b>Ongoing Subrecipient Monitoring Activities</b>		
<p>1. Execute Subrecipient Monitoring Activities as communicated upon execution of the subaward</p> <ul style="list-style-type: none"> <li>a. Retain documentation of monitoring activities, including communications, formal and informal technical reports, etc.</li> <li>b. Consider using optional templates and tools to document Subrecipient Monitoring Activities</li> <li>c. If concerns are identified, communicate with GMU OSP and/or subrecipient PI as applicable for follow up and resolution</li> </ul>	PI	Technical Progress Documentation
<p>2. Monitor active subawards for invoicing compliance. Follow up with subrecipients that are not invoicing regularly or in accordance with the terms and conditions of the subaward agreement.</p>	OSP-Subaward Administrator	Microstrategy Report
<p>3. Review active subawards approaching the end of the subaward period of performance. Send a reminder to the subrecipient 30 days prior to the end date notifying them of the final invoice due date.</p>	OSP-Subaward Administrator	Subaward Tracking Spreadsheet
<p>4. Review active subrecipient audit reports annually for identification of any findings pertaining to any subawards issued by GMU. Subaward Administrator will promptly escalate any identified findings to the Manager of the Reporting &amp; Billing Team &amp; Director, Post Award Administration for review and issuance of a management decision on audit findings within 6 months after receipt of the subrecipient's audit report.</p>	OSP-Subaward Administrator	2 CFR § 200.332 - Requirements for pass-through entities
<b>Auditing Subrecipient Monitoring Activities</b>		
<p>1. On a monthly basis, select a sample of Mason subaward invoices for review</p> <ul style="list-style-type: none"> <li>a. Request back up documentation from subrecipients supporting costs for selected invoices.</li> </ul>	OSP-Subaward Administrator	

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<ul style="list-style-type: none"> <li>b. Send PI copies of all documentation provided by subrecipient with Post Audit Review Checklist, PIs will review all information and complete the checklist and return to OSP as soon as possible to confirm invoice was adequately reviewed and regular subrecipient monitoring is taking place.</li> <li>c. Requests will be elevated to the Dean's office if the PI is not responsive.</li> <li>d. Document the results of the review by updating the subrecipient post audit review log on the shared drive and uploading the signed review form and related documentation on the subaward tab in RAMP.</li> </ul>		
<ul style="list-style-type: none"> <li>2. If gaps are identified between the designated Subrecipient Monitoring Activities and the provided documentation, escalate to the Director, Post Award to take appropriate follow-up steps: <ul style="list-style-type: none"> <li>a. Additional training, tools, and resources for PI / Dept Admins</li> <li>b. Escalated notification to the dean's office</li> </ul> </li> </ul>	OSP-Subaward Administrator	
<b>Subaward Closeout</b>		
<ul style="list-style-type: none"> <li>1. Complete technical work and programmatic closeout <ul style="list-style-type: none"> <li>a. Confirm pending project end date to subrecipient</li> <li>b. Verify subrecipient has provided all required programmatic deliverables per the SOW, including final technical reports, prior to approving the final invoice for payment</li> <li>c. Remind subrecipient that a final invoice is due on or before the 60th day after the subaward period</li> </ul> </li> </ul>	PI / Department Administrator	
<ul style="list-style-type: none"> <li>2. Complete financial closeout <ul style="list-style-type: none"> <li>a. As part of final financial reconciliation for the subaward, verify Final Invoice is received / paid. Subaward closeout documents (subrecipient release form) must be submitted with the final invoice (unless the agreement specifies otherwise). Payment of the final invoice will be withheld until closeout documents are received. Subaward Administrator will follow up with the subrecipient if the final invoice is received without the required release form.</li> <li>b. After receipt of subrecipient release form process journal voucher in FGAVCD to close subcontract encumbrance and liquidate any unobligated balances on the subaward.</li> <li>c. Update the subaward tracking log to reflect updated subaward status.</li> </ul> </li> </ul>	OSP-Subaward Administrator	

