

Policy: Subrecipient Monitoring Policy

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I. Policy

To ensure compliance with OMB Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), each subrecipient of federal flow through funds, or other funding sources requiring adherence to the requirements of 2 CFR 200.331, will be assessed for programmatic, financial, and administrative suitability.

The Office of Grant and Contract Services will obtain the Single Audit Form or similar information from the FDP clearinghouse website for each year in which the subaward is active. OGCS will evaluate the subrecipient audit findings and take any necessary precautions or incorporate additional monitoring with the Subrecipient.

II. Definitions

Per 2 CFR 200:

"§ 200.93 Subrecipient. Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency."

"§ 200.330(a) Subrecipients. A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. See § 200.92 Subaward. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

1. Determines who is eligible to receive what Federal assistance;

2. Has its performance measured in relation to whether objectives of a Federal program were met;
3. Has responsibility for programmatic decision making;
4. Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
5. 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."

III. Relevant Federal and State Statutes

[2 CFR 200 - UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS](#)

IV. Relevant UT Arlington Policies, Procedures and Forms

Subrecipient Monitoring Procedure
UTA Subrecipient Commitment Form
UTA Single Audit Certification Form

V. Who Should Know

Principal Investigators
Office of Grant and Contract Services Staff

VII. UT Arlington Office(s) Responsible for Policy

Office of Grant and Contract Services

VIII. Dates Approved or Amended

August 19, 2016
February 20, 2020

IX. Contact Information

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