



# The College of *St. Scholastica*

## Federal Grant Subaward Procedure

### I. Purpose/Relevant Policy

This procedure is set forth by the Federal Grant Subaward Policy.

### II. Procedure

#### Minimum Subaward Standards

To be eligible for a subaward through CSS, the potential subrecipient:

- Must be a U.S.-based non-profit organization
- Must have been in operation a minimum of 3 years
- Must provide all information required per the Subrecipient Commitment Form
- Must not be suspended or debarred
- Must not be presently indicted or otherwise criminally or civilly charged by a government entity
- Must not within three (3) years preceding, been convicted of or had a civil judgment rendered against it for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, state, or local) contract or subcontract; violation of Federal or state antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, or making false statements or receiving stolen property.

To mitigate CSS risk, the potential subaward budget:

- Must not exceed 50% of the prime award budget.
- Must not exceed \$500,000 in total.

#### Compliance and Risk Analysis

- Foundation & Government Resources (FGR) Staff will provide the CSS Principal Investigator or Project Director (PI/PD) with a copy of all subaward-related policy, procedure, and forms whenever there is consideration of a subaward.
- Approval of a potential subaward will be documented via the **Subaward Approval Checklist**, initiated by the CSS PI/PD and then routed to FGR and Finance.
- Potential subrecipients will complete the **Subaward Commitment Form** and provide all applicable and required attachments.

- The Associate Director of Foundation and Government Resources and another member of FGR staff will; review the Subaward Commitment form and related attachments to conduct a risk assessment and ensure compliance with the Federal Grant Subaward Policy and this procedure. This must occur prior to submission of a proposal containing a subaward or initiation of an agency-approved post-award subaward.
- FGR staff will recommend a risk classification for the subrecipient based on the **Subaward Evaluation Matrix**.
- The CSS Executive Director of Finance / CFO will review and approve all proposed subawards and determine the final risk classification of the proposed subrecipient.

## **Subaward Initiation**

- Upon receipt of the Prime Award, a member of FGR staff will create a Subaward Agreement based on the CSS template including appropriate terms and conditions in accordance with the subrecipient risk classification and the **Subaward Risk Evaluation Matrix**.
- The Subaward Agreement will include all information required in 2 CFR 200.332. All subaward agreements will contain termination provisions including but not limited to: non-performance or non-compliance.
- The contents of all agreements will be reviewed and approved by the Associate Director of Foundation and Government Resources, PI/PD and the Executive Director of Finance.
- The subaward agreement will be completed by College staff and sent to the sub-recipient within 30 days of the notice of the Prime Award if approved prior to proposal submission, or completion of the **Subaward Approval Checklist** if approved after proposal submission.
- No funds will be paid to the subrecipient until the subaward agreement is fully executed. The subaward agreement will be maintained in Foundation and Government Resources records.
- An authorized representative of the subrecipient organization must sign the agreement.
- Following partial execution by the subrecipient the PI/PD, the CSS Executive Director of Finance / CFO, and the President or their designated signatories, will sign the subaward agreement.

## **FFATA Reporting**

Once the subaward agreement is fully executed, FGR Staff will complete required reporting under the Federal Funding Accountability and Transparency Act via FSRS.gov.

## **Subrecipient Monitoring**

### **Roles and responsibilities**

- PI/PDs are responsible for monitoring the progress and compliance of the subrecipient. This includes:
  - Ensuring all invoiced expenses are allowable, reasonable, necessary, and supported by appropriate documentation in accordance with the Subaward Agreement.

- Approving satisfactory invoices by signature or via email in a timely manner.
- Requesting additional documentation for unclear or questionable expenses.
- Monitoring, reviewing, and approving the required project deliverables as listed in the Subaward Agreement.
- Approving changes in the Statement of Work or Subrecipient Budget as required in the Subaward Agreement.
- Providing programmatic technical assistance.
- Maintaining regular contact with the subrecipient PI/PD.
- Keeping all subrecipient reports and deliverables on file.
- The Associate Director of Foundation and Government Resources is responsible for financial and compliance oversight of the subrecipient. This includes:
  - Verifying all invoiced expenses are allowable, reasonable, necessary, and supported by appropriate documentation in accordance with the Subaward Agreement.
  - Providing financial technical assistance.
  - Monitoring subrecipient expenditures in comparison with the approved budget.
  - Initiating site visits in accordance with the Subaward Agreement
  - Verifying that the subrecipient is audited as required by 2 CFR 200 Subpart F.
  - Reviewing any subrecipient audit findings on an annual basis and adjust monitoring efforts as needed.
  - Utilizing the monitoring tools outlined in 2 CFR 200.332 as deemed necessary to ensure financial compliance and accountability.
  - Initiating enforcement action against noncompliant subrecipients as described in 2 CFR 200.338.
- FGR Staff are responsible for administrative support. This includes:
  - Issuing subaward modifications as needed, according to the process specified in the Subaward Initiation section of this procedure.

## **Closeout**

- Upon completion of the Subaward Closeout Checklist, FGR staff will draft a Closeout Letter specifying:
  - the subaward termination date,
  - the exact amount of the final invoice, and
  - the total amount expended over the course of the subaward.
- The PI/PD and the CSS Executive Director of Finance / CFO or their designated signatories must sign this letter.
- The letter must be sent to the subrecipient within 90 days of the end of the subaward period.