



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 Senior Grants Analyst and a 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 Senior Grants analyst, PI/PD and the Assistant Director, 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 Senior Grants Analyst 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.