



Policy Name	Subrecipient Monitoring
Policy Number	12000.017
Effective Date	March 12, 2025
Administrative Division	Division of Research and Economic Development
Unit	Division of Research and Economic Development
Revised Date	Not Applicable

## 1.0 Policy Statement

Jackson State University is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure compliance with federal, state and University regulations. The following policy applies to all subawards issued under sponsored programs made to Jackson State University without regard to the primary source of funding. Failure to adequately monitor the compliance of subrecipients could result in damage to the University and jeopardize current and future funding. All Principal Investigators (PIs) and administrators at Jackson State University within all schools, units, divisions, University-wide initiatives, and centers, who are involved with the administration and conduct of sponsored awards that issue and manage subawards must comply with this policy.

## 2.0 Purpose

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically [§200.331](#), requires pass-through entities to evaluate each subrecipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance. It is the responsibility of Jackson State University as the pass-through entity, to ensure the good stewardship of sponsored funding. All funds assigned to subrecipient organizations should receive the same diligence as sponsored funds that remain at the University.

## 3.1 Definitions

- 3.2 Pass-through entity – Non-federal entity that provides a federal award to a subrecipient to carry out a federal program; sometimes referred to as the "prime" or "lead" organization.
- 3.3 Sponsored award – Funding arrangement in which the University is providing a return benefit to, or agrees to provide a defined deliverable or complete a set of activities for, the sponsor in exchange for the funds, regardless of whether the funding instrument is designated a contract, cooperative agreement, grant, consortium agreement, or otherwise.
- 3.4 Subaward – Enforceable agreement, issued under a prime sponsored project, between a pass-through entity and a subrecipient for the performance of a substantive portion of the program; these terms do NOT apply to the procurement of goods or services from a contractor (vendor).
- 3.5 Subrecipient Database – A database managed by Unit of Sponsored Programs of all the University's Subrecipient organizations.

- 3.6 Subrecipient - subrecipient is an entity outside JSU who will help carry out a portion of a federal award and adhere to programmatic decision-making, performance objectives, and compliance requirements. This relationship implies that the subrecipient is an integral part of the project and accepts responsibility for a portion of the project effort. Subrecipients are usually in the original proposal as collaborating institutions.
- 3.7 Contractor - an individual or entity outside JSU who possesses specialized expertise, engaged to give professional advice, make recommendations, or address a specific problem. They provide goods and services within normal business operations and have little or no responsibility for overall project effort and are usually retained on a short-term basis.

#### 4.1 Additional Information

- 4.2 PIs are responsible for:
- Submitting request for a preliminary review of the subrecipient organization at the proposal stage to the Unit of Sponsored Programs (USP), if necessary.
  - Confirming the statement of work and reviewing any non-standard terms and conditions of the subaward during the subaward agreement negotiation process.
  - Monitoring programmatic progress and ability of the subrecipient to meet objectives of the subaward.
  - Reviewing and approving subrecipient invoices ensuring that costs are allocable and allowable.
  - Keeping detailed records of communication regarding satisfactory and unsatisfactory performance by the subrecipient.
  - Ensuring that subrecipients provide RCR training as required by Federal regulations and University policy.
- 4.3 Unit of Sponsored Programs and Grants and Contracts are jointly responsible for:
- Assessing subrecipients to determine the level of monitoring that should be performed in order to ensure compliance with federal program laws and regulations.
  - Secondary review of the subrecipient risk assessment checklist will be completed prior to issuing a subaward.
  - Completing the checklist and ensuring subrecipient vs. contractor determination has been completed per the Subrecipient Monitoring Procedures.
  - Incorporating additional terms into subawards based on information from the PI and the risk assessment of the subrecipient organization.
  - Notifying PIs when issues are identified with a subrecipient organization at the proposal stage or during the performance period.
  - Conducting annual assessments on active subrecipient organizations.
  - Providing training and technical assistance to its subrecipients on program related matters if needed.
  - Ensuring that subrecipients meet the audit requirements of Single Audit.
  - Reviewing Single Audit reports for subrecipients expending \$750,000 or more.
  - Developing and maintaining a subrecipient database.
- 4.4 The University may perform on-site reviews of subrecipients' program operations if deemed necessary.


## 5.0 Employee Adherence

Employees are required to adhere to these guidelines. Willful disregard of this policy shall be considered non-compliance and may result in a formal reprimand up to and including termination. The information stated in this policy pertains and applies to applicable employees, departments and funding sources of the University.

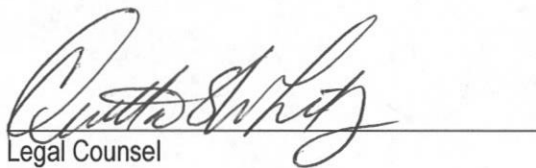


Certification of Policy Approval

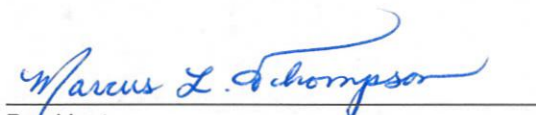
This policy is hereby approved as the University official policy on the subject of Accounting for Federal Allowable Cost and should be used as the appropriate source of guidance and adherence of this subject. All previous policies on this subject are rescinded.

  
Department Head

3.12.2025  
Date

  
Legal Counsel

3/12/2025  
Date

  
President

3/12/2025  
Date