



Subrecipient Monitoring Roles & Responsibilities

Principal Investigator (PI)

- ❖ **Initiates Subrecipient process at proposal stage by ensuring that the Subrecipient is identified in the proposal and all required information and documentation pertaining to the Subrecipient effort is provided at the proposal stage. This includes but is not limited to a specific scope of work, budget, budget justification, identification of compliance matters (Human Subjects, Animals, Select Agents, Export Controls, Conflict of Interest, etc.)**
- ❖ **Review of Subrecipient technical performance reports**
 - Maintain communications with the Subrecipient PI/PD and technical team from proposal stage to award closeout sufficient to assess the quantity and quality of work being performed
 - **Address performance issues as they occur**
- ❖ **Receive, review and approve Subrecipient invoices (in coordination with Business Manager)**
 - Sign that invoiced amounts are consistent with the amount and type of work performed to date to ensure the invoice is paid within 30 calendar days after receipt of proper billing
 - Pursue clarification of expenses that appear inappropriate (in coordination with Business Manager)
- ❖ **Notify SAM of changes to the scope-of-work, budget, or period of performance**
- ❖ **Monitor Subrecipient technical progress and performance; Notify SAM if Subrecipient does not provide timely or adequate technical reports, invoices, or other requested information**

Business Manager/Department Administrator

- ❖ **Work with the PI to review invoices to ensure the invoice is paid within 30 calendar days after receipt of proper billing**
 - Review of invoices and comparison of invoices to established Subaward budgets
 - Work with Subrecipient to clarify any charges which appear to be unallowable, un-allocable, unusual, or excessive
 - After PI has signed the invoice, submit to Contract and Grant Accounting for payment
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- ❖ **Assist PI with Subrecipient monitoring tasks and ensuring that Subrecipient effort is in compliance with the subaward terms and conditions (as well as prime if applicable)**
- ❖ **Support PI in obtaining, preparing and providing all necessary documentation and materials to Sponsored Awards Management to ensure that the Subrecipient award is processed efficiently.**

Sponsored Awards Management (SAM)

- ❖ **Make vendor-subaward determination**
- ❖ **Issue, negotiate, amend, and sign Subawards on behalf of USC**
- ❖ **Verify that all Subrecipient compliance documentation and processes are adequately addressed**
- ❖ **Coordinate the management of Subawards on behalf of USC and advise others regarding the fulfillment of their Subaward management responsibilities**
- ❖ **Advise the Principal Investigator of all Subaward issues or deficiencies that present a compliance risk USC or a risk to their respective reputations and continuing ability to receive external support**



- ❖ **Certify eligibility of subrecipient with SAM.gov**
- ❖ **Verify that Subrecipient proposals and Subaward documents have the proper approvals by authorized officials at the Subrecipient's organization**
- ❖ **Advise the Office of Research Compliance regarding any apparent conflicts of interest**

Contract and Grant Accounting (CGA)

- ❖ **Financial reporting, Award Closeout and Audit and site review assistance**
- ❖ **Fiscal compliance oversight portion of the subrecipient monitoring function**
- ❖ **Process invoices for payment to ensure the invoice is paid within 30 calendar days after receipt of proper billing**