



Subrecipient Monitoring Procedure (Updated 9-19-2025)

CSUB has implemented the following subrecipient monitoring process. Please note that this process encompasses assistance from both the Preaward and Postaward offices, in cooperation with the Principal Investigator/Project Director (PI/PD).

1. Proposal Preparation

At time of proposal preparation, a Subrecipient Commitment Form will be provided to and completed by the selected subrecipients to be included in the proposal. Return of the completed and signed Subrecipient Commitment form including any requested documents which may include any or all of the following: Scope of Work, Detailed Budget, Budget Justification, Biosketch, or Letter of Intent, is reviewed for completeness by the Senior Grants Analyst and is then maintained in the Proposal Submission electronic folder pending award notification. Completed Subrecipient Commitment forms are required before submission of the proposal. Any exception to this process must be approved by the Director of Sponsored Programs Development.

2. Notification of Award received

Upon notification of an award, the Senior Grants Analyst will review and complete the Risk Analysis Worksheet (Appendix B) to determine necessary monitoring steps based on assessed risk. If award notification is >12mos, a new subrecipient commitment form is requested of the subrecipient before the subaward is issued. If significant risk is determined [risk score 76-99], the Senior Grants Analyst will elevate the analysis to the Associate Vice President for GRaSP for review and determination. Upon review, if Associate Vice President for GRaSP agrees there is potential significant risk, the Principal Investigator/Project Director (PI/PD) will be notified to discuss options and potential necessary future monitoring. Both the Subrecipient Commitment Form and the Risk Assessment will be maintained in the subaward file and a copy will be provided to Postaward.

3. Annual renewal of Subawards

Each year, before the next installment of a subaward is issued, a new subrecipient commitment form will be requested. After receipt of the new subrecipient commitment form, the Senior Grant Analyst reviews for any potential changes such as audit issues, debarment concerns, etc. that would then trigger the need to perform a new Risk Analysis Worksheet. If risks are identified, see Step 2 for escalation process. If no significant changes are detected, then amendment is provided to subrecipient. New subrecipient commitment form is maintained in the subaward file and a copy will be provided to Postaward.



4. Postaward responsibilities in Subrecipient Monitoring

A copy of the fully executed subaward is provided to Postaward Analyst who has oversight of the primary award. Postaward Analyst then monitors the invoicing ensuring compliance with the approved budget. If issues are detected regarding expenditures or the lack of consistent invoicing, the Postaward Analyst alerts the Lead Postaward Analyst and the PI/PD.

5. PI/PD responsibilities in Subrecipient Monitoring

If notified by the Postaward Analyst that there are concerns regarding expenses or inconsistent invoicing, the PI/PD may reach out to the subrecipient to discuss concerns and need for adherence and compliance with budget and invoicing requirements. If Subrecipient does not correct the inefficiencies, a meeting can be called to include the PI/PD, the Postaward Analyst, the Postaward Lead Analyst, the Director of Sponsored Programs Development, and in some instances, the Senior Grants and Contracts Analyst and/or Associate Vice President of GRaSP to discuss appropriate actions to correct the situation. Actions can include (1) meeting to include representative of subrecipient Grants Office (2) joint meeting of Subrecipient Grants Office representative, subrecipient PI, CSUB PI, Postaward Analyst, Postaward Lead Analyst to discuss potential oversight and solutions to bring subrecipient back into compliance. (3) If it is determined that subrecipient exhibits material failures in their accounting and/or reporting processes that cannot, or is not corrected, then discussion becomes one of whether termination of the subrecipient is warranted.

6. Entities not subject to A133 type annual audits

In the event of a subaward issued to an entity (typically a private for profit or non profit company) then a Mini Audit Questionnaire (Appendix C) is sent to the subrecipient to be completed requesting a copy of their financial report or a link to it electronically. Once the mini audit questionnaire is received, the financial report is reviewed to ensure there are no audit concerns indicated. If none identified, the Mini Audit questionnaire along with the financial report is filed in the subrecipient file. This process is done on an annual basis. If any concerns are reported, then this is elevated to the Preaward Director of Sponsored Programs Development and PI/PD for discussion of potential monitoring that might be necessary until such time as the subrecipient presents a clear financial report.

7. Entities subject to A133 type annual audits

For those institutions subject to the A133 type annual audits, monitoring is done by the Senior Grants and Contracts Analyst on an annual basis at time for renewal of subaward thru one of the following steps: (1) A check of subrecipient website, (2) a check of the Federal Audit Clearinghouse (FAC) via the following link: <https://www.fac.gov/welcome/>



The Federal Audit Clearinghouse (FAC) is the place to submit federal grant audits. Entities that spend federal grant funds are required to submit an audit if they meet the following spending thresholds:

- \$750,000 or more for Fiscal Years starting before October 1, 2024
- \$1,000,000 or more for Fiscal Years starting on or after October 1, 2024