

# **Brigham Young University**

## **Subrecipient Monitoring Procedure**

Brigham Young University is responsible for ensuring that Federal funds passed through BYU to other entities are spent in accordance with all applicable laws and regulations.

### **Office of Research and Creative Activities (ORCA) responsibilities:**

The ORCA office informs subrecipients of all applicable federal laws and regulations and all flow-down provisions from the prime agreement when the subaward is issued. The Subrecipient Commitment Form is sent to subrecipients to verify certifications and required disclosures.

Prior to the issuance of the subaward, ORCA checks to ensure that the subawardee is not debarred or suspended from receiving federal grant or contract funds.

### **Principal Investigator (PI) responsibilities:**

The PI has the primary responsibility to monitor subrecipients so there is reasonable assurance that the subrecipient uses the award for authorized purposes. The PI also helps ensure that the subawardee complies with the provisions of the grant or contract agreement, and achieves its performance goals.

The PI reviews each subrecipient invoice and determines that invoiced amounts are reasonable and that progress on the subaward is satisfactory and in keeping with the statement of work. The PI is also in regular contact with the subrecipient to discuss technical progress and receive and review required reports.

### **Grants & Contracts Accounting (GCA) responsibilities:**

GCA personnel review each invoice to ensure that the billing period is within the time frame allowed by the subaward. They also review amounts invoiced and ensure that those amounts are within budget. After obtaining PI approval on an invoice, GCA submits the invoice for payment.

Annual OMB Uniform Guidance audit certifications are obtained by GCA from each subawardee that is required to have the audit. For those entities not subject to Uniform Guidance audit requirements, other procedures are taken to review their financial information. This is done to ensure compliance and check for findings associated with federal pass-through funds from Brigham Young University. If findings are present, appropriate follow-up actions are taken.