WSU Sub-Recipient Monitoring Plan

Department Responsibilities:

Pre-Award

1. Obtains letter of commitment/support from authorized institutional official. Ask for DUNS, EIN, indirect cost rate agreement (or URL), and certified document showing subrecipient is in proper financial standing to receive WSU funds. Obtain statement of work, budget and budget justification. Request other documents specific to proposal, if needed.
2. Reviews sub proposal/budget breakdown for reasonableness of hours/costs, indirect rate issues, and any other irregularities in the sub proposal.
3. Prepares sub-award initiation form and submits it to OGRD.

Post-Award

1. Watches for account set-up in database and check for proper allocation.
2. Reviews invoice for allowability/allocability/reasonableness and timeliness, ensuring that:
   a. Invoice time frame is identified.
   b. Invoice amount is clearly identified.
   c. Expenses are within the sub-award performance period.
   d. All addition is correct.
   e. Expenses are itemized according to sub-award budget, within allowed deviations.
   f. All required deliverables/reports have been received (technical reports, property reports, invention reports, etc...)
3. Forwards copy of property, invention and cost-share reports to SPS.
4. Ensures there is enough funding to pay the invoice.
5. Approves payments or addresses question/comments and concerns that might arise.
6. Codes invoices by object, initials and sends back to SPS for payment.
7. Reviews technical/progress reports to ensure making progress/meeting milestone/reporting requirements.
8. Requests additional supporting documentation on questioned costs.
10. Assist in the process of Desk Reviews and Site Visits as needed.
OGRD Responsibilities:

After Sub-recipient is identified (thru subcontract initiation form):

1. Check Visual Compliance Database (EPLS).
2. Check for DUNS # and CCR and completion attachment, as applicable.
3. Check for E-Verify, FFATA, ARRA, FCOI, A-133, etc. applicability.
4. Check that sub-award is within scope, within dates and that allocation has been set aside.
5. Send A-133 letter with sub-award for signature, as applicable.
7. If needed, do risk assessment for post-award monitoring.
8. Acts as advocate for PI and University in sub-agreement issues.

SPS Responsibilities:

After sub-award is signed and sub-award received at SPS:

1. Review sub-award agreement and translate into computer systems.
2. Review sub-award to ensure that all documents are completed.
3. Annually request and review the subcontractor’s most current audit and document.
4. Complete risk assessment form, if necessary based upon latest audit report.
5. Alert all parties if the audit review demonstrates a concern for WSU.
6. Monitor that sub-awardees return their audit results and take appropriate action to any issues timely. (such as, possibly withholding payments until issue is resolved)
8. Assist with desk review and site visits if needed.