

KSU Sponsored Programs Subrecipient Monitoring Policy

Subrecipients subject to Single Audit (2 CFR 200, Subpart F):

- Prime awards and their supplemental requirements are identified in Subaward Agreements. Access to records is required through the Subaward Agreement.
- The subrecipient will be notified if there is any delinquent Single audit information from previous subawards which would suspend payments on the current subaward. Upon receipt of delinquent Single audit information, payments will be released.
- During the subaward, each invoice will be reviewed for accuracy and allowability according to award requirements.
- SPA will request interim financial reports as necessary (i.e. invention, equipment, MBE/WBE, etc as required by prime award).
- Single audit information will be requested/reviewed annually, 9-12 months following the end of the 06/xx fiscal year. Payments will be withheld from subrecipients who have not submitted the required audit information by 06/xx of the year following the audited fiscal year. For example, payments will be withheld for subrecipients who have not submitted their audit for fiscal year ending June 30, 2014 by June 30, 2015. Audit due dates will be adjusted for those entities with alternative fiscal year end dates.
- The KSU PI will confirm the subrecipient met performance goals at the end of a subaward agreement via a certification statement to be attached to the final subaward payment. PI certification forms are available in Eforms.
- If audit findings affect funds awarded by KSU to the subrecipient, SPA will utilize whatever means are available to verify corrective actions have been taken by the subrecipient. If corrective actions are not taken by the subrecipient, KSU will determine appropriate responses at that time, which could include request for detailed records, site visits and repayment of funds.

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Subrecipients ***NOT*** subject to Single Audit (2 CFR 200, Subpart F):

- Defined as for-profit and those non-profit organizations not meeting the federal expenditure threshold of \$750,000 per annum. When the award is signed, a questionnaire will be sent to the subawardee requesting audit and F&A rate information. If the subawardee indicates they do not have an single audit or other similar audit conducted (similar audits must include review of internal controls and allowable costs, not just an audit of the entity's financial statements), subaward will be set up as a fixed price agreement with specific deliverables/milestones or *SPA personnel (Accountant III or higher) will review reimbursement invoices and will request more detailed supporting documentation (such as a detailed transaction listing), if necessary to determine allowable costs.*
- Prime awards and their supplemental requirements are identified in Subaward Agreements. Access to records is required through the Subaward Agreement.
- During the subaward, each invoice will be reviewed for accuracy and allowability according to award requirements.
- SPA will request interim financial reports as necessary (i.e. invention, equipment, MBE/WBE, etc as required by prime award).
- The KSU PI will confirm the subrecipient met performance goals at the end of a subaward agreement via a certification statement to be attached to the final subaward payment. PI certification forms are available in Eforms.
- If audit findings affect funds or awards received by the subrecipient from KSU, SPA will utilize whatever means are available to verify corrective actions have been taken by the subrecipient. If corrective actions are not taken by the subrecipient, KSU will determine appropriate responses at that time, which could include request for detailed records, site visits and repayment of funds.