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**UNIVERSITY OF MIAMI POLICY AND PROCEDURE MANUAL**

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|-----------|-----------------------------------|-------------|------------|
| TITLE:    | Subrecipient Monitoring Policy    | REFERENCE:  | New        |
| CATEGORY: | Office of Research Administration | PAGE:       | 1 of 2     |
|           |                                   | SUPERSEDES: | New        |
| APPROVER: | Barbara A. Cole                   | VERSION:    | New        |
|           | Associate Vice President          | EFFECTIVE:  | 03/31/2016 |
|           | Office of Research Administration |             |            |

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**PURPOSE:**

The purpose of this policy is to monitor our subrecipients in a manner consistent with requirements set forth in 2 CFR 200, Federal and State regulations, as well as agency specific guidelines. Failure to comply with UM's policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded clinical trials.

**SCOPE:**

All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers from around the world as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on restricted sponsored activities.

This policy applies to all UM personnel, namely:

- Faculty, including voluntary faculty.
- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

**POLICY:**

It is the policy of the University of Miami to comply with the Office of Management & Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR §200) (Uniform Guidance or UG), as well as State and other sponsor guidelines. These requirements span from proposal preparation to subaward development and execution through audit.

For Federal and Federal flow-through sponsored activities the Office of Research Administration (ORA) will:

- Make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor. UM must obtain the required data elements from each subrecipient. If UM anticipates engaging in a fixed amount subaward within the allowable thresholds, UM must specify this within the proposal in order to gain prior agency approval.
- Evaluate each subrecipient's risk of non-compliance with Federal statutes, regulations and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring. Where a subrecipient is determined to be a risk, UM will consider imposing specific subaward conditions upon the subrecipient as appropriate to mitigate risks. In addition, UM must monitor the activities of each subrecipient as necessary to ensure compliance with the statutes, regulations and terms, as well as to ensure performance goals are achieved. Depending upon the risk assessment, UM may choose to provide monitoring tools to ensure proper accountability and compliance with program requirements and achievement of performance goals.
- Verify that every subrecipient is audited when expenditures equal or exceed the threshold set forth in the UG. ORA will review audit results and consider whether on-site reviews or other monitoring indicate conditions that necessitate adjustments and/or further actions for subrecipients not following the sponsor guidelines.

For all other sponsors, UM will follow the subrecipient monitoring requirements of the sponsor.

#### **DEFINITIONS:**

Please refer to UM's ORA website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: <http://ora.miami.edu/assets/pdf/ora-policies/glossary.pdf>

#### **PROCEDURE:**

UM personnel are to use [UM's ORA website](#) for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on [UM's ORA Contacts Webpage](#).