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 ORSO.

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.
9. Document conversations / follow-up with the subcontractor.
10. Assist in the process of Desk Reviews and Site Visits as needed.

ORSO Responsibilities:

After Sub-recipient is identified (thru Subcontract Initiation form):

1. Check subrecipient organization and PI in the Visual Compliance Database, a web-based tool that WSU uses to conduct Restricted Party and Specially Designated Nationals Screening for debarment and/or suspension (we are prohibited from doing business of any kind with persons or entities on lists maintained against sanctioned individuals or entities).

2. Review either the [ORSO approved subrecipient website](#) or the department provided certified document showing subrecipient is in proper financial standing, to ensure WSU is comfortable initiating a subcontract with subrecipient organization.
3. Check for DUNS # and Sam.gov registration, as applicable.
4. Check for E-Verify, FFATA, ARRA, FCOI, A-133/single audit, etc. applicability.
5. Check that sub-award is within scope, within the appropriate date range and that allocation has been set aside.
6. Send Single Audit letter with sub-award for signature, as applicable (if Uniform Guidance related, this will be obtained from the Federal Audit Clearinghouse)
7. Check for Single Audit response for post-award monitoring, as applicable (see above).
8. Acts as advocate for PI and University in sub-agreement issues.
9. Maintain documentation.

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 obtain 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)
7. Process subcontract invoices for payment.
8. Assist with desk review and site visits if needed.
9. Maintain documentation.