BRYN MAWR COLLEGE: SUBRECIPIENT MONITORING POLICY

Bryn Mawr College (College) is responsible for ensuring that all sub-award agreements it issues comply with federal regulations. In so doing, the appropriate College faculty and staff must monitor the use of funds received and confirm their use in accordance with applicable laws, regulations, and the terms of the award. Prior to a sub-award agreement being issued by the College, a vendor and terrorist check, as well as a risk assessment of the sub-recipient must be done based on the Bryn Mawr College checklist. If neither are problematic, then a sub-award can be issued.

Any sub-award issued by the College on a federal grant must include all flow-down requirements necessary to ensure appropriate use of federal funds as well as flow-down requirements for sub-recip   -recipient permission to access its records and financial statements through the period of performance either via copies of sub-   site visits made by College employees.

Once the sub-award has been issued, the (Principal Investigator) PI is responsible for tracking and monitoring technical progress of the sub-recipient to ensure the efforts outlined in the sub-agreement scope of work are being met and reimbursements are being made in relation to technical progress. Technical reports can be requested as needed by the PI and should supplement informal communications. If there are specific deliverables or reporting requirements, the PI and Office of Sponsored Research (OSR) staff should include these in the sub-agreement. In some instances, a member of the Office of Sponsored Research (OSR) will make site visits to sub-business. Technical reports can be requested as needed by the PI and should supplement informal communications. If there are specific deliverables or reporting requirements, the PI and Office of Sponsored Research (OSR) staff should include these in the sub-agreement.

The PI is responsible for verifying all sub-   to submission to the OSR for payment processing and should not approve invoices if the appropriate technical progress has not been made. Once a year, the Senior Staff Accountant for the College will make a site visit to sub-recipient's place of business and review the appropriate financial processes for compliance with federal requirements. In addition, sub-recipients will be required to provide A-133 compliant certification for each year that the sub-award is active. Special attention should be given to purchases in excess of $3,000 and documents should be provided to show that the sub-recipient was in compliance with the price or rate quotation requirements as cited in Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200.317-326). Should instances of non-compliance be evident, either in programmatic expectations or financial activities, and negotiations to correct the issues prove unsuccessful, the College will suspend or terminate the sub-award.

All subrecipient invoices should include:

Project Name
BMC Project Number
Approved Budget lines
Current Period Expenditures by line item
Total Expenditures to Date
Balance due
Remaining Balance

Fiscal Agent Certification

Both the OSR and the PI perform a review of all subrecipient invoices prior to approval and payment. The process for invoice submission and approval is described below:
1.