

## **Subrecipient Agreements**

A subrecipient agreement is an agreement made by the Research Foundation for SUNY - University at Albany (UA), in which a defined portion of the UA work statement activity is carried out by a non-UA entity. The Office for Pre-Award and Compliance Services (PACS) must negotiate the subrecipient agreements in accordance with the prime agency's guidelines, standard business practices and, as appropriate, the Federal Acquisition Regulation. The agreement will outline the scope of work, budget, performance requirements, program authorizing legislation, Program Regulations, Title and Number, Award Name, Name of Agency, applicable compliance requirements, and a notification of annual risk assessment.

### **Subrecipient Monitoring**

Subrecipient monitoring begins before the agreement is executed. Before signing the agreement, PACS must verify that prospective subrecipients to a federal grant are not suspended, debarred, or otherwise excluded from federal contracts. To obtain this information, an EPLS (Excluded parties list System) search for each new contract and any additional amendments is done and a copy of the web search page is attached to the subrecipient file. A SAM (System Award Management) search is also conducted. The Uniform Guidance and OMB Circular A-133 entitled "Subrecipient Monitoring," provides the general standards for managing subawards. PACS is responsible for ensuring that subrecipients meet applicable audit requirements. Annually, PACS will review the Federal Audit Clearinghouse website for the previous fiscal year's audit information of all subrecipients, and ensure that corrective action is taken in instances of noncompliance with Federal laws and regulations. Other types of monitoring are done for each subrecipient according to the level of risk determined at the time an agreement is issued.

### **Principal Investigator Monitoring**

As the prime award recipient, the University at Albany assumes the ultimate responsibility for the conduct and completion of the project. However, the PI must review all invoices from the subcontractor/subrecipient to determine that the charges are appropriate and that the amount of effort and technical progress of the project is consistent with the amount being invoiced. The PI must also verify that the subrecipient has submitted all required reports and/or deliverables and that the subrecipient has made acceptable progress toward the objectives of the scope of work.

### **Amendments**

Any changes to a subrecipient agreement must be in the form of a written amendment to the agreement signed by both parties. The PI must send PACS a request to change any of the provisions in the agreement. The RA may also initiate the amendment process without a specific request from the PI, as in the case of authorizing the next budget period of the project. The PACS Research Administrator will initiate the amendment with the full knowledge of the PI then route it for review and signatures.

### **Early termination of agreement**

Should the PI determine that it is necessary to terminate a subrecipient agreement, he/she should contact PACS as soon as possible. PACS will forward a stop work order to the subrecipient in accordance with the agreement's termination clause, and will follow with a formal contract modification.

### **End of the agreement**

At the end of the indicated expiration date, the PACS administrator obtains final reports from the subrecipient institution such as, but not limited to, patent and invention reports, property reports, or other closeout reports as required. PACS will submit copies to the UA's primary sponsor as needed.