
1.0 Policy Statement

Jackson State University is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure compliance with federal, state and University regulations. The following policy applies to all subawards issued under sponsored programs made to Jackson State University without regard to the primary source of funding. Failure to adequately monitor the compliance of subrecipients could result

3.5 Subrecipient (subcontractor or subawardee) is a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program. Subrecipients are responsible for performing a substantive portion of the program, as opposed to providing goods and services.

4.0 Additional Information

4.1 PIs are responsible for :

- Submitting request for a preliminary review of the subrecipient organization at the proposal stage to the Unit of Sponsored Programs (USP), if necessary.
- Confirming the statement of work and reviewing any non-standard terms and conditions of the subaward during the subaward agreement negotiation process.
- Monitoring programmatic progress and ability of the subrecipient to meet objectives of the subaward.
- Reviewing and approving subrecipient invoices ensuring that costs are allocable and allowable.
- Keeping detailed records of communication regarding satisfactory and unsatisfactory performance by the subrecipient.
- Ensuring that subrecipients provide RCR training as required by Federal regulations and University policy.

4.2 Unit of Sponsored Programs and Grants and Contracts are jointly responsible for:

- Assessing subrecipients to determine the level of monitoring that should be performed in order to ensure compliance with federal program laws and regulations.
- Incorporating additional terms into subawards based on information from the PI and the risk assessment of the subrecipient organization.
- Notifying PIs when issues are identified with a subrecipient organization at the proposal stage or during the performance period.
- Conducting annual assessments on active subrecipient organizations.
- Providing training and technical assistance to its subrecipients on program related matters if needed.
- Ensuring that subrecipients meet the audit requirements of A-133.
- Reviewing A-133 reports for subrecipients expending \$750,000 or more.
- Developing and maintaining a subrecipient database.

4.3 The University may perform on-site reviews of subrecipients' program operations if deemed necessary.

5.0 Employee Adherence

Employees are required to adhere to these guidelines. Willful disregard of this policy shall be considered non-compliance and may result in a formal reprimand up to and including termination. The information stated in this policy pertains and applies to applicable employees, departments and funding sources of the University.