**Agency Questionnaire Responses**

Following are some of the responses agencies had to the questions below which were included in the questionnaire sent on May 18th, 2015:

**Has your agency evaluated risk of noncompliance for subrecipients with federal regulations and terms of awards in order to determine appropriate monitoring? If so, how is risk evaluated? How is this evaluation documented?**

* *Multiple steps are taken to mitigate the risk of noncompliance for subrecipients under federal awards. Steps include requiring annual program and fiscal monitoring for subrecipients. In addition, risk factors such as dollar volume and past performance are evaluated to determine the frequency of monitoring (documented annually in an Excel spreadsheet). Additionally, subrecipients’ monthly reports are reviewed and that information as well as other information factors into risk status. If a subrecipient is determined to be in high-risk status, more frequent monitoring, training, and interventions are completed.*
* *Subrecipients receiving federal education grants are monitored routinely on a three-year cycle. Additionally, risk for non-compliance is evaluated based on academic elements, numbers of programs, dollar amount of grants and various other factors, including those relating to grant management. Spreadsheets are being developed summarizing this data to identify subrecipients considered to be higher risk. Monitoring and technical assistance resources will be focused on those subrecipients.*
* *Subrecipients are identified at the proposal stage by the Office of PreAward Services and verified as not debarred/suspended from federal funding prior to submitting the proposal. Agreements with subrecipients require submission of audit reports during the agreement period. Interim and final payments will be withheld in the event the audit reports are not provided or other requirements are not met.*
* *Prior experience with same or similar subawards and extent and results of Federal awarding agency monitoring. Information provided in evaluations and reports is used in completing required State Program Report annually.*

**Are subrecipients made aware that they are to follow the requirements in the Uniform Guidance? If so, how is this communicated? Is any training provided to subrecipients?**

* *Provided providers grants and contracts training prior to implementation of the new grant and contract process in 2014. Requirements are communicated in the grant award or contract.*
* *All Uniform Guidance information will be communicated to subrecipients by reference through the Grant Assurance award documents, reporting requirements, and webinar training.*
* *Subrecipients are notified in their award documents of their grant requirements including the UG. In depth training was provided for subrecipients, and subrecipients are encouraged to continue training on their own. Annual monitoring also provides an opportunity to discuss readiness for the UG and any questions subrecipients may have.*
* *Accompanying the contract needing signature is an Assurance form which is also required to be signed by the subrecipient which states requirements/agreement of subrecipient. References to federal requirements are included. This is in the process of being updated to be more specific and provide Uniform Guidance citations and include indirect cost rate language.*
* *Applicable requirements are included in the subrecipient agreement (part of a standard template). Formal training is not typically provided. Information and assistance with understanding compliance requirements is provided as needed by the Sponsored Programs Accounting office. The vast majority of subrecipients are other entities that are also subject to and familiar with the Uniform Guidance.*

**How do you monitor subrecipients to ensure the subaward is used for authorized purposes, is in compliance with Federal regulations, and that performance goals have been achieved?**

* *Analysts conduct Grant Project Compliance Reviews for each subaward issued. Those are primarily conducted as on-site visits. Staff provide continual technical assistance. Additional desk reviews are conducted as necessary.*
* *We require programmatic audits of the subrecipients. Also, the subrecipients must send in monthly performance reports measuring their performance goals.*
* *Subrecipients are required to submit monthly reimbursement requests and any supporting documentation to the grant specialist for review and payments. Program outcome reports are submitted to program staff. Reimbursements are held if necessary if reports are not received by the posted deadlines.*
* *Scope of work in agreement details requested outcomes. Program managers review documentation sent in with payment requests. Many programs have specific project closeout procedures that program managers must work through. Project monitoring is performed by the individual program managers subject to review by their federal program managers.*
* *Use a combination of onsite and desk monitoring to ensure subrecipients are in compliance and performance goals are achieved. This includes both program and fiscal monitoring. Written standards and procedures for monitoring are maintained and followed. Monitoring reports are maintained and available for review.*
* *Have program staff in each federal program area (receiving federal funds) who perform program monitoring of grants and contracts. They are tasked with ensuring performance goals are met. They also monitor expenditures and are the first stop in the approval process when subrecipients submit monthly reports for payment. Grants and Contracts also monitors the monthly financial reporting of providers before payments are approved. Their monitoring process includes reviewing expenditures for non-allowable and unreasonable amounts. Finally, the Audit Committee approved a scope statement in 2011 for auditing all grants and contracts through the Department. This is an ongoing process and audits have been completed on a number of grantees and contractors. The Audit office also reviews independent audit reports of grantees and contractors for compliance to circular requirements. Findings in all audits and reviews are followed up through the Audit office.*
* *Each payment request from the subrecipient is reviewed by both the Principal Investigator (PI) for the award and by the Sponsored Programs’ Accounting Office prior to payment. Final payment is conditional upon certification by the PI that performance goals have been achieved.*

\*Note: Answers have been modified in order to not disclose the name of the agency.