**Agency Responses**

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

*If a pass through entity, are the procurement guidelines in the Uniform Guidance communicated to subrecipients and are expenses being reviewed in accordance with the new guidelines?*

* All Uniform Guidance information will be communicated to subrecipients by reference through the Grant Assurance award documents, reporting requirements, and webinar training.
* Procurement guidelines are communicated to the subrecipients in a Memorandum of Understanding when the grant is initially created. At this time we do not have any subrecipients operating under the new requirements, but will update the MOU to reflect the updated regulations.
* Grant managers state that uniform guidance is being communicated to subrecipients at trainings and expenses are being review through site reviews and audits. One of the agency grant managers indicates that procurement guidelines will be referenced in the RFP, the grant contract, and will be reviewed at technical assistance meetings provided to those who are preparing to apply for the grant. After the grant is awarded, the grant manager will meet individually with each recipient and his or her grant management team to review guidelines.
* As new agreements are issued the language will be reviewed for compliance to the Uniform Guidance and any changes will be communicated to the subrecipients. All expenditures are reviewed for compliance with the current agreement terms.
* Our subrecipients are other state agencies and must also be aware of the guidelines. Expenditure documentation is required from the subrecipient and reviewed prior to $’s being passed to them.
* Subrecipients have been trained on the new UG including procurement guidelines. Subrecipients are required to acknowledge they are aware of the requirements and will follow them. Expenses will be reviewed in accordance with the new guidelines during upcoming fiscal monitoring visits.
* Updated guidelines for all subrecipient requirements, including procurement procedures, are currently being prepared. Subrecipient training is also being planned. Proposed budgets submitted by subrecipients will be reviewed for compliance with the new cost allowability guidelines.
* Grants funds are required to be accounted for separate and apart from any other fund administered by subrecipient. Final financial statements from subrecipient are required and reviewed which show expenditures originally approved in the project proposal submitted at the time of application.
* Any subrecipient agreement that is issued under the UG references the UG procurement guidelines and any special reporting that will be required. It is our investigators’ responsibility to certify that their subrecipient spending is allowable and appropriate.