

Policies and Procedures

SECTION: Sponsored Programs Administration	NUMBER: 11	
CHAPTER: Sponsored Programs Administration	ISSUED: 10/2011	REVISED: 3/2013; 6/2014; 4/2016; 5/2017
POLICY: Subrecipient Monitoring	PAGE 1 OF 1	

1. PURPOSE

This policy assists Creighton University in effectively monitoring its subrecipients for compliance with applicable laws, regulations, terms, and conditions.

2. FEDERAL REQUIREMENTS

In general, Federal regulations require Creighton University, as the prime recipient, to:

- Advise subrecipients of relevant Federal regulations and flow-down provisions from the prime agreement
- Routinely receive and review technical reports
- Routinely receive and review invoices
- Periodically perform on-site visits or make other contact, if necessary
- Review A-133 audit reports filed by subrecipients (or other financial reports), any audit findings, and any corrective actions cited by subrecipients in response to audit findings
- Perform audits, if necessary
- Perform examinations, if necessary
- Consider corrective action for subrecipients in cases of serious or continued inability or unwillingness to have required audits performed or correct noncompliant actions

This list does not include all sponsor- or program-specific requirements (e.g., human subject assurances).

To ensure that Creighton University is providing adequate subrecipient monitoring, Sponsored Programs Administration has developed a [Subrecipient Intent Form](#) to be submitted with all subawards from Creighton University. Based on the assessment of the completed Subrecipient Intent Form, Sponsored Programs Administration and Grants Accounting will determine whether a formal monitoring plan is required. See Grants Account policy GAPL 08, “[Subrecipient Monitoring](#).”