



## Office of Research and Sponsored Programs

*Grant Compliance Requirements*

*Training & Resource Guide*

*Last updated: September 2024*

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### **SUBRECIPIENT MONITORING**

What is a subrecipient and subrecipient monitoring?

- A subrecipient is a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program.
- Federal law requires the California State University East Bay (CSUEB) to monitor all subrecipients, as defined in the federal regulations to ensure that grant compliance and performance objectives are met. Monitoring occurs at the pre-award stage through closeout of an award and involves principal investigators and administrators.

What are CSUEB requirements?

- At the pre-award stage, we are required to collect a subrecipient commitment form that the proposed subrecipient must complete, and several items that the subrecipient must provide, including single audit documents, indirect cost rate agreement, as well as their scope of work, budget and budget justification.
- At the post-award stage, ORSP performs a risk assessment for federal awarded grants and sends the PI a memo that details this information

- Throughout the award, an annual subrecipient monitoring report is submitted that verifies monitoring of the subrecipient's progress, including receipt of deliverables and reports.

What does ORSP need to do?

- Educate and emphasize the subrecipient monitoring requirements to appropriate personnel including ORSP staff and PIs to ensure timely completion of subaward agreements, subrecipient commitment forms, subrecipient risk assessments, and subrecipient monitoring reports.
- Communicate and distribute updated policies, procedures, and forms to appropriate personnel.
- ORSP will send out a reminder in October about completion of the subrecipient monitoring report. Due date is January 31 each year.

What do PI's need to do?

- At the proposal stage, PIs will help ORSP with the collection of required documents, such as the Subrecipient Commitment form and all required documents, scope of work, budget and justification.
- At the award stage, PIs will work with ORSP to understand how to manage any risks and requirements. PIs will also need to document their monitoring of subrecipient via the Subrecipient Monitoring report and submit by January 31 each year

**Policy:**

<https://www.csueastbay.edu/orsp/files/docs/policies/subrecipientmonitoringpolicy.pdf>

**Internal Procedures:**

<https://www.csueastbay.edu/orsp/files/docs/policies/subrecipientmonitoringprocedures.pdf>



## PROJECT CLOSEOUT

What is a project closeout?

- Closeout is the process by which the sponsor or passthrough agency determines that all applicable financial and administrative actions and all required work of the Federal award have been completed and takes actions to official close out the award, such as final project and financial reports submitted, final requests to receive monies, confirmations and certifications regarding any inventions, and disposition of federally purchased equipment.
- CSUEB also has internal procedures to confirm final reports have been submitted and that the fund is officially zero'd out and all commitments have been completed and all payments have been made.

What are the requirements CSUEB must follow?

- Most sponsors require that the submission of final documents and drawdown/invoicing occur within 90 to 120 days after the end date of the award. This often involves coordination for final drawdown/invoicing requirements and submission of reports, including any financial reports.
- All expenses should be posted to the project before the final invoice or financial report can be submitted to the agency.
- Internally, there is also coordination to closeout grants on the awardee institution's end.

What does ORSP need to do?

- When possible, ORSP should notify PI in advance that their award is scheduled to end. Preferably in 90, 60 and 30 day intervals. PI should work with ORSP to ensure final reports (programmatic and financial meet sponsor requirements). Upon determining that an award will end, all costs that were being charged to the award (i.e., salaries, P-card expenses, purchase orders, recharges, etc.) should be moved to other sources of funding if allowable.
- ORSP will work with Accounting to ensure that the final invoice and final financial report reflect all expenses to the project accurately; as well as confirm completion and submission of all sponsor requirements (technical,

programmatic and financial). In some cases, if there is identification of deficits and surpluses on projects, ORSP will work with the PI and accounting to resolve these.

- During this process, Accounting will inactivate the project in the financial system so that no additional cost can be charged to the award.
- ORSP will reiterate and emphasize the *Contract and Grant Closeout Policy and Procedures* to appropriate personnel to ensure the timely completion of the closeout process and compliance with the Foundation procedures.

What do PI's need to do?

- Prior to the grant end date, the PI will need to communicate if they intend to request an extension of their project end date in order to complete required deliverables
- The PI will also need to prepare and submit technical reports, and work with ORSP in the submission of any required financial reports

**Policy and Procedures:**

<https://www.csueastbay.edu/orsp/files/docs/policies/closeout-policy.pdf>

**Federal Requirements:**

<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR682eb6bfabcde2/section-200.344>

## **EFFORT REPORTING**

What is effort reporting?

- Federal requirement to document and substantiate time spent by employees whose compensation is charged or cost shared to federally funded projects. Compensated effort is tracked via the Common Financial System (CFS).

What are the requirements CSUEB must follow?

- Confirm that charges to Federal awards are allowable, allocable, and reasonable amounts for activities contributing and directly related to work under an agreement.

What does ORSP need to do?

- ORSP will reiterate and emphasize the requirements for effort reporting to appropriate personnel to ensure on time completion of effort certification forms.
- Twice a year, ORSP will calculate and present the effort certification documents to the PI and grant-funded faculty or staff, and collect the certifications to be kept on file. Due dates are August 31 for effort during the previous Jan-June period, and February 28 for effort during the previous July-December period.

What do PI's need to do?

- As soon as certification documents are received, PIs will need to review for accuracy and work with ORSP to make any needed corrections or adjustments.

**Policy and Procedure:**

<https://www.csueastbay.edu/orsp/files/docs/policies/compensated-effort.pdf>

## CONFLICT-OF-INTEREST REPORTING AND TRAINING

What is conflict of interest reporting and required training?

- These are federal and institutional requirements to comply with regulations, including those related to disclosing potential financial conflicts of interest. Federal agencies and other sponsors who provide external funding have different Financial Conflict of Interest (FCOI) requirements, so for each proposal ORSP and investigators need to confirm which FCOI regulations apply. These include FCOI training requirements, regulations and investigator disclosure responsibilities

What are the requirements CSUEB must follow?

- Document and implement a process to disclose potential financial conflicts of interest, as well as manage any identified conflicts of interest, and confirm training requirements are completed.

What does ORSP need to do?

- ORSP in conjunction with the Foundation, will emphasize and reiterate ORSP *Financial Conflict of Interest (CFOI) Disclosure and Training Internal Procedures* to all appropriate personnel to ensure that appropriate COI forms and training are completed in a timely fashion and documentation is retained.
- During the proposal stage, ORSP will remind investigators to submit project disclosures to ensure no potential conflict of interest exists.
- ORSP will also assist PIs to document a plan to manage any disclosed conflicts of interest.

What do PI's need to do?

- At the proposal stage, submit a project conflict of interest disclosure prior to submission of a proposal
- At the award stage, disclose any conflict of interests that might occur and work with ORSP to manage any conflicts identified
- Ensure that they are up to date with training requirements



**Policy:**

<https://www.csueastbay.edu/orsp/files/docs/policies/coi-debarment-policy.pdf>

**Procedures:**

<https://www.csueastbay.edu/orsp/files/docs/policies/coi-procedures.pdf>