



Office of the Controller

Financial Procedures

Procedure #:	1210	Effective:	7/1/2009
Procedure Title:	Sub-recipient Monitoring & FFATA Reporting	Revised:	6/16/2015
Responsible Director:	Director of Accounting	Last Reviewed:	6/16/2015

PURPOSE:

To ensure the appropriate steps are followed when monitoring the activities of sub-recipients of federal, state or local governmental funding, authorizing payment to those sub-recipients, and reporting activities subject to Federal Financial Accountability and Transparency Act.

GUIDING POLICIES:

N/A

PROCEDURES:

A-133 Review

Beginning in April, the Director of Accounting or Grants Accounting Manager will contact each sub-recipient and request a copy of its A-133 audit report for the year most recently audited. The report may be an electronic or paper copy. A list of all the sub-recipients is maintained in a database in the Grants Accounting Office. The University of Richmond must have the most recent A-133 audit report in order for invoices to be paid.

The Director of Accounting or Grants Accounting Manager will review each A-133 report to determine if any compliance issues were identified involving the subcontract. If issues are found, the Director of Accounting or the Grants Accounting Manager is responsible for following up with the sub-recipient, documenting the response, and taking the appropriate action per the subcontract. If no issues are identified, the Director of Accounting or Grants Accounting Manager will note that on the A-133 report and file it.

Invoice Review

Sub-recipient invoices must be approved by the Principal Investigator (PI) and the Grants Accounting Manager or Director of Accounting before payment is made.

When an invoice is received from the sub-recipient, the Grants Accounting Manager or Director of Accounting reviews the invoice for accuracy, and ensures that all expenses for which the grant is being billed are allowable and within the approved budget. If there are errors, the Grants Accounting Manager or Director of Accounting contacts the sub-recipient for a corrected invoice, or if acceptable to the sub-recipient, the original invoice will be adjusted to reflect the correct total. The invoice is then emailed to the PI for review.

1210 – Sub-Recipient Monitoring & FFATA Reporting

If the PI agrees that all required work has been performed to his/her satisfaction, the PI will electronically sign the invoice and return the invoice to the appropriate person in Grants Accounting for payment. If he/she does not have a suitable means for determining if the work has been performed, the PI will not sign the invoice and it will not be paid until such time that the PI is satisfied that the work has been performed. The PI may use a variety of means to ensure that the required work has been performed — e.g., phone conversations, video conferences, periodic deliverables, or site visits. The PI will use his/her discretion in determining the most appropriate means to gauge the work performed, which may vary for different stages of the grant.

FFATA Reporting

For subawards subject to the requirements of the Federal Financial Accountability and Transparency Act (FFATA), reports will be filed for subcontracts that are executed for \$25,000 or more. The reports will be filed the month following the activation of the subcontract, as required by the FFATA guidelines. For purposes of this procedure, a subcontract is considered to be active once both parties have executed the subaward agreement. The University of Richmond will always sign the subcontract last, so the date of the University's signature will dictate the reporting timeline for FFATA purposes.

RELATED PROCEDURES:

N/A